

Statement of Response to Pre-Application Opinion

Item 1 – Timing and Phasing

DUNSHAUGHLIN EAST- SHD

December 2018



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On Behalf of

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1.0 INTRODUCTION AND EXECUTIVE SUMMARY

This Statement of Response report seeks to specifically address Item No. 1, which was raised within the Opinion of An Bord Pleanála, issued following pre-application consultation in respect of the proposed development. The Opinion of the Board was issued on the 27th of April 2018.

The Opinion of the Board set out five specific items for further consideration by the applicant and design team. The Board considered that these items need to be addressed in the final documentation submitted to the Board in order to ensure that such documents would constitute a reasonable basis for an application for strategic housing development. This report seeks to provide a focused response to Item No. 1 of the ABP pre-application Opinion, which was concerned with the timing and phasing of development.

In addition, the applicant has engaged Future Analytics Consulting to prepare a Socio Economic Report which accompanies the application. This report describes the socio-economic characteristics of Dunshaughlin, alongside a review of planning pipeline activity for housing and the employment potential of the immediate and connected areas, particularly relating to the M3 'Economic Corridor' and the adjacency of Metropolitan Dublin. The evidence presented indicates a population within Dunshaughlin that is primarily characterised by a strong labour force with good access to employment opportunities both locally and within a wider catchment area surrounding the settlement.

Housing delivery in Dunshaughlin has been slow and is not expected to fulfil the targets specified under the current Meath Development Plan 2013-2019 in relation to completed schemes (amounting to approximately 10,000 units across the county according to the Development Plan). This is considered alongside the characteristics of the application site itself, which is strategically positioned on the edge of the existing settlement area and immediately adjacent to key local employment hubs, as well as in close proximity to transport connections that provide access to the surrounding area.

As a result, it is considered that delivery of housing across the comprehensive application site area (as Phase 1 lands) would fulfil the objectives for sustainable growth as described in both the Development Plan and the National Planning Framework (NPF) (February 2018) under Project Ireland 2040, and deliver much needed housing as promoted by the Governments Rebuilding Ireland Strategy.

The subject site is zoned primarily for residential development with a neighbourhood centre objective, in addition to areas of recreational / open space, and therefore the principle of a SHD development is supported by the relevant legislation. The majority of the subject lands are zoned for Phase II residential development (post 2019), with the southern portion of the site falling within the Phase I residential lands to the north of the R147.

As is set out hereunder, the proposed development will see an initial, first phase of development partially on lands which are zoned for residential development pre-2019, with the remaining phases of the overall SHD development to be delivered on post-2019 lands from the year 2019 onwards in compliance with this phasing approach. The Planning Authority have stated that it is intended to provide for residential development on the Phase II portion of the lands under the forthcoming County Development Plan, which will consider the framework provided under the NPF and the Draft Regional Planning Guidelines for the EMRA.

As is set out in this statement of response, it is envisaged that, following any grant of permission for the proposed development, the units not yet constructed within the development (likely including those on the Phase II lands) would be carried forward as 'committed' units under the next Development Plan, as has been done under previous plans and the current CDP. A condition could be attached to any grant of permission, providing for the delivery of housing on the Phase II zoned lands to be commenced from 2019 onwards.

There is significant demand for housing in the area, and Dunshaughlin provides capacity in terms of services, facilities and amenities, including a new education campus identified for lands to the immediate

west by the Department of Education and Skills (as per their April 2018 new schools announcements). Furthermore, the town at Dunshaughlin has not grown at the same rate as several other comparable moderate sustainable growth towns (medium / large growth towns) in Co. Meath, leaving the town with physical and social infrastructural capacity for the scale of development proposed.

An investigation has been undertaken in respect of existing and permitted housing delivery in the town (see map of permissions in Appendix 1), which has revealed that the supply of Phase I zoned land in the town is substantially exhausted. Notwithstanding this, the town has not yet achieved its housing target as set out in the Development Plan.

The proposed development will provide for the delivery of housing provided for under the current Development Plan, in addition to housing to be noted as 'committed' under the forthcoming new development plan (currently on hold until the RSES is adopted). The proposed residential development on the subject site will be delivered over the course of a 10 year permission subject to approval by ABP, over the lifetime of the new development plan, and the subsequent plan, with housing delivery to commence from late 2019 onward.

As is set out hereunder, the Board have recently granted permission for residential development on Phase II lands at at Halfstraddle, Ballygaddy Road, Tuam, Co. Galway (Case Reference: ABP-300560-18). This precedent is considered relevant to the present proposal, and it is respectfully submitted that the current development meets the criteria and the test set out in that case for the bringing forward of development on Phase II lands.

The proposed development will allow for sustained and sustainable housing delivery for the town while according with national and regional planning policy objectives. The applicant is committed to progressing employment generating development on the adjacent lands to their west in their ownership, and as set out in the accompanying independent report prepared by Future Analytics Consulting, there have been a number of recent developments in the area providing employment opportunities for future residents of the proposed development.

As summarised above, this statement of response sets out a detailed rationale, as to why, it is respectfully submitted, the Phase II lands within the subject site are appropriate for housing delivery under the current application. This response has due regard to the remaining Phase I land at Dunshaughlin, and includes detailed analysis of housing delivery in the town, which is further reinforced by independent analysis provided within the accompanying report prepared by Future Analytics Consulting.

2.0 RESPONSE TO AN BORD PLEANÁLA OPINION

Item No. 1 of the Boards Opinion was titled 'Timing and Phasing of Development' and stated the following:

"Further consideration and / or justification of the documents as they relate to the development of Phase II residential lands as set out in the statutory county development plan and the possible prematurity of development at this location pending the review of the county development plan process which has commenced. Further consideration of these issues may require an amendment to the documents and / or design proposal submitted. Where it is proposed to develop the subject lands prior to the adoption of the new development plan, a planning rationale / justification for the release of these Phase II residential lands should be submitted which has due regard to all Phase I residential lands which remain undeveloped."

Response to Item No. 1:

2.1 Dunshaughlin – Strategic Context

It is considered that subject lands in Dunshaughlin East constitute an opportunity for planned, compact and sustainable growth, via the expansion of an urban area which has strong physical and social infrastructure and potential for significant employment growth. The proposed development will provide for

the phased delivery of housing over a 10-year period, which will occur concurrently with employment growth in the town, including employment provision on the lands to the east of the subject site (which are controlled by the applicant) and for which they investigating the potential to bring forward employment generating development concurrently with the phased development of housing on the proposed SHD lands.

The lands are located on the M3 economic and transport corridor, with convenient and direct links by public and private transport modes to rapidly expanding employment nodes including those located at Blanchardstown, Ballycoolin, Damastown, and expanding employment provision in Meath, including the Facebook data storage complex and the significant Shires pharmaceutical facility. A Socio-Economic Study report has been prepared by Future Analytics Consulting and is submitted as part of this application. This report provides evidence and analysis of the economic opportunities available to residents of Dunshaughlin. The report notes that Dunshaughlin currently offers employment for residents of the area and for the wider Meath area.

The Future Analytics report also sets out the employment potential of the lands in the ownership of the applicant, which are zoned for employment uses. It is estimated that over 1,200 full time equivalent jobs could be provided on these lands going forward. The applicant has undertaken a review of these employment lands. A masterplan has been prepared for one of the two employment sites, with an indicative layout developed for the other site.

The NPF favours compact development within urban areas and provides that where the expansion of settlements takes place it should be delivered in a sustainable, compact manner. The proposed development constitutes an efficient use of lands which are zoned for residential development at Dunshaughlin, a town which accommodates strong physical and social infrastructure to support growth, in a masterplan led approach with supporting road infrastructure (DORR), open space (with linkages to the new playing pitches) and supporting neighbourhood facilities (and a planned education campus to the west).

2.2 Zoning of the Subject Site

The subject site is primarily zoned as objective A2, with the northern portion of the site designated as Phase 2 Post 2019 under the Meath County Development Plan 2013-2019. The A2 zoning has 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.”

A portion of the lands along their western boundary with Dunshaughlin Business Park is zoned objective F1, with an objective to “provide for and improve open spaces for active and passive recreational amenities”. A further portion of the lands located along their eastern boundary of the site is also subject to this open space zoning.

There is a zoning objective to provide for a neighbourhood centre on the northern portion of the subject site. The proposed development includes the provision of a neighbourhood centre area, to be integrated with the residential elements of the proposed development.

Please refer to Figure 2 of this document for an illustration of the extent of development to be provided on A2 Phase 1 lands and A2 Phase 2 lands. It should be noted that the above figure for units to be provided on Phase 1 lands is a best estimate due to the irregular boundary between the Phase 1 and 2 lands and the fact that this boundary runs through one of the apartment blocks proposed within the scheme.

The first development and construction phase of the proposed scheme, will be located entirely on lands in the southern portion of the site which are zoned A2 Phase 1 pre-2019 development, and comprise of 155 no. residential units (comprising of 133 no. houses and 22 no. apartments), along with a café.

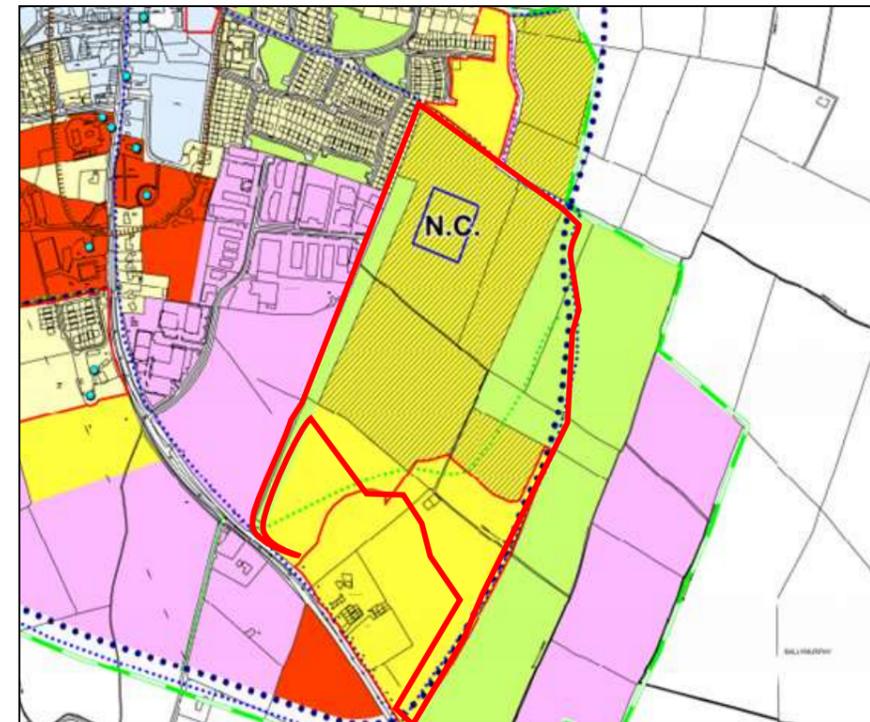


Figure 1: Extract of Zoning Map (Meath County Development Plan)

A total of 758 no. units (comprising of 372 no. houses, 186 no. duplex units, and 200 no. apartments), along with a creche, retail units, a community centre / facility, and a gym / primary care centre will be located on the lands designated as Phase 2 under the Development Plan.

A block containing 4 no. duplex units and 8 no. apartment units in the north of the site are proposed on a small portion of the site zoned F1 for recreation and open space uses. This approach was taken to address the feedback at the tri-partite meeting in respect to the overall masterplan and urban design approach, to ensure a bookmark on the Outer Relief Road and to frame the north of the large open space, while reallocating the area of open space elsewhere within the site. It is considered that this approach which integrates open space throughout the new residential and neighbourhood centre areas, while still utilising the large majority of the F1 zoned lands for high quality open space. Whereas the pre-application approach omitted residential from the F1 zoned lands.

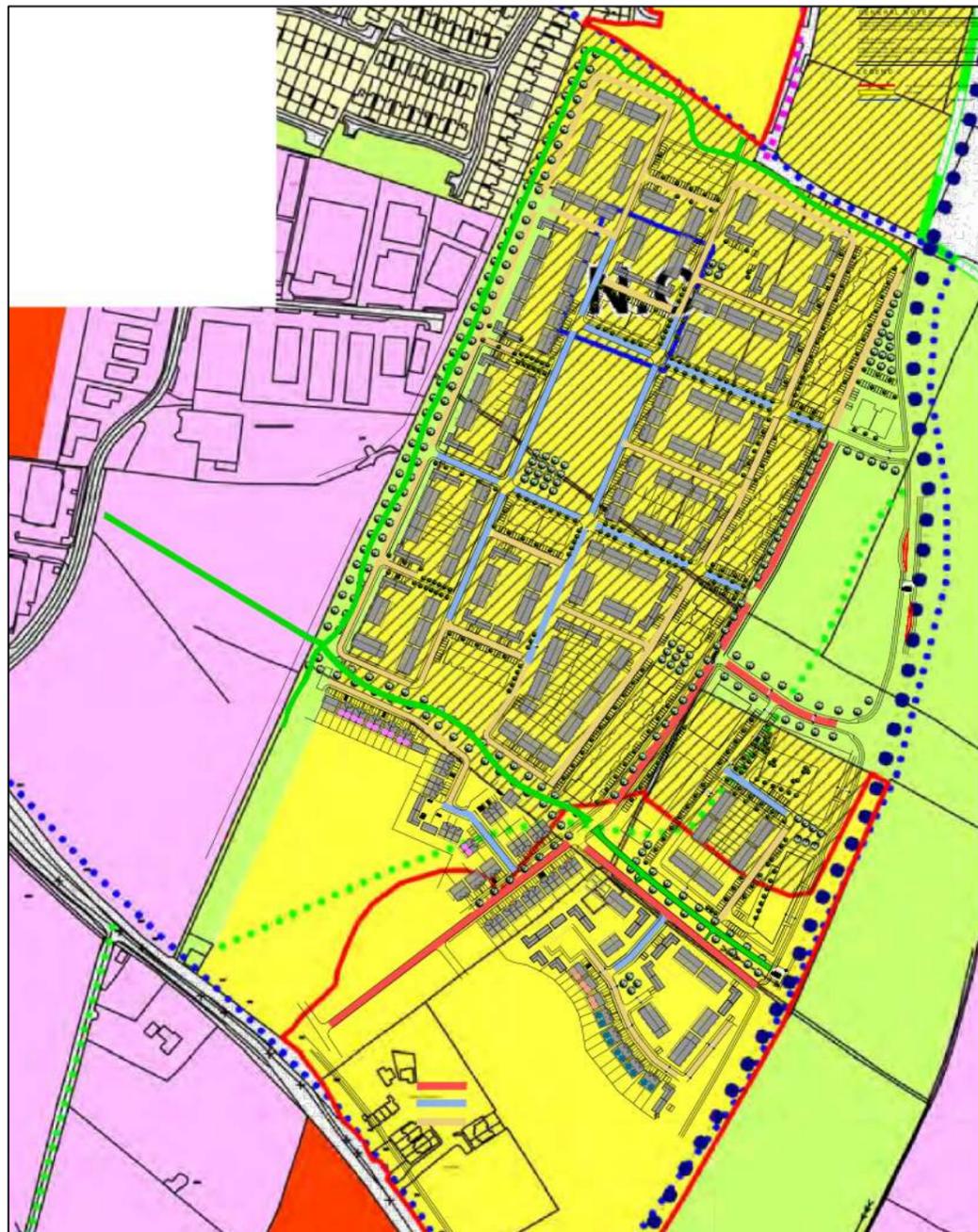


Figure 2: The proposed site layout plan for the SHD overlaid on the current zoning map for Dunshaughlin

Noting that the northern portion of the subject site is designated for Phase 2, Post 2019 development, a 10-year planning permission is sought for the proposed development which would see the delivery of the proposed residential units, neighbourhood centre and open space in a phased manner, with the delivery of units in the first phase of development likely to commence in 2019. The building-out of the proposed development would see the delivery of units in a phased manner over the lifetime of the next County Development Plan, and potentially the subsequent Development Plan following that.

2.3 Core Strategy and Settlement Strategy

The town of Dunshaughlin is identified as a Moderate Sustainable Growth town within the County Development Plan, linked to the granting of permission for a railway order for the Navan Rail Line Phase II. The Development Plan further states:

“Until such time as the railway order for Phase II is approved, Meath County Council considers that the town must develop in a manner consistent with that of a Moderate Sustainable Growth Town, i.e. focusing on self-sustaining, integrated and compact development.”

Objective SS OBJ 1 of the Settlement Strategy is *“To secure the sustainable development of County Meath in accordance with the settlement hierarchy set out in Table 3.2. In doing so, development will be primarily directed towards the identified Large Growth Towns. In towns and villages, development will facilitate in the first instance, the consolidation of settlements and the integration of land use and transport. The expansion of urban areas where it is necessary to facilitate growth as set out in the Development Plan shall promote mixed use development and be guided by the sequential approach in order to create a compact urban form and facilitate sustainable modes of transport.”*

Chapter 3 of the Development Plan ‘Settlement Strategy and Housing’ supports population growth through infrastructure and housing provision as follows:

S OBJ 11 - “To ensure that Moderate Sustainable Growth Towns develop in a self-sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.”

We note that the above is soon to be superseded by the new RSES, and the draft RSES is discussed below, however it is submitted that Dunshaughlin is strategically located to cater for significant new growth and that the proposed development will contribute to supporting a compact urban form and the integration of land use and transport due to the subject sites highly accessible location.

Dunshaughlin is well served by public transport, and the Planning Authority have acknowledged that further growth will support the viability of further public transport provision in the long term.

The proposed development would bring about the compact and sustainable extension of the built up area of Dunshaughlin, on lands which are considered sequentially best suited to accommodate residential development for the town, and in a location which allows for strong linkages with the town centre. The applicant aims to bring forward a fully considered development on the subject site under the SHD process, taking in the overall landholding, rather than develop the lands on a piecemeal, less comprehensive basis.

As set out in the Socio Economic Report, FAC and the applicant, Rockture 1 Limited, have undertaken research and established a significant shortfall in housing provision in the vicinity as compared to housing demand.

The Planning and Development (Amendment) Act 2018 has effectively stalled the Development Plan preparation and review process for Meath. It is noted however that the Planning Authority has confirmed that the ‘Phase 2’ lands within the development site are to be brought forward for residential development under the forthcoming Development Plan. Having regard to the objectives of Rebuilding Ireland, the ongoing under supply of housing and rising housing need it is considered appropriate, in the interest of timely housing delivery, to bring forward a comprehensive, masterplan led and high-quality residential development on the subject site.

In relation to Moderate Sustainable Growth towns, objective SS OBJ 11 is as follows:

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

The proposed development provides for the sustainable growth and development of the town of Dunshaughlin, via the provision of compact residential development along with associated physical and community infrastructure and facilities. The proposed development will occur on a phased basis over the duration of a 10-year planning permission, and will be brought forward concurrently with the development of adjacent employment lands which are also in the ownership of the applicant.

2.4 Development Plan 2013-2019 Core Strategy and Population Projections

The County Development Plan core strategy sets out a total housing allocation of 23,940 units in the county during the Plan period including 50% headroom.

The total number of committed units estimated in the county at the time was 10,998. Therefore, an additional 12,942 units remained to be allocated.

A housing allocation of 319 units was provided for Dunshaughlin in the County Development Plan 2013-2019, in addition to 763 no. committed units with planning permission at the time of the making of the Development Plan. This equated to a total allocation of 1,082 residential units over the plan period, including headroom.

Not all of the units taken as ‘committed’ at the time of the preparation of the current Development Plan have or will be delivered. For example, Reg. Ref.: DA803421 for 342 no. units has now expired, while Reg. Ref.: DA060537 (which included part of the subject site and lands to the south of the SHD site) has been superseded by permitted development providing for 221 units to date, rather than the 282 no. units provided for under this previous permission which was considered as ‘committed’ development.

Based on an average household size as quoted in the development plan as 2.9, this would equate with a population increase in the order of 3,137 over the plan period for the town.

Extrapolating from the allocations in the current Development Plan, a similar level of new housing allocation over the next plan period would see a housing allocation of c. 1,100 no. units for the town (including headroom) over the lifetime of the 2019-2025 Development Plan, having regard to provisions of the NPF Implementation Roadmap discussed below under Section 2.4.

2.5 The National Planning Framework and the Implementation Roadmap for the NPF

National Planning Framework

The NPF seeks to influence the location of new housing development and future population growth, and targets the location of 40% of new housing development within and close to the existing ‘footprint’ of built up areas over the lifetime of the framework.

The NPF plans and provides for growth of 490,000 to 500,000 people in the Eastern and Midlands region.

The NPF, under National Policy Objective 9, recognises that there is potential in each Regional Assembly Area for significant growth in some settlements (i.e. 30% or more above 2016 population levels). Subject to criteria including the provision of adequate infrastructure and amenities to support such growth, and concurrent employment provision.

It is considered that the Dunshaughlin East lands constitutes an opportunity for planned, compact and sustainable growth, via the expansion of the Dunshaughlin urban area in a planned manner which has strong physical and social infrastructure and potential for significant employment growth. The proposed

development will provide for the phased delivery of housing over a 10-year period, which will occur concurrently with employment growth in the town, including employment provision on the lands to the east of the subject site (which are controlled by the applicant) and for which they investigating the potential to bring forward employment generating development concurrently with the phased development of housing on the proposed SHD lands.

The lands are located on the M3 economic and transport corridor, with convenient and direct links by public and private transport modes to rapidly expanding employment nodes at Blanchardstown, Ballycoolin, Damastown, and expanding employment provision in Meath, including the Facebook data storage complex and the significant Shires pharmaceutical facility. The independent report compiled by Future Analytics Consulting provides further detail in respect of employment provision in the vicinity.

National Policy Objective 4 of the NPF seeks to “*Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being*”. The proposed development will constitute an urban area comprising a high standard of design and ensuring a liveable and attractive environment for future residents.

National Policy 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*’.

The proposed development incorporates a high standard of pedestrian and cycle permeability and provides for new linkages with surrounding land uses and the town centre. This will encourage cycling and walking for shorter trips, both within the proposed development and to access amenities and facilities in the town of Dunshaughlin.

In summary, the NPF supports the provision for planned growth at locations which are equipped to sustain such development. The NPF favours compact development within urban areas and provides that where the expansion of settlements takes place it should be delivered in a sustainable, compact manner. The proposed development constitutes an efficient use of lands which are zoned for residential development at Dunshaughlin, a town which accommodates strong physical and social infrastructure to support growth (for further information in relation to the physical and social infrastructure capacity in the area, please refer to Sections 2.6 – 2.10 of this document).

Implementation Roadmap for the NPF

The Implementation Roadmap for the NPF sets out in detail the transitional arrangements for the implementation of the NPF at regional and local level.

The Roadmap document sets out ‘Transitional Population Projections’, and notes that City and County Development Plans will undergo a process of review of review and updating by 2020 / 2021.

The transitional population projections plot a growth trajectory set approximately mid-way between what is currently being planned for in statutory Development Plans if projected forward to 2031, and the more likely evidence based and nationally coherent projected scenario to 2031 and 2040. These ‘adjusted’ transitional figures will apply to 2026 and will also inform the period to 2031.

The Roadmap document states that in all individual counties where population growth is projected to be at or above the NPF/ NDP national average baseline, provision shall be made to enable planning for aggregate growth within that county up to that figure for each Census year and related intercensal period i.e. to 2026 and, subject to review, 2031.

The Roadmap further notes that the published NPF population projections account for a 25% ‘headroom’ allowance for additional population growth in every County pro-rata, for each Census year and related

intercensal period. For the purposes of the transitional population projections for the roadmap, a further 25%, over and above the population projected to 2026 in the NPF has been added.

Cumulatively, this means provision for 50% more growth than is required to 2026 has effectively been accounted for at a national level. It also means that there is limited further requirement for 'headroom' for population growth to be incorporated into statutory Development Plans in most cases. However, the roadmap acknowledges that provision for headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline (i.e. Cork (City and County), Dublin (all four local authorities), Galway (City and County), Kildare, Limerick, Louth, **Meath**, Sligo, Waterford, Westmeath, and Wicklow).

The transitional population projections for Co. Meath set out within the Roadmap document are as follows:

- 2016 (census population figure) – 195,000
- 2026 – 216,000 – 221,000
- 2031 – 225,000 – 231,000

The Implementation Roadmap thereby acknowledges the need for a transitional period to implement the objectives of the National Planning Framework, which should provide for the Planning Authority's intended bringing forward of the residential zoning of the 'Phase 2' lands within the subject site for residential development under the forthcoming new County Development Plan (as set out in the Chief Executive's report on the pre-application stage of this SHD).

2.6 Draft Regional and Spatial Economic Strategy for the Eastern and Midlands Regional Assembly

The Draft Regional and Spatial Economic Strategy (RSES) for the Eastern and Midland's Regional Assembly (EMRA) was published on the 5th of November 2018. The public consultation period for the Draft RSES runs until the 23rd of January 2019.

Dunshaughlin would fall within the Medium to Large Town category of the settlement typology provided as Table 4.1 of the draft document. The Draft RSES identify Dunshaughlin as a Town / District Centre and a Key Service Centre in Co. Meath, along with the towns of Ashbourne, Kells, and Trim, within the Retail Hierarchy for the region.

Dunshaughlin is identified within the hinterland area of the Region, close to the boundary of the Dublin Metropolitan Area.

The Draft RSES concurs with the Implementation Roadmap for the NPF, in noting that "*the scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026.*" Therefore, the RSES note that as per the NPF Implementation Roadmap, certain local authorities, including Meath may target additional population growth above and beyond the 25% headroom allocated within the figures within the NPF Implementation Roadmap (up to 25% additional growth in addition to the 25% headroom). It will fall to Planning Authorities, including Meath County Council, to allocate this growth.

As noted above, MCC have stated at pre-application stage for the current proposal, that the subject SHD lands will be zoned for immediate housing delivery under the forthcoming new Development Plan for the County. The Draft RSES and the NPF Implementation Roadmap make provision for the levels of growth necessary to provide for the continued zoning of the subject lands for residential use.

As noted in the TTA, in pre-planning discussions with MCC the long term objective to develop a rail link to Navan with a new station at Dunshaughlin was highlighted as a positive proposal in the context of the proposed development.

The RSES includes a specific policy objective, RPO 8.6, which includes for the upgrade of the expansion of DART service to Pace rail station, providing fast, high frequency, electrified service that will integrate with the existing DART and intercity rail networks. In addition, RPO 8.6 provides for the reappraisal of the extension of the Pace (M3 Parkway) rail line to Dunshaughlin and Navan.

The planned growth of Dunshaughlin will be beneficial in both strengthening the case for the rail link and ensuring its commercial viability. The proposed SHD development by virtue of its scale, location and proximity to existing high frequency bus-based services would also strengthen the case for a rail link to Dunshaughlin in the future.

2.7 Current Situation – Permitted and Completed Residential and Housing Demand

Based on a review of units permitted, under construction and completed during the 2013-2019 Development Plan period (see Appendix 1 for marked up map) the following figures have been compiled for the town of Dunshaughlin:

- Units Completed / Under Construction – c. 634
- Further Units Permitted – c. 125

The total number of units completed, permitted and currently under construction is 759. This is set out within the map provided within Appendix 1 of this report, which also demonstrates that the supply of Phase I zoned land within the town has been largely exhausted, as the Phase I sites identified on the map benefit from a current planning permission, are currently under development, or have been built out. This is considered to be of particular relevance given the Board's request that the applicant provide a "*planning rationale / justification for the release of these Phase II residential lands should be submitted which has due regard to all Phase I residential lands which remain undeveloped*".

Given the allocation of 1,082 units over the current Development Plan period (including headroom), this constitutes a current shortfall of c. 323 units.

Therefore, the current SHD proposal would lead to a total of c. 590 units over the current 2013-2019 Development Plan allocation (including headroom) – however these further units will primarily be delivered on lands which are zoned for housing delivery after 2019, and which Meath County Council have indicated (in their report on the pre-application SHD proposal) will be zoned for residential development in the new Development Plan (2019-2025). Based on the RSES figures for Meath it is reasonable to assume a considerable allocation of growth to Dunshaughlin over the next plan period as recognised by MCC in their Chief Executive's Report on the pre-application submission where they acknowledged the suitability of these lands for Phase 1 lands in the next Plan.

Therefore, while the current proposal will require a significant portion of the housing allocation for the town in the core strategy of the new Development Plan, this is seen to be justified having regard to the strategic location of the site, and its suitability for the masterplan-led development of a new neighbourhood in a comprehensive and ordered manner, and the numerous planning gains to be delivered as part of the development proposal.

Further justification for this significant allocation of housing for the subject site is provided in the community / social infrastructure audit which forms an appendix to the Statement of Consistency and Planning Report, which sets out the physical and social infrastructure capacity of the town to provide for a development of this scale. Additionally, a comparison with other moderate sustainable growth towns is provided in the following sections, demonstrating that Dunshaughlin has not grown at a comparable rate to other centres of population, resulting in spare capacity in local infrastructure.

In parallel to this heretofore unrealised potential and spare infrastructural capacity at Dunshaughlin, the applicant (an active developer in the area) has identified a significant unmet demand for housing in Dunshaughlin.

This is further underlined by the accompanying report prepared by an independent consultant (Future Analytics Consulting) which is submitted along with this application.

2.8 Physical Infrastructure Capacity for the SHD at Dunshaughlin East

Our client's lands are situated to the south east of Dunshaughlin town centre. The lands are well served by a number of bus routes, which connect Navan and Cavan to Dublin City Centre and Belfield (UCD). The 109 and 109B bus routes provide frequent services (approximately every 20-30 mins on weekdays) to Busaras in Dublin City Centre. Private bus services also provide a link with NUI Maynooth. Proposed bus stop locations are provided to serve the subject lands on the Dublin Road and also on the proposed north-south link road on the eastern edge of the subject lands.

The lands are approximately a 7-minute drive from M3 Parkway (PACE) Railway Station which provides direct links to Dublin City Centre. The M3 Parkway Railway Station (PACE) which links directly to Dublin City Centre is located approximately 10 kilometres from Dunshaughlin and provides a 'park and ride' facility. In the longer term, it is understood that Meath County Council also hope to seek the provision of a rail link serving the town and Navan, the county town.

A Quality Bus Corridor has been provided along the R147 on the approach to Dunshaughlin Town from both the Dublin and Navan sides. This allows buses and other public transport modes to pass through the Town quickly during peak hours. The existing and planned public transport provision in the surrounding area will ensure a modal shift toward bus transport and ensure that buses continue to serve Dunshaughlin. The distance from the centre of the SHD site to the nearest existing bus stop is c. 1 km. It is proposed to provide a new bus stop on the R147 to the south of the SHD site directly adjoining Phase 1A of the Willows. This stop will be within c. 500 metres of the centre of the SHD site.

It is further intended to provide bus stop locations along the length of the proposed new distributor road to the east of the SHD development. These will provide for a convenient frequent public transport service for the proposed residential development.

The wastewater treatment capacity for Dunshaughlin is also significant, with a population equivalent of up to c. 10,000 currently provided for (with c. 5,000 existing). The Irish Water confirmation of feasibility letter confirmed that there were no servicing issues with the proposed development, subject to a localised water supply constraint being resolved as part of the connection agreement process.

2.9 Local Employment – Encouraging Sustainable Travel Patterns

The Meath Economic Development Strategy is set out in Chapter 4 of the CDP. The overall strategy identifies several Core Economic Areas where specific employment growth is to be channelled during the Development Plan period. This is consistent with the Regional Planning Guidelines policy to support the improvement of job ratio levels in each of the constituent local authorities of the region. also sets out the hierarchy of economic centres and target sectors for employment growth in each settlement.

Dunshaughlin is identified as one of the prime locations in the county for employment growth because of its infrastructure, proximity and access to Dublin and is classified in the plan as a 'District Employment Centre'. (Grouped with Trim, Kilcock and Ratoath).

The plan states that *"these towns should provide for the employment needs of their urban area as well as their rural hinterland"*. The CDP identifies 'Manufacturing' type industries as the main target sector of employment growth for Dunshaughlin.

However, the plan also states, *"new development that relates to other sectors will be considered in each level of the settlement hierarchy and will be assessed against the land use zoning objective, appropriateness of their scale, size and compatibility with the area."*

The Dunshaughlin Economic Development Strategy seeks to foster employment creation in the town in order to avoid a long-term scenario with population growth occurring without equivalent growth in employment. This will help to discourage long distance commuting, and provide for a more sustainable community in the long run.

The primary focus of employment in Dunshaughlin to date has been to the south east of the town, Dunshaughlin Business Park.

The Development Plan specifically notes *"there is an area of almost 7 hectares within the estate that remains available noting that this area presently comprises primarily playing pitches for Dunshaughlin Youths Soccer Club (DYSC)"*. These lands are owned by the applicant. Regarding the DYSC playing pitches, the applicants are currently working on an access road to a 12-acre site (bordering the SHD site to the east) previously ceded to MCC for sporting fields. MCC and DYSC have entered into a long-term lease agreement for the delivery of these playing fields meaning DYSC would move from the E2 Zoned lands. These adjacent E2 lands to the west have now been identified as the preferred location for a new education campus, with a new primary school to be developed in the short term. It is also understood that a secondary school will be developed on the lands in future to meet increasing demand.

The applicant is also the owner of zoned employment (E2) to the east of the SHD site. The applicant has prepared an initial masterplan for the development of a portion of these employment lands in the short term to the east of the site. Please refer to Appendix 2 for the initial masterplan. The applicant is in on-going discussions with potential stakeholders including MCC Enterprise Section, IDA Ireland, Enterprise Ireland as well as seeking advice from firms specialized in the development of commercial/employment lands. It is envisaged that one of the "blocks" in the Master plan would include small units (less than 1,000ft²) for incubation/start-up companies. IDA Ireland have indicated that these units would be an attractive prospect for new start-ups and small enterprises.

2.10 Comparison with other Moderate Sustainable Growth Towns

The table below sets out a comparison of the growth of the town of Dunshaughlin with other Moderate sustainable Growth Towns in the county during the course of the 2011-2016 intercensal period.

Over this period, Dunshaughlin sustained a growth rate of just 3.4% over a five-year period, with an absolute increase of just 132 people.

Other Moderate Sustainable Growth Towns with similar levels of infrastructure such as Ashbourne and Trim both exhibited significantly greater levels of population growth, with growth levels in excess of 11% during the intercensal period.

It is noted that the neighbouring town of Ratoath, despite its lower designation on the settlement hierarchy, in fact has a higher population than Dunshaughlin.

Town	Household Allocation 2013-2019	Population (Census 2011 settlement boundary)	Population (Census 2016 settlement boundary)	Absolute increase over intercensal period	Percentage increase over intercensal period
Dunshaughlin	319 + 763 committed	3,903	4,035	132	3.4%
Ashbourne	637 + 1,132 committed	11,355	12,679	1,324	11.7%
Trim	518 + 755 committed	8,268	9,194	926	11.19%
Kells	518 + 352 committed	5,888	6,135	247	4.2%
Kilcock	398 (0 committed)	5,533	6,093	560	10.1%

Having regard to the level of infrastructural capacity in the town of Dunshaughlin (for further details refer to the Infrastructure Audit which forms Appendix 1 of the Planning Report and Statement of Consistency) and its strategic location as set out above, it is considered that the town has failed to realise its potential to support sustainable growth over the past intercensal period, which would have been supported by adequate infrastructure, both physical and social.

It is therefore considered that the proposed development, constituting a sustainable and considered extension of the town, would provide for a trajectory of population growth over the coming years which is commensurate with the infrastructural capacity of the town.

2.11 Precedent Development on Phase II Zoned Lands

We note the recent approval of a Strategic Housing Development by ABP on Phase 2 residentially zoned lands, at Halfstraddle, Ballygaddy Road, Tuam, Co. Galway (Case Reference: ABP-300560-18).

The Inspector's Report states the following:

'Having regard to the location of the site, existing permitted pattern of development along Ballygaddy Road and availability of good footpath connections including public lighting to the town centre, I consider that the subject lands can be considered for development. The applicant has demonstrated that the development of phase 1 lands has not been forthcoming within the lifetime of the current LAP. There has been a total of 2 no. housing units granted permission during the lifetime of the LAP on phase 1 lands. I also draw the Board's attention to the draft LAP where the development site in question is now identified as Phase 1 residential zoned lands. I am satisfied that a justification for the consideration of developing these phase 2 lands can be sustained having regard to the provisions of Policy RN3.'

It is respectfully submitted that, having regard to the foregoing justification, the delivery of housing on the portion of the subject site which is subject to the Phase II designation is merited and justified. The subject development will provide for a continuation of existing / permitted development to the south, on a site which is well connected to the town centre and which is adjacent to lands identified for both educational and recreation uses. The lands are linked to the town centre by good pedestrian and cycle infrastructure, which the proposed development will strengthen via a link through the development to the north, reaching the Lagore Road.

As has been noted within this report, notwithstanding the fact that the supply of Phase I zoned land for the town is practically exhausted, the town has not achieved its housing targets as set out within the current Development Plan. Accordingly MCC have recognised the suitability of the subject lands for Phase I lands in the next Plan, which is currently on hold.

The Planning and Development (Amendment) Act 2018 has effectively stalled the Development Plan preparation and review process for Meath. Having regard to the objectives of Rebuilding Ireland, the ongoing under supply of housing and rising housing need it is considered appropriate, in the interest of timely housing delivery, to bring forward a comprehensive, masterplan led, high quality residential development on these Phase II residential zoned lands. Furthermore, the Planning Authority has noted at pre-application stage that it is intended that the subject lands will be zoned for immediate residential development under the forthcoming Development Plan.

3.0 CONCLUSION

This Statement of Response has sought to address in detail the first item of the Opinion of An Bord Pleanála in respect of the current proposed Strategic Housing Development of 913 no. units and associated facilities and infrastructure at Dunshaughlin East, Co. Meath. Item No. 1 of the Board's Opinion was concerned in particular with the timing and phasing of development in Dunshaughlin and sought justification for the delivery of the proposed development on lands which are partially designated for development post 2019.

As has been set out herein, the proposed development will see the first phase of housing being delivered on lands zoned for A2 Phase 1 housing development, with the remaining residential units and other associated uses to be delivered on the post-2019 lands from c. late 2019 onwards in accordance with the phasing of these lands, and over the lifetime of the next County Development Plan, and potentially the subsequent plan thereafter.

Meath County Council have acknowledged the suitability of the subject lands for development of this nature both within the Planning Authority's Opinion on the SHD pre-application documentation submitted, and during the course of the pre-application meeting with An Bord Pleanála, whereat it was confirmed by the Authority that the Phase 2 lands within the subject site will be zoned for residential and neighbourhood centre facilities in the next County Development Plan. The NPF, as clarified above based on the Implementation Roadmap, and the Draft RSES, provide further policy support for the provision of a planned development expansion in this location, and this can be supported by ABP through the SHD process.

The proposed development provides for an orderly and sustainable extension of the town of Dunshaughlin, on appropriately zoned lands, with development to be delivered concurrently with employment creation. As has been established herein, the development of the town has been somewhat stunted in recent years when considered in the context of other Moderate Sustainable Growth Towns in the county given the infrastructural capacity available in the town.

While it is considered likely that the proposed development will cater for a significant portion of Dunshaughlin's housing allocation over the next Development Plan period (which could then be pencilled in as 'committed' development in a similar fashion to the 'committed' development taken into account in the current CDP), it is also considered that this development constitutes the optimal solution for the effective, sustainable and integrated delivery of much-needed housing for the town over the coming years.

Having regard to the foregoing, including the precedent for SHD development on Phase II lands as referenced above, it is considered that the proposed timing and phasing of development on the SHD site, including the delivery of housing on Phase II zoned lands is justified in this instance.

APPENDIX 1: MAP OF MULTI-UNIT RESIDENTIAL DEVELOPMENTS PERMITTED / COMPLETED / UNDER CONSTRUCTION IN DUNSHAUGHLIN

APPENDIX 2: INITIAL MASTERPLAN FOR EMPLOYMENT ZONED LANDS TO THE EAST





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