

STATEMENT OF RESPONSE TO AN BORD PLEANÁLA'S CONSULTATION OPINION



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IN RESPECT OF A
PROPOSED RESIDENTIAL DEVELOPMENT
AT ACADEMY STREET NAVAN, CO. MEATH
NOVEMBER 2019

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1.0 INTRODUCTION

1 The pre-application consultation opinion from An Bord Pleanála in relation to the proposed strategic housing development at Belmont, Academy Street, Navan Co. Meath was received on the 2nd July 2019 (case reference no. ABP-304494-19).

2
3 The opinion states that An Bord Pleanála “has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.”

4 The opinion further states that “An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development”. The issues listed are under the following headings:

- Residential Phasing;
- Density;
- Design, Layout and Unit Mix;
- Built Heritage;
- Archaeology;
- Traffic;
- Flooding;
- Storm Water Management (SuDS).

5 Section 2 of this report sets out how the applicant has responded to each of the issues raised by the Board in their Consultation Opinion, with particular reference to The Site Layout, and accompanying reports and drawings prepared by the design team and which accompany this application. This Statement of Response, and the associated amendments to the scheme, in turn responds to the key issues raised by the Planning Authority's opinion as set out in their Report on the pre-application proposals and the Board's Opinion.

6 Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017 states:

‘(5) At the conclusion of a pre-application consultation, the Board may do either or both of the following: (b) notify the prospective applicant that specified information should be submitted with any application for permission for the proposed development, including photographs, plans, maps, drawings or other material or particulars and, where the Board considers it appropriate, either or both—’.

7 The pre-application consultation opinion from An Bord Pleanála states pursuant to Article 285(5)(b) that the following specific information should be submitted with any application for permission:

- *Detailed of proposed earthworks to address level differences on site, including detail of proposed cut and fill works and resultant gradient / retaining features.*
- *Design of the proposed surface water management system including attenuation features and cross sections of all SuDS features proposed on site in the context of surface water management on the site.*
- *Details of all materials proposed for buildings, open spaces, paved areas, boundary and retaining walls.*

- *Details of public lighting.*
- *Details of Part V provision clearly indicating the proposed Part V units.*
- *A plan of the proposed open space within the site clearly delineating public, semi-private and private spaces.*
- *A detailed phasing plan for the proposed development should be provided.*
- *A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.*
- *Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.*
- *Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:*
 1. *Transport Infrastructure Ireland*
 2. *National Transport Authority*
 3. *Minister for Culture, Heritage and the Gaeltacht*
 4. *Heritage Council*
 5. *An Chomhairle Ealaíon*
 6. *Faite Ireland*
 7. *An Taisce*
 8. *Irish Water*
 9. *Inland Fisheries Ireland*
 10. *Meath County Childcare Committee*

8 A detailed response to each of the points raised above has been provided within this response report and has been included as part of the planning application documentation.

2.0 STATEMENT OF RESPONSE TO ISSUES RAISED

1 The following sets out how the applicant has addressed the four issues raised in the Board's Notice of Pre-Application Consultation Opinion, with reference to the accompanying documentation submitted, to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

2.1.1 Summary of the alterations to the layout

2 In response to the Board's opinion the design of the overall scheme has undergone a number of alterations which has further enhanced the design:

- Increase in overall number of dwellings from 487 to 544 to now propose a density of 44.5 units per hectare;
- Broadening of mix;
- Increase in heights of buildings within subject site;
- Inclusion of apartment buildings to the rear of Academy Street;
- Provision of Corner blocks along key internal street intersections;

3 The Site Layout Plan prepared by CCK Architects shows the overall layout in context.

2.2 Response to Item 1 – Residential Phasing

4 Item 1 of the An Bord Pleanála opinion states the following:

“Further consideration of the documents as they relate to the phasing of residential zoned lands in the Navan Development Plan (Objective CS OBJ 3 refers). This consideration, including a justification for any application for development, should have regard to, inter alia, the Navan Development Plan 2009 - 2015 as it relates to the phasing of residential development and, in particular, the quantum and location of Phase 1 lands within the Development Plan which remains undeveloped. This consideration and justification should also have regard to, inter alia, the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) as it relates to the sequential approach and phasing.

5 It is considered beneficial firstly to introduce the site context in this response document before progressing to the justification of the development of Phase II residential lands in this instance.

6 The proposed site is considered an appropriate site for new residential development given its land use zoning as “new residential”, its proximity to existing employment and retail developments and community infrastructure (Beafort College, commercial pockets, retail including large scale supermarkets Navan Rugby and Football Club, Ard Ri Community National school, a proposed new school site), its proximity to the town centre and main street, the site's location contiguous existing residential developments, the ongoing expansion of Navan and the potential of the proposed development to provide for the orderly and sustainable expansion of the town.

7 In relation to Issue No.1 – Phasing of Development, the section below sets out to provide further justification of the proposed development of Phase II residential lands, and address the concern raised about possible prematurity of development at this location, pending the review of the CDP.

8 A Statement of Consistency with Planning Policy accompanies this planning application which outlines consistency with the Meath County Development Plan, Section 28 guidelines and National and Regional Planning Guidelines including the adopted RSES for the EMRA.

9 In addition, a Statement of Material Contravention has been prepared which justifies the proposed development with regard to the criteria of section 37(2)(b) of the Planning and Development Act 2000 (as amended). The Material Contravention Statement, along with this Statement of

Response to the pre-application Opinion and Statement of Consistency, puts forward a justification for the development of Phase II lands at this location.

10 In summary this response report addresses the planning rationale and justification for bringing forward a strategic housing development on the subject site which is zoned A2, with a Phase II (post 2019) phasing in the Meath County Development Plan 2013-2019.

11 It is considered, based on this analysis, that the existing Phase I zoned lands have failed to deliver the targets set out in the core strategy. Please note the below graphic, illustrating the existing permitted phase 1 developments and non-developed phase I lands.

Figure 2.1 – Phase 1 lands under the Navan Development Plan



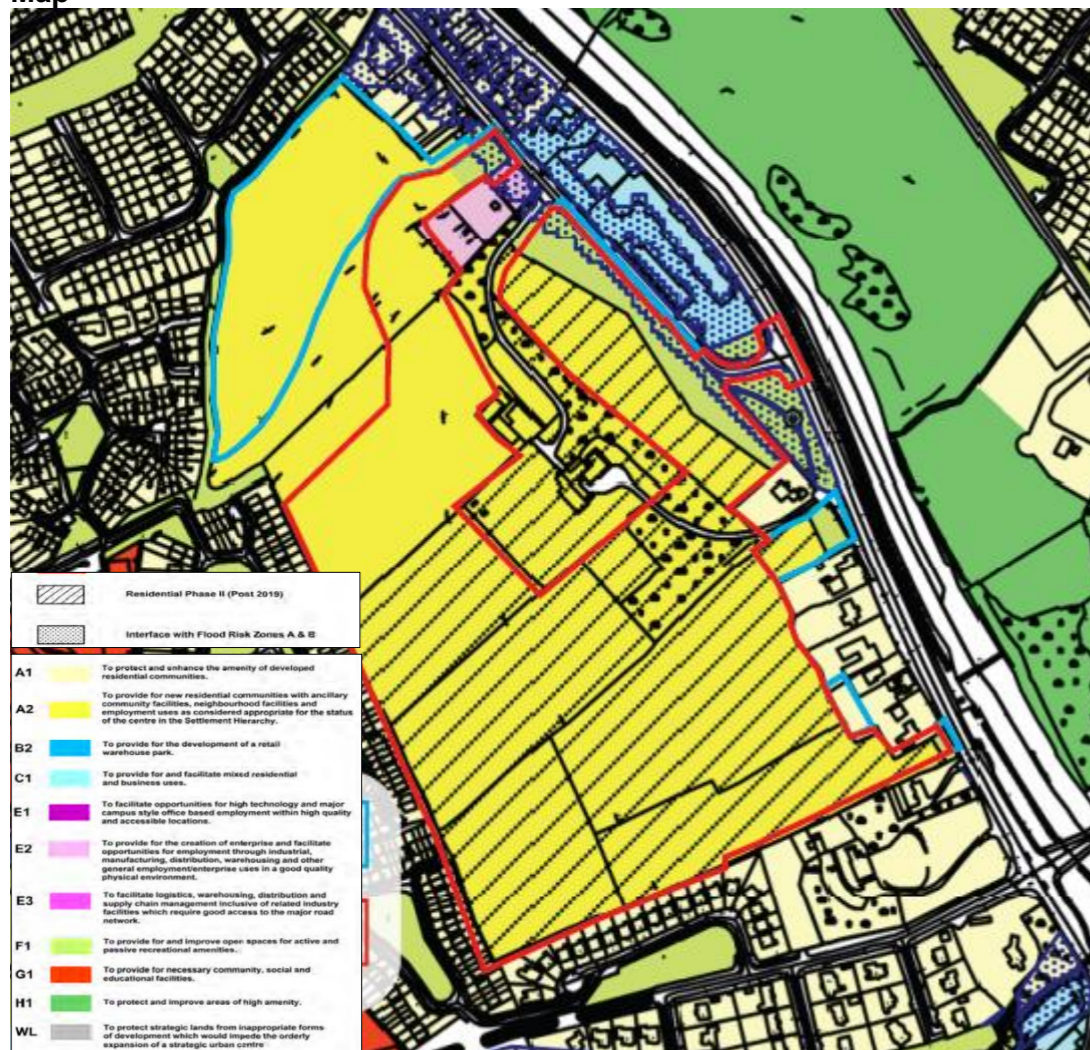
12 In relation to the residential land evaluation, it is considered evident that in any updated residential land evaluation undertaken for the next County Development Plan that the subject site would score more favourably, due to the factors such as the expanding population of Navan, the proposed road links as part of this development and proposed school site to the north of the subject site.

13 It is submitted, based on the analysis undertaken of the phase 1 zoned lands in Navan, their poor delivery performance to date, the site characteristics, proposed school site and the intended development of the site post 2019, that the release of Phase II lands (Post 2019) is justified in this instance.

2.2.1 A2 Land Use Zoning

- 14 The majority of the application site is zoned as A2 "New Residential", under which zoning residential development is permissible.
- 15 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'.
- 16 The A2 zoned lands within the subject site are also subject to a phasing objective 'Residential Phase II Post 2019' under the Meath County Development Plan 2013-2019.
- 17 The accompanying Material Contravention Statement prepared by John Spain Associates provides a concise rationale for the granting of permission notwithstanding the phasing objective applying to these A2 lands. However, it is noted that no issue arises in relation to section 9(6)(b) of the Planning and Development (Housing) and Residential Tenancies Act, as amended, as the proposed development accords with the A2 zoning objective under which residential development is permissible. The zoning of the subject site, and the compliance of the proposed development with the relevant zoning objectives, is addressed in detail within the accompanying statement of consistency and planning report prepared by John Spain Associates.

Figure 2.2 – Meath County Development Plan 2013-2019, Navan Town - Land Use Zoning Map



Order of Priority

The Meath County Development Plan states that;
 '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'.

2.2.2 Housing Allocation

- 18 The Meath 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.
- 19 A housing allocation of 3,984 units was provided for Navan in the County Development Plan 2013-2019. Since then, 785 units have been granted planning permission in the area, as of October 2019. This equated to a total allocation of 3,199 residential units over the plan period, including headroom, that the plan has failed to construct.

2.2.3 Planning Rationale/ Justification for bringing forward the proposed Phase II Lands)

- 20 The Planning and Development (Amendment) Act 2018 has held back the Development Plan preparation and review process for Meath to tie in with the RSES adoption timescale. 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 lands.
- 21 The release of Phase II residential lands is considered justifiable in this instance given the following:

- The quantum of units identified for the site at 460 for Phase 1, is broadly similar to that proposed, which is 544 no. dwellings (which includes the proposed school site),
- Lack of development of Phase 1 lands and lack of delivery of targeted growth figures during the lifetime of the current development plan, having regard to the fact that the core strategy of the Development Plan is out of date, and the subject site is intended to be zoned for immediate housing delivery under the forthcoming new Development Plan, as confirmed by MCC during the course of the pre-application process.
- National planning policy including Rebuilding Ireland - Action Plan for Housing and Homelessness, the National Planning Framework, and the Regional Spatial and Economic Strategy for the EMRA.
- The position of Navan in the Meath settlement hierarchy and its designation as a Key Town under the RSES.
- The current housing shortage, in which residential developments of scale can be considered to be of strategic and national importance.

- The schools, employment and retail facilities serving the area including Beaufort College, Lidl, Supervalu, Navan Rugby and Football Club and Ard Ri Community National School.
- The location and characteristics of the proposed site.

22 Based on the reasons outlined above and herein it is considered reasonable to assume that the post-2019 phased, A2 zoned lands which are the subject of this proposed strategic housing development will be identified as A2 zoned lands in the new Development Plan. This assumption is supported by the Planning Authority, who have noted that it is intended to zone the lands for immediate residential development under the new County Development Plan. We note also that any decision on the future proposed strategic housing development will be made in 2019 onwards with implementation of the development likely to commence in Q2 2020.

2.2.4 Phase I Land Evaluation

23 This statement of response provides a detailed analysis (summarised below) of the Phase 1 lands within Navan which clearly reveals a shortfall in housing delivery over the Development Plan period to date on these lands vis a vis the housing allocation provided for under the Core Strategy.

24 The Core Strategy of the Meath County Development plan set out a target for delivery of 3,984 units, and then evaluated and designated the development sites where these would be delivered.

25 The core strategy figures have not been realised on the identified Phase I zoned lands. A site survey and review of the planning history of the sites reveals that only 172 units have been delivered, and there are not sufficient planning permissions in place for the delivery of these units. The following tables summarises this position.

Table 2.1 – Delivery on Core Strategy Allocation

	Units
Housing Allocation as per Table 2.5 of the Development Plan	3,984
Delivered / Committed	
Ref. NA181326/ Ref. NA151046	106
Ref. NA160838/ NA180712	18
Ref. NA160607	218
Ref. NA140132/ REF.NA190822	99
Ref. NA181229	31
Ref. NA170747	264
Ref. NA180276/ Ref. NA151352	51
Total committed	785
Shortfall from 3,984 allocation	3,199

26 As set out in Table 1 above, based on a review of units permitted, under construction and completed on lands included in the residential land evaluation (as set out above), the following figures have been compiled for Navan for the 2013-2019 Development Plan period:

- Units Completed /Commenced / Under Construction – c. 172
- Units Permitted (including units commenced / under construction)– c. 785
- The total number of units completed and currently under construction is therefore 172 units.
- Given the allocation of 3,984 units over the current Development Plan period (including headroom), this constitutes a current shortfall of c. 3,812 units.

27 It is considered therefore that the existing Phase I lands have failed to deliver the targets set out in the core strategy. As a consequence of this the town has failed to realise its potential to support sustainable growth over the past development plan period.

28 We would respectfully suggest if permission is granted for the proposed development, the scheme whilst partly on lands designated as Phase II, will still accord with development plan policy to deliver targeted development within the core strategy numerical allocations for the town.

29 Therefore, the proposed development can be seen to be justified having regard to the failure of the existing Phase I zoned lands and ‘committed developments’ to deliver the targets set out in the core strategy, the location of the site adjacent to education, employment and retail land uses, 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.

2.2.5 Summary and Conclusions

30 The proposed site is zoned as A2 “New Residential” but is also partly subject to a separate phasing objective ‘Residential Phase II Post 2019’ under the Meath County Development Plan 2013-2019.

31 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’.

32 This section of the report has sought to address potential concerns in relation to the timing and phasing of development in Navan and aims to provide a planning rationale and justification for the delivery of the proposed strategic housing development on lands which are designated for development post 2019 (i.e. Residential Phase II).

33 It is considered that the proposed development of residential units in a key regional growth centre on zoned residential lands, contiguous to existing residential developments should be considered despite the phasing barrier to development provided by the Order of Priority Phasing Arrangement for Residential Zoned Lands outlined in the County Development Plan.

34 The proposed development provides for an orderly and sustainable extension of the town of Navan on appropriately zoned lands which benefit from permitted infrastructure including access and are proximate to social and community infrastructure such as schools (Beaufort College, a proposed new school site, Navan Rugby Football Club and Ard Ri Community National School.), employment and retail.

35 In relation to the residential land evaluation, it is considered evident that in any updated residential land evaluation undertaken for the next County Development Plan the subject site would score more favourably, due to the factors outlined within this response.

36 It is considered, based on the analysis undertaken of the phase 1 zoned lands in Navan and their poor delivery performance to date, that the site characteristics and permitted infrastructure serving the proposed site, the current housing shortages being experienced in the region, and the intended development of the site post 2019, that the release of Phase II zoned lands (Post 2019) is justified in this instance. The suitability of the lands for residential development is already acknowledged through its residential zoning.

37 Having regard to the objectives of Rebuilding Ireland, the NPF and the RSES, and in light of 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, which are proposed to be developed post 2019.
- 38 The release of Phase II post 2019, A2 zoned residential lands is considered justifiable in this instance given the following;
- Navan's status as referred to above in the NPF, the RSES and the Meath County Development Plan.**
- The quantum of units identified for the site at 460 for Phase 1, is broadly similar to that proposed, which is 544 no. dwellings (which includes the proposed school site),
 - The lack of development of current Phase 1 zoned lands and failure to deliver the targeted growth figures set out in the core strategy during the lifetime of the current development plan which expires in December 2019,
 - The subject lands are zoned residential and are in the ownership of a housebuilding company with a proven track record of delivery of high-quality housing,
 - The current housing shortage in which residential developments of scale can be considered to be of strategic and national importance,
 - The location and characteristics of the proposed site and its proximity to social and community services, transport and employment.
- 39 In conclusion it is considered that this response and the justification set out herein clearly demonstrates that the proposed strategic housing development at Belmont, Academy Street, Navan is in accordance with the development management standards set out within the County Development Plan and Town Plan as well as helping to meet some of the much needed supply of housing for the area, which is a designated rent pressure zone.
- 40 The response set out above has provided justification of the proposed development of Phase II residential lands, and has addressed the concern raised about possible prematurity of development at this location pending the review of the CDP.
- 41 In relation to the second part of Item 1, a Statement of Consistency with Planning Policy accompanies this planning application which outlines consistency with the Meath County Development Plan, Section 28 guidelines and National and Regional Planning Guidelines including the adopted RSES for the EMRA.
- 42 In addition, a Statement of Material Contravention has been prepared which justifies the proposed development with regard to the criteria of section 37(2)(b) of the Planning and Development Act 2000 (as amended). The Material Contravention Statement, along with this Statement of Response to the pre-application Opinion and Statement of Consistency, puts forward further justification for the development of Phase II lands at this location.
- 43 In light of the foregoing, it is respectfully requested that An Bord Pleanála have regard to the rationale and justification set out for the development and permit the proposed residential development in contravention of Objective SP1 of the Meath County Council Development Plan 2013-2019, having consideration to section 37(2)(b) (i) and (iii) of the Planning and Development Act, 2000 (as amended), specifically the policies and objectives set out within the Section 28 Guidelines, the failure of the Core Strategy to deliver the required housing units, the national importance of delivering housing given the current housing crisis, and the status of the lands in question as readily developable, sequential and contiguous to the developed footprint of Navan, which should be brought forward if Navan is to achieve its potential.
- 2.3 Response to Item 2 – Infrastructural Constraints**
- 44 Item no. 2 of the An Bord Pleanála opinion states:
- “Further consideration/clarification of the documents as they relate to both water supply and wastewater infrastructure constraints in the network serving the proposed development. The documentation at application stage should clearly indicate the nature of any constraints, the proposals to address the constraints, whether such constraints require statutory consent and/or may be subject to a compulsory purchase process and if such consent has been received or CPO completed, who is going to undertake the works required and the timelines involved in addressing these constraints relative to the construction and completion of the proposed development.”*
- 45 In response to the above we refer the Board to the Engineering Services Report prepared by CS Consulting Engineers, which confirms there is an existing wastewater treatment plant in Navan, constructed in 2007 to serve Navan (town of County Meath), which has an organic design treatment capacity of 50,000 PE (population equivalent) and that the current size of the agglomeration served is approx. 37,286 PE; the plant therefore currently has a spare capacity of 12,714 PE.
- 46 In response to item no. 2 CS Consulting engaged further with Irish Water.
- 47 As set out in the CS Consulting ESR, discussions were held between CS Consulting and Irish Water who reviewed their response and carried out additional checks on the current network. Following Irish Water's internal review, a second pre-connection enquiry was lodged with Irish Water for which a response was received on the 19/08/2019. The letter from Irish Water confirms that:
- “Based upon the details you have provided with your pre-connection enquiry and on the capacity currently available as assessed by Irish Water, we wish to advise you that, subject to a valid connection agreement being put in place and the conditions listed below, your proposed connection to the Irish Water network can be facilitated.”*
- 48 The letter from Irish Water confirms the following upgrades to address localised constraints in the network:
- “Water: In order to supply this development approximately 1.5km of 200mm water main is to be upsized to 300mm. Irish Water may want to upsize this main further. This may be subject to change.*
- Wastewater: In order to connect this development to Irish Water's wastewater network a network extension is required. A new 300mm gravity foul sewer, length approximately 470m southwards along the Dublin Road and discharge to the existing Dublin Road pump station. This may be subject to change.”*
- 49 This response indicated that a section of watermain was required to be constructed for the development. CS Consulting Drawing no. D061-069, shows the route of the envisaged upgrade works for the new 300mm watermain along the Dublin Road. With reference to the foul sewer it is envisaged that a new foul sewer will be installed along the Dublin Road to tie into the existing Irish Water sub-station.
- 50 The Irish Water's letter confirms that a contribution for the upgrade works would be required from the applicant to progress the upgrade works, which would be subject to further discussions.
- 51 Having regard to the nature of the works, it is considered that a separate CPO/consent process would not be required as the works are located within the public road and the timing/funding would be dependent on the applicant contributing (a relevant portion) of the costs of the upgrade works.

As such the upgrade works can be delivered within the construction and completion of the proposed development.

2.4 Response to Item 3 – Density

52 Item no. 3 of the An Bord Pleanála opinion states:

“Further consideration of documents as they relate to the density in the proposed development, specifically in relation to the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009). Particular regard should be had to the guidance on calculating net and gross site areas and the need to develop at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the proximity of the site to the Navan town centre and to public transport connections and to established social and community services in the immediate vicinity. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.”

53 In relation to Issue No.3 referred to in the pre-application consultation opinion from An Bord Pleanála, further consideration has been given to the residential density of the site. In this regard, the applicant has revised the scheme and has increased the overall number of dwellings from 487 to 544 dwellings which is a 11.7% increase, from initially proposed. The proposed development will provide a sustainable, integrated series of neighbourhoods, close to (c. 800m-1,000m) from the established Navan town centre amenities located in the vicinity of the proposed development.

54 The net density previously indicated in the pre-application submission to the Board, was 40.2 units per hectare, based on 487 no. units and a net site area of c. 12.1 hectares. The proposal now proposes a net density of 44.5 units per hectare (based on a net site area of 12.08 hectares).

55 The density proposed reflects the proximity of the northern and eastern parts of the subject lands to Academy Street and the town centre, while also reducing the scale of development towards Belmont House (a protected structure) located adjacent and also the established lower density dwellings located along the western and southern boundaries.

2.4.1 Sustainable Residential Development in Urban Areas 2009

56 The density proposed is in keeping with the principles of the “Sustainable Residential Development in Urban Areas”, 2009 (SRD) which promotes a ‘plan led’ approach to development in “transposing national and regional policies and setting the strategic context for local area plans.”

57 It is important to note that Section 2.1 of the (SRD) highlight the critical role of Local Area Plans (LAPs) in identifying locations for new residential development stating that:

“The scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy.”

58 The SRD set out the fundamental questions which are “to be addressed at the outset of the planning process.” These questions include the amount and type of new housing, the sequential approach to zoning, adequate existing public transport capacity, the scale, location and type of public open space, the setting of appropriate density levels within the area, protection and enhancement of biodiversity and the green infrastructure, avoidance of natural hazards, such as flood risk.

59 Section 4.9 of the SRD states that, “The amount and types of residential development to be accommodated in a new district or neighbourhood will be guided by the planning authority’s housing and settlement strategy.”

Sustainable Residential Development – Locations for Increased Density

60 Chapter 5 of the SRD identify locations for appropriate densities where it states that:- *“In general, increased densities should be encouraged on residentially zoned lands and particularly in the following locations;”* such as town centres, brownfield sites within city or town centres, public transport corridors, inner suburban infill, institutional lands and outer suburban/greenfield sites.

61 For town and city centres, the SRD note that *“in order to maximise inner city and town centre population growth, there should, in principle, be no upper limit on the number of dwellings that may be provided within any town or city centre site”* subject to safeguards.

62 The SRD do not indicate any minimum density for town centre sites. It is noteworthy that the subject lands are located on ‘A2’ zoned residentially zoned land and not within the town centre zoning, and comprises an ‘inner-suburban infill’ site. Having regard to the established social and community services, it is considered that the density now proposed of 44.5 units per hectare net provides an appropriate balance between the desire to promote sustainable density in a site located to the south of the town centre of Navan, while also taking into account the site constraints into the design of the proposal as well as taking cognisance of the provisions of the SRD Guidelines with respect of the definition/classification of the subject lands.

2.4.2 Appendix A SRD Net Density

63 We refer the Board, to Drawing no. 1828P108, prepared by CCK Architects, which sets out the net site area for the calculation of the density of the proposed development.

64 It is noted the gross residential zoned area within the overall site of 15.1 hectares is 13.34 hectares giving an overall gross density of c. 40.1 units per hectare.

65 The areas excluded have had regard to Appendix A of the SRD 2009, which excludes the following from the gross site area:

- *major and local distributor roads;*
- *primary schools, churches, local shopping etc.;*
- *open spaces serving a wider area; and*
- *significant landscape buffer strips.*

66 In this regard, the net site area the net site area is 12.2 hectares which gives a net density of 44.5 units per hectare set out below:

Figure 2.3 – Net Areas for Density Calculation

Source: CCK Architects

In addition, the net site area excludes the northern access road (a portion of which is under the ownership of Meath County Council) which will serve to provide access to the primary school's campus, which is located to the north of the proposed development. It will essentially act as a local distributor road to serve the Primary School's campus as well as the proposed development, before linking back into the remainder of the site (previously the entire loop road was excluded from the net site area). In addition, the net site area excludes the significant woodland associated with Belmont House, which will be incorporated into an open space of exceptional high-quality, which will serve a wider area. The playground area (integrated with the woodland) and the creche area are included in the net area (noting that they could be excluded under the provisions of Appendix 2).

68 The SRD note that a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.

69 The design approach is based on a need to protect the amenities of the surrounding residential development, where similar housing is proposed (2 storey and dormer) and that the apartments are located centrally within the scheme layout. The design intent is to protect the amenities of the adjoining neighbours and general character of the area and its amenities.

2.4.3 Navan Town Development Plan 2009-2015

70 The Navan Town Development Plan 2009-2015 outlines that the Core Strategy of the Meath County Development Plan 2013-2019 includes the population projection for the county. Table 2.4 of the Development Plan illustrates the household allocations for the various urban centres and the rural area in Meath.

71 The NTDP states that:

"The Core Strategy for the existing Meath County Development Plan 2013 – 2019 assumes a net density of 45 units per hectare across all zonings which would provide residential development. Having reviewed the location of available land banks and their relative remove from either the proposed R147 public transport corridor or the town centre, it is not considered realistic to propose such high densities across the entire development plan envelop. Instead, maximum densities have been differentiated across the available land parcels. Meath County Council has retained the suggested density of 45 units per hectare where this is considered appropriate."

72 Having regard to the above it is considered that the revised proposals have addressed the issue of sustainable residential densities and provide an appropriate design response to the Board's Opinion.

67 The net area excludes the Open Space zoning located along Academy Street along with the lands under the control of Meath County Council required for the signalised upgrade on the Dublin Road.

Figure 2.4 – View through Woodland Open Space and access Road



2.5 Response to Item 4 – Design, Layout and Unit Mix

73 Item no. 4 of the An Bord Pleanála opinion states:

“Further consideration of documents as they relate to unit mix, building height, typology and layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009), the 'Urban Development and Building Heights Guidelines' and the 'Design Manual for Urban Roads and Streets'. In addition to density which is addressed above, the matters of unit mix, the configuration of the layout and the architectural approach should be given further consideration. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”

74 In response to this item the proposed unit mix, building heights, typologies and layout has been amended significantly.

2.5.1 Unit Mix, Building Height and Typology

75 In summary, the proposed mix has been amended to include a broader unit mix and typologies throughout the overall landholding. At, pre-application stage, the western portion of the subject lands contained predominantly 2 storey, detached and semi-detached houses, while Academy Street contained 3 no. apartment blocks in an appropriate urban edge, at this key location in Navan. The response is set out under the following headings:

- Sustainable Residential Development in Urban Areas - 12 criteria set out in the Urban Design Manual
- 'Urban Development and Building Heights Guidelines'
- 'Design Manual for Urban Roads and Streets'.

2.5.2 Sustainable Residential Development in Urban Areas' (May 2009)

76 The proposed development conforms to the more detailed guidance within the Guidelines on layout, design and density – by making effective use of the site; making a positive contribution to its surroundings; having a sense of identity and place; providing for effective connectivity, and featuring a design which is guided by the principles of passive surveillance. The proposed development meets the 12 criteria for sustainable residential development contained within the Urban Design Manual (2009), a companion document to the SRD Guidelines, examined below and set out in the CCK Architects design statement.

77 The proposed development incorporates design principles such as shared surfaces / home zones to reduce traffic speeds on streets with housing and aims to prioritise walking and cycling through quality alternative linkages other than roads. The layout is highly accessible for all users, with a permeable layout both internally and externally as new linkages are provided to surrounding land uses. The layout is considered to be legible, with a clear distinction in design, character and treatment between distributor, local and shared surface streets.

78 The Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines are accompanied by a Design Manual which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

79 The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The 12 criteria are discussed in detail below.

80 This SHD application is accompanied by a Design Statement, prepared by CCK Architects, which demonstrates how the proposed development has regard to and has been developed in accordance with best practice in respect to urban design. The Design Statement should be read in conjunction with this Statement of Consistency and Planning Report and with the plans and particulars accompanying this submission.

2.5.3 Urban Design Manual – A Best Practice Guide (2009)

Figure 2.5 – Urban Design Manual 12 criteria



Source: Urban Design Manual DoEHLG 2009

81 The Urban Design Manual is based around 12 criteria that have been drawn up to encapsulate the range of design considerations for residential development based on “a distillation of current policy and guidance and tried and tested principles of good urban design.” The 12 no. criteria are assessed as follows:

2.5.3.1 Context: How does the development respond to its surroundings?

82 The proposed development responds to its surroundings by providing attractive streets and open spaces, high quality buildings and features setbacks from neighbouring dwellings, located to the south in Limekiln Hall and to the west in Limekiln Wood, where the layout proposes a back to back 2 storey arrangement. The apartments are located along Academy Street, reflecting the desire to present a more urban edge, away from sensitive boundaries, at this gateway entrance to Navan.

83 The existing mature Belmont Woodland is retained and protected at the centre of the site, integrated as a key amenity component of the residential scheme for future occupants. The

development addresses the adjoining Belmont House (a protected structure), along the main element of the internal loop road.

2.5.3.2 Connections: How well is the new neighbourhood / site connected?

84 The proposed development features an integrated model of street design that balances the needs of pedestrians, cyclists and motorists. The development layout design put forward improves the existing road environs with enhanced pedestrian facilities. The development design ensures pedestrian permeability to the west, north and east to existing established residential estates while also providing for future pedestrian connectivity to the south east.

85 The development layout incorporates features that benefit vulnerable road users by encouraging low vehicle speeds (such as reduced road corner radii, kerb buildouts, plantings, etc.), following the principle that roads should serve a community and not dominate it. The provision of good permeability for pedestrians, cyclists & public transport are all key objectives of the proposed site layout.

2.5.3.3 Inclusivity: How easily can people use and access the development?

86 The proposed development includes apartment and duplex apartments which are suitable for mobility impaired persons, which includes for a bedroom at ground floor allowing for ease of access as needs change and access to upper floors become difficult. Landscape design and detailing of roads and footpaths provide for movement throughout the development by mobility impaired persons, in compliance with Building Regulations Part M.

87 The overall development will include 10% social housing which will be provided within the scheme.

88 The proposed development will provide a variety of vehicle, pedestrian and cycle routes throughout the site. The internal road network provides for a clear navigable route throughout the development with a series of cycle paths and footpaths to increase the overall level of connectivity and permeability for future residents.

89 The development will provide for disabled car parking spaces and all communal areas and house types are designed to be accessible to all.

2.5.3.4 Variety: How does the development promote a good mix of activities?

90 The proposed development provides for a good mix of dwelling types including a mix of apartments and house types of varying sizes. This will ensure a mix of tenures is provided for within the scheme. The proposal also includes creche facilities, and a substantial network of public open spaces measuring c. 2.13 ha. It is considered that the proposed development provides for the necessary ancillary land uses required for this large-scale residential development, whilst having regard to the significant range of community, commercial and social infrastructure in the wider Navan area.

91 The proposed development includes for a substantial amount of usable open space in the form of active and passive open space and which includes a substantial area of centrally located open space, which will be of high quality. In addition, there will be a series of pocket parks, distributed evenly throughout the site.

92 The residential element of the proposed development comprises 544 no. dwellings as follows:

- 260 houses comprising 18 no. 2 bedroom houses, 207 no. 3 bedroom houses and 35 no. 4 bedroom houses.
- 198 no. apartments in 3 no. 5/6 storey apartment buildings and 2 no. 4 storey apartment buildings (46 no. 1 no. bedroom apartments and 152 no. 2 bedroom apartments).

- 86 no. duplex units (16 no. 1 bedroom, 39 no. 2 bedroom and 31 no. 3 bedroom duplex apartments).

2.5.3.5 Efficiency: How does the development make appropriate use of resources, including land?

93 The proposed development includes areas of a steep gradient, which are not suitable to develop. This results in a net density of c. 44.5 units per hectare. This density makes efficient use of the residential zoned lands and includes an appropriate quantum of public open space (15%). The density responds to its immediate context (2 storey dwellings to the south, and also to the east), with apartments located along Academy Street.

94 The layout and orientation of the scheme has been designed by CCK Architects to have regard to aspect and views and ensure both dwellings and areas of open space achieve light throughout the day. This is reflected in the masterplan for the site.

2.5.3.6 Distinctiveness: How do the proposals create a sense of place?

95 In this case, the Site Layout Plan has been devised to provide a legible, permeable layout with a range of dwelling types which, together with a varied use of materials and finishes, engender a definitive sense of place in a new residential community. The Landscape report prepared by CSR Landscape Architects sets out in detail the landscaping and how it will integrate with the design of the new residential district – all of which will form a strong and positive identity for each area.

96 The proposed layout of the streets and design of the residential buildings will create a high quality and distinctive residential environment.

97 There is a variety and mix of dwelling types, heights and design, with a mix of apartment buildings and houses, proposed throughout the scheme, thereby providing a distinctive sense of place on site. In this regard it is proposed to provide a range of dwelling typologies as set out above, including apartments, duplex units/terrace and detached and semi-detached dwellings.

2.5.3.7 Layout: How does the proposal create people-friendly streets and spaces?

98 The proposed site layout plan provides for a legible, permeable and distinctive layout, as well as the provision of a range of dwelling types together with a varied use of materials and finishes, engender a definitive sense of place in a new residential community. The structure of the Site Layout Plan is based on the principles of best practice urban design including permeability, connectivity and legibility as set out above.

99 The internal layout has been designed with pedestrian and cyclists to the forefront and with traffic safety in mind. Reduction of vehicle speed is a fundamental principle behind the layout. In general, all roads are designed for maximum vehicle speeds of 30 km/h or 20 mph. Traffic calming features have also been designed into the development – all in accordance with best practice (DMURS).

100 The proposed layout of the development provides for a straightforward, easily accessible and easily navigable network of places for pedestrians and cyclists and vehicles. The hierarchy of streets and routes are clearly defined with the main artery route through the development with a number of other circulation roads and footpaths branching off this main access.

2.5.3.8 Public Realm: How safe, secure and enjoyable are the public areas?

- 101 The layout and design of the proposed development has been influenced by the level of security and overlooking to be provided by the future residents. The design of the development has been carefully considered so as to provide a high level of passive surveillance on both the area of open space and public access areas. The design of the dwellings provide for a direct frontage onto all public areas ensuring the provision of a safe, secure and enjoyable residential development.
- 102 The proposed development will also provide for a connected series of public open spaces c. 2 hectares or 15% of the zoned lands. The proposed development therefore meets the open space requirements as set out in the Development Plan at 15%. An additional 0.63 hectares of open space is provided for on the F1 zoned lands fronting onto Academy Street (and is excluded from the 15% figure).
- 103 The location layout and usability of the proposed public open spaces are of a high quality and will contribute positively to the residential amenity of future residents. The open space provision for the entire scheme was carefully considered by the design team, and it is submitted the detailing and high-quality finish as illustrated on the Landscape Masterplan (drawing no.100), prepared by CSR, Landscape Architects, and the Landscape Design Statement which confirms a high degree of amenity for future residents of the scheme.

2.5.3.9 Adaptability: How will the buildings cope with change?

- 104 Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size. The development provides a mix of 1, 2, 3- and 4-bedroom units that can be easily reconfigured to adapt to the changing life cycles and personal needs of each resident.
- 105 The overall architectural style is contemporary and reflects the modern requirements to balance lighter, airier elevations with the need to satisfy energy reducing objectives. Similarly, all proposed house types incorporate generous space standards so as to provide for adaptable living requirements.

2.5.3.10 Privacy / Amenity: How do the buildings provide a high-quality amenity?

- 106 Each dwelling is provided with an area of useable private open space which meets or exceeds the Development Plan standards. All of the dwellings meet or exceed the Section 28 Guidelines unit size requirements. The design of dwellings has also had due regard to the siting and orientation of the development in order to maximise the solar gain and natural light aspect of each dwelling.
- 107 The development provides for adequate separate distances between dwellings. This maintains a high level of privacy and amenity obtained by residents, and reduced the level of overlooking and overshadowing.
- 108 In this regard, reference should be made to Housing Quality Assessment prepared by CCK Architects, which contains a detailed appraisal of the standards achieved in the proposed development in meeting the space and amenity needs of future residents.
- 109 In summary, it is confirmed that each proposed residential unit has an area of useable private outdoor space as well as being in accordance with storage requirements.

2.5.3.11 Parking: How will the parking be secure and attractive?

- 110 In this case, parking is provided for within the curtilage in front of dwellings with 218 no. car parking spaces for the apartments and the creche (along with car sharing spaces). Cycle parking will comprise 417 no. cycle spaces for the apartments, including cycle spaces for visitors.

2.5.3.12 Detailed Design: How well thought through is the building and landscape design?

- 111 The proposed design of the development has been subject to a number of pre-application consultations between the design team and the Planning Authority. The design rationale from an urban design and architectural perspective is explained in the Design Statement prepared by CCK Architects. The landscape design rationale is set out in the Landscape Design Statement prepared by CSR Landscape Architects.
- 112 The proposed landscaping aims to enhance the overall biodiversity and ecology of the area which will improve the overall character and visual amenity of the development. Full details on the rationale for the landscaping design can be found in the tree survey, ecology report and landscape plan which accompanies this pre-application request.

2.5.4 'Urban Development and Building Heights Guidelines'

- 113 The Urban Development and Building Heights contain SPPR 4 which requires:

"It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2009)" or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more."*

- 114 The following provides a response to the sub-items above.

1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2009)" or any amending or replacement Guidelines;

- 115 The proposed development provides an appropriate density in compliance with the Sustainable Residential Development in Urban Areas (2009) at c. 44.5 units per hectare (net). This is detailed above in Section 2.4.

2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and

- 116 The proposal includes for a mix of building heights and includes, 3 storey duplex apartments, and 4/5/6 storey apartment buildings. In addition, the proposal avoids mono-type building typologies, and includes a range of dwelling types, comprising 11.4% 1-bedroom units, 38.4% 2-bedroom units, 43.8% 3-bedroom units and 6.4% 4-bedroom units (52% apartments and duplexes, 48% houses).

- 117 The pre application submission to An Bord Pleanála proposed the following:

Table 2.2 – An Bord Pleanála – Pre application Mix

	1 bedroom	2 bedroom	3 bedroom	4 bedroom	Overall	%
Houses		34	240	43	317	65%
Apartments	38	120			158	32.4%
Duplex Apartments		6	6		12	2.5%
Total	38	160	247	43	487	
Overall Mix	7.8%	33.7%	50.5%	8.8%	100%	

Source: CCK Architects

118 In summary, the proposed revised development comprises the construction of 544 no. dwellings consisting of 260 no. houses, 198 no. apartments and 30 no. duplex units as well as 56 no. dwellings in a series of corner apartment buildings. The mix of units has broadened to reduce the number of houses from 65% to 47.8% of the dwellings (from 317 no. to 260 no. dwellings).

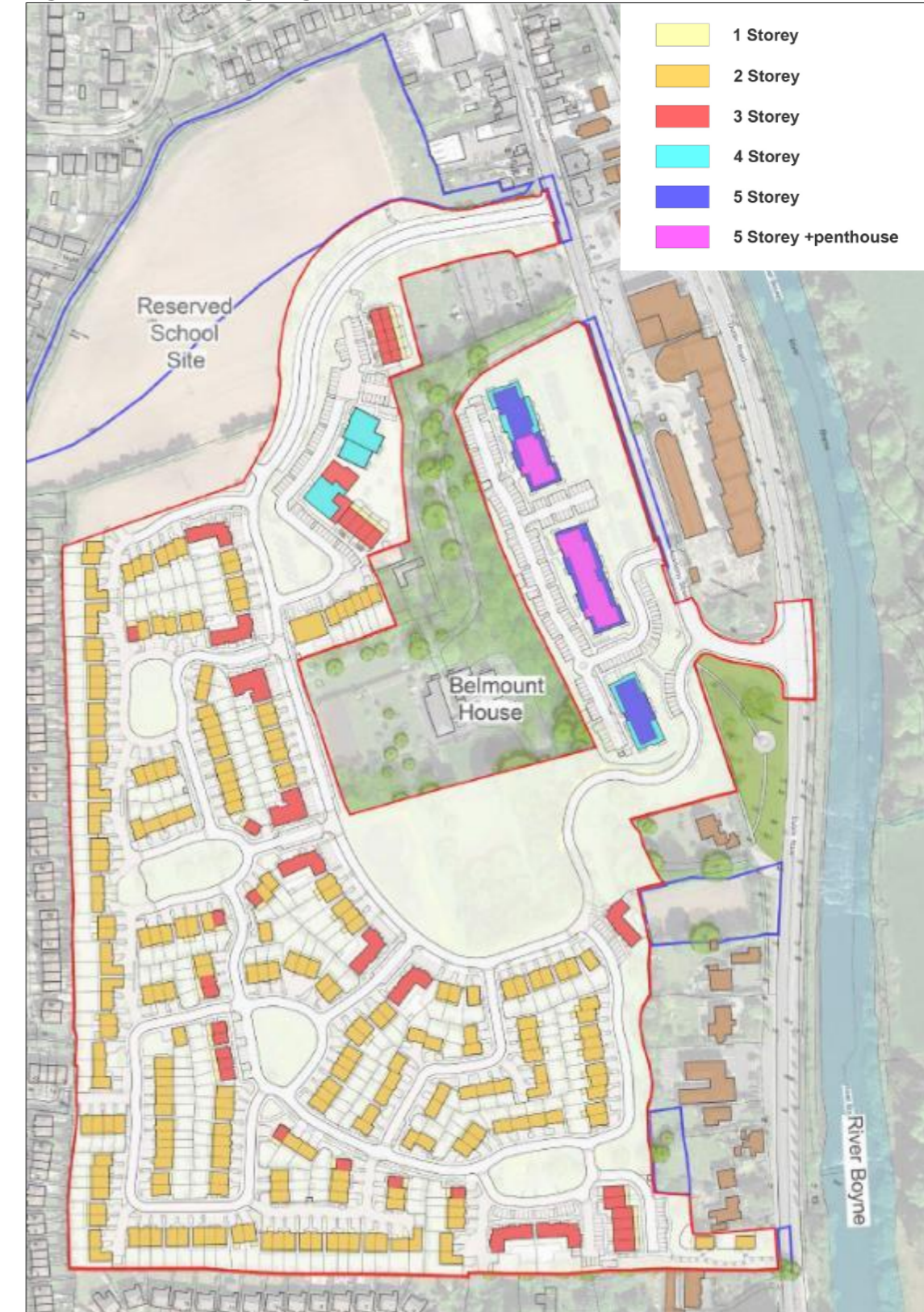
Table 2.3 – Overall Residential Development Mix – ABP SHD Application

	1 bedroom	2 bedroom	3 bedroom	4 bedroom	Overall	%
Houses		18	207	35	260	47.8%
Apartments	46	152			198	36.4%
Duplex Apartments		15	15		30	5.5%
Corner Apartment Buildings	16	24	16		56	10.3%
	62	209	238	35	544	
Overall Mix	11.4%	38.4%	43.8%	6.4%		

Source: CCK Schedule

119 A wide variety of dwelling typologies are included in the proposal, comprising 198 no. apartments in 1, 2 and 3 no. bedroom apartments in 5 no. apartment buildings along with 86 no. duplex units, in a series of buildings dispersed throughout the proposed development. These apartment dwellings comprise c. 52% of the overall mix of units. In addition it is proposed to provide 260 no. 2, 3 and 4 bedroom dwellings in a range of typologies comprising terraces, semi-detached and detached configurations.

Figure 2.6 – Building Heights



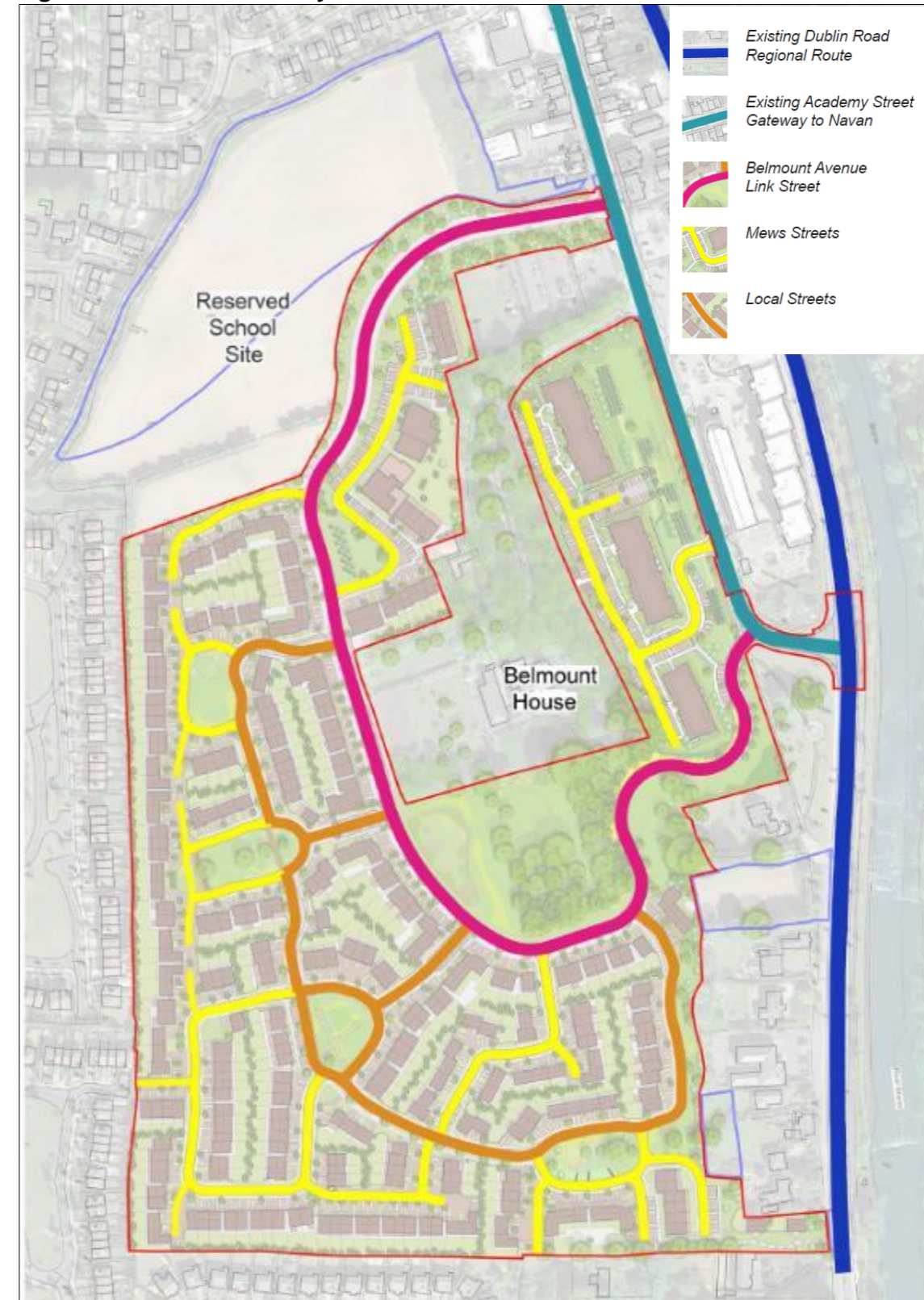
Source: CCK Architects

120 As set out in the CCK Architects Design Statement 55% of the dwellings exceed 2 storeys in height, with 19% in 3 storey units and 36% of units in buildings of 4 storeys or more.

2.5.5 Design Manual for Urban Roads and Streets (DMURS) (2013)

- 121 The Engineering Services Report, prepared by CS Consulting Engineers and the CCK Architectural Design Statement provides further detail in respect of the consistency of the proposed development with DMURS.
- 122 The site layout encourages permeability through appropriate block sizes and a looped system where most streets lead on to other streets. DMURS notes that permeable layouts provide more frequent junctions which have a traffic calming effect as drivers slow and show greater levels of caution. The site layout demonstrates that the proposal has adopted this principle by incorporating a highly permeable road network with numerous built in traffic calming features including junctions and road bends.
- 123 The scheme consists of an urban edge to Academy Street fronting a linear park, and a loop route from Academy Street through to the lands beyond. The hierarchy of the plan is clear:
- A linear 5 storey edge to Academy Street, with set-back penthouse over, forms the urban town edge to the street which has a district function.
 - A loop route from Academy Street forms a memorable wooded route containing the main park, accessing the school, and edged by housing framing local access points into individual character areas.
 - Each character area is defined by an open space, usually curating existing trees, and these spaces form a necklace along a quieter tree lined street.
 - The inner most part of each character area consists of shared surface homezones. These traffic calmed pedestrian friendly places in turn interlink to form an outer pedestrian / cycle only loop around the site.
- 124 This hierarchy decreases from Academy Street, onto the neighbourhood wooded loop, the quiet park necklace street, and finally the interconnected homezones.
- 125 Cul-de-sacs have also been kept to a minimum to encourage connectivity and permeability throughout the development. Linkages are proposed to encourage and improve connectivity in the wider area.
- 126 In addition, the design of the internal access roads include a number of restrictive road bends and traffic calming measures which will ensure low vehicular speeds through the site protecting the vulnerable road users. DMURS also suggests that measures should be considered that reduce the dominance of the vehicle in favour of pedestrian and cyclists having dominance within a street. This is provided within the housing layout through the provision of shared surfaces.
- 127 Long straight stretches of road are avoided where possible and gentle curves and other traffic calming measures are utilised in road sections which respond to topography, layout requirements and guidance within DMURS. The Design Manual for Urban Roads and Streets notes that drivers are more likely to maintain lower speeds over shorter distances than over longer ones, and the proposed road layout reflects this.

Figure 2.7 – Road Hierarchy



- 128 The proposed development further develops the permeability and accessibility in the area by providing a highly permeable development with connectivity to the wider area for cyclists and in particular pedestrians. The scheme allows for potential future connections to the south and west.

Figure 2.8 – Connections

129 The development layout design put forward improves the existing roads environs with enhanced pedestrian facilities. The development design ensures pedestrian permeability to the west, north and east while also providing for future pedestrian connectivity to the south.

130 The final development layout incorporates features that benefit vulnerable road users by encouraging low vehicle speeds (such as reduced road corner radii, raised tabled junctions, plantings, etc.), following the principle that roads should serve a community and not dominate it. The provision of good permeability for pedestrians, cyclists & public transport are all key objectives of the proposed site layout.

2.6 Response to Item 5- Built Heritage

131 Item no. 5 of the An Bord Pleanála opinion states:

132

“Further consideration of documents as they relate to the protection of architectural heritage, specifically in relation to the Architectural Heritage Protection - Guidelines for Planning Authorities, issued by the Department of Arts, Heritage and the Gaeltacht.”

133 In response to this item we refer the Board to Chapter 13 of the EIAR submitted with the SHD application, prepared by John Cronin and Associates. Extracts are outlined below:

134 There are a number of listed structures located within nearby properties and these include Belmont House (NIAH 14013039), its entrance gateway (NIAH 14013041), an associated farm building (NIAH ref. 14013035) and Russell’s B & B (NIAH 14013042).

135 The Navan Town Development Plan lists 15 Protected Structures located within the study area and, three examples, Belmont House (PS NT025-177), Belmont House entrance gateway (PS NT025-178) and Russell’s B & B (PS NT025-179), are located in adjacent properties. The proposed development site is not located within an ACA.

136 The subject site encompasses a number of tillage fields surrounding Belmont House, which is outside the boundary of the proposed development area. The house is not listed in the 1824 Pigot’s Directory of Navan¹ and the NIAH dates its construction to c.1825. Lewis (1837) records that it was the residence of J. Goggan in the 1830s and it was described as a ‘neat house, with a garden and pleasure ground attached’ in the Ordnance Survey Field Name Books (1835-6)².

137 The first edition 6-inch OS map of 1841 shows a wooded area between the house and the roadside to the east while a formal garden plot is shown to the west of the house. The map also shows two access lanes to the house which extend from the road to the east along the north and south ends of the wooded area. The location of the west garden is outside the boundary of the proposed development while sections of the vacant woodland area to the east and part of the southern access lane are within the boundary.

138 At the time of the compilation of the *Griffith’s Valuation* in 1854, Belmont House and its garden to the west and roadside area to the east were occupied by Rev. Maurice Nelligan who lived in Navan between 1852-54 and then moved to Dublin where he eventually became the Chaplain of Christ Church³. The Valuation also records that the field to the west of the house were leased by Nicholas Russell while the fields in the southern end of the proposed development site were among the possessions of the Duke of Bedford, a major 19th century landlord within the Navan area, and were being leased by a number of sub-tenants. Belmont was recorded as the residence of Patrick Nicholls in the 1870s⁴ and the 1901 Census lists the occupant as Elizabeth Nicholls. The 1901 Census also records that the house contained 13 occupied rooms and had 14 outbuildings, including a stables and coach house. The detail on the 25-inch OS map of 1900 indicates that all of these outbuildings were located outside the boundary of the proposed development site. The map also shows the location of a lodge building at the gateway along the southern access lane. This area is also outside the boundary of the proposed development and a

¹ <https://www.swilson.info/wp/?p=1149>

² <http://www.navanhistory.ie/inde13.php?page=belmount>

³ <http://www.mageoughchapel.dublin.anglican.org/The%20Story%20of%20the%20Mageough.pdf>

⁴ <https://www.ancestry.ie/boards/thread.aspx?mv=flat&m=232&p=topics.researchresources.land-tax>

modern residence now occupies the former location of the lodge building. The 1911 Census records that the house had come into the ownership of John Spicer III, a local entrepreneur and politician who ran a number of milling operations in Navan town. The house continued to remain in the ownership of the Spicer family for the remainder of the 20th century.

139 The Navan Town Development Plan lists 15 Protected Structures within the study area (500m of the development site) and the majority of these are located within the urban area of Navan town and also include a number of the archaeological monuments located in Athlumney townland to the north which have been discussed in earlier sections of this assessment. There are no protected structures within the site boundary though three examples, Belmont House (Protected Structure Ref. NT025-177), a former entrance gateway (NT025-178) and Russell's B & B (NT025-179), are located in adjoining properties. In addition, the NIAH record a single-storey farmyard complex (NIAH Ref. 14013035) adjacent to the development site. The following section provides a summary of the RPS and NIAH structures within properties located adjacent to the proposed development site along with their published NIAH descriptions. Four structures of architectural heritage interest are located within the immediate environs of the development site.

Table 2.4 – Designated architectural heritage sites within the immediate environs of the development site

Ref.	NIAH Ref.	Protected Structure Ref.	Name	Classification	Distance from proposed development
A	14013039	NT025-177	Belmont House	Country House	35m to south-west (development site largely encloses the grounds of the house)
B	14013041	NT025-178	Former entrance to Belmont House, Dublin Road, Navan	Gates/railings/walls	32m to south-east
C	14013035	N/A	Single-storey farmbuilding, Limekilnhil	Farmyard complex	11m to north-east
D	14013042	NT025-179	Russell's B & B, Dublin Road	House	56m to north-east

140 The most notable of the four structures is Belmont House which is situated within its own tree-lined grounds and is accessed by a long driveway that commences at a formal entrance to the north on the Academy Street; the house is a Protected Structure (NT025-177) and is also included in the NIAH (ref. 14013039). The NIAH describes the building as follows:

“Detached five-bay two-storey house over basement, c.1825. Re-orientated, enlarged and porch added, c.1910. Windows refitted c.1994. Double-pitched and hipped roof, natural slates, decorative clay ridge tiles, nap rendered chimneys. Rendered ruled and lined, limestone string course - east façade. Stone cills, uPVC casement windows - except for some basement sash windows, balustraded porch, bay window - west façade. Standing in its own grounds.”

Figure 2.9 – Front elevation of Belmont House



(Image Source: National Inventory of Architectural Heritage)



Plate 13.1: View from drone looking NE towards Belmont House: the house is bounded close by to the north-west (left of photo) and the north-east by dense tree belts whilst the areas immediately to south-east and south-west consist of open gardens that are bounded by mature hedgerows. The hedge in the foreground forms a boundary to the development site.

141 The house is very well-screened from the development site by mature trees and hedgerows. The remains of second driveway that formerly connected the house to the Dublin Road (R147) (to the south-east) is cut into the hillside, is overgrowth and extends into the development site and then

into a private property on the Dublin Road where the former entrance gates (a protected structure (NT025-178)) survive but act as the entrance to a modern dwelling.

- 142 The gates, walls and railings that make up the former entrance which fronts onto the Dublin Road (R147) are a Protected Structure (NT025-178) and are also listed in the NIAH (ref. 14013041). This entrance is located outside the boundary of the proposed development site and have been described by the NIAH as follows:

“Gateway consisting of ashlar limestone piers, quadrant walls, cast-iron railings and pair of gates, c.1850. Painted ashlar limestone piers.”



Plate 13.2: View of the former southern entrance to Belmont House (on the Dublin Road). This now forms the entrance to a modern private residence; the driveway that led towards Belmont House is no longer in use and extends into the proposed development site.



Plate 13.3: View NW along the curving former southern driveway that led to Belmont House. The majority of this driveway is within the development site

- 143 A house located in a property adjoining the southeast corner of the proposed development site, which is now in use as a B&B, is a Protected Structure (PS NT025-179) and is also listed in the NIAH (ref. 14013042) which describes it as follows:

“Detached three-bay single-storey house, c.1900, with exposed rubble façade and projecting brick porch. Three-bay single-storey extension added c. 1993. Now also in use as guest house. Double-pitched roof, concrete tiles - 1993, brick chimney stacks. Exposed rubble stonework to walls with flush brick dressings to window opes, brick porch. Round-headed door opening, T & G door, eight by two pane sash windows. Single leaf wrought-iron gate to site.”



Plate 13.4: View of Russells B&B, a protected structure, located roadside on the Dublin Road and to the south-east of the development site.



Plate 13.4: Aerial view (from south-west) of the farmyard complex located to the north-west of Belmont House; the single-storey structure recorded by the NIAH is heavily-overgrown and it is not a protected structure. The hay barn is a modern addition and devoid of architectural heritage interest.

- 144 To the north-west of Belmont House is a farmyard complex that is recorded by the NIAH (ref. 14013035) but which is not a protected structure. The farmyard complex borders the proposed development site and consists of a steel-frame barn and a single-storey farm building; the NIAH describes the single-storey building as follows:

“Detached four-bay L-plan single-storey farm building, c.1825, set in walled cobbled yard. Double-pitched and hipped roof, corrugated iron. Uncoursed rubble walls - whitewashed. T & G deal double doors, brick dressings, narrow vent loops. Cobbled paving to yard. Rubble stone wall to north-east of yard with brick-dressed openings.”

2.6.1 Potential Impacts of the Proposed Development

2.6.1.1 Architectural Heritage

- 145 There are no designated or undesignated architectural heritage buildings located within the proposed development site while there are a number of examples located in adjoining private properties. No access to these neighbouring properties will occur during the construction phase and there are, therefore, no predicted impacts during this phase.
- 146 Belmont House is a protected structure (Reg. No NT025-177) that sits within a land parcel that is largely surrounded by the proposed development scheme. The majority of the proposed development will be accommodated on farmland rather than former parkland or woodland associated with the house; the only area of former parkland proposed for development are lands that flank the western side of Academy Street. The house is situated on elevated ground that is screened by generous gardens and mature tree belts. The landscape and visual assessment undertaken for this development appraisal confirms that Belmont House will contain only a partial and / or oblique view of the proposed development and the woodland located around Belmont House will remain as a visual feature and a backdrop to views from the house. The principal approach to the house is from Academy Street and the entrance there will not be impacted by the development (a second entrance to the estate located on the Dublin Road survives and is a protected structure but the connecting driveway is abandoned, overgrown and is now in multiple ownerships). The only alteration to the setting of the protected structure is that a proposed access road for the development will cut across an abandoned driveway that formerly connected Belmont House to the Dublin Road to the south-east; this intervention will involve localised ground-reduction and removal of a number of trees and this represents change to a now-redundant historic landscape element resulting in discreet and localised change to historic

landscape character of the environs of Belmont House but no loss to the visual amenity and setting of the protected structure. Overall the impact on the setting of the house and the former demesne is considered to be *negligible*.

147 The impact on the other buildings or features of architectural heritage within the environs of the development is also considered to be *negligible*. Protected structures such as Russell's B & B and the former entrance gates at Dublin Road along with the NIAH-recorded farm complex to the north-west of Belmont House will be unaffected by the development works.

148 The operational phase of the proposed development will result in *negligible* impacts on the settings of the Belmont House (PS NT025-177), the former Belmont House entrance gateway (Protected Structure Reg. NT025-178), Russell's B & B (PS NT025-179)) and the single-storey farm building within the Belmont House property which is listed in the NIAH (ref. 14013035).

Table 2.5 – Summary of predicted impacts on cultural heritage assets within study area and mitigation measures

Asset Designation	Description	Value	Magnitude of Impact	Construction Phase: Duration, Type, Quality & Significance of Impacts (if any)	Operational Phase: Duration, Type, Quality & Significance of Impacts (if any)	Mitigation Measures	Monitoring of mitigation
RPS NT025-177 NIAH 14013039	Belmont House and curtilage	Medium	Negligible	None	None	None required	None required
RPS NT025-178 NIAH 14013041	Belmont House gateway	Medium	Negligible	None	None	None required	None required
NIAH 14013035	Farm complex	Low	Negligible	None	None	None required	None required
RPS NT025-179 NIAH 14013042	Russell's B&B, Dublin Road	Medium	Negligible	None	None	None required	None required

2.7 Response to Item 6 – Archaeology

149 Item no. 6 of the An Bord Pleanála opinion states:

“Further consideration of the documents as they relate to the protection of archaeology.”

150 In response to this item we refer the Board to the Cultural Heritage Chapter of the EIAR and also to the Archaeological Impact Assessment, both prepared by John Cronin and Associates. The following is a summary.

151 The reports present the results of a combined program of geophysical survey and archaeological test trenching undertaken within an area of tillage farmland in Limekilnhill townland on the southern outskirts of Navan town, Co. Meath. There are no recorded SMR/RMPs sites within the landholding or within 260m of its boundary. The geophysical survey and test trench investigations were carried out as part of a pre-development assessment of a proposed strategic housing development within the subject lands.

152 The geophysical survey of the proposed development area was undertaken by J.M. Leigh Surveys Ltd (Licence 18R0084). In summary, the survey revealed the sub-surface remains of two sub-rectilinear enclosures within the tillage fields and these were located c.50m apart. Both enclosures appear to contain internal features and potential external annex features were also identified. Various other external linear trends within the environs of the enclosures were interpreted as possible remains of associated field systems.

153 The archaeological test trench investigations were carried out under an excavation licence (18E0499) issued by the National Monuments Service (NMS). A licence for the use of a metal-detector (18R0171) was also obtained in order to assist in artefact retrieval. The aim of this preliminary phase of test trenching was to undertake limited investigations of the enclosing elements of the two enclosures, and their associated potential annex features, as well as examining the various external linear trends.

154 The program of test trenching demonstrated that the soil profiles within the tillage fields have been extensively impacted by ploughing activity down to the surface of the underlying natural subsoil. This activity has created a mixed layer of disturbed subsoil at the base of the plough zone and the potential that this layer may seal underlying archaeological deposits within areas of the site was noted. The test excavations successfully identified the buried remains of the disturbed, ephemeral upper surfaces of both enclosure ditches as well as traces of two conjoined, sub-circular annexes to the south of the northern enclosure. The surface expression of many of the ditch fills were not clearly defined perhaps due to a combination of plough disturbance, recut activity and the presence of re-deposited subsoil originating from levelled enclosing earthen banks. While a number of linear cut features were noted within the site, including a number to the north of the southern enclosure, no clear pattern was evident within the plough damaged subsoil and the potential exists that some examples may originate from later agricultural activity. Given the amount of plough disturbance it is probable that open areas of excavation would be required to establish the full extent of the remains of any external field systems in the vicinity of the enclosures. A small number of possible archaeological features, including pits and/or postholes, were noted within the fields and the possibility that these were associated with external industrial/structural features was noted.

155 In correspondence issued in June 2019 by the Development Applications Unit (DAU) to An Bord Pleanála, in relation to Strategic Housing Development (SHD) consultation for the project (ABP Ref. ABP-304494-19), the Department stated that it had examined the Archaeological Testing Report (Excavation Licence No. 18E0499, September 2018). The Department noted the identification of at least two enclosures and associated features of archaeological interest within the footprint of the development site but that the submitted reporting had not offered any conclusions/recommendations with regard to proposed mitigation of the impacts from the development. The Department recommended that an Archaeological Impact Assessment be submitted with the planning application. The DAU stated that the Impact Assessment should include clear descriptions of the impacts and likely impacts on the archaeological sites and material that has been identified within the proposed development site. Furthermore the Department recommended that the Archaeological Impact Assessment should include a description of the proposed archaeological mitigation measures that will be carried out.

156 A proposed layout of the housing development was made available in September 2019 and this final report was compiled based on this layout. The results of the geophysical survey and targeted

test trenching investigations have also been incorporated into the Archaeological and Cultural Heritage Chapter of the EIAR that has been prepared for the proposed development.

157 The following mitigation measures are proposed:

“The geophysical survey and test trenching investigations undertaken as part of this assessment have identified two archaeological enclosures, with associated external features, within the proposed development site. It is proposed these enclosures will be preserved in record by a full systematic archaeological excavation under licence from the National Monuments Service. The extent, phasing and methodology of these excavations, and subsequent post-excavation specialist analyses, will be agreed in advance with the National Monuments Service and will be clearly detailed in a method statement submitted as part of the licence application process. A programme of licensed archaeological monitoring will be undertaken within all other areas of the proposed development site during the construction phase. In the event that any archaeological sites or features are uncovered, ground works will halt in that area, the sites/features will be cordoned off and recorded and the NMS will be consulted to determine appropriate mitigation measures.

There a number of obligatory processes to be undertaken as part of archaeological licence applications for excavation projects and these will allow for monitoring of the successful implementation of the archaeological mitigation measures. All archaeological excavations will be carried out under licence issued by the National Monuments Service following the approval of a submitted detailed method statement outlining all proposed archaeological strategies. A preliminary report presenting a summary of results will be compiled and submitted to the National Monuments Service and National Museum of Ireland within one month of the completion of the excavations. This will include details on all proposed specialist post-excavation analyses. A final detailed report, which will include the results of specialist post-excavation analyses, will be submitted within twelve months of the completion of excavations.”

Proposed schedule of archaeological mitigation works

In summary, the proposed archaeological mitigation works will comprise the following:
(A) *Archaeological test trenching within an area in the east end of the site [Area H] which was inaccessible during the pre-development phase,*
(B) *Preservation by record through the archaeological excavation of two previously unrecorded enclosures and associated features identified during archaeological test investigations undertaken as part of the pre-development impact assessment, and*
(C) *archaeological monitoring of ground works during the construction phase in remaining areas of the PDS.*

158 We refer the Board to the enclosed correspondence dated 22nd of November 2019 from the Department of Culture, Heritage and Gaeltacht which confirms that the mitigation measures in the EIAR and the Outline Archaeological Method Statement are appropriate which states:

“The National Monuments Service (NMS) of the Department has received the Outline Archaeological Method Statement (John Cronin & Associates) forwarded on 21 November 2019. We appreciate your prompt response to the recommendations in our letter of 18 November 2019. The NMS has examined the outline method statement relating to preservation by record of known archaeological remains, further archaeological test excavations of previously untested areas and archaeological monitoring of ground disturbance works. The NMS concurs with the proposed methodologies relating to the proposed archaeological mitigation measures. Furthermore, the NMS welcomes the intention to incorporate the updated information into the archaeological component of the Environmental Impact Assessment Report that is to be submitted with the planning application to An Bord Pleanála.

The updated archaeological impact assessment will allow for an informed planning decision to be taken with regard to the impacts or likely impacts of the proposed development on any archaeological remains that may survive at the site.”

2.8 Response to Item 7 – Traffic and Transportation

159 Item no. 7 of the An Bord Pleanála opinion states:

“Further consideration of documents as they relate to Traffic, specifically in relation to trip generation, impact on junctions, internal street layout and gradient, car parking and street hierarchy. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”

160 In response to this item we refer the Board to the Traffic and Transport Assessment prepared by Pinnacle Consulting Engineers (trip generation, impact on junctions and car parking), drawings prepared by CS Consulting (in relation to internal street layout and gradient), and hierarchy (by CS Consulting).

161 Included within the overall development is an upgrade of the existing Old Dublin Road / Academy St priority junction to a signalised junction thereby improving pedestrian permeability and traffic safety at this junction.

2.8.1 Trip Generation and Impact on Junctions

162 The following is an extract from the Traffic Impact Assessment Report prepared by Pinnacle Consulting Engineers. The scope of the TIA was agreed with the Roads and Traffic Department of Meath County Council.

2.8.1.1 Trip generation

163 The proposed development will generate a number of trips by various modes of travel including vehicular, pedestrian, cycle and public transport. These trips may have an impact on the surrounding road network. Specific impacts are identified below.

2.8.1.2 Traffic impact

164 The traffic impact of the development is dependent upon the background traffic on the local road network, the capacity of the existing road network, and the amount of additional traffic generated as a result of the proposed development.

2.8.1.3 Traffic Generation - Including Cumulative Assessment

165 The trip rates outlined above in conjunction with the proposed schedule of accommodation to determine the resultant total trips generated by the proposed development.

166 For the proposed development, these figures can be seen below.

Table 2.6 – Peak Hour Trips

Peak Hour Trips					
Trip Generation from TRICS	Units	Weekday AM 08:00-09:00		Weekday PM 17:00-18:00	
		Arrivals	Departures	Arrivals	Departures
Houses – Privately Owned	260	16	50	57	28

Peak Hour Trips					
Apartments/Duplex– Privately Owned	284	53	165	99	53
School	234	100	54	13	11
Creche*	-	-	-	-	-
Peak Total		168	269	169	92
Two Way Total		437		261	

167 It can be seen from the above that the total vehicle movements generated by the proposed development will be 168 arrivals and 269 departures in the AM peak (two-way total of 437). The total number of vehicle movements in the PM peak hour will be 169 arrivals and 92 departures (two-way total of 261).

2.8.1.4 Traffic distribution

168 It is expected that the origins and destinations of traffic to/from the proposed development will be similar to the distribution of the current traffic patterns on the local roads.

2.8.1.5 Junction Capacity Analyses

169 Junction capacity analyses have been undertaken at the site access junction and at the key junctions at which existing flow data had been obtained. These tests have been carried out using industry standard and approved software for the existing junctions with no development and the assumed year of opening of the development, namely 2022, and for a 5-year design horizon, namely 2027 and for a 15-year design horizon, namely 2037 with development flows added.

170 LinSig and OSCADY results are expressed in terms of queues generated and the 'Degree of Saturation' (DoS). A DoS value of 85% or below indicates that the junction is operating within capacity. A DoS value of between 85% and 100% indicates that the junction remains within capacity but is beginning to show signs of queuing and delay. A DoS value of less than 100% is desirable in urban areas during peak period traffic. However, values of greater than 100% are typical at many junctions. For the purpose of these calculations the results are reported in terms of maximising the capacity of the junction analysed.

171 The results of the various capacity assessments are summarised in a series of tables. For each flow condition and for each junction the PICADY or ARCADY output has been assessed and the maximum Ratio of flow to Capacity [RFC] tabulated together with the maximum (end) queue value for the relevant time segment. For signalised junctions the OSCADY/ LinSig output will be in terms of maximum (end) queue value and DoS.

172 For the corresponding flow diagrams refer to Appendix B of the EIAR (Volume 3).

173 For the detailed junction analysis refer to Appendix B of the EIAR (Volume 3).

2.8.1.6 Trip Distribution

174 The trips generated by the proposed development have been distributed on the surrounding road network using the directional flows on the surrounding road network. The proposed movements created by the development in the AM and PM peak hour are shown in Appendix B of the EIAR.

2.8.1.7 Junction Capacity Analysis

175 For the full junction capacity analysis refer to the submitted Traffic and Transport Assessment. A summary of the analysis is provided below.

Circular Road/Kells Road

176 The base model has been created using the data provided by Pinnacle Consulting Engineers. This model was then used to model the future year scenarios. All traffic signal timings have been optimised for the future year scenarios and existing base data.

177 The results show that the junction is currently running within capacity. When running a 60 second cycle time the AM peak has a PRC of 16.3% and the PM peak has a PRC of 0.4% with Arm 1 - Circular Road being 89.7% saturated.

R161 Circular Road/R896 Bridge Street/Academy Street crossroads

178 The operation of the crossroads was modelled using Junctions 8 PICADY software, and tested with the 2017 base year, 2022 Opening year, 2027 Opening year +5 years and 2037 opening year.

179 In the 2037 opening year +15 years without development, all the roads operate within the 85% design threshold ratio of flow capacity (RFC) in both the morning and evening peak hours. The maximum RFC recorded was 0.73 with a corresponding queue of 2.55.

180 The additional of the development traffic has a minimal impact on the operation of the junction which continues to operate within capacity in both the peak hours. The junction delay in the evening peak is forecast to increase by 7.13 seconds from 13.1 seconds in 2017 base year to 20.23 seconds in 2037 opening year +15 years (with development). Therefore, the additional of the development traffic has a minimal impact on the operation of the junction, hence this is not a severe impact and no mitigation measures are required.

Academy Street/Site Access

181 The operation of the crossroads was modelled using Junctions 8 PICADY software, and tested with the 2017 base year, 2022 Opening year, 2027 Opening year +5 years and 2037 opening year.

182 In the 2037 opening year +15 years without development, all the roads operate within the 85% design threshold ratio of flow capacity (RFC) in both the morning and evening peak hours. The maximum RFC recorded was 0.57 with a corresponding queue of 1.28 in the 2037 AM Peak. The new junction operates with a max delay of 13.65s.

Dublin Road / Academy Street Priority Controlled Junction

183 The operation of the crossroads was modelled using Junctions 8 PICADY software, and tested with the 2017 base year, 2022 Opening year, 2027 Opening year +5 years and 2037 opening year.

184 In the 2037 opening year +15 years without development, all the roads operate within the 85% design threshold ratio of flow capacity (RFC) in both the morning and evening peak hours. The maximum RFC recorded was 0.62 with a corresponding queue of 0.65 in the AM Peak.

185 The additional of the development traffic has a minimal impact on the operation of the junction which continues to operate within capacity in both the peak hours. The junction delay in the evening peak is forecast to increase by 9.31 seconds from 27.34 seconds in 2017 base year to

18.03 seconds in 2037 opening year +15 years (with development). While delay at the junction has increased it is within acceptable norms based on an RFC of less than 0.85.

Dublin Road/Bothar Sion/Springfield Glen & Dublin Road/Academy Street

186 The Navan 2030 plan considers two key elements that would support and promote sustainable development in Navan Town through:

- Enhancing the physical attractiveness of the town; and,
- Improving movement and access in and out of the town centre.

187 In addition, the following junctions were assessed as part of a signalised network to determine the future potential to accommodate bus priority along Academy Street through the provision of linked signal junctions:

- Academy Street/Site Access T-junction/R147 Dublin Road/Academy Street Signalised Junction;
- Unnamed Junction;
- Dublin Road/Bothar Sion/Springfield Glen;

188 The Dublin Road/Bothar Sion/Springfield Glen 4 arm junction, the Academy Street/R147 3 arm junction, and the Site Access/Academy Street junction have all been modelled as a signalised network. Due to the short distance between the sites the Academy Street/R147 and the Academy Street/Site Access junction they have been modelled as one traffic signal-controlled junction incorporating one stage stream to ensure rigid linking between the sites.

189 It is noted that these works aren't necessary for the proposed development as outlined modelling of isolated junctions and are included for information purposes only.

190 The base model has been created using the data formulated by Pinnacle Consulting Engineers. This model was then used to model the future year scenarios. All traffic signal timings have been optimised for the future year scenarios and existing base data.

191 The Academy Street/Site Access T-junction/R147 Dublin Road/Academy Street Signalised Junction currently works with capacity running a 82 second cycle time. All scenarios operate within capacity by running the current cycle time and reoptimizing the green splits such that they complement the junction 'Y' values. The worst-case scenario is AM 2037 with development traffic which operates at a PRC of 9.8% and a DOS of 82.0s%.

192 The Unnamed junction (residential access) operates within capacity for all scenarios. The worst-case scenario is AM 2037 with development traffic which operates with a DOS of 59.3%.

193 The Dublin Road/Bothar Sion/Springfield Glen currently works with capacity running a 164 second cycle time. All scenarios operate within capacity by running the current cycle time and reoptimizing the green splits such that they complement the junction 'Y' values. The worst-case scenario is AM 2037 with development traffic which operates at a PRC of 10.1% and a DOS of 77.2%.

2.8.1.8 Conclusions

194 The conclusions of the Pinnacle Traffic and Transportation Report confirms that:

- *The results of the junction analysis undertaken demonstrates that traffic from the proposed development can be accommodated on the surrounding road network and is within reasonable limits having regard to the prevailing road conditions and development location.*

- *The traffic assessment has confirmed that the proposed access arrangements would adequately accommodate anticipated levels of traffic visitation and that as such the traffic generated by the development would have no material adverse impact on the operation of all junctions modelled.*
- *It has been shown by the application of recognised assessment techniques that there is a slight increase in traffic levels arising from the development and the distribution of resultant flows around the adjacent road.*
- *The results in terms of flows and movements can be accommodated by the neighbouring junctions with an anticipated slight uplift in congestion and delays at these locations.*
- *This assessment has also considered the transportation aspects of the internal arrangements of the development and has concluded that the proposals would provide enhanced facilities and improved accessibility for all users of the site.*
- *Where applicable, the proposed development is also fully compliant with DMURS.*
- *Accordingly, there are no reasons in relation to traffic and transportation aspects why this scheme should not be granted planning permission.*

2.8.2 Internal street layout and gradient

195 We refer the Board to Section 6 of the Engineering Services Report and the DMURS Statement prepared by CS Consulting Engineers.

2.8.2.1 Access 1

196 The main entrance to the proposed development is located to the northern boundary of the overall site, outside the preserved Belmont House curtilage. The road 1 alignment is adjoining the proposed school site to the north and has been designed to accommodate future access to the school site in addition as the main access road to the residential scheme.

197 This service road shall consist of the following road cross-section:

- *6m wide carriageway*
- *2m wide off-road cycle track on both sides*
- *2m wide footpath on both sides*

198 The road geometry does not exceed 5% in gradient and the footpath and cycle track alignment follows alongside the carriageway roadside kerbed edge.

2.8.2.2 Access 2

199 The apartment development will be accessed separately from the housing scheme via a proposed priority junction to/from Academy St. The junction with Academy Street has been designed to meet visibility splays and gradients as required for a priority junction in accordance with the Design Manual for Urban Roads and Streets.

2.8.2.3 Access 3

200 A secondary access to the site has been provided known as access (No. 3) Following discussions with Meath County Council and in conjunction with the design team Arborists the location of this entrance is at the southern end of the site boundary with Academy Street.

201 The road has been designed to meet the existing ground level as it reaches the residential development within the site. Refer to Drawing D061-029 Road Layout for details which shows the proposed road in the overall site context.

202 This design incorporates specialist advice on tree preservation. It uses a 5.5 metre width carriageway. The 2.0-metre-wide footpath is not “tied” to the carriageway but follows a more natural route through the trees.

203 This does have an impact on achievable gradients. The road through the trees reaches a maximum 8% gradient. The derived road alignment results in the following proactive design thereby minimising the impact on existing trees:

- It minimises the distance that the road would impact on the stand of trees thereby reducing the number of trees affected.
- It minimises the impact of cut required to achieve lower road gradients on the southern boundary to the trees in front of the proposed houses within the development site.
- It also minimises impact on the ridge of the site between Belmont House and these houses maintaining the existing ground level of 44.5m at the end of the right of way at Belmont and the residential T-junction between houses 238 and 269 / 273 also at 44.5 (see DRG D061-029).
- The junction with Academy Street has been designed to meet visibility splays and gradients as required for a priority junction in accordance with the Design Manual for Urban Roads and Streets.

2.8.3 Internal Road Layout

204 The internal road layout of the proposed development is designed in accordance with the guidance provided in the Design Manual for Urban Roads and Streets (DMURS) as set out above in section 2.5.

2.8.4 Parking

205 It is proposed to provide 502 no. car parking spaces for the houses along with 218 no. car parking spaces for the apartments (including the creche in Block C). In addition, it proposed to provide 140 no. car parking spaces for the duplex apartments. The overall number of car parking spaces is 875. It is also proposed to provide 417 no. cycle spaces for the apartments (including creche in Block C), 46 no spaces are provided for the duplex units, along with 14 no. cycle spaces for the creche (2 storey). The parking layout includes for 4 no. ‘car sharing’ spaces.

Table 2.7 – Car and Cycle Parking

	Car Parking	Cycle Parking
Houses	502	-
Apartments (including creche in Block C)	218	417
Corner Blocks		104
Creche (Access Road 1)	15	14
Duplex	140	46
Overall	875	581

Source: CCK Architects Schedule of Areas

206 The rationale for the car parking provision is set out in the Pinnacle Consulting Engineers Traffic and Transportation Assessment.

207 The ‘Sustainable Urban Housing – Design Standards for New Apartments’ published by the Department of Housing, Planning and Local Government (2018) determines the car parking

requirements ‘having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria’ based on the following designations:

- Central and/or Accessible Urban Locations;
- Intermediate Urban Locations; and
- Peripheral and/or Less Accessible Urban Locations.

208 Central and/or Accessible Urban Locations are defined by larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport where the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.

209 Intermediate Urban Locations are defined as suburban/urban locations that are served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre). In such instances planning authorities are encouraged to consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.

210 Based on the location of the subject site, it is considered that northern and eastern portions of the subject lands are located in an intermediate location as being c. 800m-1000m to the south of Navan town centre.

211 As a result, the proposed development allows for a reduced car parking standard for the apartments in accordance with the Design Standards for Apartments 2018.

212 The parking provision is as follows:

213 A total of 875 parking spaces will be provided for the development. Parking will be provided within the curtilage of each house. On street surface car parking will be provided for the apartments, duplexes, creches and visitor car parking spaces.

214 The development plan standard suggests a total of 297 spaces for the Apartment Block A-E. This is based on a mix of 1 and 2 apartments and a creche.

215 Without car parking dominating the proposal and taking into account the guidance set out in publications like DMURS and ‘Sustainable Urban Housing – Design Standards for New Apartments’ it was proposed to provide 170 spaces including 4 car club spaces for Apartment Block A-C and 48spaces for Apartment Block D & E.

216 The proposed level of car parking spaces for the apartments and duplexes is approximately 89% of the level of car parking spaces required under the Development Plan standard. Restricting car parking provision is a recognised method of reducing car dependence of a development.

217 This level of parking will both meet the demand for spaces but will also act as demand management tool for trips to/from the proposed development.

218 The car parking strategy is to provide an equivalent rate of 204 spaces for Apartment Block A,B & C which is 96% of the requirement of Meath County Council and is in line with Section 4.20 the ‘Design Standards for New Apartments For Planning Authorities’ for Apartment Block A, B & C. For Apartment Block D & E, there are 48 no. spaces available. This results in a ratio of 1 space per apartment.

219 Therefore, a balance has been struck for the car parking provision taking into account the Development Plan standard and the anticipated demand.

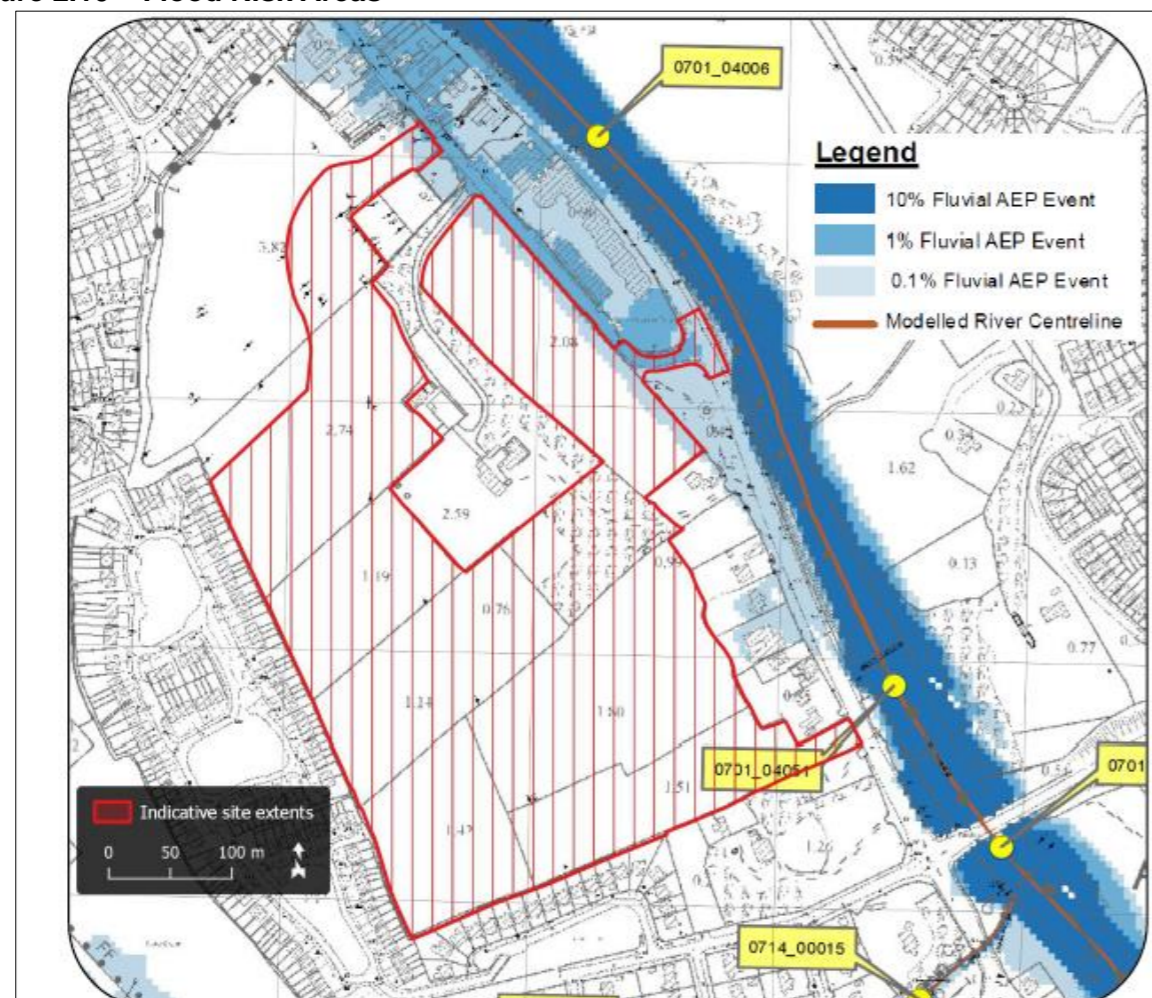
2.9 Response to Item 8 – Flood Risk

220 Item no. 8 of the An Bord Pleanála opinion states:

“Further consideration of the documents as they relate to Flooding, specifically in relation to the Planning System and Flood Risk Management Guidelines for Planning Authorities, issued by the Department of the Environment, Heritage and Local Government and the OPW.”

221 In response to the above we refer the Board to the Site Specific Flood Risk Assessment prepared by CS Consulting Engineers in accordance with *“The Planning System and Flood Risk Management Guidelines for Planning Authorities”* (2009).

Figure 2.10 – Flood Risk Areas



222 The majority of the subject site is located in Flood Zone C with a small portion located in Flood Zone B (along Academy Street).

223 A small proportion of the subject site is located within the zone at highly vulnerable development, as designated in Table 3 above. The risk of fluvial flooding in this zone is modelled as 0.1% annually: this corresponds to a flooding event on average every 1000 years that would cover the small portion at the east of the site (i.e. a 1-in-1000-year event).

224 In relation to the proposed road accesses on Academy Street, based on the Navan Fluvial Flood Extents Map (November 2017), part of the Eastern CFRAM Study, there is a flood risk of the 1%

AEP event (i.e. a 1-in-100-year event) at the entrances of the proposed development. This 1% Fluvial AEP Flood Depth is between 0.25m and 0.5m. The existing level on Academy Street at Access 3 will be raised 250mm to allow a fire tender vehicle to access the proposed development in case of an emergency.

225 As a residential use, the subject site is classified by the Flood Risk Guidelines as ‘highly vulnerable. Due to a small portion of the proposed development (relating to the site access) being located in the predicted 1-in-1000 year flood zone, Flood Zone ‘B’ a Justification Test for Development Management for the site has been carried for the proposed development, CS Consulting Engineers, and is included in the SHD application.

2.10 Response to Item 9 – Storm Water Management (SuDS)

226 Item no. 9 of the An Bord Pleanála opinion states:

“Further consideration of the documents as they relate to storm water management, specifically the capacity of the stormwater network to cater for the development and the provision of additional SuDS measures on the site.”

227 In response to this item we refer the Board to the Engineering Services Report (ESR) prepared by CSC Consulting Engineers and associated drawings.

2.10.1 Capacity of Stormwater Network

228 The CSC Consulting ESR sets out that storm water is to be managed in two phases. The first is to restrict storm water runoff from the proposed development to greenfield runoff rates.

229 The green field runoff rate was established by reviewing:

- i) Soil Type (From Flood Studies Report) - Soil type 2,
- ii) Standard Annual Average Rainfall (From Met Eireann) - 908mm/yr.
- iii) Climate Change factor - 10% Increase.

230 According to the CSC ESR, the hardstanding area of the proposed developed was established and a storm water network was designed in accordance with Meath County Council requirements. The stormwater network was modelled using the micro drainage ‘WinDes’ software and a simulation carried out to ensure no-onsite flooding would be experienced during a 1-in-100year storm event, increased by 10% for the predicated effects of climate change.

231 To retain the attenuation required for the proposed development a number of underground storage tanks are proposed. These tanks will allow storm water not retained in sustainable urban drainage features to be withheld on site and released at a controlled rate. By restricting the discharge rate to the greenfield runoff rate for all storm water events the required attenuation volume to be retained is 4,605m³. This volume is to be provide in a 6 No. of underground tanks.

232 CS Consulting’s drawing D061-012, D061-013, D061-014 and D061-015 for details of the proposed drainage system.

2.10.2 SuDs Measures

233 The overall SuDs strategy measures are outlined in drawing no. D061-070 prepared by CSC Consulting Engineers.

234 As set out in the CSC Consulting Engineering Services Report, the following SuDs measures are proposed:

- i) To include low water usage sanitary appliances,*
- ii) To provide for 'water butts' to retain rain water on site for local reuse, for landscaping and maintenance purposes,*
- iii) Permeable paving for car parking bays,*
- iv) To install local infiltration drains to the rear of the housing units to allow for initial storage of rainwater,*
- v) Ultimately storm water storage is required for the extreme storm events. This will be provided by an on-site attenuation tank designed for 100-year event plus 10% climate change, as noted above.*

3.0 STATEMENT OF RESPONSE TO SPECIFIC INFORMATION REQUIRED

1 The following sets out how the applicant has addressed the Board's request for additional information in respect of the proposed development.

3.1 Item no. 1 – Details of Levels

2 Item no. 1 seeks:

3

“Details of proposed earthworks to address level differences on site, including detail of proposed cut and fill works and resultant gradient / retaining features.”

3.1.1 Details of Earthworks

4 In Chapter 5 (Land and Soils) of the EAIR, CS Consulting have outlined the following:

5

- Approximately 39,000m³ (approximately 0.3m depth of topsoil across the site) of topsoil shall be excavated from the existing ground level in order to form a building platform for the new houses and associated roads infrastructure. This will result in the exposure of the subsoil to various elements including weather and construction traffic. Therefore, the impact may be characterised as a likely, short term, slight, adverse impact on the natural strength of the subsoil and subsequently resulting in deeper foundations being required.
- Rutting and deterioration of the topsoil layer and any exposed subsoil layers or bedrock by earthworks plant and construction traffic. As such, the impact may be characterised as likely, short term, moderate, adverse impact on subsoil, the consequence of which will be erosion and generation of sediment laden runoff.
- Earthworks are required in the open space areas to accommodate underground and overground surface water storage systems and detention basins and other SuDS features. This landscaping activity will likely have a moderate, positive, permanent, impact on the soil and ground profile. Earthworks to road infrastructure is also required due to the existing steep topography of the site for access.
- During the construction period, large machinery and associated fuel and fuel storage will be present on site. As a result, accidental spills and leaks (e.g. storage of oils and fuels on site), use of cement and concrete during construction works are inevitable during the construction phase. Therefore, the unlikely impact may be characterised as a likely, short term, moderate, slight impact on subsoil and ground water.
- Approximately 20,000m³ of fill (generally comprising normal stone used in the construction of roads, footpaths and buildings) will be required across the development, with some of this material originating from cut material on site. Therefore, the likely impact may be characterised as, permanent, slight impact on subsoil and ground water.

3.1.1.1 Stripping of Topsoil

6 Removal of the existing topsoil layer will be required across the site. Stripping of topsoil will result in exposure of the underlying subsoil layers to the effects of weather and construction traffic and may result in subsoil erosion and generation of sediment laden runoff.

Table 3.1 – Preliminary Estimated Topsoil Volumes (Approximate)

	Volume (m ³)
Topsoil Strip (300mm thick layer)	39,000
Topsoil Reuse (landscaping of open spaces etc.)	23,000

3.1.1.2 Excavation of Subsoil Layers

7 Excavation of existing subsoil layers will be required in order to allow road construction, foundation excavation, drainage and utility installation and provision of surface water attenuation facilities.

8 Where feasible, excavated material will be reused as part of the site development works (e.g. use as fill material beneath roads) however, unsuitable excavated subsoil is expected and will have to be removed to an approved landfill.

Table 3.2 – Estimated Cut/Fill Volumes (Approximate)

	Volume (m ³)
Cut	42,000
Fill	20,000
Removal of Unsuitable Material	22,000

9 The number of construction related heavy goods vehicle movements to and from the application site will be approximately 15 arrivals and departures during the first 2-3 months of works and decreasing to 3 to 5 thereafter.

3.1.2 Gradient and Retaining Features

10 The gradient features are shown on CSC Consulting Engineers Drawings:

- D061-032 Proposed Road Profiles 1 of 4
- D061-033 Proposed Road Profiles 2 of 4
- D061-034 Proposed Road Profiles 3 of 4
- D061-035 Proposed Road Profiles 4 of 4

11 Sections of the road layout are shown on CSC Consulting Engineers Drawings:

- D061-041 Proposed Road Details 2 of 3
- D061-042 Proposed Road Details 3 of 3

12 Further section detail of the road layout is provided on CSR Landscape Drawing (18221-2-201) as follows.

Figure 3.1 – Landscape Section through Northern Access (and schools site access) Road

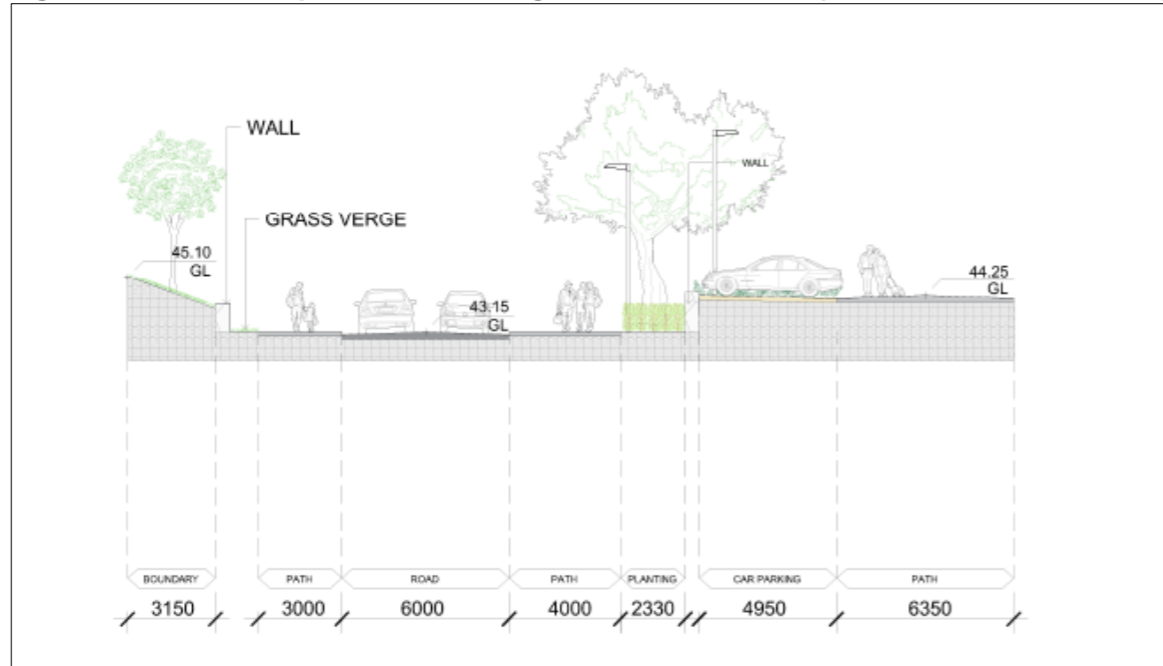


Figure 3.2 – Landscape Section through Southern Access Road

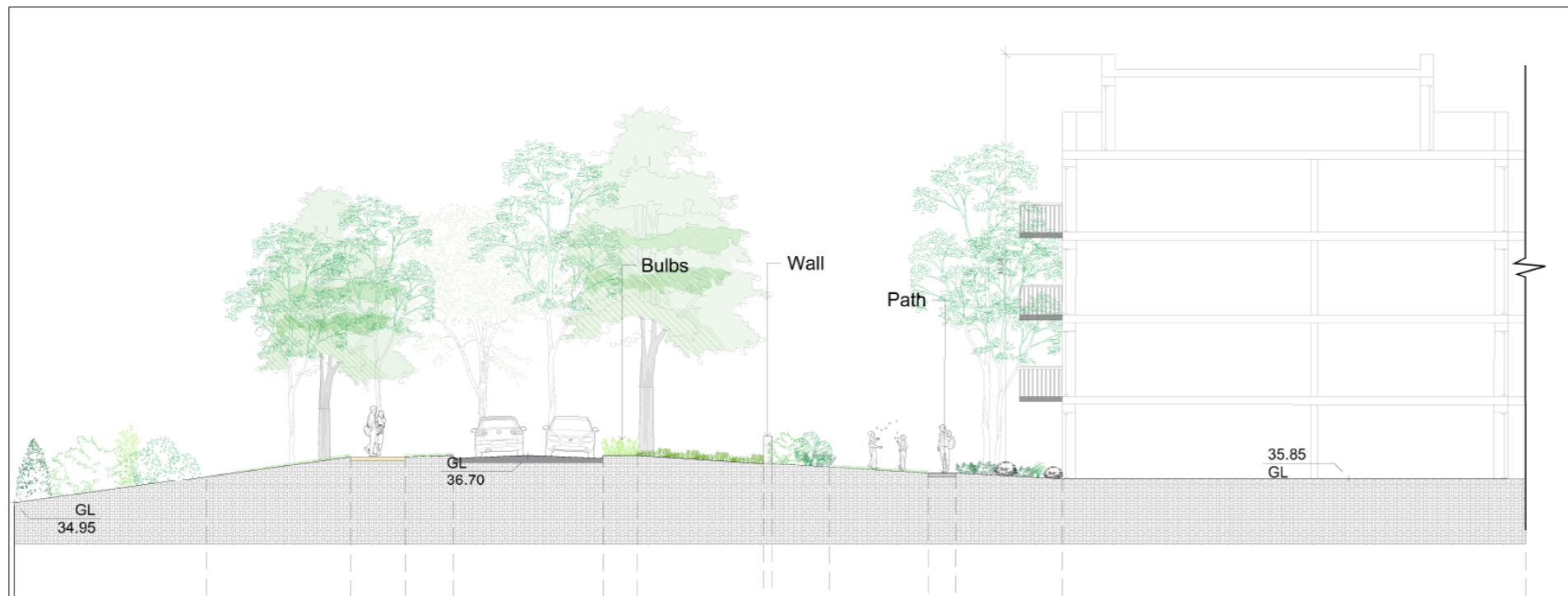


Figure 3.3 – Site Sections (CCK Architects)

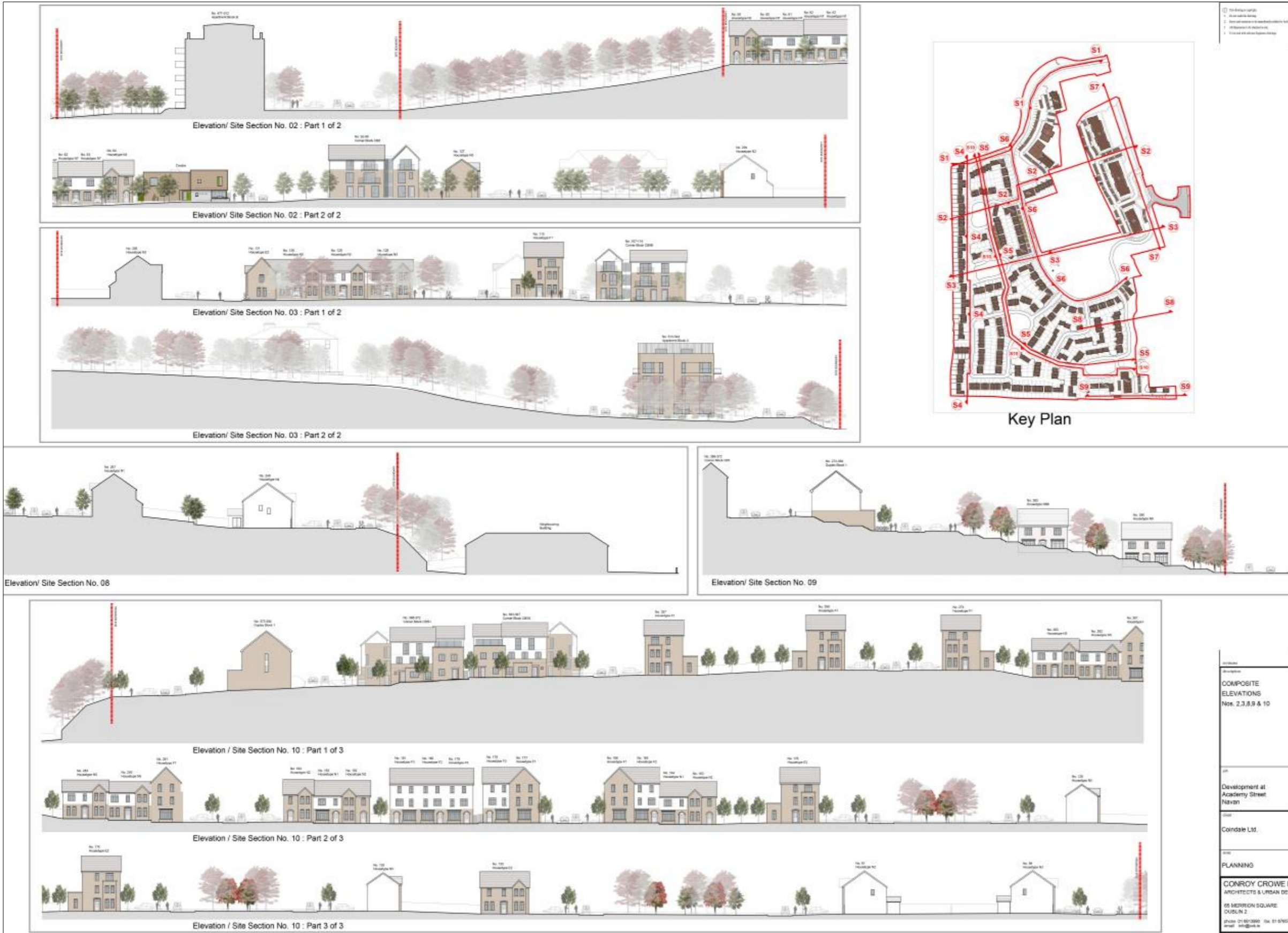


Figure 3.4 – Site Sections (CCK Architects)



3.2 Item no. 2 – Surface Water Management

13 Item no. 2 seeks:

“Design of the proposed surface water management system including attenuation features and cross sections of all SuDS features proposed on site in the context of surface water management on the site.”

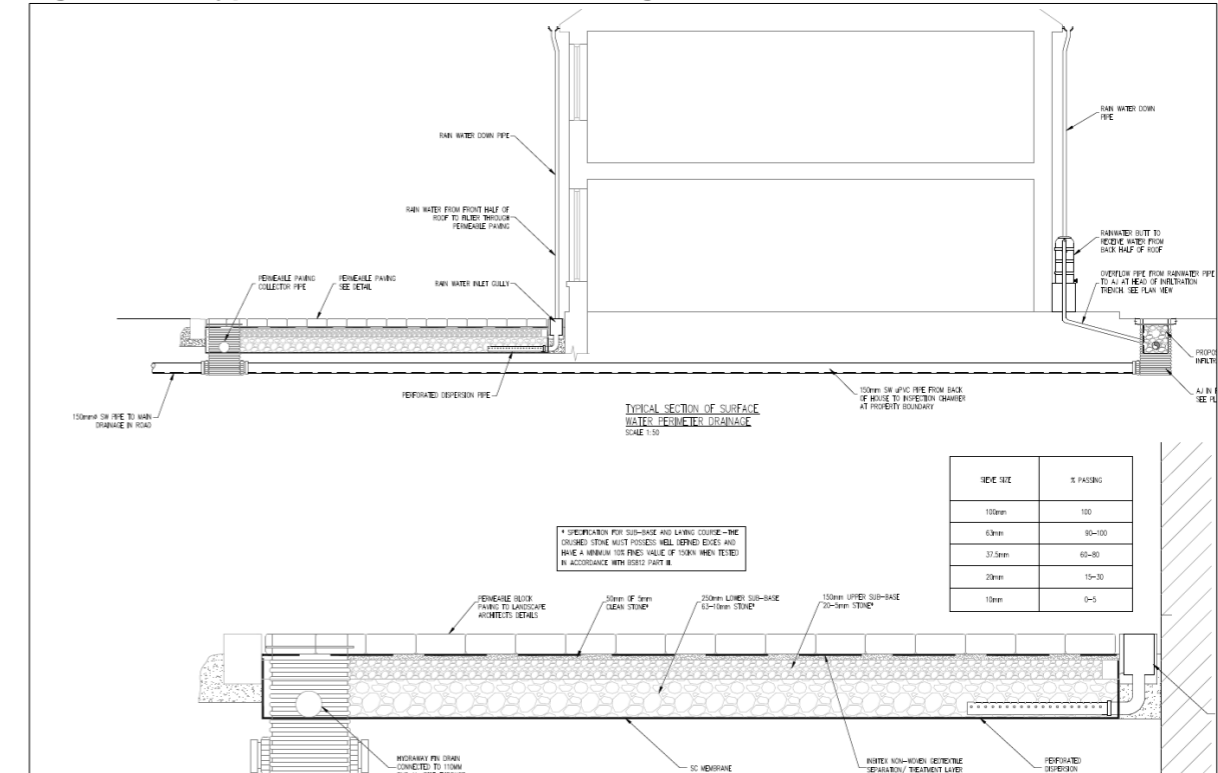
14 In response to this item we refer the Board to item no. 9 above which sets out the proposed surface water management system, including attenuation features.

15 Sections of the attenuation tanks are shown on the following drawings prepared by CS Consulting Engineers:

- D061-019 Attenuation System Details 1 of 3
- D061-020 Attenuation System Details 2 of 3
- D061-020 Attenuation System Details 2 of 3

16 Typical Perimeter House Drainage and SuDS Details are shown on CS drawing no. D061-069:

Figure 3.5 – Typical Perimeter House Drainage and SuDS Details



Source: CS drawing no. D061-069

3.3 Item no. 3 – Materials

17 Item no. 3 seeks:

“Details of all materials proposed for buildings, open spaces, paved areas, boundary and retaining walls.”

18 In response to this item we refer the Board to the CCK Architects Design Statement and the Cunnane Stratton Reynolds Landscape Architects Design Report.

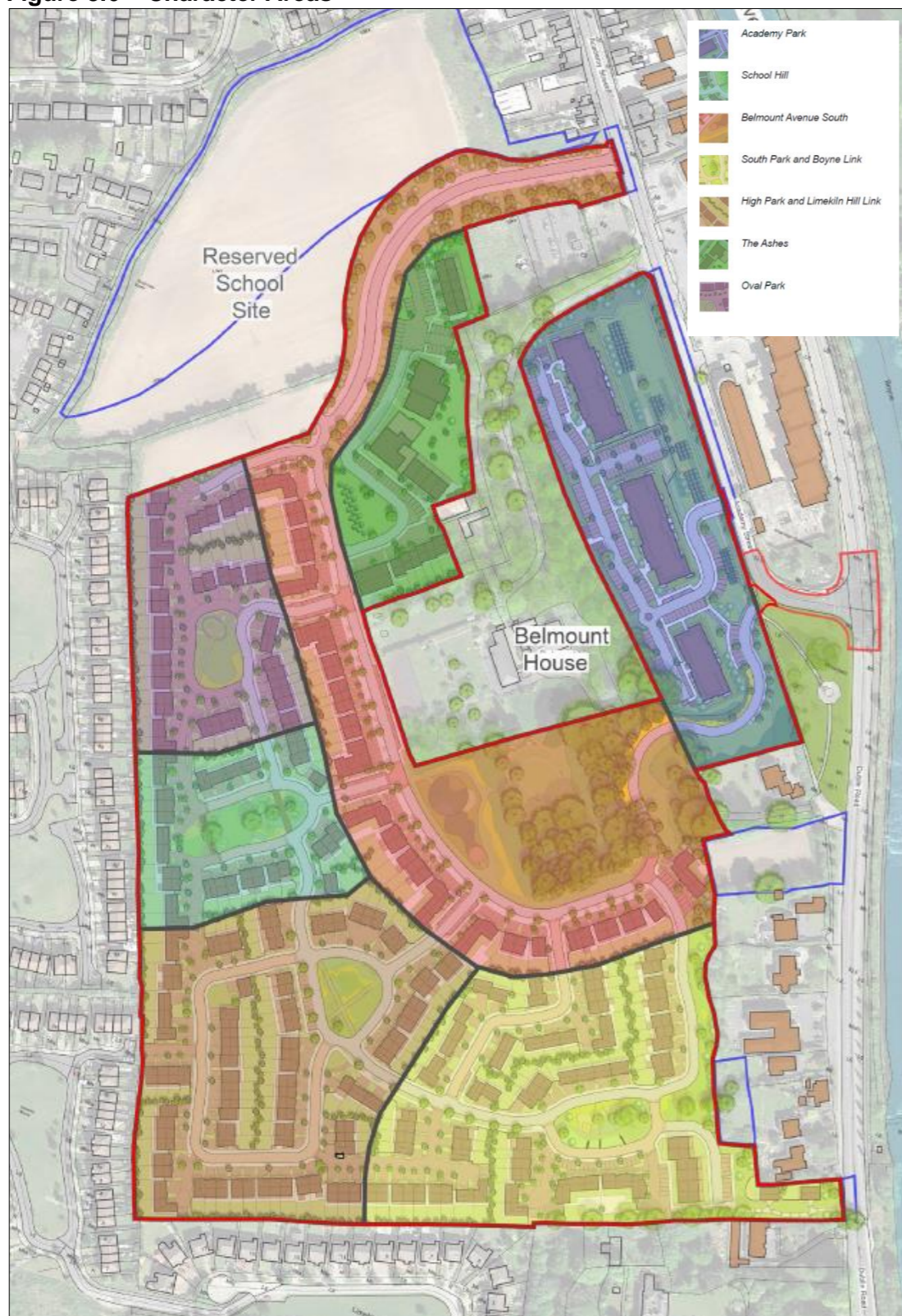
19 CSR Drawing no. 18221-2-103 sets out the hard and soft landscape materials specification. Appendix 2 of the CSR Landscape Design Report sets out the Soft Landscape Specification, Maintenance and Management.

3.3.1 Character Areas and Materials

20 The development divides into a number of character areas according to location and function:

- Academy Street edge is urban in character and part of the Navan street network.
- Belmont Avenue North and the schools. This is the town context.
- Belmont Avenue South and the woodland park. The wooded access route and central Belmont Park and Avenue character area orientate the scheme.
- The necklace of parks and character areas:

Figure 3.6 – Character Areas



Source: CCK Architects

secondary tree lined avenue connecting from pocket park to pocket park forming a more local connection between adjoining housing cells; and finally homezones along the southern and western periphery all interconnect with pedestrian/cycle only links.

- 22 The urban edge to Academy Street reinforces the predominance of Navan centre beyond, the mature woodland forms the focal point in the inner housing area, retained trees in pocket parks define local character areas.

Building Materials

- 23 Each character area has a subtly different brick while slate roofs and common detailing continue a common theme with the neighbourhood.
- 24 The palette of building materials will have enough consistency to ensure it all appears as one neighbourhood, and enough local variation to give distinction to reinforce character. It is not intended to appear like several conjoined (and unrelated) housing estates.
- 25 The CCK Design Statement outlines that successful character differentiation will also rely on position, existing features such as retained trees, the type of road and its place in the hierarchy, and the local detailing of the open spaces defining each place.
- 26 For example:

Belmont Avenue

Materials along the length of Belmont Avenue are consistent: A soft red brick predominates with small areas of render on the duplex blocks, roofs are slate and windows are cream/white. The duplex blocks at the green contain wide fronted units at garden level, and these face wide fronted houses on the other side of the green. This sets the character of the enclosure. Materials inside Belmont Avenue will be a mixture of brick and render particular to this area. Slate roofs and common detailing maintain a common theme with the neighbourhood.

- 21 As set out in the CCK Design Statement, the character areas are connected to each other in a descending hierarchy of streets: Firstly along Belmont Avenue, secondly along an internal

Figure 3.7 – Photomontage Detail of Apartments along Academy Street



3.4 Item no. 4 – Public Lighting

27 Item no. 4 seeks:

28

“Details of public lighting.”

29 In response to this item the public lighting has been incorporated and integrated into the Landscaping Design, which has been prepared by CSR Landscape Architects.

30

31 The specific detail of the lighting columns can be found on the Morley Walsh Public Lighting Layouts and the public lighting report. The lighting layouts were subject to review by Dr. Tina Auhney (Bat Specialist). The Bat report contains mitigation in relation to lighting.

32

33 We also refer the Board to the letter dated 13th November from Morley Walsh Consulting Engineers which confirms that:

“the public lighting for the scheme in accordance with Bat Conservation Ireland guidelines; Bat Conservation Ireland (Bats and Lighting: Guidance Notes for Planners, Engineers, Architects and Developers, BCI, 2010) and the Bat Conservation Trust (Guidance Note 08/18 Bats and Artificial Lighting in the UK (BCT, 2018).”

3.5 Item no. 5 – Part V Provision

34 Item no. 5 seeks:

35

“Details of Part V provision clearly indicating the proposed Part V units.”

36 The applicant has entered into initial discussions with the Housing Department of Meath County Council in respect to Part V. The applicant agrees to accept a condition on a grant of planning permission, if the Board is minded to approve the proposed development, which requires the applicant to enter into a Part V agreement with Meath County Council as per their requirements prior to the commencement of development.

37

38 The applicants Part V proposals are described and mapped in the Part V material accompanying this consultation request. Coindale Ltd., propose to allocate 54 no. dwellings as follows:

- 8 no. 1 bedroom apartments and duplex units;
- 19 no. 2 bedroom apartments and duplex units;
- 6 no. 2 bedroom dwellings;
- 14 no. 3 bedroom dwellings.
- 7 no. 3 bedroom duplex units

39 We refer the Board to the enclosed letter from MCC dated the 11th of October 2019 which indicates no objection in principle to the Part V proposals. Relevant costings and a map are included in the SHD application.

40 The location of Part V units are indicated below:

Figure 3.8 – Part V Allocations



Source: CCK Architects

3.6 Item no. 6 – Open Space

41 Item no. 6 seeks:

42

“A plan of the proposed open space within the site clearly delineating public, semi-private and private spaces.”

43 In response to this item we refer the Board to 1828 P 109 prepared by CCK Architects which sets out the public open space provision within the proposed development. In addition, we refer the Board to the CSR Landscape Design Statement, included with the SHD Application, which also outlines the landscape strategy and rationale for the design of green infrastructure, open space hierarchy and boundary treatments.

44 Drawing no. 18221-2-104 shows the public, semi-private (communal), private open spaces, along with the areas designated for the creches.

45 The open space requirement in Meath Development plan is for 15% of the residential land within the application site to be open space. The gross residential area for the purposes of calculating the open space is 13.34 hectares, (this area excludes the open space zoned land along Academy Street, the school site, and the northern portion of the access road, which is from Academy Street to the school) resulting in a requirement of 2 hectares. In addition to this the scheme includes a further 0.65 hectares of open space on the F1 zoned land fronting onto Academy Street, which additional and is not included in the 15%.

46 Communal Open Space is to be provided adjacent to the Apartments, in accordance with the Apartment Guidelines 2018. As set out in the Housing Quality Assessment, there is a requirement for 1,926 sq. m of communal open space. The proposed development provides 4,873 sq. m of communal open space for the multi-unit buildings.

Blocks A,B,C – 1,030 sq. m required – 1,240 sq. m provided.
 Blocks D&E – 264 sq. m required – 1,242 sq. m provided.
 Duplex blocks 240 sq. m required – 337 sq. m provided.

47 For the communal (corner blocks) the following is outlined:

Communal Open Space (m ²)					
Block no.	Reqd. Min	Provided	Block no.	Reqd. Min	Provided
CB5A	37	154	CB8A	48	54
CB5B	37	143	CB8B	48	56
CB5C	37	176			
CB5D	37	157			
CB5E	37	266			
CB5F	37	219			
CB5G	37	400			
CB5H	37	429			
Total	296	1944		96	110

Figure 3.9 – Public Open Space



Source: CCK Architects

Figure 3.10 – Open Space Delineation



Source: CSR Landscape Architects

Figure 3.11 – View along Access Road within Retained Woodland



3.7 Item no. 7 – Phasing

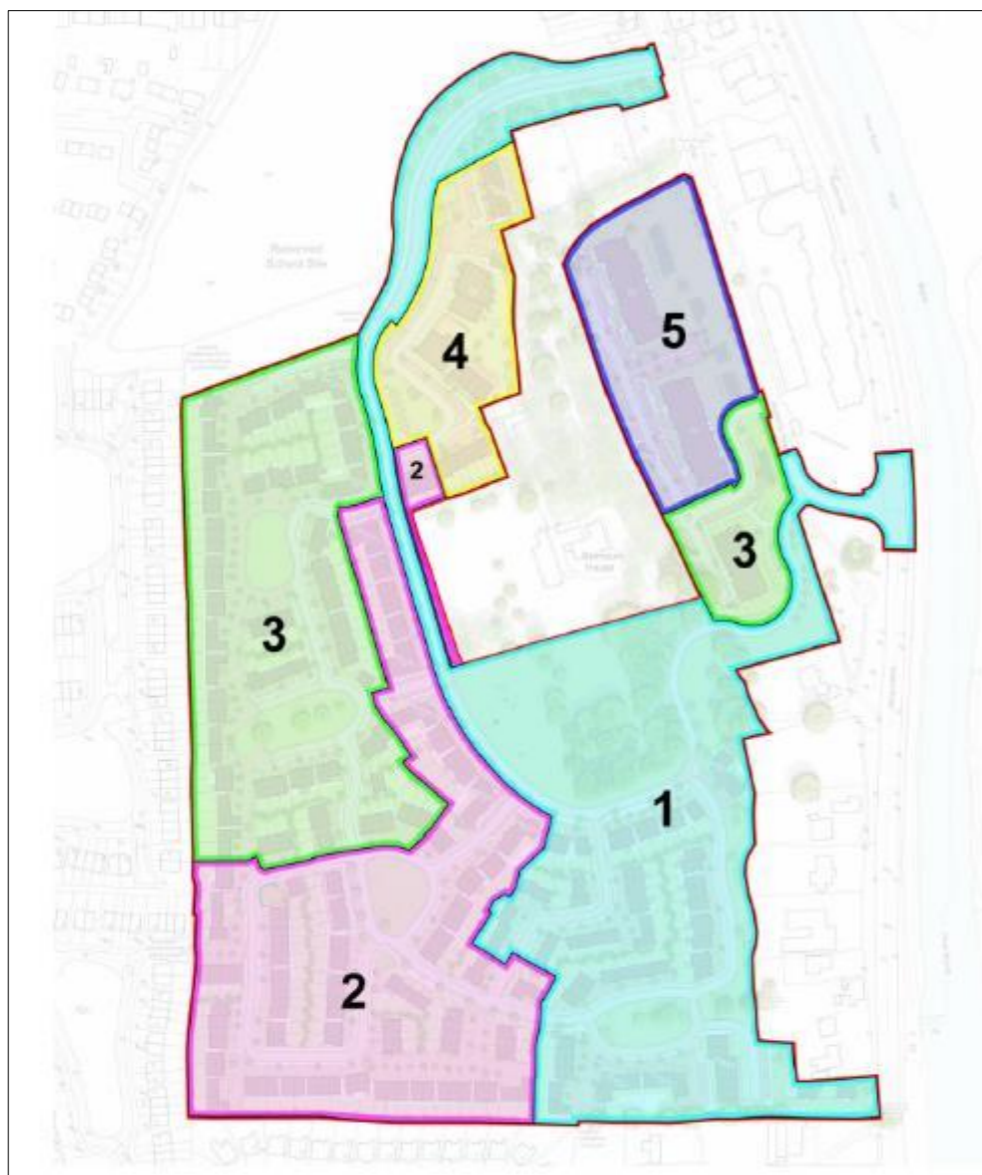
48 Item no. 7 seeks:

“A detailed phasing plan for the proposed development should be provided.”

49 In response to this item we refer the Board to the enclosed drawing no. 1828 P110, prepared by CCK Architects which shows the overall phasing of the proposed development. The indicative phasing is outlined below.

50 The expected construction staging provides for 5 phases. While the pace and timing of this phasing is highly dependent on unpredictable market conditions, the overall site design and phasing strategy takes account of the infrastructure and open space provisions associated with each phase.

Figure 3.12 – Phasing



Source: CCK Architects

51 Phase 1 will comprise:

- Construction of the access and road to primary schools' site as well as internal spine road through the site;
- Woodland Park Area of c. 1.34 hectares & open space of 0.2 hectares;
- 80 dwellings comprising 27 no. duplex/corner blocks & 53 no. houses as follows:
 - 1 no. duplex block – 12 no. units comprising (6 no. 2 bedroom duplex units & 6 no. 3 bedroom duplex units);
 - 3 no. Corner blocks - 15 no. units comprising (3 no. 1 bedroom units, 6 no. 2 bedroom units & 6 no. 3 bedroom units)
 - 1 no. 2 bedroom house, 47 no. 3 bedroom houses and 5 no. 4 bedroom houses.

52 Phase 2 will comprise:

- Creche 443 sq. m & open space of c. 0.12 hectares;
- 139 dwellings comprising 31 no. corner block dwellings & 108 no. houses as follows:
 - 3 no. 5 unit corner blocks & 2 no. 8 unit corner blocks comprising - 31 no. units comprising (11 no. 1 bedroom units, 14 no. 2 bedroom units & 6 no. 3 bedroom units);
 - 9 no. 2 bedroom houses, 96 no. 3 bedroom houses and 3 no. 4 bedroom houses.

53 Phase 3 will comprise:

- Creche 195 sq. m (ground floor of Block C)
- Open space of c. 0.23 hectares;
- 135 dwellings comprising 42 no. apartments and corner block dwellings & 93 no. houses as follows:
 - Apartments comprising 15 no. 1 bedroom apartments, 17 no. 2 bedroom apartments, 2 no. 1 bedroom, 4 no. 2 bedroom and 4 no. 3 bedroom corner block units;
 - 4 no. 2 bedroom houses, 82 no. 3 bedroom houses and 7 no. 4 bedroom houses.

54 Phase 4 will comprise:

- Open space of 0.12 hectares;
- 64 no. dwellings comprising 58 no. apartments/duplex apartments and 6 no. houses as follows:
 - 8 no. 1 bedroom apartments, 32 no. 2 bedroom apartments;
 - 9 no. 2 bedroom duplex apartments and 9 no. 3 bedroom duplex apartments;
 - 4 no. 2 bedroom houses and 2 no. 3 bedroom apartments;

55 Phase 5 will comprise:

- Open space of 0.63 hectares (zoned F1 lands)
- 126 no. apartments comprising 23 no. 1 bedroom apartments and 103 no. 2 bedroom apartments

Table 3.3 – Overall Phasing

	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
Houses	53	108	93	6	
Apartments			32	40	126
Duplex Apartments	12			18	
Corner Buildings	15	31	10		
	80	139	135	64	126
Overall Mix	14.7%	25.5%	24.8%	11.8%	23.2%

Source: CCK Site Layout Phasing – Note Indicative and subject to demand.

3.8 Item no. 8 – Taken-in-Charge

56 Item no. 8 seeks:

“A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.”

57 In response to this item we refer the Board to the enclosed drawing no. 1828 P110, prepared by CCK Architects which shows the areas to be taken in charge.

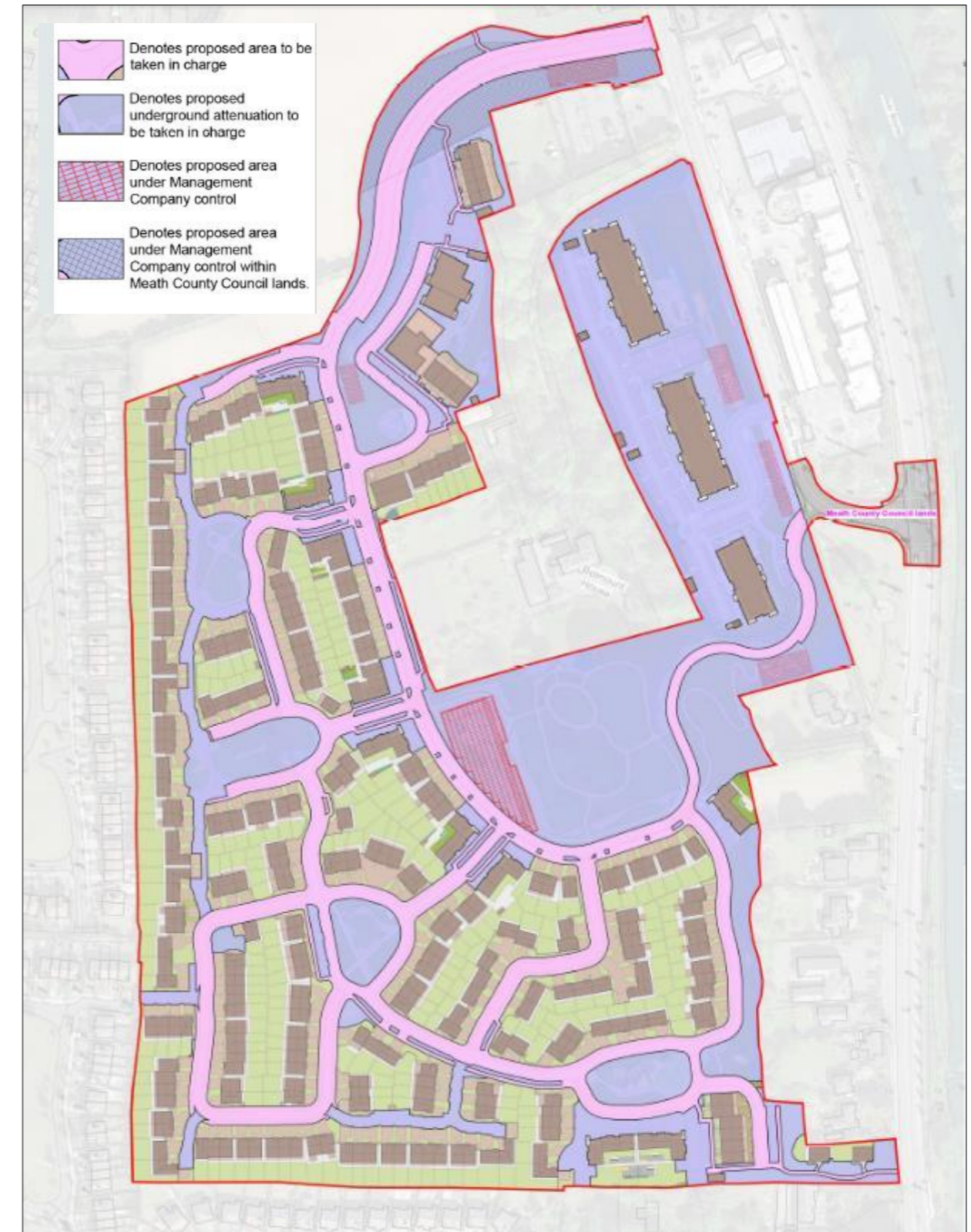
58 Coindale Ltd., are proposing the following condition:

“(a) The development, including all roads, footpaths, cycle paths, verges, public lighting, open spaces, surface water drains, attenuation infrastructure and all other services, as permitted under this order, and as amended by the conditions of this permission, shall be carried out and completed in accordance with the “taking-in-charge” standards of the planning authority. The areas to be taken in charge, upon completion of the development, shall be in accordance with the areas shown on drawing number (CCK Architects - 1828P113), unless otherwise agreed with the local authority.

(b) The areas not to be taken in charge, as defined by this condition, shall be maintained by a properly constituted private management company, details of which shall be agreed in writing with the planning authority.

(c) All of the areas of public open space to be taken in charge shall be maintained by the developer until such time as the development is taken in charge by the local authority.”

Figure 3.13 – Taken -in-Charge Areas



3.9 Item no. 9 – Material Contravention

59 Item no. 9 seeks:

“Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.”

60 Section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016 states that:

“where the proposed development materially contravenes the said plan other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.”

61 As set out in Section 37(2)(b) of the Planning and Development Act states that an Bord Pleanála may materially contravene a development plan or Local Area Plan where national planning policy objectives take precedence.

62 Section 37 (2) (b) of the Planning and Development Act states:

“(2) (b) Where a planning authority has decided to refuse permission on the grounds that a proposed development materially contravenes the development plan, the Board may only grant permission in accordance with paragraph (a) where it considers that—

- (i) the proposed development is of strategic or national importance,*
- (ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or*
- (iii) permission for the proposed development should be granted having regard to regional planning guidelines 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, or*
- (iv) 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”.*

63 An appropriate justification is set out within the enclosed Statement of Material Contravention and a summary is set out below:

3.9.1 Summary of Statement of Material Contravention

3.9.1.1 Location of the Proposed Development

64 The subject site is strategically located contiguous with the built-up area of Navan. The proposed development includes a new branch road to the west as well as a new access road to the proposed school site. The subject site also benefits from proximity to several schools, both existing and permitted, and proximity to the town centre. The proposed development represents a logical, sequential and sustainable expansion of Navan.

3.9.1.2 Part (i) - Proposed Development is of Strategic or National Importance

65 The proposed development comprises of 544 no. dwellings in a sustainable mix of houses and apartments, and duplex apartments including 2 no. creches and active open space of c. 2.13 hectares which will comprise a necklace of green spaces and linear parks within an overall site of c. 15.1 hectares.

66 The proposed development falls within the definition of a Strategic Housing Development in accordance with the definition of same provided under section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended. On this basis it is submitted that the proposed development is, by definition, strategic in nature and of strategic importance.

3.9.1.3 Part (ii) - there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned

67 It is respectfully submitted that the proposed development can be further justified on the basis of certain conflicts within the local planning policy context pertaining to the subject site. In particular, as demonstrated within the John Spain Associates Statement of Response to the Board's Opinion, the phasing strategy for the residentially zoned lands within Navan clearly conflicts with the housing delivery goals set out within the Core Strategy of the Development Plan.

68 The proposed development has been designed via an iterative process in order to respond to the comments made by the Board and the local Planning Authority during the course of the pre-application process. The resulting final scheme is considered to accord with the provisions of the Meath County Development Plan and Navan Town Development Plan in relation to the zoning objectives for the subject site and other policies and objectives pertaining to design and development standards. As set out previously, however, it is considered that the proposed development may represent a material contravention of the phasing objective pertaining to the lands.

69 The proposed development will help to achieve the household and population targets for the town set out within the Core Strategy of the Development Plan which (as set out within the Statement of Response) the phasing strategy has heretofore curtailed.

70 As set out in detail within the accompanying Statement of Response document, the sites identified as Phase 1 have failed to deliver on their housing allocations. This has led to a significant shortfall in residential development to date.

71 On the basis of the detailed analysis of housing delivery on Phase 1 lands in the town (set out within the Statement of Response document and the Statement of Consistency) it has been identified that there remains a significant shortfall in housing delivery on the Phase 1 lands and the lands which were identified as having 'committed development'.

3.9.1.4 Part (iii) - 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

72 It is respectfully submitted that the provisions of the National Planning Framework, the Regional Spatial and Economic Strategy for the EMRA, guidelines published under section 28 of the Act, and other relevant policies of the Minister for Housing, Planning, and Local Government all support the delivery of the proposed development, notwithstanding the phasing objective pertaining to the A2 zoned lands within the subject site.

73 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 Navan town which accommodates strong physical and social infrastructure to support growth and is designated a key town.

74 The subject development seeks to provide for medium density residential development on zoned lands within the Navan town boundaries. The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.

75 On the basis of the foregoing, it is respectfully submitted that the RSES for the EMRA supports the delivery of the proposed development.

76 The RSES furthermore recognises that “the zoning of land and planning permission alone, do not necessarily guarantee delivery and population growth in accordance with projected, targeted timeframes.” This fact is evident in Navan, where the consideration of ‘committed units’ for the purposes of the Core Strategy, and the phasing of development land has failed to deliver upon the housing and population targets envisaged for the southern environs of the town within the County Development Plan 2013-2019.

77 It is respectfully submitted that ‘changing circumstances and issues unforeseen at the time of the original making of the Development Plan’, as referenced in the foregoing extract, have indeed arisen in Navan, as exemplified by the shortfall of housing delivery on Phase 1 lands, and the failure in delivery of units which were considered as ‘committed development’ for the purposes of the Core Strategy. In this context, it is considered that the proposed development will be a positive step towards acknowledging and addressing these changing circumstances, while delivering the increased housing provision sought in the Government and the Minister’s policies and circular as set out above.

3.9.1.5 Part (iv) 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.

78 The pattern of development and permissions granted in the area of the subject site are key considerations in the rationale for the current Strategic Housing Development proposal. The pattern of development in the immediately surrounding area are of relevance to the current development proposal.

79 The pattern of development surrounding the subject site, and the level and pattern of permitted development in the area have changed considerably since the making of the County Development Plan in 2013, as set out in detail within the Statement of Response.

80 The immediate surrounding context now includes two schools, a proposed new school site, retail and commercial shops and social amenities such as the Navan Rugby Football Club.

81 On the basis of the surrounding pattern of implemented and permitted development, it is respectfully submitted that the proposed development is wholly appropriate.

3.9.2 Conclusions

82 It is respectfully submitted that should An Bord Pleanála consider the proposed development a material contravention of the Meath County Development Plan 2013-2019 and Navan Town Plan 2009-2015, an appropriate justification is set out within this statement demonstrating that the proposed development should be considered, having regard to the consistency of the proposed

development with national planning policy, the zoning objective of the subject site and the site’s location contiguous to the built up area of Navan, which is identified as a key town, and proximate to public transport.

83 It is considered that there is ample justification for An Bord Pleanála to permit a material contravention (if considered such) of the Local Area Plan having regard to the policies outlined in the NFP, the Implementation Framework for the NPF, the RSES for the EMRA, and other Ministerial and Government policies, and having regard to Section 37(2)(b)(i) and (iii) of the Planning and Development Act, 2000 (as amended).

84 It is respectfully requested that An Bord Pleanála have regard to the justification set out within this statement for a potential material contravention of the Meath County Development Plan and permit the proposed development, notwithstanding the potential that the proposal is a material contravention of the Development Plan.

3.10 Item no.10 – Letters to Prescribed Bodies

85 Item no. 10 seeks:

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

1. *Transport Infrastructure Ireland (Soft Copy)*
2. *National Transport Authority (Soft Copy)*
3. *Minister for Culture, Heritage and the Gaeltacht*
4. *Heritage Council (Soft Copy)*
5. *An Chomhairle Ealaíon*
6. *Failte Ireland*
7. *An Taisce (Soft Copy)*
8. *Irish Water (Soft Copy)*
9. *Inland Fisheries Ireland*
10. *Meath County Childcare Committee (Soft Copy)*

86 As required in the Board’s Consultation Opinion a copy of the application has been sent to the prescribed bodies set out above. Several prescribed bodies stated that they would prefer to receive a soft copy of the planning application documentation only. These are noted above, and a copy of email correspondence confirming this preference to receive a soft copy only is included as Appendix 1 of the SHD application cover letter.

4.0 CONCLUSIONS

- 1 This document outlines how the items outlined in the pre-application consultation opinion from An Bord Pleanála in relation to the proposed residential development at Belmont, Academy Street, Navan Co. Meath have been addressed in full by the applicant and design team prior to lodgement of the application to An Bord Pleanála.
- 2 The document also addresses the specific information requested by An Bord Pleanála and identifies the source or location of the response within the planning submission documentation.
- 3 The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 4 The layout and design changes incorporated into the final scheme will result in improvements to the overall design and layout and will a sustainable approach to the development of these lands. It is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.