

SLA

Stephen Little
& Associates

Planning
Application to
An Bord
Pleanála

Planning
Report &
Statements of
Consistency

Dunshaughlin West /
Phase II Strategic
Housing Development

In the Townlands of
Readsland, Roestown
and Knocks,
Dunshaughlin, Co.
Meath

For Castlethorn
Construction
Unlimited Company

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1 INTRODUCTION

1.1 Strategic Housing Development Application

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, are instructed by our Client (the Applicant), Castlethorn Construction Unlimited Company, Usher House, Dundrum, Dublin 14, to prepare this Strategic Housing Development (SHD) Planning Application Report & Statement of Consistency.

The development proposed generally comprises 415no. unit (254no. houses, 106no. apartments and 55no. duplexes), with non-residential uses consisting of a childcare facility (c. 409 sq. m) and associated public open space, landscaping and site development works on lands at Readsland, Roestown and Knocks, Dunshaughlin, Co. Meath.

The development is being referred to as '**Dunshaughlin West**' for the purposes of distinction from other recent SHD Application in Dunshaughlin. In consultant's Reports accompanying this planning application, the proposed development is referred as 'Phase 2' as it is located directly south of the Applicants Phase 1 residential development now nearing completion.

A Site Location Map outlining the lands subject of the proposed works (in red) and extent of land ownership (in blue) has been prepared by O'Mahony Pike Architects, and is enclosed with this SHD Planning Application (Dwg. No. 1217A-OMP-00-ST-DR-A-1010 'Site Location Map' refers).

This Report accompanies an SHD Planning Application to An Bord Pleanála, made under Section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016, as amended (hereafter referred to as 'the SHD Act').

The SHD Planning Application is made following consultation with An Bord Pleanála, undertaken in accordance with the provisions of Sections 5 and 6 of the SHD Act, and having regard to the Board's written 'Pre-Application Consultation Opinion' dated 24 June 2020.

This Report addresses the requirements of the SHD Act and associated Planning & Development Regulations 2001 (as amended), to include a written statement to the effect that, in the Applicant's opinion, the proposed development: -

- Is consistent with the relevant objectives of the Development Plan.
- Is consistent with the relevant Special Planning Policy Requirements (SPPR's) of the relevant Section 28 Ministerial Guidelines.
- How development responds to the Board Opinion issued at the conclusion of Pre-Planning consultation.

The SHD Planning Application is also accompanied by a separate report that addresses: -

- A Justification of Material Contravention of the Development Plan / Local Area Plan.

The inclusion of the above Report as part of the SHD Planning Application is referenced in the statutory notices, as is the requirement.

This Report addresses the issues that required further consideration and amendment, and the specific information requested, as set out in the Board's Opinion dated 24 June 2020. It also addresses the following planning policy context: -

- National Planning Framework, Ireland 2040 (NPF).
- Eastern & Midlands Regional Spatial & Economic Strategy (RSES) and Dublin Metropolitan Area Spatial Plan (DMASP).
- Rebuilding Ireland – Action Plan for Housing and Homelessness.
- Meath County Development Plan 2013 – 2019.
- Dunshaughlin Local Area Plan 2009 – 2015.

- Other relevant national and regional planning strategies, objectives and planning design guidelines for achieving sustainable urban residential development in the Meath/Dublin Hinterland area.

Enclosed with the application is a Part V Proposal Letter, prepared by Castlethorn Construction Unlimited Company, and associated drawing prepared by O'Mahony Pike Architects (Refer to accompanying Drawing Register). These identify how the Applicant proposes to comply with Section 96 of the Planning & Development Act 2000 (as amended), as agreed in principle with Meath County Council's Housing Department.

Letters of consent accompany the (SHD) Planning Application. The proposed development includes works on lands outside the control of the Applicant. These letters of consent give consent from these landowners to the making of this planning application on their lands (Please refer to Section 4).

The likely significant effects of the proposed development on the environment have been examined in the preparation of the Environmental Impact Assessment Report (EIAR) and Appropriate Assessment Screening which accompany the SHD Planning Application. The EIAR is detailed in the statutory notices, as is the requirement under the SHD Act.

In accordance with the Statutory Regulations, we confirm that the sum of €66,894.80 as the appropriate fee in this instance. A cheque to this amount is enclosed with the SHD Planning Application.

This Report should be read in conjunction with all of the other plans and particulars submitted with this application (refer to individual schedules as required). A complete list of application enclosures can be found at Section 16 of this Planning Report.

1.1.1 Brief Description of Development

The subject site forms part of the Applicant's wider landholding of c. 18.8 Ha extending north and beyond the Drumree Road. The subject lands are irregularly shaped and largely comprise two distinct sites within the western part of the Dunshaughlin Local Area Plan and are bisected by Drumree Road and Dunshaughlin Link Road and comprise a total area of c. 14.8 Ha (which includes the lands zoned F1 – Open Space) on lands at Readsland, Roestown and Knocks, Dunshaughlin, Co. Meath.

The proposed development is set out in three character areas. Character Area 6 (c. 3.75 Ha) comprises a greenfield site which lies north of Drumree Road and to the west of the Dunshaughlin Link Road (R125). A single private dwelling adjoins the subject site along the south eastern boundary.

Character Areas 3 & 4 (c. 8.47 Ha) are generally bounded to the west by the existing Dunshaughlin Link Road (R125), to the south and east by lands zoned for open space and Dunshaughlin Community College, to the north by Phase 1 residential lands (currently under construction by the Applicant) and lands identified for neighbourhood centre use.

In summary, the proposed Strategic Housing Development broadly comprises: -

- 415no. residential units (254no. houses, 55no. duplex and 106no. apartments) in buildings ranging in height from 2 to 5-storeys.
- 1no. childcare facility (c. 409 sq. m gross floor area).
- Provision of access from Drumree Road (Character Area 6) and Dunshaughlin Link Road – R125 (Character Areas 3 & 4) and provision of internal road network including pedestrian and cycle links.
- Provision of public open space including facilitation of planned pedestrian and cyclist connection along River Skane Greenway toward Dunshaughlin Town Centre.
- Provision of wastewater infrastructure including connections to main sewers on Drumree Road and to foul networks in permitted Phase 1 development and provision of SuDS infrastructure.
- All associated and ancillary site development and infrastructural works, hard and soft landscaping and boundary treatment works.

1.2 Definition of Strategic Housing Development

We consider the development now being proposed to be Strategic Housing Development as defined by the Section 3 of the Planning & Development (Housing) and Residential Tenancies Act 2016, as amended.

Section 3 of the Act confirms, *inter alia*, that: -

“ ‘strategic housing development’ means—

(a) the development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses,

... which may include other uses on the land, the zoning of which facilitates such use, but only if—

*i) the **cumulative gross floor area of the houses...**, comprises not less than 85 per cent, or such other percentage as may be prescribed, of the **gross floor space of the proposed development ...**, and*

ii) the other uses cumulatively do not exceed —

*I) 15 square metres gross floor space for each house ..., in the proposed development ..., subject to **a maximum of 4,500 square metres gross floor space** for such other uses in any development, or*

II) such other area as may be prescribed, by reference to the number of houses or bed spaces in student accommodation within the proposed development or to which the proposed alteration of a planning permission so granted relates, which other area shall be subject to such other maximum area in the development as may be prescribed;” (SLA bold text emphasis identifies qualifying criteria for the proposed development).*

(SLA bold emphasis)

Subsequent to the commencement of the SHD Act, the proposed residential development is of a scale that constitutes a ‘Strategic Housing Development’ as determined under Section 3 of said SHD Act on the basis that: -

- The application site is largely zoned for A2 – New Residential which states that: -

“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.”

where residential use is acceptable in principle.

- The proposed development exceeds the minimum 100no. unit threshold for residential use and remains below the maximum 4,500 sq. m gross floor area limit for non-residential use. (i.e. greater than 100no. units).

As the development is for greater than 100no. dwellings and those dwellings are all proposed on land zoned for residential development, the proposal amounts to a strategic housing development. The development also includes ancillary accommodation and additional infrastructure necessary to facilitate the development of the 415no. residential units.

In particular, the proposal includes the provision of a childcare facility (c. 409 sq. m gross floor area). This is significantly below the threshold of 4,500 sq. m of non-residential floorspace relevant to SHD projects.

The overall residential floorspace proposed in this case amounts to approximately 43,800 sq. m gross floor area. As a result, the non-residential floorspace amounts to approximately 0.9% of the overall development. This is significantly below the threshold of 15% of the overall floor area of a development that can be non-residential floorspace relevant to SHD projects.

Arising from the above, the quantum of other uses falls well below the maximum allowances provided for by the Act. As a result, the proposal can be considered a strategic housing development in our professional opinion.

For all of the reasons, arguments and considerations noted above, we are of the professional opinion that the proposal before the Board represents Strategic Housing Development.

1.3 Circulation to Prescribed Bodies

We acknowledge receipt of the Board's Opinion, together with the list of Prescribed Bodies which the Bord have requested be circulated with a copy of the application.

We enclose herewith as part of this SHD Planning Application a copy of the Cover Letters to the relevant Prescribed Bodies in this case, being: -

- Irish Water.
- Transport Infrastructure Ireland.
- National Transport Authority.
- Meath County Childcare Committee.

2 SITE DESCRIPTION & CONTEXT

2.1 Site Description

The subject site forms part of the Applicant's wider landholding of c. 18.8 Ha extending north and beyond the Drumree Road. The proposed development forms part of Phase 2 plans for the remaining undeveloped portion of the overall lands in the Applicant's ownership. The lands are greenfield in nature and fall gradually in topography from north to south. These lands are irregularly shaped and largely comprise two distinct sites within the western part of the Dunshaughlin Local Area Plan (LAP) and are bisected by Drumree Road and Dunshaughlin Link Road and comprise a total area of c. 14.8 Ha (which includes the lands zoned F1 – Open Space).

The proposed development is set out in 3no. Character Areas. Character Area 6 (c. 3.75 Ha) comprises a greenfield site bounded to the north and west by agricultural lands, Drumree Road (L2208) to the south and Dunshaughlin Link Road (R125) to the east. A single private dwelling adjoins the subject site along the south eastern boundary.

Character Areas 3 & 4 (c. 8.48 Ha) are generally bounded to the west by the existing Dunshaughlin Link Road (R125), to the south by lands zoned for open space (proposed to be changed to employment use under the Draft County Development Plan) and east by lands zoned for open space and Dunshaughlin Community College, to the north by under construction development of Phase 1 residential lands (currently under construction by the Applicant) and lands identified for neighbourhood centre use which may ultimately accommodate a local centre providing local convenience and service uses.



Figure 1: Extract from Google Earth providing an aerial view of the subject site (SLA overlay of indicative boundary line in red). Note works on Drumree Road not indicated, please refer to the Site Location Plan prepared by O'Mahony Pike Architects for the definitive red line boundary of the subject site.

The site is ideally located in close proximity to Dunshaughlin town centre (c. 1km) to the east of the subject lands and the amenities therein (supermarkets, restaurants, pharmacies, schools and sports facilities, childcare facilities, primary health centre, library etc.).

The lands are served by a number of bus routes, which connect Navan and Cavan to Dublin City Centre and Belfield (UCD). The 109, 109A and 109B bus routes provide frequent services to Busaras in Dublin city centre (approx. every 20-30 minutes on weekdays), Dublin City Centre and Dublin Airport. Private bus services also connect Dunshaughlin to Dublin City Centre and NUI Maynooth. The subject lands are approximately a 10 minute drive from M3 Parkway (PACE) Railway Station and its park and ride facility which provides direct links to Dublin City Centre. A quality Bus Corridor has been provided along the R147 on the approach to Dunshaughlin Town.

The Dunshaughlin (Phase II) SHD site is zoned 'A2' and 'F1' within the Meath County Development Plan 2013 – 2019 and associated Dunshaughlin LAP.

The subject lands are exceptionally well served by existing road infrastructure, comprising the Dunshaughlin Link Road to the M3 Motorway, which forms the western frontage of Character Areas 3 & 4, and cycle and pedestrian links which have been initiated in the Phase 1 development (currently under construction and is largely occupied) (MCC Reg. Ref. DA120987 ABP Ref. – PL.17.241988 refers) both through the Phase 1 'Dun Rioga' development and along its frontage with the Drumree Road, which connects east to Dunshaughlin Main Street. Dunshaughlin GAA, Dunshaughlin Community College and Dunshaughlin Community Centre are all located immediately to the north-east and east of the subject lands with their associated playing fields and ballcourts. A wide range of community facilities and amenities within Dunshaughlin Town Centre are also conveniently accessible c. 1km distance.

The site is not within an Architectural Conservation Area (ACA), zone of archaeological interest and does not contain any Protected Structures.

In this context the site presents a sustainable opportunity to deliver the consolidation of medium density, high quality residential development on the edge of Dunshaughlin Town Centre. Heights are appropriately modulating with increased heights turning corners and addressing open space areas and key frontages.

The commercial node of Dunshaughlin is located within 1 kilometre of the subject lands and provides a wide range of shops and services including a large Supervalu and Lidl supermarket, cafes / delicatessens, pubs and restaurants, hair and beauty facilities, boutiques, antique shops, hardware stores, motor repair shops, Bank of Ireland, Credit Union, Post Office, Health Centre, dentists, doctors, library, pharmacies, auctioneers and estate agents.

2.2 Existing & Planned Uses

The lands are currently utilised for agricultural purposes which consist of a series of fields and field boundary used primarily for animal grazing.

The planned uses are for a residential development, a childcare facility and associated site development works including the provision of public open space and pedestrian / cycle infrastructure. Full details of the proposed development are set out in Section 8 of this Report.

2.3 Planning History

Castlethorn Construction have been proactively trying to develop the subject lands over the past 20 years. Castlethorn's overall landholding comprises six distinct residential character areas and development is nearing completion for the permitted residential scheme known as Dun Rioga (Reg. Ref. DA120987, as amended by MCC Reg. Ref. RA200041 refers), which comprises of lands to the north and south of the Drumree Road, referred to as Character Area 1 & 2 in the context of Castlethorn's overall landholding.

The following sets out a chronology of the planning history which has involved Castlethorn Construction in Dunshaughlin, including the subject site. The planning history illustrates how Castlethorn have been both patient and proactive in assisting with the delivery of physical and social infrastructure for these western lands and Dunshaughlin in general in order to facilitate the development of these long time zoned residential lands.

Castlethorn commenced the acquisition of these lands in 2000 from local farming landowners as an already zoned residential landbank.

2.3.1 2002 – 2010 – Infrastructure Deficits

MCC Reg. Ref. DA/20081

Castlethorn lodged its first planning application in March 2002 for the development of 264no. dwellings on part of the subject lands. The lands were zoned for residential development at that time. This planning application essentially sat in abeyance further to a Further Information request until such time as the alignment of the Dunshaughlin Link Road connection to the M3 Motorway was determined and the Skane Valley Sewerage Scheme was commissioned and indeed was nearing completion. Although Further Information was submitted in January 2006 which responded to these issues, Meath County Council were unsatisfied with respect to water supply and refused permission in March 2006 on the sole basis that there was inadequate capacity with respect to the potable water supply in the area.

Lands were acquired from Castlethorn to facilitate the construction of Dunshaughlin Link Road and Castlethorn and its consultant engineers, PH McCarthy & Partners, worked closely with the National Roads Design Office in the delivery of Dunshaughlin Link Road. Main trunk gravity foul sewers were laid traversing the southern part of the subject lands (just north of the Skane River) with Castlethorn's consent as part of the Skane Valley Drainage Scheme.

Further to the refusal of planning permission as outlined above, Castlethorn and their consulting engineers, PH McCarthy & Partners, turned their attention to exploring a means of solving the apparent water supply capacity issues in the town. The Dunshaughlin Water Supply Scheme was completed in 2010 and involves the provision of 7no. bored wells, water treatment and a water storage tower. Castlethorn actively assisted in the provision of two of those production wells on lands adjacent to their residential holding. The overall scheme design and on-site delivery of Dunshaughlin Water Supply Scheme was managed by PH McCarthy & Partners in partnership with Tobin Engineers.

With the completion and substantial progression of resilient new wastewater and potable water supply infrastructure serving Dunshaughlin as a whole and the impending opening of key roads infrastructure to the west of the town, Castlethorn commenced in late 2007 with design and preparation work for a new residential planning application on these lands.

As part of Castlethorn's liaison with the Planning Authority and with the adjoining stakeholder, Dunshaughlin GAA, Castlethorn ceded without charge just over 2 Ha of G1 'Community' zoned land in their ownership to Dunshaughlin GAA. This land transfer was executed in May 2008 and accommodated the provision of a Junior GAA pitch, training facility and circulation space all long since completed on-site. Inquiries were also made at that time regarding the adjoining F1 zoned lands to the south (c. 4 Ha in overall extent) in which Castlethorn have a controlling interest.

2.3.2 2008 – Emerging Planning Policy Restrictions

In February 2008 Variation No. 2 to the Meath County Development Plan 2007 - 2013 was adopted. It set out an 'Order of Priority' with respect to the development of zoned residential lands across the County. In essence it represented a phasing sequence with all residential zoned lands across the County designated as either Phase 1 lands, to be developed within the period 2007 - 2013, or Phase 2 lands to be developed post 2013.

The Order of Priority also identified an additional Strategic Reserve of 1,000no. units in total that could be allocated across the County for developments of particular significance in terms of their associated delivery of community facilities and/or planning gain. Up to 350no. dwellings were allocated to the subject Castlethorn lands as part of that Strategic Reserve under the Order of Priority meaning that they could be developed during the 2007 – 2013 period provided that the full extent of associated F1 and G1 zoned lands (c. 6 Ha in total) were made available to the Council as community open space. As noted above, the G1 zoned lands (just over 2 Ha in extent) were transferred to Dunshaughlin GAA by agreement with Meath County Council without charge in May 2008.

MCC Reg. Ref. DA/803421 (Character Areas 1, 2 and 3)

Castlethorn lodged a planning application in December 2008 for the development of 342no. dwellings in three distinct character areas (one north and two south of the Drumree Road). In response to a request for Further Information extensive geo-physical survey work and test-trenching was undertaken and resulted in the discovery of a significant archaeological feature comprising the remains of a Late Bronze Age / Early Medieval settlement and burial ground. A decision was thus taken to omit Character Area 1 (north of Drumree Road) in our response to the Further Information request but in granting planning permission in December 2009 Meath County Council also omitted development of Character Area 3 due to archaeological concerns and permission was only granted for Character Area 2, comprising of 140no. dwellings (62no. houses, 48no. duplexes and 30no. apartments), adjoining to the south of Drumree Road.

Castlethorn and its design team (led by Margaret Gowan & Associates) had extensive consultations with the National Monuments Section of the Department of the Environment, Heritage and Local Government around how best to respond to and preserve this archaeological feature on-site. These discussions took place whilst our further information response was being considered and subsequent to the partial grant of permission that was issued in December 2009.

MCC Reg. Ref. DA803422 (Roundabout Junction on R125)

In December 2008, by way of a concurrent application, Castlethorn sought permission for the construction of an additional roundabout junction on the permitted Dunshaughlin Link Road (PL.17.MS2004, 22/08/2007), to provide vehicular access to a single private dwelling / farmholding to the west and neighbourhood centre zoned lands to the east and residential lands (Character Area 3) to the southeast and Dunshaughlin GAA and all associated works, all on a site of c. 0.624ha

Permission was granted by Meath County Council on the 19 October 2009 subject to 5no. conditions.

2.3.3 2009 – 2015 – Economic & Market Constraints & Increased Planning Policy Restrictions

The economic climate, both nationally and internationally, changed dramatically during the course of the preparation and determination of the above-referenced planning application (MCC Reg. Ref. DA/803421). It was evident upon receipt of that planning permission that the scheme so permitted would not be viable or deliverable for the foreseeable future. It was not just the dearth of development finance available at that time or the relatively high density and mix of dwelling types that led Castlethorn to that conclusion but also the relative lack of rigour and design efficiencies achieved through the design development process that are so evidently essential in such a changed economic climate.

Castlethorn's focus from 2009 was fixed firmly on surviving the unprecedented economic and financial collapse with residential construction of any scale essentially halted across the State from 2009-2015. During this period there were national planning policy changes including the requirement for Core Strategies within County Development Plans to demonstrate compliance with the County housing allocations under the then Regional Planning Guidelines. This had further implications for Meath and Castlethorn's landholding in Dunshaughlin.

The Meath County Development Plan 2013 – 2019, as initially adopted, effectively imposed a moratorium on development on all 'A' - Residential zoned lands until such time as Local Area Plans were made for each town. Land Use zoning objectives for the main urban centres were introduced under Variation No. 2 to the County Development Plan as adopted in May 2014. Notwithstanding the submissions made on Castlethorn's behalf during that process, the bulk of the Castlethorn lands were designated for Phase 2 development i.e. post-2019 with only Character Area 1 & 2 (lands adjoining to the North and South of the Drumree Road) available for Phase 1 development. The concept of a Strategic Reserve was no longer included in the new County Development Plan and the priority afforded to our clients' lands was no longer evident.

MCC Reg. Ref. DA/120987 (ABP Ref. PL 17.241988) (Character Areas 1 and 2)

Castlethorn appointed new project architects (O'Mahony Pike Architects) and lodged a planning application in November 2012 for a development of own-door housing comprising 160no. dwellings across Character Area 1 & 2. As agreed with the National Monuments Section of the DoEH&LG the archaeological feature in Character Area 1, north of the Drumree Road, was set within an enlarged public open space reflective of the configuration of the retained archaeological feature below. A Notification of Decision to Grant Planning Permission (MCC Reg. Ref. DA/120987) for 140no. dwellings was issued by Meath County Council in April 2014 (in line with the extant permission for 140no. units previously permitted on Character Area 2). This decision was upheld by An Bord Pleanála, further to a third-party appeal, in November 2014 with permission granted for 142no. dwellings in total.

That development is under construction, nearing completion, and is called Dún Ríoga.

MCC Reg. Ref. RA171431

An extension of duration for the above permission (Reg. Ref. DA/120987) was granted by Meath County Council on 09 February 2018 which extended permission for one year to 16 December 2019.

MCC Reg. Ref. RA190815

A further extension of duration for the above permission (Reg. Ref. DA/120987) was granted by Meath County Council on 08 August 2019 which extended permission to 31 December 2021.

MCC Reg. Ref. RA200041 (ABP Ref. 307021-20)

Permission was sought by Castlethorn for amendments to permitted housing development MCC Reg. Ref. DA/120987 (ABP Ref. PL 17.241988) comprising amendments to 57no. 2 storey houses and alterations to the site development and landscape works. These amendments are a) house type changes to 21no. dwellings, and b) the provision of a new cycleway through the site southwards from the Drumree Road and the consequential repositioning of 42no. dwellings required to accommodate that cycleway; together with associated site development and landscape works. The number of permitted dwellings remains unchanged. Permission was granted by Meath County Council on 10 March 2020 subject to 12no. conditions.

A Third Party Appeal was submitted to the An Bord Pleanála. An Bord Pleanála subsequently granted permission on 27 July 2020.

2.3.4 2015 – Present

Castlethorn are aware of the current Draft Meath County Development Plan 2020 - 2026 that seeks to respond to the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the East and Midland Region. The Draft County Development Plan yet again proposes to defer development on the balance of their landholding until post-2026 and it further seeks to de-zone their long-standing residential zoned lands on the western side of Dunshaughlin Link Road (Character Area 6). Castlethorn have made a detailed and robust submission on the Draft Plan and they make this SHD application under the terms of the statutory County Development Plan in force at this time i.e. the Meath County Development Plan 2013 – 2019.

2.3.5 Residential Development Progress To-Date

Castlethorn commenced development of the permitted scheme in April 2018. It is known as Dun Rioga and comprises of lands either side of the Drumree Road, referred to as Character Area 1 & 2 in the context of Castlethorn's overall landholding. Dun Rioga represents an efficient and innovative residential layout that responds to context and optimises the density of development achievable for a scheme comprising entirely of own-door housing in a variety of conditions and with conventional rear gardens. It incorporates a complimentary mix of deep plan and wide frontage housing to 'turn corners' effectively and facilitate reduced separation distances without compromise to residential amenity. It is urban in character comprising predominantly of short terraces of housing and shared surface 'home-zone' streets and is aimed particularly at first time buyers.

Castlethorn have provided affordable housing at Dun Rioga with 3-Bed mid-terraced housing starting at €280,000. Sales have been steady and virtually all dwellings made available for sale have been sold with most now occupied. These house prices provide the most affordable homes available for sale in Dunshaughlin. There are also 14no. Part V social houses being delivered as part of this development.

Castlethorn's Phase 1 development also included for the delivery of significant infrastructure required for the development of Phase 2 lands. A large wetland attenuation area has been completed towards the southern end of Character Area 3, just north of the Skane River. It has been sized to provide surface water attenuation for Character Areas 3 & 4 (as well as the permitted scheme on Character Areas 1 & 2). A trunk foul sewer has also been laid adjacent to the surface water outfall and it traverses and will serve Phase 2 development in Character Area 3. A new roundabout junction on the Dunshaughlin Link Road was also permitted under our Phase 1 scheme and is about to be constructed. It was included primarily to serve the development of the Phase 2 lands and is demonstrably not required to serve Phase 1 development. A childcare facility is also being provided as part of this Phase 1 development.

3 THE APPLICANT

We wish to confirm that the Applicant in this case is Castlethorn Construction, the required details of which are as follows: -

Name: Castlethorn Construction Unlimited Company

Address: Usher House, Main Street Dundrum, Dublin 14, D14 N7Y8

Telephone: 01 216 40 80

Email: info@castlethorn.ie

Please note that Castlethorn Construction Unlimited Company is referred to hereafter simply as 'Castlethorn'.

4 APPLICANTS LEGAL INTEREST

4.1 Ownership

The Applicant owns the majority of lands which form the site which is subject of the proposed development.

Portions of the lands on the western and eastern edge of Character Areas 3 & 4 are under the control of the Newell Family.

Portions of lands are under the control of Meath County Council. To provide for improved connectivity between the Character Area 6 (located to the northwest) improvements are proposed to include a cycle lane leading toward the roundabout on the Drumree Road and associated raised table crossing. Furthermore, landscaping works are required on the eastern edge of the R125 (Dunshaughlin Link Road) to provide a suitable boundary / interface with the proposed residential development and the edge of the road embankment.

Open Space lands (c. 2.84 Ha) are controlled by the Applicant by way of a legal call-option and lie outside of the red line of this development (the eastern edge of Character Area 3 & 4). It is proposed as part of this SHD application that these lands as outlined in blue on the Site Layout Plan would be transferred to Meath County Council and/or its nominees without charge for appropriate recreational and/or community use. We refer the Board to the Design Statement, prepared by O'Mahony Pike Architects for further detail.

4.2 Letters of Consent

As a result of the above, there are 2no. areas of these proposed application lands which are currently controlled by third parties.

4.2.1 Newell Family

We attach herewith a Letter from the Newell Family that consents to the making of the ultimate planning application on these lands insofar as they relate to lands in their control. These areas are identified in the Site Plan, prepared by O'Mahony Pike Architects appended to the Letter of Consent.

4.2.2 Meath County Council

We attach herewith a Letter from Meath County Council that consents to the making of the ultimate planning application on these lands insofar as they relate to lands in their control. These areas are identified in the Site Plan, prepared by O'Mahony Pike Architects appended to the Letter of Consent.

5 AGENT

This SHD Planning Application to An Bord Pleanála has been co-ordinated by Stephen Little & Associates, Chartered Town Planners and Development Consultants under a Design Team led by O'Mahony Pike, Architects.

For the purposes of this SHD Planning Application, details of the agent are set out below for the convenience of the Board: -

Name: Stephen Little & Associates, Chartered Town Planners & Development Consultants.
Address: 26/27 Upper Pembroke Street, Dublin 2, D02 X361.
Telephone: 01-676 6507.
Email: info@sla-pdc.com.

Arising from the Covid-19 emergency, there remains a high level of remote working being undertaken at Stephen Little & Associates. The principal means of contacting the office should therefore be via email.

5.1 Design Team

The following identifies the core Design Team involved in the preparation of this SHD Planning Application: -

Stephen Little & Associates Chartered Town Planners & Development Consultants – Preparation and co-ordination of the SHD Planning Application to An Bord Pleanála. Providing guidance from a Planning perspective, and consultation with the Meath County Council Planning Department.

O' Mahony Pike Architects – Preparation of Architectural Design Statement setting out the detailed design rationale for the proposed development, Statement of Response, Part V Document, architectural plans and drawings, technical documents (including Schedules of Accommodation and HQA)

Waterman Moylan Consulting Engineers – Full civil engineering consultancy services including detailed roads and engineering services design, structural advice, preparation of Traffic and Transportation Assessment, Drainage Report, Outline Construction Management Plan, Flood Risk Assessment, External Lighting Design, Sustainability/Energy Statement and other infrastructural requirements. Consultation with Irish Water and Meath County Council (Transportation and Water Services divisions), as appropriate.

Doyle + O'Triothigh Landscape Architects - Preparation of the Landscape Report, Landscape Masterplan and Landscape Drawings, Visual impact (verified photomontage views).

The Tree File Ltd – Preparation of Arboricultural Assessment and Tree & Hedgerow Survey/drawings.

Future Analytics Consulting – Preparation of Socio-Economic Study.

Modelworks Media – Preparation of Verifiable Views & Photomontages.

IN2 Engineering Design Partnership – Preparation of a Daylight/Sunlight Analysis.

AWN Consulting – Preparation of a Construction & Demolition Waste Management Plan and Operational Waste Management Plan.

Scott Cawley – Preparation of Ecological Impact Assessment and Appropriate Assessment Screening Report.

Burton Consulting Engineers – Preparation of a Stage 1 Road Safety Audit.

Castlethorn – Building Lifecycle Report setting out the long-term management arrangement for apartment and duplexes.

5.2 EIAR Team

The following lists the expert consultants involved in the preparation of the Environmental Impact Assessment Report for the proposed development: -

Stephen Little & Associates Chartered Town Planners & Development Consultants – Preparation and co-ordination of EIAR and preparation of and EIAR chapters relating to Population and Human Health.

Waterman Moylan Consulting Engineers – Preparation of EIAR Chapter relating to Land, Soils and Geology, Water, Material Assets (Transportation) and Material Assets (Utilities).

Doyle + O'Triothigh / Modelworks – Preparation of EIAR Chapter relating to Landscape & Visual Impact Assessment.

IN2 Engineering Design Partnership – Preparation of EIAR Chapter relating to Climate (Daylight and Sunlight).

Scott Cawley – Preparation of EIAR Chapter relating to Biodiversity.

Cathal Crimmins – Preparation of EIAR Chapter relating to Cultural Heritage (Architectural Heritage).

Archaeology Plan – Preparation of EIAR Chapter relating to Cultural Heritage (Archaeology).

AWN Consulting – Preparation of EIAR Chapter relating to Material Assets (Waste), Air (Noise & Vibration) and Climate (Air Quality & Climate Change).

The individual consultants involved from each firm and their qualifications are contained in the EIAR.

6 PRIOR CONSULTATION IN RESPECT OF PROPOSED STRATEGIC HOUSING DEVELOPMENT

6.1 An Bord Pleanála Pre-Application Consultation

A Pre-Application Consultation meeting was held on the 3 June 2020 under Section 6 of the SHD Act. This was attended by representatives from An Bord Pleanála, Meath County Council, the Applicant and Design Team.

At the outset the applicant fully acknowledges the ‘without prejudice’ nature of pre-planning consultation. The following sections are provided for the Board’s information only. The Board will have its own record of Meath County Council’s S. 247 minutes of meetings that took place on 7 February 2020, and of the subsequent pre-planning report of the Council’s Chief Executive, signed by the Executive Planners on 14 May 2020 and submitted in advance of the Pre-Application Consultation meeting

The Board issued its formal Opinion on 24 June 2020, identifying a number of issues requiring further consideration within the planning application, including: -

- Connections between the proposed housing and the rest of Dunshaughlin (in particular the town centre).
- The Core Strategy and the phasing provisions of the Meath County Council Development Plan.

The Board’s Opinion also listed specific information that should be submitted with this application.

A response to the Board Opinion is included at Section 7 of this Report. This includes cross reference to the relevant plans and particulars submitted with the SHD Planning Application that further describe, illustrate and / or analyse the revised scheme. We draw the Board’s attention also to Section 1 of the Design Statement, prepared by O’ Mahony Pike Architects that illustrates the proposed design changes.

We refer the Board otherwise to the plans and particulars submitted with the application which are set out in the Enclosures List at the end of this Report (Section 16), which detail all relevant material submitted and relevant to the consideration of the revised scheme subject of this SHD Planning Application.

6.2 Section 247 Consultations with Meath County Council

Prior to the formal An Bord Pleanála Consultation meeting, a formal Section 247 Pre-Planning Meeting was held with the local Planning Authority (Meath County Council) on 7 February 2020.

The S. 247 Pre-Planning Meeting was attended by the following officials of the Planning Authority: -

- Pat Gallagher, Planning Department, Meath County Council.
- Billy Joe Padden, Planning Department, Meath County Council.
- Philip Maguire, Planning Department, Meath County Council.
- Paul Aspell, Drainage Division, Meath County Council.
- Brendan Fulham, Housing Department, Meath County Council.
- Joe McGarvey, Transport Department, Meath County Council.
- David Keyes, Environment Section, Meath County Council.
- Alan Rogers, Meath County Council.

At the S. 247 Pre-Planning Meeting, the Planning Authority provided its recommendations on the key planning and design issues that it considered should be taken into account in the SHD Planning Application to the Board.

The Applicant has had regard to the general guidance provided at the S. 247 Pre-Planning Meeting with Meath County Council, the details of which are also outlined in the Council's S. 247 Pre-Planning Meeting minutes already issued to An Bord Pleanála.

6.3 Other Consultation with MCC

Prior to the formal S. 247 Pre-Planning Meeting, a Pre-Planning Meeting was also held with the Planning Authority on 22 October 2018. Additional meetings have taken place with the various Departments of Meath County Council in late 2019 and during 2020 to-date.

6.3.1 MCC Roads, Water Services and Environment Departments

Further to the aforementioned formal Pre-Planning meetings, there were a number of inter-departmental meetings held with the relevant Council Departments, prior to the submission of this SHD Planning Application.

This included various meetings with the Roads and Water Services to discuss a broad range of design related issues, including drainage design / SuDs, site access, car parking strategy and road design throughout the planning design process.

6.3.2 MCC Housing Department – Part V Consultation

Preliminary consultation between the Applicant and Meath County Council has identified how the Applicant intends to meet its Part V obligations.

The Applicant proposed, without prejudice to final permission and Part V agreement, to meet its Part V obligations through provision of housing units within the development.

We refer the Board the Part V Proposal (including calculation of indicative costs), prepared by Castlethorn Construction Unlimited Company. Details of the Part V units are contained within the enclosed Part V Statement, prepared by O'Mahony Pike Architects.

6.4 Prescribed Bodies

In addition to discussions with the Planning Authority, consultation with other authorities took place as necessary.

6.4.1 Irish Water

Waterman Moylan Consulting Engineers had ongoing consultations Irish Water in the months leading up to this SHD Planning Application. Meetings with Irish Water were also supplemented by email and telephone communications.

A Confirmation of Feasibility, from Irish Water, dated 20 February 2020 is enclosed with this SHD Planning Application.

We refer the Board further to the Statement of Design Acceptance, dated 4 September 2020, in respect of the proposed development which demonstrates compliance with Irish Water Standards and confirmation that connection to the Irish Water network is feasible.

6.4.2 Other Prescribed Bodies

We note that the Prescribed Bodies identified in the Board's Opinion, dated 24 June 2020, and in Section 1.3 of this Report, will otherwise be notified of the SHD Planning Application and invited to make submissions.

Section 50 Consent Process (Watercourses)

Waterman Moylan Consulting Engineers has engaged with the Office of Public Works (OPW) in relation to the Section 50 Application process for the proposed 2no. pedestrian / cycle bridges and road crossing over the River Skane to link between Character Area 3 & 4.

We note that this is a separate consent process for the purposes of crossing any watercourse but has nonetheless been progressed by the Applicant.

We refer the Board to the Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers for further detail with regard these consultations.

7 APPLICANT'S RESPONSE TO AN BORD PLEANALA PRE-APPLICATION OPINION

In accordance with Section 6(7) of the Planning and Development (Housing) and Residential Tenancies Act 2016, and Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the Board has set out its written Opinion, dated 20 February 2020, on whether the documents submitted at pre-application consultation stage constitute a reasonable basis for a Strategic Housing Application. It sets out also its Opinion on the issues that require further consideration or justification, and any specific information that is necessary to accompany the application.

Article 297(3) provides: -

“(3) Where, under section 6(7) of the Act of 2016, the Board issued a notice to the prospective applicant of its opinion that the documents enclosed with the request for pre-application consultations required further consideration and amendment in order to constitute a reasonable basis for an application for permission, the application shall be accompanied by a statement of the proposals included in the application to address the issues set out in the notice.”

Before proceeding to set out the details of the characteristics of the overall proposed development now before the Board (see Section 8 below), the statement of proposals referred to under Article 297(3) required in response to the Board's Pre-Application Consultation Opinion is set out in this overall Section.

This should be read in conjunction with the plans and particulars that accompany the application which provide a further illustration and/or written analysis and justification of the proposed design response to the specific issues raised by the Board. We cross reference the relevant material in the responses below for the convenience of the Board.

We can confirm that in making this SHD Planning Application the Applicant will have issued notification to the Prescribed Bodies identified in the Board's Opinion, inviting submissions on the application (see cover letters enclosed with application). We refer the Board also to Section 1.3 of this Planning Application Report for a list of the prescribed bodies that have been notified.

7.1 Amendment to Proposed Scheme Following An Bord Pleanála Pre-Planning Consultation

We refer the Board in the first instance to the Design Statement, prepared by O'Mahony Pike Architects. This clearly identifies the key changes to the proposed scheme made following the Pre-Application Consultation (3 June 2020) and in response to the design issues raised in the Board's Opinion dated 24 June 2020.

In broad terms, the key change are as follows: -

Character Area 3 & 4

- Omission of road through F1 zoned lands to the east of Character Area 3.
- Revised road layout in southwest area of CA4 reduces length of homezone.
- Addition of sheltered/older person housing.
- Improved cycle and pedestrian connectivity.
- Communal open space for Block 02 now at level 00 as is Block 03.
- New detention basin provided.

Character Area 6

- Omission of 7no. units.
- Improved connectivity by connecting 2 cul-de-sacs.
- Moving houses and duplexes adjacent to southern shared boundary further north by c. 1.35m.
- Added horizontal deflection along central spine route and improved central open space.

- Inclusion of bicycle stores.
- House in the southeast (adjacent the new vehicular entrance) moved closer to Drumree Road.
- Revised substation location.

The Architectural Design Statement outlines the holistic design response to the planning design issues raised by the Board. It has been prepared by O'Mahony Pike Architects, with input from the core design team including Waterman Moylan Consulting Engineers, Doyle + O'Troithigh Landscape Architects and Stephen Little & Associates Chartered Planners & Development Consultants.

7.2 Response to Issue Raised

7.2.1 Issue 1 – Connectivity & Compliance with DMURS

*Connections between the proposed housing and the rest of the town. The submitted documentation should demonstrate that pedestrians, cyclists and those using public transport would have **safe and convenient access from the proposed housing to services and facilities**, including those in the town centre and the adjacent school. The documentation should specify which **links** would be provided as part of the proposed development. It should also demonstrate that the proposed streets and any works to existing streets **comply with the specific requirements of DMURS and that any cycle facilities comply with the specifications set out in the National Cycle Manual**, in particular those regarding the **design of junctions and the provision of street frontage**. General assertions of compliance with the principles set out in those guidance documents would not suffice in this regard.*

(SLA bold font emphasis)

Applicant's Response: Connectivity

We refer the Board in the first instance to the Traffic & Transport Assessment and DMURS Statement of Consistency, prepared by Waterman Moylan Consulting Engineers. These documents detail the level of connectivity proposed within the development and how this integrates with adjoining development to ensure safe and convenient access to Dunshaughlin town centre.

The proposed development, albeit within two distinct development parcels, is premised on cycle and pedestrian connectivity. The layout has been designed to be DMURS compliant and served by a series of interconnected pathways.

Existing and Permitted Pedestrian / Cycle Facilities

We set out briefly below the current conditions in terms of pedestrian and cycle connectivity within proximity to the proposed development: -

- A pedestrian footpath extends from Character Area 6 along the northern side of the Drumree Road all the way into Dunshaughlin town centre. Dropped kerbs are provided on the R125 / Drumree Road intersection for pedestrians to cross. Meath County Council in dialogue with Waterman Moylan Consulting Engineers have noted that this is not the optimal solution for this crossing point, therefore, as part of this SHD Planning Application this pedestrian and cyclist crossing will be upgraded (discussed further below).
- As part of the permitted Phase 1 development (MCC Reg. Ref. DA120987 ABP Ref. – PL.17.241988 refers), under construction and nearing completion, cyclepaths and footpaths are being developed which will extend down to the southern edge of the Phase 1 site. This development is located immediately north of Character Area 3.

Existing Public Transport Facilities

We set out briefly below the current public transport facilities within proximity to the proposed development: -

- The proposed development site is currently served by Bus Eireann service routes 109, 109A and 109B which serve public bus stops located in Dunshaughlin Town Centre, approximately 1km east of the subject site. These routes connect Dunshaughlin to Dublin Airport, Dublin City Centre and Dublin Busaras Terminal. In the opposite direction, these routes connect Dunshaughlin to Navan, Kells and Trim.
- The proposed development site is located approximately 12.5km north of the closest train station – M3 Parkway, which is the terminus of the Docklands to M3 Parkway Western Commuter service. The Commuter Rail service through M3 Parkway Station serves all stations from Docklands to M3 Parkway. The service operates at 3 – 4 services per hour on weekdays. This station includes 1,200no. free car parking spaces for commuters.

Integration of Character Area 3 & 4

We refer the Board to Dwg. No. 12-081A-P160 'Cycle Connection Layout', prepared by Waterman Moylan Consulting Engineers which shows the primary network of pedestrian and cycle paths proposed within Character Area 3 & 4. We refer to the Landscape Masterplan, prepared by Doyle + O'Troithigh Landscape Architects which details the other footpaths which traverse the open space areas to provide further connectivity within the site and ensure pedestrian and cyclist desire lines are met.

As noted above, as part of the permitted Phase 1 development (MCC Reg. Ref. DA120987 ABP Ref. – PL.17.241988 refers), under construction and nearing completion, pedestrian and cycle connections are being developed linking directly to and along the Drumree Road.

A series of two-way cycle and pedestrian paths (3.5m/2m wide respectively) and shared cycle and pedestrian path (3m min. width), supplemented further by internal pedestrian footpaths will connect with the pedestrian / cycle paths being developed in Phase 1 to provide direct connection to the Drumree Road.

The primary pedestrian / cycle network provides a direct route through Character Area 3 & 4 and connection to Phase 1 with pedestrians / cyclist being given priority at all major junctions. The pedestrian / cycle network provided within Character Area 3 & 4 is effectively a looped network which ensure that all dwelling units have convenient access and dedicated amenity routes segregated from vehicular traffic.

Future Connections from Character Area 3 & 4

The layout of Character Area 3 & 4 will ensure that future connectivity to adjoining lands to the east and south can be facilitated.

- **River Skane Greenway**

We refer the Board to Dwg. No. 12-081A-P160 'Cycle Connection Layout', prepared by Waterman Moylan Consulting Engineers which shows the primary network of pedestrian and cycle paths proposed within Character Area 3 & 4.

A two-way cycle and pedestrian path (3.5m/2m wide respectively) is proposed along the River Skane to the eastern edge of the landholding which adjoins the southwestern corner of the Dunshaughlin Community College lands. The Applicant has engaged with the adjoining landowner who owns the Community College lands (the Louth and Meath Education and Training Board – LMETB) who are fully supportive of such a link being opened up across their lands when there is a sufficient critical mass of occupied adjacent residential development on the subject lands in order to encourage through use and passive supervision of this route. please We refer the Board to the attached letter of support and commitment from the LMETB and the accompanying land Ownership Plan, prepared by O' Mahony Pike Architects. Further detail in relation to the future connection to the Greenway is set out in the Design Statement, prepared by O' Mahony Pike Architects.

This link will realise a long-standing Development Plan and Local Area Plan objective to connect these western residential zoned lands to Dunshaughlin Town Park and Main Street by way of this segregated pedestrian and cycle link. It will be a great amenity not just to prospective residents within the subject scheme but also to the wider community including pupils and visitors to Dunshaughlin Community College and Community Centre.

The realisation of this Development Plan objective to deliver this Skane River Greenway will require Castlethorn to continue to work closely with both the LMETB and Meath County Council to which the Applicant is fully committed. A separate planning application for these works is proposed to deal with construction details and specification including appropriate boundary treatment and the management and future maintenance of this route. The Applicant would invite An Bord Pleanála to attach a condition limiting the extent of future occupations to a maximum of 50% of units within Character Area 4 until such time as Meath County Council are satisfied that a pedestrian and cycle link has been delivered and is operational from the subject lands east along the Skane River to connect with College Park and Dunshaughlin Town Park.

We would further note, as set out in the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers that the Greater Dublin Area Cycle Network Plan identifies the development of a dedicated cycle route on the Drumree Road towards the town centre. This would represent an improvement to the existing pedestrian and cycle links from the subject site east to Dunshaughlin Main Street.

- **Lands to the South**

Future pedestrian / cycle connections have been considered toward the lands located immediately south of Character Area 4 also. The Dunshaughlin Local Area Plan 2010 – 2015 (as extended) identified future pedestrian / cycle connectivity extending south adjacent the R125 and from the south east corner of the application lands in the form of a 'green network'.

The proposed pedestrian / cycle networks take full account of these future aspirations. A toucan crossing is proposed on the eastern arm of the existing roundabout on the R124 to facilitate the continuation of the pedestrian / cycle infrastructure south on the western edge of the proposed development.

Furthermore, continuation of the pedestrian / cycle infrastructure from the southeast corner of Character Area 4 is also facilitated. Vehicular access is catered for to unlock the development potential of the lands located to the southeast. It is envisaged that development of these lands will include a layout which links back into the pedestrian / cycle infrastructure along the eastern side of the proposed development.

Integration of Character Area 6

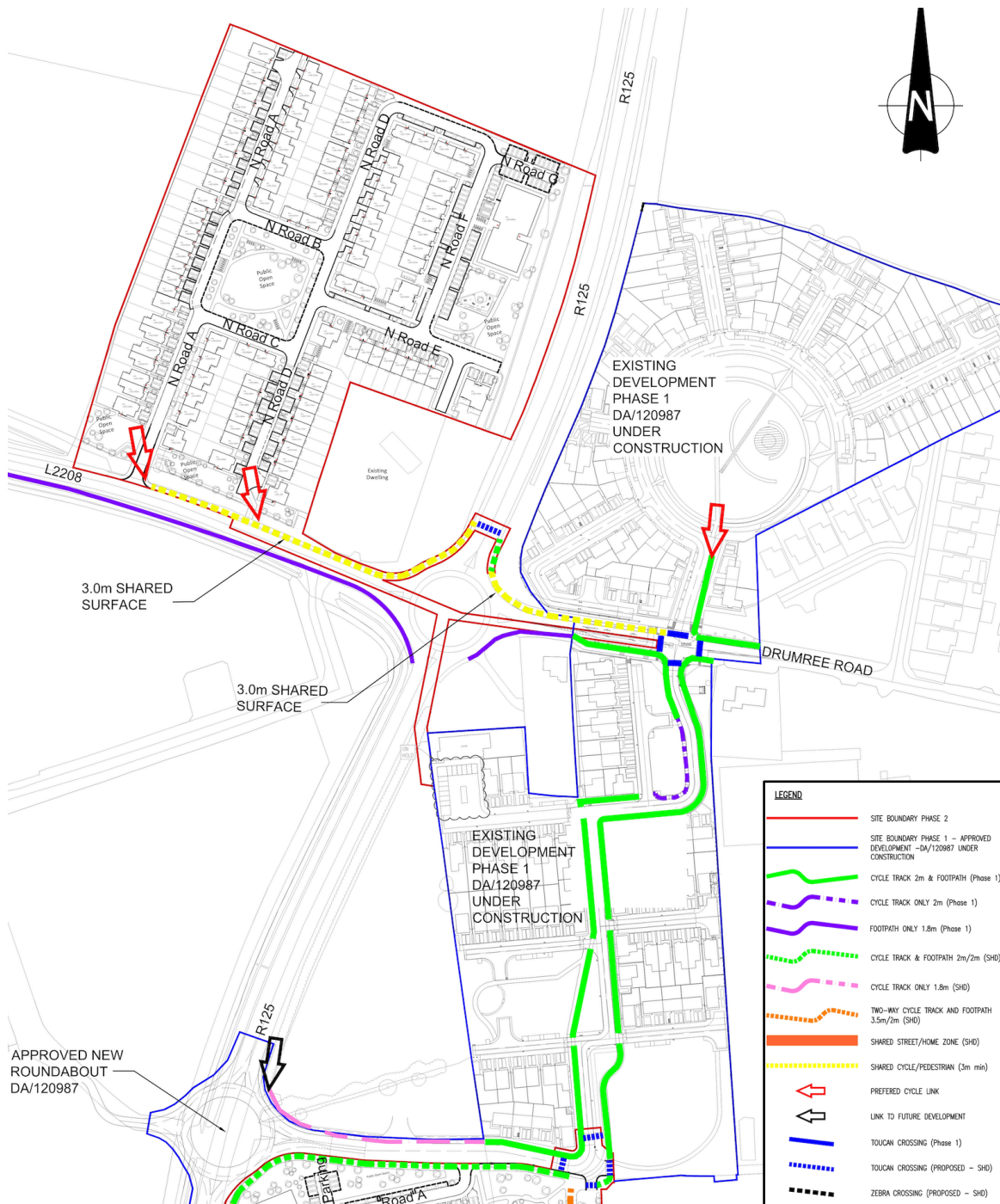
We refer the Board to Dwg. No. 12-081A-P160, prepared by Waterman Moylan Consulting Engineers which shows new connections onto the Drumree Road from Character Area 6.

Character Area 6 will include 2no. pedestrian connections (1no. via the vehicular entrance and 1no. dedicated pedestrian link). A shared cycle and pedestrian path (3m min. width) will be provided on the northern side of the Drumree Road adjacent Character Area 6. This will extend toward the roundabout at the intersection of R125 and Drumree Road.

A new pedestrian crossing with dropped kerbs and tactile paving is proposed on the northern arm of the Drumree Road / R125 roundabout. It is proposed to tie in with the cycle track (2m) and footpath developed as part of Phase 1 on the northern side of the Drumree Road.

In combination, these works will provide safe pedestrian and cyclist movement from the Character Area 6 towards Dunshaughlin town centre including the local schools and GAA grounds adjacent Phase 1.

Overall, the proposed residential development will create an environment which priorities pedestrians and cyclists. Figure 2 below (taken from the DMURS Statement of Consistency, prepared by Waterman Moylan Consulting Engineers) shows the network proposed. The interconnected network of pedestrian and cycling facilities will ensure that future residents will have an attractive and convenient amenity on their doorstep. The looped nature of the networks could readily be designated as a ‘*Slí na Slainte*’ to promote active and healthy lifestyles. Such facilities are becoming increasingly more important as lessons learned from the on-going COVID-19 emergency show the value of amenities within close proximity of ones home when movements are restricted for public health reasons. Furthermore, connectivity with the wider Dunshaughlin environs has also been fully considered. Connectivity to the south, southeast and east from the proposed development has been catered for. These future connections will ensure that as new development and amenities will become increasingly connected for the benefit of both pedestrians and cyclists.



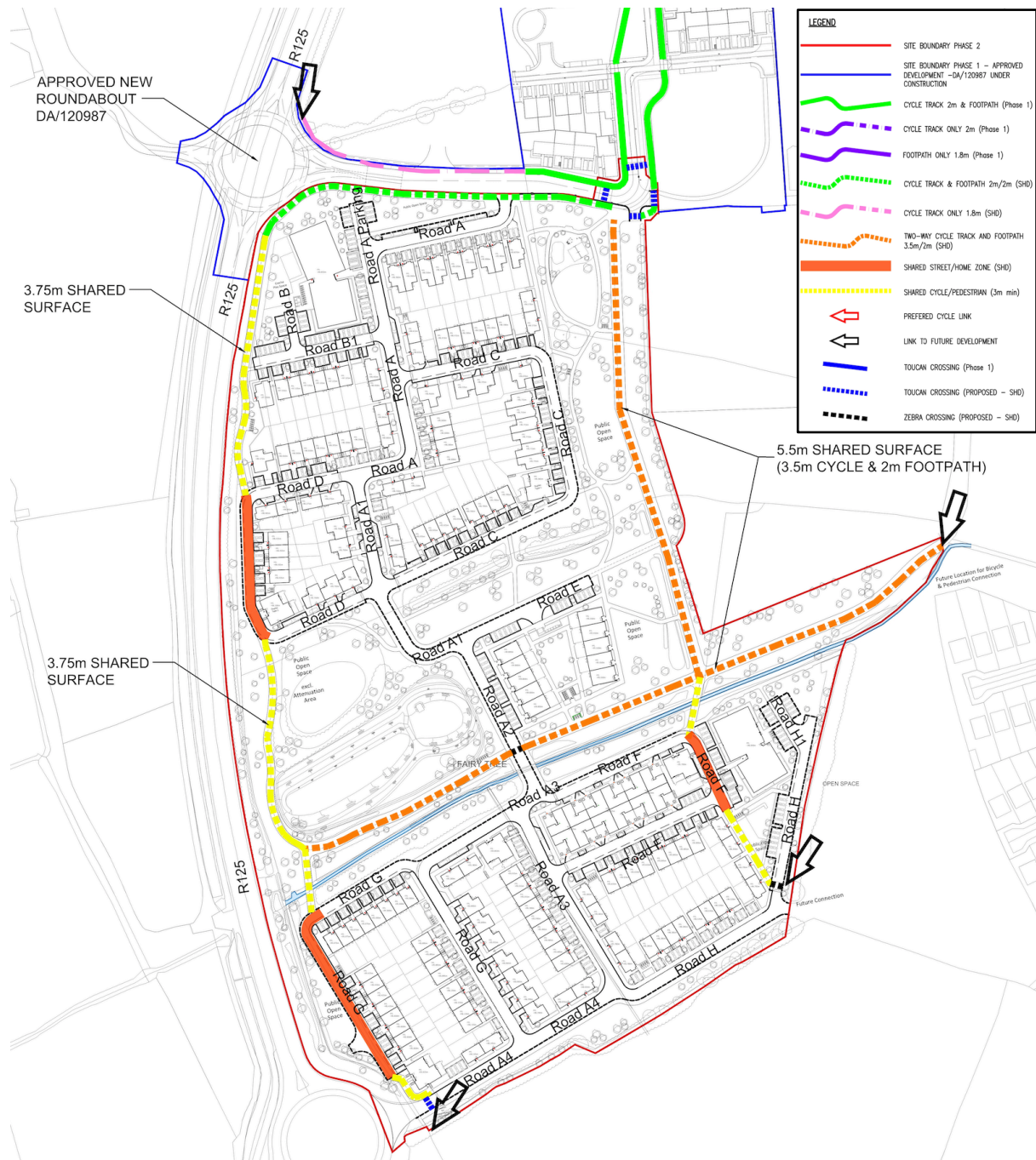


Figure 2: Extract from the DMURS Statement of Consistency, prepared by Waterman Moylan Consulting Engineers illustrating the proposed pedestrian /cycle facilities as well as location for future connections outside the application site.

Applicant’s Response: Compliance with DMURS

We refer the Board in the first instance to the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers. The Report confirms that: -

“All internal roads in the proposed development (North and South Sites) are designed for a speed limit of 30kph with 5.0m wide carriageways and footpaths along both sides. All intersections within the development itself will be priority junctions with raised tables where appropriate. The low design speeds and traffic calming measures will ensure the desirable operation of these junctions and a safe/secure environment for pedestrians and cyclists.”

And

“All footpaths proposed for the subject development (North and South Sites) will be provided in accordance with Section 4.3.1 of the DMURS which suggests that a minimum 1.8m footpath should be provided. All the proposed cycle tracks are designed in accordance with the National Cycle Manual. These proposed pedestrian/cycle facilities will connect to the existing/under-construction facilities in the vicinity of the sites and will provide a good quality and safe/secure network for pedestrians and cyclists.”

The proposed development contains a variety of conditions with widths of pedestrian / cycle infrastructure ranging from 2-5.5m. The conditions include dedicated pedestrian / cycle infrastructure and combined infrastructure to create a clear hierarchy of connectivity across the proposed development as well as the adjoining Phase 1 development (Dún Ríoga).

With reference DMURS Statement of Consistency, prepared by Waterman Moylan Consulting Engineers the following four characteristics have been achieved as part of the proposed development: -

- **Connectivity**

The proposed development has been designed with pedestrians and cyclists taking precedence over other modes of transport where possible. Pedestrian and cyclist connectivity is provided throughout the proposed development and along the Drumree Road interface and the R125 with links to the existing established residential developments and east towards Dunshaughlin Main Street.

- **Enclosure**

The proposed development has been designed as a legible hierarchy of residential streets from broader avenue to side street and intimate homezone streets with the focus on a very efficient and high quality shared public realm. There is variety in building scale and form responding to immediate context to optimise the sense of enclosure within streets and buildings are consciously positioned and designed to ‘turn corners’ with animated facades and activity so that the residential units address public open spaces and provide passive surveillance. Landscaping and tree planting are provided along the roads/streets which further assists in providing a sense of enclosure.

- **Active Edges**

All streets are actively overlooked with grouped residential blocks truly four-sided in terms of aspect and animation. All proposed duplexes as well as houses will have own door access which will ensure a high degree of animation and activity within streets as well as passive surveillance.

- **Pedestrian Activities / Facilities**

As detailed above, the proposed residential development includes a significant provision of high quality and amenity pedestrian and cycle infrastructure. The proposed development includes two north-south spines of pedestrian / cycle infrastructure running along the western and eastern sides of the site and one east-west spine running along the north side of the River Skane. These facilities are interconnected with Phase 1 to facilitate wider pedestrian and cycle movement in and around the proposed development. The proposed development has been designed with pedestrians and cyclists taking precedence and the development will be exceptionally well served by these facilities.

Furthermore, the proposed layout has been subject to a safety audit to ensure compliance with the relevant standards set out by Transport Infrastructure Ireland. We refer the Board to the Stage 1 Road Safety Audit, prepared by Bruton Consulting Engineers. 2no. minor issues were identified (a visibility splay in Character Area 3 to be reviewed and a risk assessment of a safety barrier on the R125 adjacent the existing roundabout which will provide access to Character Area 4). The visibility splay has been addressed and the audit of the barrier will be carried out at detailed design stage. Notwithstanding, the layout is deemed compliant from a road safety perspective.

Overall, having regard to the linkages provided for as part of the proposed development, it is considered that the development proposal will ensure good connectivity with the town centre, existing and future employment uses, and local facilities and amenities. The proposed layout will favour pedestrian / cyclist movement through the site and will provide extensive additional open space amenity and pedestrian and cyclist infrastructure for prospective future and existing residents.

7.2.2 Issue 2 – Core Strategy

The core strategy and the phasing provisions of the development plan. The submitted documentation in this regard should address **higher level planning policy, including the adopted RSES for the region**. Any references to the circumstances of Dunshaughlin, including those relating to the availability or otherwise in the town of **housing, development land, employment, commercial or social services**, should be based on verifiable facts. The prospective applicant should satisfy itself that any application complies with section 8(1)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, regarding the **material contravention** of the provisions of the development plan other than zoning.

(SLA bold font emphasis)

Applicant's Response

The Core Strategy states that "...Meath occupies a strategic location in the Greater Dublin Area (GDA) and benefits from a wealth of natural resources. As a constituent of the GDA, it is part of the largest market in the county and at the centre of Ireland's primary economic hub."

The Development Plan has identified Dunshaughlin as a 'Moderate Sustainable Growth Town'. The Development Plan notes that all of the Moderate Sustainable Growth Towns should develop in a self-sufficient manner and levels of growth should be balanced to ensure that any increase in population will be in tandem with employment opportunities, capacity in physical and social infrastructure and will not be based on long distance commuting.

Table 2.4 Housing Allocation & Zoned Land Requirements

	Household Allocation 2013-2019	Av. Net Density Applicable unit/ha	Quantity of Residential Zoned Land Required*	Available Land Zoned for Residential Use (Ha)	Available Land Zoned for Mixed Use incl. Residential (Ha)**	Total Available Zoned Land (Ha)	Deficit/ Excess (ha)
Large Growth Town I							
Navan*	3,984	45	88.5	240.5	13.9	254.4	165.9
Drogheda Environs	857	43	19.9	157.2	1.8	159.1	139.1
Large Growth Town II							
Dunboyne	1,494	45	33.2	88.6	1.19	89.8	56.6
Maynooth	199	35	5.7	9.5	0.85	10.4	4.7
Moderate Sustainable Growth Towns							
Ashbourne	637	35	18.2	39.5	0.3	39.7	21.5
Trim	518	35	14.8	108.4	3.3	111.7	96.9
Kells	518	35	14.8	75.7	7.1	82.7	67.9
Dunshaughlin	319	35	9.1	62.9	1.9	64.9	55.7
Kilcock	398	35	11.4	63.5	0.0	63.5	52.1

Table 2.4 of the Development Plan (above) highlights is that whilst there is a requirement for 9.1 Ha of residentially zoned lands required, there are a total of 55.7 Ha of lands zoned for residential development in Dunshaughlin remaining. Those lands have capacity for a further 1,950no. dwellings (based on a conservative estimate of 35no. units per Ha).

Table 2.5 Allocated and Committed Units

Urban centre	Committed Unbuilt Units	Household Allocation 2013-2019*
Large Growth Town I		
Navan	786	3,984
Drogheda Environs	1,653	857
Large Growth Town II		
Dunboyne	113	1,494
Maynooth	0	199
Moderate Sustainable Growth Town		
Ashbourne	1,356	637
Trim	912	518
Kells	349	518
Dunshaughlin	784	319
Kilcock	0	398

Table 2.5 of the Development Plan (above) clarifies that there was already Permission for 784no. units in Dunshaughlin at that time, with the Allocation for the period 2013 – 2019 being only 319no. units. As such, 1,103no. units are within the Core Strategy provision for Dunshaughlin up to 2019. That level of household provision could represent an increase in population of approximately 3,200no. persons (using a 2.9 average household size as per the Development Plan).

Dunshaughlin as a ‘Moderate Sustainable Growth Town’ is dependent on the granting of permission for a railway order for the Navan Rail Line Phase II. The Development Plan further states:

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

Objective SS OBJ 1 sets out: -

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

Objective SS OBJ 11 sets out: -

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

Note: Regard is also given to the provision of the Core Strategy of the Draft County Development Plan 2021 – 2027 currently on display.

Dunshaughlin is strategically located to cater for significant new growth and the proposed development will contribute to supporting a compact urban form providing strong linkages and an extension of the built up area of Dunshaughlin on lands which are zoned for new residential development. The proposed development supports the integration of land use and transport due to the highly accessible location of the subject lands. Dunshaughlin is well served by public transport and the Planning Authority have acknowledged that further growth will support the viability of further public transport provision in the medium to longer term with the preferred route for the rail line and planned Dunshaughlin train station located to the west of the town and conveniently accessible to the subject lands.

The proposed development of 415no. residential units and a childcare facility reflect the aspirations set out in the Core Strategy. The proposed scheme provides a sustainable solution for Dunshaughlin’s growing population, by providing a compact medium-density development on a spatially sequential greenfield site with all the necessary physical infrastructure available and is convenient to high quality public transport options via numerous bus routes serving Dunshaughlin and the existing park and ride facility available at M3 Parkway Rail Station.

The proposed development will respond to demand and need for residential development within close proximity to Dunshaughlin town centre and to existing residential areas. The proposal is also exceptionally well located in terms of road infrastructure to Dublin and Navan.

The Applicant has retained Future Analytics Consulting Ltd. to provide a comprehensive socio-economic assessment for Dunshaughlin which looks at population, work force, travel patterns and residential development output and this report is included as part of this SHD application. In preparing their assessment, Future Analytics Consulting Ltd. have had regard for the current Development Plan and Draft Development Plan currently on display by Meath County Council in terms of housing allocations set out in the Core Strategy.

- **National Planning Framework – Ireland 2040**

The National Planning Framework – Ireland 2040 (NPF) marks a fundamental shift away from allowing urban sprawl, to a more compact urban form focused on public transport that will deliver a far more dense compact urban environment. This is intended to provide for significantly reduced commuting times and lead to a greater quality of life for residents / workers over time.

The NPF targets 40% of all new homes nationally to be located close to the existing ‘footprint’ of existing settlements over the lifetime of the framework.

The NPF plans for growth of up to half a million people in the Eastern and Midlands Region and recognises that there is potential in each Regional Assembly Area for significant growth in some settlements (i.e. c. 30% or more above 2016 population levels). Subject to criteria including the provision of adequate infrastructure and amenities to support such growth, and concurrent employment provision. It is considered that Dunshaughlin constitutes an opportunity for planned, compact and sustainable growth, via the expansion of the urban area which has strong physical and social infrastructure and potential for significant employment growth.

Region Based Objectives

Section 3 of the NPF sets high level planning and place-making policies and enablers to help shape the strategic development of our regions. In relation to the Eastern and Midlands Area (which includes Counties Kildare, Meath and Wicklow, proximate to the Capital) the following is stated: -

“The Mid-East has experienced high levels of population growth in recent decades, at more than twice the national growth rate. Managing the challenges of future growth is critical to this regional area. A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.” (pg. 33)

The emphasis within the NPF with regard future development relates to managing the sustainable growth of compact cities, towns and villages to achieve effective density and consolidation.

The regional based objectives for the Eastern and Midlands area set out in the NPF suggest that future residential growth will be linked to increased employment opportunities / investment within settlements such as Dunshaughlin that have seen rapid residential expansion in the last 15 years. Dunshaughlin has experienced approximately 32% growth in population over that period; but this was from a very low base.

Dunshaughlin has benefitted from substantial capital investment in water services infrastructure in recent years with the Dunshaughlin Sewerage Scheme completed in 2006 and the Dunshaughlin Water Supply Scheme completed in 2012. The Draft Meath County Development Plan acknowledges this under Section 3.4.8 with respect to Self-Sustaining Growth Towns where it states specifically with respect to Dunshaughlin:

“The town is in the unique position of having benefitted from significant investment in water and wastewater infrastructure. The front loading of these services alongside upgrades to the local network has created significant capacity in this infrastructure to accommodate medium-long term growth.”

The Meath Economic Development Strategy 2014 – 2022 identifies Dunshaughlin as an existing employment centre in the County. The Development Plan categorises Dunshaughlin as a ‘District Employment Centre’. The Socio-Economic Study, prepared by Future Analytics Consulting Ltd. which accompanies this submission sets out that while there is currently a significant level of outward commuters there is also a ‘a not insignificant number of inward commuters’. In terms of employment potential, the assessment goes on to state that: -

“Dunshaughlin has the potential to position itself as an extremely attractive location for both businesses and citizens to relocate, one that still offers easy accessibility to Dublin...”

...Both Dublin and Navan are accessible within 20 minutes, while Dublin airport can be reached in under a half hour. Such proximity to key settlements and infrastructure offers companies or entrepreneurs an ideal location within which to establish 'second-site' offices or new facilities."

The proposed development will be located to the north of a substantial existing landbank with a proposed zoning for employment use in the Draft Meath County Development Plan and the proposed road from the roundabout of the R125 along the southern edge of the subject site can provide further access to these lands. The Socio-Economic Study, prepared by Future Analytics Consulting Ltd. generally concludes with regard to the correlation between provision of suitable levels of housing and employment potential in the context of the development of the Applicants current zoned lands that: -

"The proposed development would not only provide the necessary accommodation for a growing population, it would also provide housing directly adjacent to lands that are earmarked for enterprise and industry. In this respect, the proposed development would contribute towards the sustainable, long-term development of Dunshaughlin by providing housing that could support the employees of industries on these lands. By doing so, it would significantly reduce the proportion of outward commuting that occurs on a daily basis, offering employees homes that are within walking distance of their places of employment."

The development of housing on the Prospective Applicant's existing zoned landholding which is located close to the existing town centre, in a settlement that is well served by public transport represents a significant opportunity to provide the critical mass to achieve the aspiration of the Meath County Council to counteract outward commuting to provide more attractive conditions for investment in employment in Dunshaughlin.

Objective 72a requires Planning Authorities to apply a standardised tiered approach to zoning of land and Appendix 3 of the NPF 'A Methodology for a Tiered Approach to Land Zoning' sets out a two-tier approach to land use zoning. The following is set out in relation to Tier 1: Serviced Zoned Land: -

"Tier 1: Serviced Zoned Land

This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development.

These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.

Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement."

The subject site can be considered 'Tier 1 Serviced Zoned Land' in the context of the NPF for zoning purposes. It is set out that the landholding is 'shovel ready' and can be readily facilitated. This is in large part due to the fact that the existing Dun Ríoga development (Phase 1) provides access to footpaths roads and services. The following infrastructure is available (Refer to Design Statement, prepared by O'Mahony Pike Architects): -

- Foul Drainage Capacity and Water Supply Capacity – confirmed by Irish Water in Confirmation of Feasibility for the proposed Strategic Housing Development for Phase 2 lands.
- Road infrastructure (including a new roundabout on the R125 to facilitate direct access to the landholding which is being delivered as part of the first phase of Castlethorn's development).
- Surface water attenuation pond within the current Phase 2 landholding that is sized to serve both Phase 1 and Phase 2 development.
- Trunk foul main and surface water outfall already in place in the Phase 2 lands of the landholding.

- Furthermore, the lands are considered spatially sequential and positioned adjacent to the existing built-up footprint of Dunshaughlin and contiguous to existing developed lands, facilities and amenities.

- **Implementation Roadmap for the NPF**

The Implementation Roadmap for the NPF sets out in detail the transitional arrangements for the implementation of the NPF at regional and local level. The Roadmap sets out “Transitional Population projections’ and notes that City and County Development Plans will undergo a process of review and updating by 2020 / 2021.

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

The Roadmap further note that the published NPF population projections account for a 25% ‘headroom’ allowance for additional population growth in every county pro-rata, for each Census year and related intercensal period. For the purposes of the transitional population projections for the roadmap, a further 25%, over and above the population projected to 2026 in the NPF has been added. Cumulatively this means provision of 50% more growth than is required to 2026 has effectively been accounted for at national level. Also, this means that there is limited further requirement for ‘headroom’ of population growth to be incorporated into statutory Development plans in most cases.

However, the Roadmap acknowledges that provision for headroom, not exceeding 25%, can be considered to 2026 in those counties where population growth is projected to be at or above the national average baselines (i.e. Cork, Dublin, Galway, Kildare, Limerick, Louth, Meath, Sligo, Waterford, Westmeath and Wicklow).

Further to the above, Irish Home Builders Association (IHBA) and Construction Industry Federation (CIF) commissioned Tom Phillips + Associates to conduct a review of the transitional guidance contained in the RSES¹. It applied the finding to Draft Development Plans including the Draft Meath County Development Plan. The following is generally set out: -

- It is generally set out that the population projections as published in the NPF utilise an overly conservative growth scenario that does not adequately reflect the in-migration documented within the country from 2017 - 2019 and grossly underestimates the number of people which will need to be housed in the EMRA region by 2031.
- Recent analysis of housing output estimates by Central Bank (Reported in the Irish Times²) suggest that c. 34,000no. houses are required each year up to 2030 to meet future needs. Furthermore, the impact of the COVID-19 emergency has contracted housing output in 2020 and is likely to reduce further the longer the COVID-19 emergency continues.
- There is also evidence that these projections are being taken as a maximum number to be delivered by the planning authorities, when they in fact reflect the minimum population that must be accommodated by each target year.
- Any housing allocation figure extrapolated from these ranges must be taken as the minimum number of units to be delivered in each target year for occupation, not a maximum number of units to be allowed through the planning system.

¹ Castlethorn Construction are members of IHBA and CIF and have provided the RSES Review Statement, prepared by Tom Phillips + Associates for reference as part of preparing this Pre-Planning submission.

² <https://www.irishtimes.com/business/economy/central-bank-says-34-000-houses-needed-each-year-for-next-decade-1.4110839>

- The NPF also puts forward an unrealistic approach to land allocation which effectively shrinks the available land bank for housing in achievable areas in an attempt to redirect development to urban infill/brownfield sites which are inherently more difficult to deliver. It is counterintuitive to reduce the amount of available residential land in a housing crisis.

The proposed development will be located to the north of an existing landbank proposed for employment use and the proposed road from the roundabout of the R125 along the southern edge of the subject site can provide further access to this highly accessible employment landbank. The Socio-Economic Study, prepared by Future Analytics Consulting Ltd. generally concludes with regard to correlation between provision of suitable levels of housing and employment potential in the context of the development of our clients current zoned lands that: -

“...the population of Dunshaughlin is projected to increase each year to 2031, with the economically important age cohort of 15 to 44 year olds growing significantly over that same period.

Analysis of the socio-economic profile for Dunshaughlin, including the population projections made by FAC and in the Draft CDP, would suggest there is an imperative for the delivery of new, varied housing stock to meet the future demands of Dunshaughlin’s population.”

It is considered reasonable based on population projections that Dunshaughlin will cater for significant future growth in Meath over the next 10 years. Our Client’s landholding can support the future expansion of Dunshaughlin in a sustainable manner and supporting the growth envisaged in the NPF where population growth is projected to be at or above the national average baselines.

- **National Development Plan 2018 – 2027**

The National Development Plan 2018 – 2027 (NDP) sets out the main investment projects, programmes and priorities envisaged over the next decade in order to drive the implementation of the NPF. The NDP states that in 2016 as part of the preparation of the Greater Dublin Area Transport Strategy, a cost benefit analysis of an extension of the Dunboyne / M3 Parkway line to Dunshaughlin and Navan was conducted by the National Transport Authority (NTA).

The NTA is required to review its Greater Dublin Area Transport Strategy before the end of 2021. This review will include a reappraisal of the project taking into account the scale of new and planned development along the route and will allow for its consideration during the Mid Term Review. The Transport Strategy for the Greater Dublin Area (GDA) 2016 – 2035 sets out that: -

“The Transport Strategy also states that the corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.”

Meath County Council sets out as part of Pre-Planning consultations for the Strategic Housing Development for Phase 2 lands that Dunshaughlin can become a ‘multi-modal’ town with the provision of the train link. Dunshaughlin is well served by public transport, and the Planning Authority have acknowledged that further growth will support the viability of further public transport provision in the medium to longer term.

Additional housing will provide additional critical mass to support this aspiration of Meath County Council for Dunshaughlin to become a ‘multi-modal’ town. The location allows for strong linkages with the town centre and are considered sequentially suited to consolidate the western edge of Dunshaughlin and rebalance the recent expansions to the eastern side of the town.

- **Eastern & Midlands Regional Spatial & Economic Strategy**

The Eastern & Midlands Regional Spatial & Economic Strategy (RSES) is a strategic plan and investment framework to shape future development to 2031 and beyond. County Meath forms part of the Eastern and Midland Regional Assembly (EMRA).

The RSES acknowledges the need to increase the delivery of housing across the county and projects that at least half of all new homes to be built nationally up to 2040 will be required in the Eastern and Midland Region with Regional Policy Objective (RPO 3.2) requiring that all new homes in towns outside of cities to be located 'within and close to the existing built up area'. (RPO3.2 & NPO 3c).

Dunshaughlin falls within the Self-Sustaining Growth Town Category of the Settlement Hierarchy provided in Table 4.2 of RSES which is defined as: -

"i) Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining."

Dunshaughlin is identified within the hinterland area of the Region, close to the boundary of the Dublin Metropolitan Area. The RSES concur with the Implementation Roadmap for the NPF in noting that "...the scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026..."

The Guiding Principles (p.187) set out in the RSES in relation to the Integration of Land Use and Transport supports the '10 minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.

It is respectfully submitted that the development of housing on the subject site which is located close to the existing town centre (approximately 10 – 12 minutes walking distance or 4 – 6 minutes cycling) is considered to be a sequentially appropriate consolidation of Dunshaughlin westwards. Further linkages to the town centre will be facilitated by connections provided as part of this application to be extended east along the Skane River in tandem with adjacent residential development on the subject site.

Housing delivery in Dunshaughlin has been slow under the current development plan, with a large number of consented applications remaining unbuilt at this time. Whilst construction is beginning to pick up, housing delivery will need to account for future population growth requirements as well as growth anticipated that was previously intended to be accommodated under the current Development Plan period of 2013 – 2019.

- **Employment**

The Socio-Economic Study, prepared by Future Analytics Consulting Ltd. which assessed workplace zones (WPZ) and 10 / 15 minute drivetimes (considered a local commute) from the town. The Report notes that: -

"...journey times under 15 minutes had the largest percentage at 42.6%, which suggests that 1,207 people within Dunshaughlin work locally. 73% of the population had a journey time of less than 30 minutes. Only 3.4% of people travel over 1 hour to get to their destination. These journey time figures suggest that a large proportion of people living in Dunshaughlin go to work, school, college within or within close proximity to Dunshaughlin. Only 7.7% of people within Dunshaughlin record a journey times of 45 minutes or more."

The WPZ zones data provides an insight into the main employment areas of Dunshaughlin. There is a strong workforce with a total of 1,235no. workers within the town settlement

The CSO's Place of Work, School or College – Census of Anonymised Records (POWSCAR) data was also assessed. This data is used to establish travel patterns and understand where people travel to and from for college, school or work. The Report notes that: -

“Importantly, the Dunshaughlin ED has the highest number of commuters, with surrounding EDs, particularly those to the east (Ratoath and Dunboyne) also destinations for high numbers. Several EDs within Dublin are popular, as would be expected for a town that is in such proximity to the capital.”

The reverse trend is also considered (i.e. people commuting to Dunshaughlin). The Report notes that: -

“While there are a significant number of people who leave Dunshaughlin for work (2,358 based on the POWSCAR data), equally there is a substantial number that travel into the ED, with statistics suggesting a total of 1,809 persons. Such numbers could suggest there is potential demand for housing within the existing workforce catchment for the area.”

Analysis has also been provided to consider the number of employers within Dunshaughlin and within short commuting distance (10 – 15 minutes). Data shows that there are approx. **410no. employers** of various sizes within 5km and the majority of work travel is local in nature (c. 43% travelling up to 15 mins and 73% travelling up to 30 mins). Full details of the employers identified are set out in the Socio-Economic Study, prepared by Future Analytics Consulting Ltd.

The impact of COVID-19 has also been considered in terms of workforce and the requirement for working from home. Response to surveys compiled by the CSO note that approximately 60% of staff worked remotely from office-based enterprise. It is noted that the impact of COVID-19 is likely to change future working practices permanently. The Report notes that in terms of future working practices that: -

*“The NPF current estimates a work to resident ratio of 0.5, with approximately half of jobs estimated to be outside the town (noting that the majority are in fact within local 15 minute drive). **Applying the current level of remote working of 59% (to the NPF workforce of 1,841) would give a ratio of 0.8 and even with a reduction to a 30% increase in remote working the ratio would be 0.7.**”*

Overall Analysis of Socio-Economic Profile

The Socio-Economic Report, prepared by Future Analytics Consulting Ltd. sets out with regard to the socio-economic profile of Dunshaughlin that: -

“Dunshaughlin has a younger, more highly educated and greater skilled population when compared to both the County and State averages. It acts as a sub-regional hub for economic activity in County Meath, seeing a higher proportion of inward commuters, in comparison to many other parts of the County. Furthermore, the population of Dunshaughlin is projected to increase each year to 2031, with the economically important age cohort of 15 to 44 year olds growing significantly over that same period.

*Analysis of the socio-economic profile for Dunshaughlin, including the population projections made by FAC and in the Draft CDP, **would suggest there is an imperative for the delivery of new, varied housing stock to meet the future demands of Dunshaughlin’s population.** With a large existing cohort of young, highly educated professional workers that is set to increase further, there will be a greater demand for premium residential properties of mixed unit sizes. Catering for this ‘middle class’ will ensure that Dunshaughlin can retain this particularly vital demographic, which will have further benefits for the town and environs. Profound changes in work practices in 2020 will support a far higher level of remote working (home based economic activity) which is likely to push the work – live ratio from approx. 0.5 (in 2016) up to between 0.7 and 0.8 in 2020/2021, supporting ever increasing trends in sustainable settlement formation.”*

Overall, in terms of employment it can be seen from the analysis carried out by Future Analytics Consulting Ltd. that Dunshaughlin and its immediate hinterland (10 – 15 minutes’ drive) is a key economic hub for this region. The timely delivery of housing located within close proximity to Dunshaughlin town centre, zoned employment lands and other key facilities such as schools and sports facilities and spatially sequential to the existing built up area will be critical to Dunshaughlin to continue as a self-sufficient settlement.

- **Housing Delivery**

We refer the Planning Authority to Socio-Economic Study, prepared by Future Analytics Consulting Ltd. which generally sets out that: -

“The evidence presented indicates a population within Dunshaughlin that is primarily characterised by a strong labour force with good access to employment opportunities both locally and within a wider catchment area surrounding the settlement.

*It has been shown that **Dunshaughlin has the capacity to support further delivery of housing, beyond the build out of the extant planning permissions.** This is considered alongside the characteristics of the application site itself, which is strategically positioned on the edge of the existing settlement area and immediately adjacent to strategically important lands zoned for enterprise.”*

The socio-economic assessment generally sets out that the housing demand for Dunshaughlin is not being met by current residential development output. The existing zoned ‘A2 New Residential’ within the built up areas of Dunshaughlin have extant permissions which have been considered as part of the household allocation provision within the Core Strategy of the context of the Draft Development Plan 2020 – 2026.

In preparing their Socio-Economic Study, Future Analytics Consulting Ltd. carried out a review of planning permissions and applications that are of a scale which could influence the direction and composition of future developments or proposals. This exercise generally confirmed the following: -

“It is important to reference the Draft County Development Plan in order to establish the quantum of residential units that could be delivered in Dunshaughlin. The Draft CDP provides Dunshaughlin with a household allocation for the 2020 to 2026 period of 1,003 units, of which it is stated that 600 are to be accounted for as part of the granted SHD application by Rockture. This leaves an allocation of 403 units for this period. The proposed Castletown development, which is the subject of this socioeconomic study, is seeking to construct 415 units. If permitted, the Castletown application would allow the household allocation to be met in advance of 2026 and do so in a single, coherent development, resulting in a more orderly and structured delivery of the household unit allocation.

A more forensic analysis of the Draft CDP figures and those obtained from the pipeline development study demonstrates that the effective capacity is, in fact, greater than the previous scenario indicates. The number of extant units not yet built is listed as 1,156 in the Draft CDP. Combining this figure with the allocation for the 2020-2026 period (1,003 units) results in a total of 2,159 units. This means that there are 2,159 units that have either already been permitted but not yet constructed or have been allocated for the time period.

The pipeline development analysis performed for this study indicates a total of 1,613 units proposed as part of permitted applications. If this figure is deducted from the combined figure for extant and allocated units an effective capacity of 546 units is arrived at (2,159 – 1,613). In this regard, an argument could be made that an effective capacity of 546 units remains from the overall allocation for the 2020-2026 period. This remaining capacity would not include any extant, unbuilt developments, which also applies to the entire Rockture SHD located to the east of Dunshaughlin and referenced in the Draft CDP. This would, therefore, leave sufficient scope for the permitting of the 415-unit Castletown development as, even after completion, an allocation of 131 units would remain.

It is significant that both these scenarios show that there is capacity within the scope of the household allocations to accommodate the proposed Castletown development. In the first instance, the proposed development would result in the delivery of the household allocation when the permitted SHD is accounted for. In the second instance, where the pipeline figures determined by this study are subtracted from the combined Draft CDP figures, the proposed development would still allow for future residential developments within the overall scope.”

Based on the assessment prepared by Future Analytics Consulting Ltd. the following can be taken from the data presented: -

Data / Scenario	No. of Units
Extant units not yet Built as per Core Strategy of Draft Development Plan	1,156 (A)
Household Allocation for 2020 – 2026 as per Core Strategy of Draft Development Plan	1,003 (B)
Combined Total (A + B)	2,159 (C)
Units Permitted / Under Construction (identified by Future Analytics Consulting Ltd.) <i>Note: This includes all of the units granted in the SHD application by Rockture – 600no. of which are committed for this Development Plan cycle and 313no. committed post 2026.</i>	1,613 (D)
Discounting 313no. units granted in the SHD application by Rockture which are allocated post 2026 from Units Permitted / Under Construction (D – 313)	1,300 (E)
Potential Capacity for Dunshaughlin 2020 – 2026 (C – E)	859

From the above it can be reasonable argued that there is potential household allocation in Dunshaughlin for **859no.** units in the period between 2020 – 2026.

Notwithstanding, the number of units identified, the Report generally concludes: -

“...the pipeline housing analysis has highlighted the number of extant permissions that exist in Dunshaughlin. It is the opinion of this report that the total number of units that comprise the combined permissions, if built out, would still not meet the future needs of Dunshaughlin’s growing population. The proposed development would help meet the demands of a growing population and constitute compact development that occurs within the existing built footprint of the settlement.”

The independent Socio-Economic Study, prepared by Future Analytics Consulting Ltd. fully supports the opinion that Dunshaughlin has capacity and potential to grow beyond what is set provided for in the Draft Development Plan up to 2026.

SUMMARY

Based on the provision of the NPF the Applicants landholding can be considered ‘Tier 1 Serviced Zoned Land’ in the context of the NPF. It is set out that the landholding is ‘shovel ready’ and development can be readily facilitated.

As highlighted above and acknowledged in the Draft Meath Development Plan Dunshaughlin is exceptionally well-placed from an infrastructural capacity perspective due to recent significant investments in water and wastewater infrastructure. Dunshaughlin is unique in that there is sufficient capacity in this infrastructure to accommodate the medium to long term growth of the town.

The subject lands are also uniquely placed in terms of existing infrastructure. The site is immediately adjacent to the Dunshaughlin Link Road, a key completed distributor road for the town which provides direct access to the M3 Motorway. The proposed development will also connect directly to a foul trunk main, surface water outfall and attenuation pond completed within the subject Phase 2 lands as part of Phase 1 works.

The Applicant is mobilised on-site completing, selling and occupying affordable homes on adjoining lands and are ready to commence development on these Phase 2 lands. Furthermore, the subject lands are spatially sequential and positioned adjacent to the existing built-up footprint of Dunshaughlin and contiguous to existing developed lands, facilities and amenities.

The regional based objectives for the Eastern and Midlands area set out in the NPF suggest that future residential growth will be linked to increased employment opportunities / investment within settlements such as Dunshaughlin.

The NDP states that in 2016 as part of the preparation of the Greater Dublin Area Transport Strategy, a cost benefit analysis of an extension of the Dunboyne / M3 Parkway line to Dunshaughlin and Navan was conducted by the National Transport Authority (NTA). The provision of additional housing in a consolidated fashion will provide additional critical mass to support this aspiration of Meath County Council for Dunshaughlin to become a ‘multi-modal’ town.

The RSES acknowledges the need to increase the delivery of housing across the county and projects that at least half of all new homes to be built nationally up to 2040 will be required in the Eastern and Midland Region with Regional Policy Objective (RPO 3.2) requiring that all new homes in towns outside of cities to be located ‘within and close to the existing built up area’.

It has been demonstrated that Dunshaughlin does not possess the housing supply to meet current demand. The proposed development will respond to the demand and need for affordable residential development within close proximity to the centre of Dunshaughlin and adjoining existing residential areas as well as educational and community facilities. The proposal is exceptionally well located in terms of the immediately accessible road infrastructure to Dublin and Navan and is also well served by public transport in terms of both existing and planned future provision.

7.3 Response to Specific Information Requested

7.3.1 Item 1 – Housing Quality Assessment

A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements.

Applicant’s Response

We refer An Bord Pleanála to the detailed Housing Quality Assessment (HQA), prepared by O’Mahony Pike Architects. The HQA outlines the requirements of the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018) and how each unit complies with the associated standards.

We also refer An Bord Pleanála to Section 9.5 of this Report which demonstrates compliance with the SPPR’s contained within the above Apartment Guidelines.

7.3.2 Item 2 – Site Specific Flood Risk Assessment Report

A Site Specific Flood Risk Assessment Report. The prospective applicant is advised to consult with the relevant technical section of the planning authority prior to the completion of this report which should describe this consultation and clarify if there are any outstanding matters on which agreement has not been reached with regard to surface water drainage.

Applicant’s Response

We refer the Board to Site Specific Flood Risk Assessment (SSFRA), prepared by Waterman Moylan Consulting Engineers. The SSFRA confirms that: -

“All housing aspects of the proposed development are in Flood Zone C. In Zone B, only less vulnerable aspects of the proposed development are situated, such as open spaces, paths, outdoor sports and recreation amenities. There is no need to perform the justification test.”

The SSFRA goes on to conclude that: -

“Through careful design and appropriate mitigation measures, the risks and consequences of flooding have been mitigated across the development.

Surface water runoff from the site is limited to Greenfield runoff and does not impact on developments upstream or downstream of the subject site.”

The subject lands have been analysed for risks from flooding from the Irish Sea, fluvial flooding, pluvial flooding, groundwater and failures of mechanical systems. Through careful design and appropriate mitigation measures, the risks and consequences of flooding have been mitigated across the development.

The residual risk associated with flooding from the Irish Sea, fluvial flooding, pluvial flooding, groundwater and failures of mechanical systems is categorised as low on the basis that mitigation measures are fully implemented.

7.3.3 Item 3 – Engineering Services Report

An Engineering Services Report that would demonstrate how foul drainage and water supply would be provided for the proposed development. The prospective applicant is advised to consult with Irish Water prior to the completion of this report.

Applicant's Response

We refer the Board to the Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers. The Report sets out the detail in relation to Foul Water, Surface Water and Water Supply. The details of the water services proposal are set out in Section 8 of this Report.

Waterman Moylan Consulting Engineers had ongoing consultations Irish Water in the months leading up to the SHD Planning Application. A Confirmation of Feasibility, from Irish Water, dated 20 February 2020 is enclosed with this SHD Planning Application.

We refer the Board further to the Statement of Design Acceptance, dated 4 September 2020, in respect of the proposed development which demonstrates compliance with Irish Water Standards and confirmation that connection to the Irish Water network is feasible.

7.3.4 Item 4 – Site Zoning Plan

A site plan showing the layout of the proposed development in relation to the various zonings that apply to the site.

Applicant's Response

We refer the Board to the Site Layout Plan (Dwg No. 1217A-OMP-00-ST-DR-A-1010), prepared by O' Mahony Pike Architects which overlays the zoning that applies to the site.

The map clearly demonstrates that the residential elements of the proposed development are contained within the area zoned A2 – New Residential. Residential development is permitted on lands zoned A2 – New Residential. Landscaping, pedestrian / cycle pathways are proposed on lands zoned F1 – Open Space. This type of development is permitted on land zoned F1 – Open Space. Further discussion in relation to land use zoning is set out in Section 10 of this Report.

There is an instance with a short section of roadway traverses lands zoned F1 – Open Space between Character Area 3 and Character Area 4. The vehicular link is proposed for convenient vehicular access through this part of the overall development. The primary access and egress to Character Area 3 is via the permitted roundabout on the R125 (MCC Reg. Ref. DA120987 – ABP Ref. PL17.241988) and to Character Area 4 is via the existing roundabout on the R125.

Further discussion in relation to land use zoning is set out in Section 10 of this Report. The short section of roadway which crosses the lands zoned F1 – Open Space between Character Area 3 and Character Area 4 in land use planning terms may not be considered permissible. The road in itself is ancillary to residential use and a residential use on lands zoned F1 – Open Space is not permissible under the Meath County Development Plan 2103 – 2019.

We would argue that the road connection through the lands zoned F1 – Open Space are very minor in nature. The road represents a minor piece of overall road infrastructure and it is considered that it does not impact on the usability of the lands zone F1 – Open Space. The proposed development will introduce a landscaping scheme which will maximise the open space lands for the benefit of the prospective residents and visitors alike. The road link will not impact on the use of the F1 – Open space lands in any significant way.

Notwithstanding, the Applicants Design Team has considered the potential omission of this road link should it be considered inappropriate by the Board. We refer the Board to the alternative road layout drawings, prepared by Waterman Moylan Consulting Engineers and the associated alternative landscaping arrangement included in the Landscape Design Development Report, prepared by Doyle + O'Troithigh Landscape Architects.

The alternative layout has been considered as part of the Environmental Impact Assessment Report to ensure any environmental impacts are considered. It can generally be concluded from the various assessment, where the omission of the road link is relevant, there is no significant impact.

We hereby confirm the Applicants' willingness for a condition of any grant of planning permission to require the omission of that road link between Character Area 3 and Character Area 4 across F1 zoned lands should the Board consider that more appropriate from a land use planning perspective.

7.3.5 Item 5 – Screening for Appropriate Assessment

A screening report for appropriate assessment.

Applicant's Response

We refer the Board to the Appropriate Assessment Screening Report, prepared by Scott Cawley Ltd. The Report concludes: -

"Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded...In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.

Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)."

7.3.6 Item 6 – Proposed Boundary & Surface Treatments

Details of proposed boundary and surface treatments throughout the development, and of landscaping and planting.

Applicant's Response

We refer the Board to the enclosed Landscape Architecture pack, prepared by Doyle + O'Trioithigh Landscape Architects which includes: -

- Landscape Design Report.
- Landscape Masterplan.
- Landscape Sections.
- Playground Design.
- Boundary Treatments.
- Planting Plans.
- Softworks and Hardworks Details.

The rationale for the chosen material palette is set out in the Landscape Design Report, prepared by Doyle + O'Troithigh Landscape Architects. The Report sets out that: -

"The landscape design for the scheme has been developed to offer its own character and sense of place with the use of a comprehensive set of cohesive and complimentary external finishes."

A full range of details are included in the Landscape Design Development Report and the Landscape Drawings which include details of softworks and hardworks and a full suite of drawings detailing boundary finishes across the proposed development.

7.3.7 Item 7 – Draft Construction Management Plan

A draft construction management plan.

Applicant's Response

We refer the Board to Outline Construction Management Plan, prepared by Waterman Moylan Consulting Engineers.

7.3.8 Item 8 – Draft Waste Management Plan

A draft waste management plan.

Applicant's Response

We refer the Board to Construction & Demolition Waste Management Plan, AWN Consulting Ltd. which sets out a clear strategy for the management of waste during the construction process.

Furthermore, we refer the Board to Operational Waste Management Plan, prepared by AWN Consulting Ltd. which details how household waste will be managed on the development is operational. Dwg. No. 1217A-OMP-00-ST-DR-A-1040 'Bin Storage Plan', prepared by O'Mahony Pike Architects shows the distribution of waste storage facilities throughout the site. AWN Consulting Ltd. have worked closely with O'Mahony Pike Architects to ensure the appropriate size and locations are identified for waste facilities within the proposed development.

8 PARTICULARS OF THE PROPOSED STRATEGIC HOUSING DEVELOPMENT

The application site is located at the townlands of Readsland, Roestown and Knocks, Dunshaughlin Co. Meath. The proposed development is set out in three distinct character areas, Character Area 6 (c. 3.75 Ha) extending to the north west of Drumree Road (L2208 Link Road roundabout) and Character Areas 3 & 4 (c. 8.48 Ha) to the south east generally bounded to the west by the existing Link Road, to the north by Phase 1 lands (currently under construction by the applicant), to the south and east by lands zoned for open space and Dunshaughlin Community College.

The overall development will consist of 415no. residential units (254no. Houses, 55no. Duplex units and 106no. Apartment units), accommodated across two sites (Character Area 6 and Character Area 3 & 4) in buildings ranging in height from 2 to 5 storeys. The development proposal will also include a childcare facility (c. 409 sq. m gross floor area) and associated garden & play area (c. 430 sq. m), public open space, internal roads, cycle and pedestrian infrastructure, services and all other associated development on a site of c. 12.2 Ha. The proposed development generally comprises of: -

- **Character Areas 3 & 4** (c. 8.48 Ha) – 266no. residential units comprising: -
 - 159no. Houses (6no. 2-bed, 118no. 3-bed and 35no. 4-bed).
 - 72no. Apartments (Block 01: 10no. 1-Bed and 28no. 2-Bed and Block 02: 11no. 1-Bed and 23no. 2-Bed).
 - 35no. Duplexes (Type 1: 5no. 2-Bed and 10no. 3-Bed and Type 2: 10no. 2-Bed and 10no. 3-Bed).
 - Childcare facility (c. 409 sq. m) at ground floor level of Block 01 and associated outdoor garden and play area (c. 430 sq. m).
- **Character Area 6** (c. 3.75 Ha) – 149no. residential units comprising: -
 - 95no. Houses (73no. 3-bed and 22no. 4-bed).
 - 34no. Apartments (Block 03: 11no. 1-Bed and 23no. 2-Bed).
 - 20no. Duplexes (Type 1: 2no. 2-Bed and 4no. 3-Bed & Type 2: 7no. 2-Bed and 7no. 3-Bed).
- And, all associated and ancillary site development and infrastructural works (including plant), hard and soft landscaping and boundary treatment works including: -
 - New vehicular access provided to Character Area 6 from Drumree Road, to Character Area 3 from the permitted roundabout on the R125 (MCC Reg. Ref. DA120987 – ABP Ref. PL17.241988) and to Character Area 4 from existing southern roundabout on the R125.
 - Provision of enhanced pedestrian and cycle linkages east and north to Phase 1 (Dún Ríoga) and onwards towards Dunshaughlin Town Centre.
 - Provision of internal road, footpath and cycle network including 1no. vehicular bridge and 2no. pedestrian / cyclist bridge crossings over the River Skane and dedicated footpath / cyclepath along the Skane River to the western boundary of Dunshaughlin Community College lands to facilitate connection east to College Park and Dunshaughlin Town Park.
 - Provision of foul water drainage, surface water drainage and water supply infrastructure including works along Drumree Road and connections into the existing Phase 1 (Dún Ríoga) network of services.
 - Provision of public open space (c. 4.07 Ha) in the form of landscaped linear parks, pocket parks and communal open space areas for apartments and duplexes.
 - 664no. car parking spaces & 568no. long and short-term bicycle parking spaces.
 - Bin stores and bicycle parking facilities for all terraced houses, duplexes and apartments.
 - 6no. ESB Sub-stations.
 - The development involves minor amendments to permitted site development works in Phase 1A – Dún Ríoga (MCC Reg. Ref. DA120987 – ABP Ref. PL17.241988).

8.1 Key Site Statistics

In summary, the key statistics for the proposed developments are outlined below: -

Key Site Statistics	
Total Number of Units	415
Maximum Gross Floor Area (Residential only)	c. 43,800 sq. m c. 44,183 sq. m (With optional extensions for House Type 01 included).
Gross Floor Area (Residential and ancillary uses)	44,656 sq. m
Gross Site Area (Character Areas 3, 4 & 6)	14.8 Ha
Building Height	2 to 5 storeys
Net Density	c. 42 unit per Ha
Unit Mix	<p>Houses:</p> <p>2 Bed: 6no. (1.4% of total units)</p> <p>3 Bed: 191no. (46% of total units)</p> <p>4 Bed: 57no. (13.7% of total units)</p> <p>Apartment / Duplex:</p> <p>1 Bed: 32no. (7.7% of total units)</p> <p>2 Bed: 96no. (23.6% of total units)</p> <p>3 Bed: 31 (7.5% of total units)</p>
Public Open Space	4.07 Ha (27.5%)
Part V	10% (42 no. Units)
Plot Ratio	0.44
Site Coverage (Gross)	15.1%

8.2 Proposed Residential Development

415no. residential units are proposed in this case, including a mix of 23no. different unit types. These range from apartments, duplexes and houses.

The housing design typology ranges from bungalows, deep plan to wide frontage detached, semi-detached and terraced houses, of two to three storeys, accommodating 2, 3 and 4 bed units.

The apartment design typology is reflected in 3no. apartment buildings, ranging from 4 to 5 storeys, and accommodating a range of 1 and 2 bed apartment units.

The duplex design typology is reflected in 2no. main typologies comprising small corner blocks of interlocking duplexes and longer terraces of duplex over duplex each accommodating a range of 2 and 3 bed duplex units.

The following tables identify the extent of housing and apartment accommodation envisaged within the scheme. For clarity, duplex units are considered as apartments and are included in that table as a result.

Houses			
Unit Type	No. of Units	GFA (m²) / Unit	Min. Size – Guidelines 2007
House Type 01 – 3-bed deep plan.	102	105.6 - 114	92
House Type 02A – 4-bed deep plan.	19	129.1	110
House Type 02B – 4-bed deep plan w. bay window.	2	130.8	110
House Type 03A – 3-bed wide plan	20	103.2	92
House Type 03B – 3-bed wide plan w. bay window.	20	105	92
House Type 04A – 3-bed wide plan + garage.	21	104.5	92
House Type 04B – 3-bed wide plan + garage	8	104.9	92
House Type 04C – 3-bed wide plan + garage	4	104.6	92
House Type 05 – 4-bed wide plan corner unit detached house.	6	136.3	110
House Type 06 – 3-bed deep plan.	10	102.4	92
House Type 07A – 4-bed deep plan	3	143.4	110
House Type 07B – 4-bed wide plan house.	3	146.1	110
House Type 08A – 4-bed deep plan terraced house.	22	141.4	120
House Type 08B – 4-bed deep plan terraced house.	1	142.2	120
House Type 08C – 4-bed deep plan terraced house.	1	142.2	120
House Type 09A – 2-bed house	6	70.8	60
House Type 09A – 3-bed house	6	118.9	92
Total	254	Max. 29,202.1 sq. m	
Apartments & Duplexes			
Unit Type	No. of Units	GFA (m²) / Unit	Min. Size – Guidelines 2018
1 Bed Apartment	32	47.1 – 50.3	45
2 Bed Apartment – 4 Person	74	75.5 – 80.8	73
2 Bed Duplex – 4 Person	24	99 – 106	73
3 Bed Duplex	31	104 – 115	90
Total	161	Max. 10,342.2 sq. m	
Overall Total	415	Max. 43,799.5 sq. m	

* **Net Internal Area** (i.e. floor area of apartments only – omitting circulation areas etc. within apartment blocks).

These details can also be found in the Schedule of Accommodation and Housing Quality Assessment, together with the House Type and Apartment Block Drawings, prepared by O'Mahony Pike Architects enclosed with this submission.

8.3 Non-Residential Development

The following table identifies the extent of ancillary accommodation envisaged within the scheme.

Class of Development	Gross Floor Space in m ²
Childcare Facility	c. 409 sq. m

Consideration is also being given to the provision of a small retail unit in Block A of the proposed development. In the potential absence of the development of a Neighbourhood Centre on adjacent third party lands this small facility could provide adequate provision of convenience retail in the form of a small corner shop. It is noted however, the proposed development is located within 1km of Dunshaughlin Main Street which has a wide range of retail and service retail facilities.

We refer the Board to the Design Statement, prepared by O'Mahony Pike Architects which shows an alternative arrangement of the ground floor of Block A to provide a small retail unit (160 sq. m). This is indicated as an optional alternative ground floor layout for Block A should An Bord Pleanála consider such provision necessary or desirable and we can confirm that the Applicant would be satisfied with a condition of permission requiring its delivery in that manner.

An analysis of the childcare demand created by the proposed development is set out Childcare Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.

8.4 Residential Density

The Housing Allocation & Zoned Land Requirement set out in Table 2.4 of The Meath County Development Plan 2013 – 2019 promotes the achievement of residential densities in Dunshaughlin at 35no. units per hectare. Other considerations include ensuring high quality urban design and open space.

The proposed residential density accords with the outer-suburban greenfield nature of the subject site, which is situated in a Moderate Sustainable Growth Town. The Guidelines for Sustainable Residential Development in Urban Areas (2009) provide guidance on the appropriate level of residential density for such sites, with net residential density of 35 – 50no. units per hectare recommended.

The net developable area excludes the Flood Zone area, wetland attenuation area and lands zoned F1 – Open Space which is consistent with Appendix 1 of the Sustainable Residential Development Guidelines.

The proposed development achieves a net density of c. 42 units per Ha and is in accordance Sustainable Residential Development in Urban Areas (2009). We refer the Board to Dwg. No. 1217A-OMP-00-ST-DR-A-1080 'Net Density Calculation', prepared by O'Mahony Pike Architects which show the areas omitted for the purposes of net density calculations.

The proposed development provides critical mass in terms of delivering architecturally designed residential accommodation for a range of household types, close to existing facilities and amenities in the town centre thereby representing a sustainable new residential development that will support the viability of local businesses and community facilities within Dunshaughlin.

Located within reasonable walking distances of existing and planned key transport options such as Bus Eireann and Private Bus routes (and future Phase 2 Navan to Dublin Rail), the scheme supports sustainable integrated land use and transport planning and is proximate to employment, education and retail service facilities in Dunshaughlin. Core Principle 6 seeks: -

"To support the creation of a compact urban form in all settlements in Meath."

The proposed density is consistent with greater policy emphasis in the National Planning Framework, Regional Spatial and Economic Strategy and Ministerial Guidelines. These documents (all published since 2018) promote higher densities and greater height in the pursuit of more sustainable compact urban development at central or accessible urban locations, and that support investment in and use of sustainable transport such as this.

8.5 Proposals to Integrate with Surrounding Land Uses

The proposed development is set out in 3no. Character Areas. Character Areas 3 & 4 (c. 8.48 Ha) are generally bounded to the west by the existing Dunshaughlin Link Road (R125), to the south and east by lands zoned for open space and Dunshaughlin Community College, to the north by under construction development of Phase 1 lands (currently under construction and nearing completion by the Applicant) and lands identified for neighbourhood centre use which may ultimately accommodate a local centre providing local convenience and service uses.

Character Area 6 (c. 3.75 Ha) comprises a greenfield site bounded to the north and west by agricultural lands, Drumree Road (L2208) to the south and Dunshaughlin Link Road (R125) to the east. A single private dwelling adjoins the subject site along the south eastern boundary.

Character Area 3 & 4

Character Areas 3 & 4 comprises 266no. residential units (159no. houses, 72no. apartments and 35no. duplex units) ranging in height from 2 – 5 storeys, with 2 – 3 storey houses and duplex units and 2no. 4 – 5 storey apartment Blocks. The following sets out how these Character Area will integrate with the surrounding context: -

- The residential layout and pedestrian / cyclist infrastructure proposed for Character Area 3 & 4 is designed to facilitate and maximise pedestrian and cycle permeability throughout the scheme and consists of two north-south spines running along the western and eastern sides of the site connected east-west along the Skane River and further south within the street network of Character Area 4 to create a looped network within the overall scheme.
- In line with the ‘Dunshaughlin Land Use Zoning Objectives Map’ within the Meath County Council Development Plan 2013 – 2019, allowances for future pedestrian / cycle links have also been provided between Character Area 4 and any potential future development to the east and south.
- An east-west pedestrian and cycle route running along the north side of the Skane River is provided, which will facilitate connections east to and through the adjoining community college lands to connect to Dunshaughlin Town Park and further east to Main Street.
- All proposed pedestrian and cycle routes will be interconnected with Phase 1 infrastructure providing access to Drumree Road, with dedicated cycle lanes and pedestrian routes and shared surfaces to ensure that a safe / secure and attractive environment is provided for residents travelling within or to and from the proposed development.
- The primary vehicular connection to Character Area 3 will be provided from R125 Dunshaughlin Link Road, via the four-armed roundabout approved under Phase 1 development (Reg. Ref. DA/120987 – ABP Ref. PL17.241988) with completion of this expected in Q2 2021. This access road will comprise off road cycle lanes along both sides and will also provide access to the Character Areas 3 and 4 of the proposed development.
- A connection from Character Area 3 will also be created with Phase 1 immediately north and tie into the existing road network.

Character Area 6

The proposed development comprises 149no. residential units (95no. houses, 34no. apartments and 20no. duplex units) ranging in height from 2 – 5 storeys, with 2 – 3 storey houses and duplex units and a 4 – 5 storey apartment Block at the eastern boundary addressing the R125. The following sets out how this Character Area will integrate with the surrounding context: -

- Existing pedestrian facilities are located to the south of Character Area 6 along both sides of the carriageway leading to the R125 / Drumree Road roundabout. It is proposed to upgrade and renovate the existing pedestrian facilities along the L2208 / Drumree Road from the vehicular access point to Character Area 6 to link in with the pedestrian facilities currently under construction on Drumree Road as part of the Phase 1 development works.

- This proposed upgrades include a 3m wide shared cycle/pedestrian facility along Character Area 6 frontage onto L2208 and a new pedestrian crossing with dropped kerbs and tactile paving on the northern arm of the Drumree Road / R125 / L2208 roundabout (as discussed and agreed with MCC Roads Department).
- Provision has been made for a potential road link at the northern boundary of the single private dwelling adjoining the subject site to unlock the potential future development of these adjoining third party lands.

8.6 Architectural Design Statement

We refer the Board to the enclosed Architectural Design Statement prepared by O'Mahony Pike Architects, which sets out the detailed urban, site and architectural design analysis and rationale for the proposed scheme.

The Design Statement sets out the key design principles informing the layout of the proposed development including broadly: -

- **Pedestrian Connectivity:** The layout is designed to maximise opportunities for pedestrian and cyclist movement through the proposed development and neighbouring areas.
- **Road Hierarchy:** A clear hierarchy of road typologies are proposed which are fully in accordance with the Design Manual for Urban Roads and Streets.
- **Streetscape / Homezones:** Due consideration has been given to the quality of streetscape to reflect the road hierarchy. Homezones are proposed to create intimate housing clusters and to form part of a clear hierarchy of public realm.
- **House Types / House Blocks:** Detailed consideration has been given to separation distances, active frontages, accessibility of rear gardens and the orientation of the blocks. The proposal includes a variety of unit and block types including some which diverge from the traditional suburban housing block format in terms of separation distances. This is achieved through innovation and creates greater layout efficiencies and variety without impact on residential privacy or amenity.
- **Open Space / Landscape Strategy:** A network of interlinked open spaces is proposed through Character Area 3 & 4. Each development parcel meets the minimum Development Plan requirement of 15% public open space. The landscape proposal will deliver a high level of visual amenity and passive recreation for the residents all year round.
- **Building Height:** The height strategy for the overall lands have been considered at the scale of the settlement, the neighbourhoods and the buildings. Building ranging between 2 – 5 storeys are proposed.
- **Character Areas:** 3no. Character Areas are proposed. Each Character Area will respond to its surrounding context. The landscaping proposal will play a key part in defining and distinguishing the character of each area.
- **Residential Quality:** Full suite of details are provide setting out how the proposed apartments, duplexes and houses meet the required residential amenity standards.

8.7 Landscape Proposals

The landscape proposals in this case have been designed by Doyle + O' Troithigh Landscape Architects. The proposed landscape scheme is a key component of the integration of the new building environment with the existing and proposed landscape conditions having regard to the provisions of the land use zoning pertaining to the site and the LAP.

The landscape is a key asset which establishes the strategy of the site, with the space in between these public open spaces forming the development zones across both sites. The proposed development includes a considered and high-quality landscape proposal. The development provides c. 4.07 Ha of open space and can be broken down as follows: -

Character Area	Class 1	Class 2	Lands Zone 'F1' – Open Space	Total Hectares (% of Site Area)
Character Area 3 & 4	0.82 Ha	0.5 Ha	2.18 Ha	3.5 Ha*
Character Area 6	-	0.57 Ha	-	0.57 Ha
Total	0.82 Ha	1.07 Ha	2.18 Ha	4.07 Ha (27.4%)

* Does not include landscape buffer areas to the east adjoining undeveloped lands and the west adjoining the R125 (incidental landscaping rather than useable space) – 0.13 Ha.

We refer the Board to the Landscape Design Development Report, prepare by Doyle + O' Troithigh Landscape Architects which details the following key objectives of the landscape proposals specific to this development are: -

- To provide a landscape scheme which delivers a high level of visual amenity and passive recreation for the residents all year round.
- To create an attractive, high quality landscape for the residents and their lifestyles. Well-designed landscapes, especially in neighbourhoods contribute to an overall sense of well-being by providing places for people to meet up for a walk, for collaboration or just to chat. People places are successful places.
- To ensure that the plant material proposed is suitable in terms of scale, species selection, on-going maintenance and overall longevity.
- To adopt a repetition and rhythm of plant species to ensure a cohesive style and an overall consistency.
- To adopt ecological compensatory measures for the scheme, including the objective to retain and reinforce hedgerow boundaries of the scheme, where appropriate, which will provide a positive aspect to the landscape and offer significant ecological mitigation measures.
- To sensitively integrate the required surface water attenuation measures into the landscape design and to 'blend' the existing attenuation pond into the overall landscape scheme.
- To incorporate a strong network of cycle/footpaths throughout the scheme promoting strong permeability throughout. All cycle/footpaths connect interlinking open spaces which will be of benefit to future users, including the provision of a new greenway arrangement linking eastwards beyond offering further permeability throughout the scheme, and a valued public amenity to the development and wider lands.

Character Areas 3 & 4

Key landscape features include: -

- **Eastern Linear Park:** This linear open space is located to the eastern edge of Character Area 3. This space features a dedicated cycle/pedestrian path accessing the site from the north where it runs southwards through a new parkland arrangement towards the River Skane and further interconnecting path links. The main park shall include open kickabout spaces, interlinking pathways, seating positions with good aspect as well as dedicated and formalised play spaces. Existing hedgerows and trees of merit will be retained and reinforced with additional native (tree & hedgerow) species planting. The eastern edge of this boundary will include a new native hedgerow populated with complimentary specimen trees.

- **East / West Open Space:** The existing attenuation pond located between Character Area 3 & 4 will be retained. An open space is proposed immediately to the north of the ponds and the River Skane corridor is located to the south. The northern open space shall include a recessed bowl-shaped basin which shall act as a dry detention basin as well as a level localised zone for active play. To the south of the dry detention basin, where it interfaces with the existing ponds, the slopes are steeper however they will be fully planted out with a largely native meadow mix which will offer screening value, aid maintenance and improve the overall sites biodiversity.
- **River Skane Corridor:** The River Skane runs centrally through the site located between Character Area 3 & 4 in an east-west direction. The side slopes of the corridor will require some remodelling to deal with required site levels and Finished Floor Levels whilst ensuring a natural landscape quality of relationship with the proposed built development to the north and south. Whilst there will be some hedgerow removal to facilitate the new corridor arrangement, a new planting arrangement of the side slopes shall be adopted which will in time create a new habitat and create beneficial ecosystems within the scheme. 2no. pedestrian bridge are proposed to connect over the River Skane to provide further permeability through the site.



Figure 3: CGI, prepared by Modelworks Media looking east along River Skane indicating the proposed landscape treatment as part of the proposed development.

A soft edge is provided in the form of a landscape buffer along the western boundary of the site adjacent to Dunshaughlin Link Road. There are a number of level changes along the R125 adjoining the edge of the subject site that will be appropriately landscaped. The embankment with the R125 will be planted and a clear 'edge' to the development will be delineated with the use of native hedgerow and the introduction of a solid timber fence (to reduce the transfer of noise from traffic from the R125) to protect residential amenity. We refer the Board the Landscape Sections, prepare by Doyle + O' Triothigh Landscape Architects for further detail.

Overall, Character Areas 3 & 4 provide a generous provision of interlinked open space areas (Class 1 and Class 2). The landscape design provides high quality open space and green links and wildlife corridors which traverse the site with generous open space provision and play opportunities provided along the eastern edge and within the F1 zoned lands bisecting Character Area 3 and Character Area 4.

Character Area 6

Key landscape features include: -

- **Central Open Space:** The space is located centrally with Character Area 6. It is on an axis with the vehicular entrance and will offer visual interest on the approach into the area by including feature tree line to the west of the space.

The open aspect of the space will offer opportunity for well-placed seating, set off a series of inter-linking pathways, offering views over the space.



Figure 4: CGI, prepared by Modelworks Media looking north into Character Area 6 towards the proposed central open space.

- **Eastern Open Space:** This open space is located to the eastern edge of the Character Area 6 where it incorporates a seating zone with a south and south-west facing aspect edged with formalised hedging and clear trees. Within this space, a formalised play area is proposed with feature play elements for younger children.

A woodland edge mix is proposed to the west of this space to add further to the roadside planting to create a quality organic edge to this space.

- **Southern Buffer:** A series of open spaces are proposed which shall include underground attenuation tanks. Gentle grass mounding and feature tree planting are proposed here which will provide visual interest upon arrival as well as providing opportunity for play and a break-out zone from adjoining dwellings.

The wide roadside verge area shall receive naturalised mix of bulb planting to offer interest, appeal and seasonal variation.

Character Area 6 also meets the requirement of a minimum of 15% public open space within this parcel of development and therefore meeting the open space requirements even in isolation. Notwithstanding, the landscape proposal for the overall development is premised on overall connectivity facilitated by green corridors and generous access to high quality public open space.

In addition to the above, a further c. 2.84 Ha of zoned Open Space lands are controlled by the Applicant and lie outside of the red line of this development (the eastern edge of Character Area 3 & 4). It is proposed as part of this SHD application that these lands as outlined in blue on the Site Layout Plan would be transferred to Meath County Council and/or its nominees without charge for appropriate recreational and/or community use.

All the aforementioned open space areas are connected through a consistent use of surface materials and landscape treatment. The public and communal open space areas are uniquely designed and bring a positive interface with surrounding areas. Details of the landscape design proposals are enclosed in the Landscape Masterplan and Landscape Design Development Report, prepared by Doyle + O'Troithigh Landscape Architects.

8.8 Public Lighting

We refer the Board to the Public Lighting Layout Plan, prepared by Sabre Electrical Services Ltd. This should be read in conjunction with the Outdoor Lighting Report also prepared by Sabre Electrical Services Ltd.

The public lighting proposals have been designed with due regard to public safety and the creation of welcoming streets and spaces. The public lighting has been designed to strike a balance of ensuring public safety at key pedestrian access points, while minimising the impact of artificial lighting on ecology in the area.

The public lighting has been co-ordinated with the landscaping scheme presented by Doyle + O'Troithigh Landscape Architects. Furthermore, due consideration has been given to the potential ecological impact of the lighting scheme proposed. The potential impact is fully considered as part of the Biodiversity Chapter of the EIAR, prepared by Scott Cawley Ltd.

8.9 Water Services

There has been on-going engagement with Irish Water and Meath County Council Drainage Department and Irish Water by Waterman Consulting Engineers with regard to the provision of wastewater and surface water services respectively.

In the first instance, we refer the Board to the Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers which provides a more detailed discussion regarding water and drainage infrastructure requirements.

A Confirmation of Feasibility, dated 20 February 2020, as well Statement of Design Acceptance, dated 4 September 2020 has been provided by Irish Water and accompany this SHD Planning Application. These show that the proposed connection to the Irish Water network can be facilitated and that the detailed network design as proposed is satisfactory.

8.9.1 Waste Water

There is an existing 525mm diameter foul sewer to the north of the River Skane located to the south of Character Area 3. The foul sewer runs alongside the River Skane and ultimately discharges to the Waste Water Treatment Works at Castlethorn, Tara. The entire proposed development will gravity feed into this foul sewer.

Character Area 3 will discharge directly into the foul sewer trunk main constructed under Phase 1 (Reg. Ref. DA/120987, ABP Ref. PL17.241988 refers).

Character Area 4 will discharge by gravity into the foul sewer which runs alongside the Skane River via a manhole which was constructed in Phase 1 (Reg. Ref. DA/120987, ABP Ref. PL17.241988 refers).

Character Area 6 will be connected to the foul sewer constructed in Phase 1 (Reg. Ref. DA/120987, ABP Ref. PL17.241988 refers). This will require drainage works along the Drumree Road and a portion of the R125 to facilities these connections.

We refer the Board to the accompanying Foul Drainage Drawings, prepared by Waterman Moylan Consulting Engineers for further detail. Furthermore, we refer to the foul drainage calculations within the Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers.

8.9.2 Surface Water

The River Skane flows from east to west through the southern portion of the development. The site, which is currently green field, forms part of the River Skane catchment area. An existing 450mm diameter surface water pipeline is located within the Dumree Road, east of the roundabout, which carries surface water along the R125, ultimately discharging to the River Skane. It is proposed that the development will discharge surface water at pre-existing run-off rates into the River Skane.

Character Area 3 & 4 surface water will drain into the existing drainage network constructed under the approved Phase 1 (Reg. Ref. DA/120987, ABP Ref. PL17.241988 refers). The existing drainage and attenuation pond have sufficient capacity to cater for this catchment. Attenuation tanks are included in Character Area 4 to ensure the discharge of surface water is appropriately managed to pre-existing run-off rates.

Character area 6 surface water will discharge into the existing network on the Drumree Road. Attenuation tanks are included in this area to ensure the discharge of surface water is appropriately managed to pre-existing run-off rates.

Sustainable Urban Drainage Systems (SuDS) measures are also been implemented throughout the development to assist in the management of surface water runoff: -

- Permeable Paving.
- Swales.
- Hydrobrake.
- Downstream Defender.

We refer the Board to the accompanying Surface Water Drainage Drawings, prepared by Waterman Moylan Consulting Engineers for further detail.

8.9.3 Water Supply

The proposed development is served by an existing water main within Dumree Road and existing watermain spurs constructed in Phase 1 (Reg. Ref. DA/120987, ABP Ref. PL17.241988 refers).

Character Area 3 & 4 will connect to the existing watermain spurs constructed in Phase 1 (Reg. Ref. DA/120987, ABP Ref. PL17.241988 refers).

Character Area 6 will connect to the existing water main within Dumree Road.

We refer the Board to the accompanying Watermain Drawings, prepared by Waterman Moylan Consulting Engineers for further detail.

8.9.4 Flood Risk

A Site Specific Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers in accordance with the recommendations in the Strategic Flood Risk Assessment produced as part of the Meath County Development Plan 2013 – 2019 and the Planning System and Flood Risk Management Guidelines for Local Government (2009).

The Site Specific Flood Risk Assessment (SSFRA) confirms that: -

“All housing aspects of the proposed development are in Flood Zone C. In Zone B, only less vulnerable aspects of the proposed development are situated, such as open spaces, paths, outdoor sports and recreation amenities. There is no need to perform the justification test.”

The SSFRA goes on to conclude that: -

“Through careful design and appropriate mitigation measures, the risks and consequences of flooding have been mitigated across the development.

“Surface water runoff from the site is limited to Greenfield runoff and does not impact on developments upstream or downstream of the subject site.”

The subject lands have been analysed for risks from flooding from the Irish Sea, fluvial flooding, pluvial flooding, groundwater and failures of mechanical systems. Through careful design and appropriate mitigation measures, the risks and consequences of flooding have been mitigated across the development. The residual risk associated with flooding from the Irish Sea, fluvial flooding, pluvial flooding, groundwater and failures of mechanical systems is categorised as low on the basis that mitigation measures are fully implemented.

8.10 Transportation

In the first instance, we refer the Bord to the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers which sets out how the proposed development would address traffic and transportation issues, including road infrastructure, traffic generation, pedestrian and cyclist linkages and safety, public transport availability and capacity.

8.10.1 Access / Layout

The proposed layout is highly permeable. Primary north / south pedestrian and cycle linkages have been facilitated on the western and eastern edge of Character Areas 3 & 4 which are connected east-west along the northern and southern edges of the site and along the Skane River to facilitate looped walking and cycling routes. The proposed green route along the Skane River has the potential to connect east to the Town park and Main Street. This proposed looped network would also connect north to the completed Phase 1 footpath and cycle network.

The general layout is based on the provision of a clear hierarchy of streets including ‘homezones’ which are in compliance with DMURS with the emphasis of the proposed layout to prioritise pedestrian and cycle movements.

Vehicular access to Character Areas 3 & 4 is via 2no. vehicular junctions off the Dunshaughlin Link Road (R125) – one existing at the southern end of Character Area 4 and one permitted (under Phase 1) but as yet unconstructed at the northern end of Character Area 3. Further access will be provided through Character Area 2 (north of the subject site – currently under construction) which will ultimately connect to the Drumree Road.

Vehicular access to Character Area 6 is proposed from L2208 via a new priority-controlled T-junction from L2208 Drumree Road (south of the site).

1no. vehicular bridge and 2no. pedestrian bridges will be provided to connect Character Areas 3 & 4 over the River Skane. It is acknowledged that a Section 50 Application will be made to the Office of Public Works (OPW) for each crossing separately to facilitate the development of these bridges in due course. We confirm that Waterman Moylan Consulting Engineers have engaged with the OPW and an application is being prepared for submission.

Provision has also been made on the southern edge of Character Area 4 to facilitate future connections to the undeveloped residential lands to the southeast and proposed employment lands to the south of the subject site.

The layout of the proposed development has been designed in accordance with the Design Manual for Urban Roads and Streets (2013), The National Cycle Manual and Meath County Council requirements for Taking in Charge. We refer the Board to the DMURS Statement of Consistency, prepared by Waterman Moylan Consulting Engineers for further detailed discussion.

Alternative Access between Character Area 3 & 4

Should the Board consider that the road connection between Character Area 3 and 4 is not permissible in term of land use zoning consideration has been given to an alternative layout where this vehicular link is omitted. Further discussion in relation to land use zoning is set out in Section 10 of this Report.

The Design Team have included an option whereby the road connection is omitted and the layout including pedestrian connectivity is amended to suit the alternative layout. We refer the Board to the Dwg. No. 12-081A-P171 'Road Options Across F1 Zoned Land', prepared by Waterman Moylan Consulting Engineers which illustrates the alternative option which is simply a matter of omitting the road link and rationalising the road layout whereby vehicular access to Character Area 3 would be solely from the north and vehicular access to Character Area 4 would be solely from the south.

We refer the Board to the Landscape Design Development Report, prepared by Doyle + O'Troithigh Landscape Architects which illustrate how the landscaping approach is amended to respond to the omission of the road link.

To provide sufficient comfort to the Board, the Environmental Impact Assessment Report also considers the potential impact of this minor alteration. It was found that no significant impact would arise from the omission of this road link from the proposed development.

Ultimately, the Applicants preferred solution is to include the vehicular link between Character Area 3 & 4. Notwithstanding, the Applicant will accept a condition as part of any grant of permission seeking the omission of the road if the Board deem it unacceptable from a land use planning perspective.

8.10.2 Car Parking & Bicycle Parking

Car Parking

Table 11.9 of the County Development Plan sets out the car parking standards for new developments and those standards applicable to this application are set out as follows: -

Land Use	MCDP Car Parking Standards
Dwellings	2 per conventional dwelling
Flats / Apartments	1.25 per 1 & 2 Bed 2 per 3-4 Bed In all cases, 1 visitor space per 4 apartments
Land Use	Car Spaces
Childcare Facility	1 per employee & dedicated set down area 1 per 5 children

664no. car parking spaces are proposed in total within the development, the breakdown as follows: -

- **Houses:** 442no. car parking spaces are provided for the proposed houses. Parking is provided in a mix of on curtilage and allocated and unallocated on-street parking. The number of car parking spaces provided for houses results in a ratio of 1.7 per house.
- **Apartments / Duplexes:** 161no. car parking spaces are allocated for apartment and duplexes. Car parking for apartments is provided at surface level adjacent to the apartment blocks. Banks of car parking spaces are located adjacent to the duplex blocks. 1no. car parking space is provided as a designated space for each individual apartment and duplex.

When visitor parking is taken into account the ratio of car parking for the apartments and duplexes increases to c. 1.3 spaces available per apartment / duplex. 47no. visitor car parking spaces are dispersed in close proximity to the apartment / duplex blocks proposed within the development.

- **Disabled Car Parking:** 6no. universal car parking spaces are provided within the development.

- **Childcare Facility:** 6no. car parking spaces are allocated to cater for car parking generated by the childcare facility.

The car parking proposals are in line with the County Development Plan's Core Principle "to promote and support the integration of land use and transport and a modal shift to greater use of sustainable modes of transport, including public transport, walking and cycling".

The site is accessible to local services and to numerous frequent bus routes and is a short drive away from high capacity commuter transport option at M3 Parkway (Pace) Railway Station with 1,200no. free park and ride car parking spaces which provides direct links to Dublin City Centre.

It is anticipated that the proposed parking provision will be sufficient to meet the needs of the future residents. We refer the Board to the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers which concludes that the car parking provision is generally in accordance with the Meath County Development Plan 2013 – 2019 and the New Apartment Guidelines (2018).

We refer the Board to the Mobility Management Plan, prepared by prepared by Waterman Moylan Consulting Engineers which provides the rationale for the provision of car parking and its management having regard to the proximity of the application site to existing public transport.

Furthermore, we refer the Board to Dwg. No. 1217A-OMP-00-ST-DR-A-1030 'Car Parking Plan', prepared by O'Mahony Pike Architects which show the allocation of car parking across the proposed development.

Bicycle Parking

Section 11.9.2 of the County Development Plan sets out the bicycle parking standards for new developments and those standards applicable to this application are set out as follows: -

"Secure cycle parking facilities shall be provided in new office, residential, retail and employment generating developments... The number of stands required will be a third of the number of car spaces required for the development, subject to a minimum of one stand."

Section 4.17 of the "Design Standards for New Apartments – March 2018" sets out a minimum standard of cycle storage space for new apartments as follows: -

"...a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units."

In total, 568no. bicycle parking spaces are proposed within the development, the breakdown as follows: -

- **Apartments:** 188no. dedicated bicycle parking spaces and 58no. visitor bicycle parking spaces are provided for the apartment blocks. Secure bicycle stores are located at ground floor level of the apartment blocks with visitor bicycle parking located externally adjacent to the blocks.
- **Duplexes:** 141no. dedicated bicycle parking spaces are provided for the duplexes (78no. bicycle parking spaces are provided within the communal rear gardens where appropriate and 63no. spaces are located within secure bicycle stores which are located adjacent to duplex blocks). 28no. visitor bicycle parking spaces are also provided for the duplex units.
- **Mid-Terrace Houses:** 101no. dedicated bicycle parking spaces are allocated to the terraced houses within secure bicycle stores which are conveniently located within the street and adjacent open space areas. 52no. visitor bicycle parking spaces are allocated to the houses which is dispersed throughout the development.

For houses with direct separate access to rear gardens, bicycle parking can be readily accommodated within the rear curtilage of the property.

We refer the Board to the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers which concludes generally that the bicycle parking provision exceed the requirements set out in the Meath County Development Plan 2013 – 2019 and the New Apartment Guidelines (2018).

Furthermore, we refer the Board to Dwg. 1217A-OMP-00-ST-DR-A-1050 'Bicycle Parking Plan', prepared by O'Mahony Pike Architects which demonstrate the range of bicycle parking facilities across the proposed development. Careful consideration has been given to the location of bicycle stores in particular to ensure they are within convenient walking distance of dwellings.

8.11 Childcare Facility

The Childcare Guidelines 2001, as highlighted in the City Development Plan, recommend the provision of one childcare facility per 75 no. dwellings. It is appropriate to also have regard to demographic trends and the geographical distribution of childcare facilities in the local area.

The New Apartments Guidelines (2018) states that with regards to childcare provision: -

"One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms."

The proposed development will include the provision of a purpose-built childcare facility (approximately 413 sq. m) with an outdoor play area to accommodate approximately c. 80no. full time equivalent children (409 sq. m). The childcare facility includes a dedicated outdoor play space, as well as parking and drop off spaces.

The proposed childcare facility is to be conveniently located in the north western portion of character Area 3 which is accessible via internal street network from Phase 1 to the north and Character area 4 to the south. It is immediately adjacent to the new vehicular access provided off R125 Dunshaughlin Link Road, via the roundabout approved under Phase 1 development (Reg. Ref. DA/120987, ABP Ref. PL17.241988).

It is noted also that a further childcare facility is also already being provided in Phase 1 of Dún Ríoga. As such, there will be two childcare facilities, with a combined capacity of 125no. children to cater for approx. 557no. units (combined Phase 1 – 142no. unit and proposed development 415 no. unit), including 1-Bed and 2-Bed apartments.

We refer the Board to the enclosed Childcare Needs Assessment, prepared by Stephen Little & Associates for further details. Generally, the assessment concludes that there is sufficient capacity within the proposed creche in combination with the permitted creche in Phase 1 and existing creches in Dunshaughlin to meet childcare demand.

8.12 Building Lifecycle Report

A Building Life Cycle Report has been prepared by Castlethorn and is enclosed in this application. This report contains an assessment of long term running and maintenance costs of the development. On foot of this assessment, the Applicant proposes specific measures (contained in the Report) to effectively manage and reduce costs for the benefit of residents.

8.13 Energy Statement

An Energy Statement, prepared by Waterman Moylan Consulting Engineers is enclosed with this application. This analysis determined an energy and servicing strategy to enable compliance with the standards set out under the following: -

- Building Regulations Technical Guidance Document Part L 2019.
- EU Directive for Near Zero Energy Buildings.
- Building Energy Rating A2.

8.14 Archaeology and Architectural Heritage

We refer the Board to the EIAR Chapter 17: Cultural Heritage (Archaeological) and EIAR Chapter 18: Cultural Heritage (Architectural). No significant impacts are predicted, subject to appropriate mitigation measures as identified in the EIAR.

8.15 Construction and Environmental Management Plan

An outline Construction Management Plan (CMP), prepared by Waterman Moylan Consulting is enclosed with this application. This details how the construction phase will be managed with minimal impacts on the environment or the surrounding community.

We confirm that a fully comprehensive Construction and Environmental Management Plan to implement the requirements of the outline Construction Management Plan will be submitted to the Planning Authority for its approval in advance of any works commencing on site, should the Board grant permission for the proposed development.

8.16 Construction & Demolition Waste Management Plan

A Construction and Demolition Waste Management Plan, prepared by AWN Consulting is enclosed with this application as an appendix to the EIAR. The plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

8.17 Operational Waste Management Plan

An Operational Waste Management Plan, prepared by AWN Consulting is enclosed with this application and as an appendix to the EIAR. This plan provides a strategy for storing, handling, collecting and transporting wastes generated at the subject site in accordance with the current legal and industry standards. The plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible, and provides guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution. The plan estimates the type and quantity of waste to be generated from the proposed development during the operational phase and provides a strategy for managing the different waste streams.

8.18 Phasing of Development

It is proposed that the development will be delivered in three phases. We refer the Board to the Dwg. No. 1217A-OMP-00-ST-DR-A-1060 'Construction Phasing Plan', prepared by O' Mahony Pike Architects.

The first phase of development provides for the delivery of 141no. residential units in Character Area 3 comprising of a mix of houses, apartments and duplex units, along with the largest area of open space to the east of the site and along southern perimeter, the childcare facility and proposed pedestrian and cycle infrastructure within the development with connections into the Phase 1 network.

The second phase of development provides for a mix of residential typologies, totalling 125no. units in Character Area 4, along with areas of open space and vehicular and pedestrian connections over the River Skane. The east-west pedestrian / cycle path will be implemented along the north side of the River Skane towards the eastern boundary to facilitate a further connection east to and through the community college lands to Dunshaughlin Town Park and on towards Main Street. The development of Character Area 4 will also provide for future connections southeast to adjoining residential zoned land and south to a substantial tract of land proposed for employment use.

The proposed third phase of development will comprise the delivery of 149no. residential units in Character Area 6 and associated open spaces. This phase will also complete the shared pedestrian / cycle facility along the Character Area 6 frontage onto L2208 and a new pedestrian crossing with dropped kerbs and tactile paving on the northern arm of the Drumree Road / R125 / L2208 roundabout.

8.19 Part V

There has been on-going dialogue between Castlethorn and Meath County Council Housing Department with regard Part V provision prior to making this SHD Planning Application. The proposed development will include the provision of 41no. units under Part V.

We refer the Board to the Part V Proposal, prepared by Castlethorn Construction which sets out the breakdown of the units proposed and the associated costs. Furthermore, we refer the Board to Part V Layout included as part of the Design Statement, prepared by O'Mahony Pike Architects illustrating the location of the units.

In the Section 247 Pre-Planning Meeting held on 7 February 2020 the type of social housing which Meath County Council required was discussed. It was noted that housing more suited to people with disabilities and older people for 'downsizing' was in particular demand. Meath County Council noted that positive consideration would be given a 'bungalow typology' whereby own door level access could be provided. A relaxation of the Development Management standards in terms of private open space and car parking would be considered to allow for the creation of an efficient typology understanding the overriding requirement to meet appropriate densities.

It was further noted that the Board have previously granted permission for residential development in Meath using similar typologies with the understanding that the 10% requirement would not need to be fully achieved to facilitate these non-standard dwelling types.

The proposal provides 41no. Part V units including 12no. 2/3 Bed bungalows which respond specifically to the feedback received from Meath County Council.

8.20 Education Needs Assessment

We refer the Board to the Educational Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants. In general, it is concluded that the proposed development will not create additional demand on existing Primary and Post-Primary within the Dunshaughlin catchment area having regard for the scale of the development and the cycle of students enrolling on a yearly basis. Furthermore, the Department of Education and Skills is investing in schools infrastructure including the building extensions to existing schools and provision of new schools. This will further assist in absorbing the demand created by the proposed development.

9 STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY

9.1 National Planning Framework – Ireland 2040

The National Planning Framework – Ireland 2040 (NPF) marks a fundamental shift away from allowing urban sprawl, to a more compact urban form focused on public transport that will deliver a far more dense compact urban environment. This is intended to provide for significantly reduced commuting times and lead to a greater quality of life for residents / workers over time.

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 NPF seeks to influence the location of new housing development and future population growth, and targets the location of 40% of new housing development within and close to the existing ‘footprint’ of built up areas over the lifetime of the framework. The NPF plans for growth of up to half a million people in the Eastern and Midlands Region and recognises that there is potential in each Regional Assembly Area for significant growth in some settlements (i.e. c. 30% or more above 2016 population levels). Subject to criteria including the provision of adequate infrastructure and amenities to support such growth, and concurrent employment provision. Section 3.2 identifies that in locations such as: -

*“Meath, proximate to the Capital, has resulted in significant development in a region characterised by the dominance of Dublin. ... Managing the challenges of future growth is critical to this regional area. A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. **This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.**” (pg. 33)*

Section 6.6 of the NPF sets out national core principles for housing delivery and as such: -

“Prioritise the location of new housing provision in existing settlements to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.”

The NPF sets out a number of National Policy Objectives (NPO) that seek to ensure that the overriding intent of the NPF is delivered. The NPF, under National Policy Objective 9, recognises that there is potential in each Regional Assembly Area for significant growth in some settlements (i.e. 30% or more above 2016 population levels). Subject to criteria including the provision of adequate infrastructure and amenities to support such growth, and concurrent employment provision. In the context of this proposal, it is considered that the following particular NPOs are worthy of mention: -

National Policy Objective 3a

“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.”

National Policy Objective 4

“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being”.

National Policy Objective 11

“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”

National Policy Objective 13

“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment”.

National Policy Objective 27

“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.”

National Policy Objective 33

“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”

National Policy Objective 35

“To increase residential density in settlements, through a range of measures including restrictions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights”.

Objective 72a requires Planning Authorities to apply a standardised tiered approach to zoning of land and Appendix 3 of the NPF ‘A Methodology for a Tiered Approach to Land Zoning’ sets out a two-tier approach to land use zoning. The following is set out in relation to Tier 1: Serviced Zoned Land: -

“Tier 1: Serviced Zoned Land

*This zoning comprises lands that are **able to connect to existing development services**, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which **there is service capacity available**, and can therefore accommodate new development.*

*These lands will **generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands**. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*

*Inclusion in Tier 1 will generally require the lands to be **within the footprint of or spatially sequential within the identified settlement**.”*

Applicant’s Response

The proposed development constitutes an efficient and sustainable use of lands in delivering a new planned residential neighbourhood on lands zoned for residential use as part of the Meath County Development Plan 2013 – 2019 and Dunshaughlin Local Area Plan 2009 – 2015.

The subject site is located within the settlement boundary of Dunshaughlin Town and within walking distance (c. 10 – 12 minutes) from the town centre and associated social infrastructure which is consistent with NPO 3a, NPO 33 and NPO 35.

Dunshaughlin is a Moderate Sustainable Growth Town and has considerable potential for employment growth. The proposed development will assist in creating a sustainable community where people can both live and work: -

- The proposed development will respond to demand and need for residential development within close proximity to Dunshaughlin town centre and to existing residential areas.
- The lands are considered spatially sequential and positioned adjacent to the existing built-up footprint of Dunshaughlin and contiguous to existing developed lands, facilities and amenities.
- Dunshaughlin is strategically located to cater for significant new growth and the proposed development will contribute to supporting a compact urban form providing strong linkages and an extension of the built up area of Dunshaughlin on lands which are zoned for new residential development.
- The proposal is for a residential development which exhibits a high standard of architectural and landscape design, and which will provide for a high-quality and sustainable environment for future residents on a suitable site which has long since been zoned for such development.
- The proposed development supports the integration of land use and transport due to the highly accessible location of the subject lands. In line with its Settlement Strategy status the proposed development supports Dunshaughlin in continuing to develop in a self-sufficient manner to facilitate additional population growth.
- The proposed development will respond to demand and need for residential development within close proximity to Dunshaughlin town centre and to existing residential areas. The development will include a broad mix of units types to support the creation of new community.

- The development is premised on creating a pedestrian / cycle friendly environment. Dedicated pedestrian and cycle connections within the development to the adjoining Phase 1 development and Drumree Road are provided. Further pedestrian and cycle connections east along the Skane River are also provided to be extended to and through the adjoining community college lands to link with Dunshaughlin Town Park and on towards Main Street.
- The proposed development will assist in the consolidation of population growth in Dunshaughlin and in County Meath as a whole. As demonstrated above, the proposed development will benefit from proximate public transport facilities, and strong pedestrian and cycle linkages internally and externally to Dunshaughlin town centre.
- Dunshaughlin is well served by public transport and the Planning Authority have acknowledged that further growth will support the viability of further public transport provision in the medium to longer term with the preferred route for the rail line and planned Dunshaughlin train station located to the west of the town and conveniently accessible to the subject lands.
- Dunshaughlin is well served by public transport with Bus Éireann services running regularly direct to Dublin City. M3 Parkway Railway Station (PACE) which has direct commuter rail services to Dublin City Centre is located approximately 10 kilometres from Dunshaughlin and provides a 'park and ride' facility (1,200no. free car parking spaces). The M3 motorway is immediately accessible to the subject site and provides a direct link to Dublin City to the south and Navan to the north.
- The subject site benefits from its immediate accessibility to high quality road infrastructure as well as foul drainage and water supply infrastructure already in-situ under Phase 1 works.
- We refer the Board to the independent Socio-Economic Study, prepared by Future Analytics Consulting (FAC) Ltd. Which provides a comprehensive socio-economic assessment for Dunshaughlin which looks at population, work force, travel patterns and residential development pipeline and output.
- The Report demonstrates that there is a significant amount of employment within Dunshaughlin and within a 15min drive based on data from the CSO's Place of Work, School or College - Census of Anonymised Records (POWSCAR). The provision of additional housing will ensure that the demand created by this workforce is met and ensures jobs can be retained and unsustainable patterns of commuting are reduced.

The regional based objectives for the Eastern and Midlands area set out in the NPF suggest that future residential growth will be linked to increased employment opportunities / investment within settlements such as Dunshaughlin.

Based on the provision of the NPF the Applicants landholding can be considered 'Tier 1 Serviced Zoned Land' in the context of the NPF.

As highlighted above and acknowledged in the Draft Meath Development Plan Dunshaughlin is exceptionally well-placed from an infrastructural capacity perspective due to recent significant investments in water and wastewater infrastructure. Dunshaughlin is unique in that there is sufficient capacity in this infrastructure to accommodate the medium to long term growth of the town.

The subject lands are also uniquely placed in terms of existing infrastructure. The site is immediately adjacent to the Dunshaughlin Link Road, a key completed distributor road for the town which provides direct access to the M3 Motorway. The proposed development will also connect directly to a foul trunk main, surface water outfall and attenuation pond completed within the subject Phase 2 lands as part of Phase 1 works.

Please refer to Section 7 of this Report (Response to An Bord Pleanála Opinion) which sets out a detailed argument for the development of these lands within the context of the Core Strategy and the phasing provisions of the Meath County Council Development Plan 2013 – 2019 having regard for national planning policy including the NPF.

9.2 Eastern and Midlands Regional Spatial & Economic Strategy

The Regional Spatial and Economic Strategy (RSES) for the East and Midlands provides regional level strategic planning policy for the eastern and midland region, and Dublin, in line with the NPF. Dunshaughlin is identified within the hinterland area of the Region, close to the boundary of the Dublin Metropolitan Area.

The RSES contains the following elements: -

- Spatial Strategy – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- Economic Strategy – that builds on the region’s strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- Metropolitan Plan – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- Investment Framework – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- Climate Action Strategy – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The RSES concur with the Implementation Roadmap for the NPF in noting that *“...the scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026...”*

The Guiding Principles (p.187) set out in the RSES in relation to the Integration of Land Use and Transport supports the ‘10 minute’ settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.

Dunshaughlin falls within the “Sustaining Growth Towns” category in Table 4.1 relating to the settlement hierarchy for the region which is defined as: -

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

This category of settlement is defined as having “moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.”

Table 4.3 of the RSES states that Self Sustaining Growth Towns should be targeted for consolidation coupled with targeted investment where required to improve local employment, services and sustainable transport options and to become more self-sustaining settlements.”

Section 3.2 of the RSES sets out growth enablers and Dunshaughlin is located within the Core Region, close to the Dublin Metropolitan Area, *“the peri-urban ‘hinterlands’ in the commuter catchment around Dublin”*.

Growth enablers for the Hinterland area include: -

- To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns to become more self-sustaining and to create the quality of life to attract investment.
- Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.
- Catch up’ investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.

Applicant's Response

The proposed development is consistent with the regional policy objectives of the RSES that seek to implement the growth targets and national policy objectives of the NPF.

The RSES acknowledges the need to increase the delivery of housing across the county and projects that at least half of all new homes to be built nationally up to 2040 will be required in the Eastern and Midland Region with Regional Policy Objective (RPO 3.2) requiring that all new homes in towns outside of cities to be located 'within and close to the existing built up area'.

Dunshaughlin is a key urban settlement in the Core Region that adjoins the Metropolitan Area of Dublin. The proposed development will continue the growth of the town providing additional demand for local employment and services, and public transport.

The proposal is representative of sustainable development on a serviced site adjacent to Dunshaughlin Town Centre, well served by numerous local services and transport facilities, which will contribute to the RSES compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements.

The development of housing on the subject site which is located close to the existing town centre (approximately 10-12 minutes walking distance – c. 1km) is considered a sequentially appropriate consolidation of Dunshaughlin westwards. Further linkages east along the Skane River to and through the community college lands will be facilitated by connections provided within the proposed development and will provide an alternative segregated and high amenity pedestrian and cycle link from the subject development towards Main Street.

The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.

Please refer to Section 7 of this Report (Response to An Bord Pleanála Opinion) which sets out a detailed argument for the development of these lands within the context core strategy and the phasing provisions of the Meath County Council Development Plan 2013 – 2019 having regard for national planning policy including the RSES.

9.3 Smarter Travel – A Sustainable Transport Future, A New Transport Policy for Ireland 2009 – 2020

This document represents a new transport policy for Ireland for the period from 2009 – 2020. Overall, the transport policy document has the following aims: -

- To reduce overall travel demand.
- To maximise the efficiency of the transport network.
- To reduce reliance on fossil fuels.
- To reduce transport emissions.

To improve accessibility to transport, the Policy recognises progress made under the National Spatial Strategy (now superseded by the National Planning Framework) and the Regional Planning Guidelines (now superseded by the Regional Spatial and Economic Strategies) in promoting integrated transport and spatial planning. These strategies recognise the need for more compact, walkable urban areas that support investment in good quality public transport under Transport 21.

Applicant's Response

In accordance with this policy document, the proposed development would provide a compact urban form by locating new medium density residential development on a strategically located greenfield site. The proposed development is in line with the overall vision for better integration between land-use and transport. The on-site car parking and cycle parking provision, along with its proximity and connectivity to educational and community facilities as well as lands earmarked for employment use and public transport should facilitate reduced private car dependency of prospective residents.

9.4 TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2016-2035

The NTA Strategy promotes the consolidation of the GDA allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built-up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike.

The site is located within “Corridor-B (Navan – Dunboyne – Blanchardstown – to Dublin City Centre)”

Applicant’s Response

It has been a strategic and long-standing land use transportation objective in the Greater Dublin Area to provide a rail link to Navan. The initial Dublin Transportation Office (DTO) Land Use Transportation Strategy called “A Platform for Change” (2001) included this rail link on foot of the previous work undertaken in the mid-1990’s under the Dublin Transportation Initiative (DTI). The rail link to Navan has been identified as an objective in successive NTA Transport Strategies for the Greater Dublin Area and has been captured within the National Planning Framework: 2040 also. In 2007, Irish Rail sought a Railway Order for the first stage of the Navan Rail line; connecting the Maynooth line with Dunboyne. In 2010, this first phase of the railway link opened, with stations in Dunboyne, the M3 Parkway, north of Dunboyne and at Hansfield.

The preferred route alignment for the train line and the location of the train station are identified to the southwest of the subject site (generally to the west of Dunshaughlin). This is identified in the Dunshaughlin Local Area Plan. The future station will be conveniently accessible from the subject lands.

The Exchequer Capital Investment Programme was reduced around that time and effectively deferred the completion of the line to Navan, as initially planned. When constructed, it will include stations at Dunshaughlin, Kilmessan, Navan town centre and one at the northern edge of Navan. A re-appraisal of this project is to be carried out as part of the Mid-term Review of the National Transport Authority’s Transport Strategy for the Greater Dublin Area 2016 – 2035.

The proposed development will significantly increase the critical mass of population in Dunshaughlin providing additional demand for public transport between the town and the larger urban centres. The scheme also provides for enhanced cycle and pedestrian links to / from the town centre. This will further ensure that any investment in the provision of a rail line to Dunshaughlin will be economically viable.

9.5 Section 28 Ministerial Guidelines

The following Statements of Consistency sets out how the proposed development is consistent with the Section 28 Ministerial Guidelines.

9.5.1 Sustainable Residential Guidelines in Urban Areas (Cities, Towns, Villages) (2009)

Chapter 5 of the Guidelines generally sets out that that planning authorities should promote increased residential densities in appropriate locations and the objective should be the achievement of an efficient use of land appropriate to its context, while avoiding the problems of over-development.

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. The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

- Prioritise walking, cycling and public transport, and minimise car use.
- Are easy to access for all users and to find one's way around.
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions.
- Provide a mix of land uses to minimise transport demand and reduce traffic speeds in housing developments.

Section 5.11 in particular is relevant to the subject site in relation to residential developments in the outer Suburban / 'Greenfield' sites at the periphery of cities or larger towns as strategic locations to have higher densities of a general range of 35 – 50no. unit per Ha. The Guidelines suggest a net density of c. 35 – 50 units per hectare for outer suburban greenfield sites such as the subject site on the edge of this Moderate Sustainable Growth Town.

"These may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares."

Applicant's Response

The proposed development is consistent with the Sustainable Guidelines in Urban Areas (2009), for cities, towns and urban villages, having regard to the provisions of Chapter 5 (in particular Section 5.11) of these Guidelines.

The application site is zoned for residential use in the current County Development Plan and is located within the settlement boundary of Dunshaughlin and provides a suitable location for the sustainable sequential expansion of the town.

The proposed development incorporates design principles such as shared surfaces and raised table junctions to reduce traffic speeds on streets with housing and to prioritise walking and cycling. Segregated cycle paths are also proposed along the main boulevards within the development and quality pedestrian areas are provided throughout. 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 hierarchy of streets in design, character and treatment.

The development includes a childcare facility with an option to include a small retail unit in Block 1 also. The development is located approximately 1km from Dunshaughlin town centre which provides a wide range of services and facilities.

The proposed development has a net residential density of c. 42 units per Ha, based on a net developable site area of 12.2Ha hectares. This is considered to be wholly appropriate for the subject site having regard to the guidelines and the location on the subject site, which is contiguous to the built up area of Dunshaughlin.

The proposed development will contribute to the critical mass of local population required to support the viability of local businesses and the delivery of further facilities including enhanced public transport for Dunshaughlin.

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

The following table provides an overview of the '12 Design Criteria' contained within the Urban Design Manual (2009), which are relevant to the proposed development. A response as to how the proposed development adheres to each of the criteria is also set out.

Criteria	Applicant's Response
1. Context	<p>How does the development respond to its surroundings?</p> <ul style="list-style-type: none"> The proposed development is located on the western fringe of Dunshaughlin Town Centre and is served by the R125 Drumree Road and the Dunshaughlin Link Road (M3 Bypass). The proposed development is located to the south and west of Phase 1 lands which is currently under construction (by the applicant). The proposed development is accommodated across two sites and the scheme is laid out into three distinct character areas. The layout of the proposed scheme has been predicated on the need to integrate the development with its surroundings to provide for a suitably varied urban development which creates an extension from Phase 1 lands and a varied new urban edge for the town as evident along the R125 (Dunshaughlin Link Road). The massing increases from 2 to 3 storeys for units facing on to public open space. Similarly, the apartment blocks located at prominent corners of the subject lands range in height from 4 / 5 storeys) facing the entrance from the Dunshaughlin Link Road and overlooking the large expanse of 'F1' open space lands to the east of the Character Areas 3 & 4. The height strategy will provide for a varied streetscape and good levels of passive supervision of the adjoining publicly accessible spaces. The tallest blocks are positioned consciously at the entrance of the site and along the R125 (Dunshaughlin Link Road) and addressing the main open space areas. They will assist on orientating people around the development and identifying the potential green link east to Dunshaughlin Main Street. The height, scale and massing are considered appropriate given its context within the site and the surrounding developments in the wider area. The proposal creates an identity and a sense of place for the neighbourhood and the high-quality design integrates into its natural setting and respects the existing characteristic of the site. The development has been designed around the natural features, mature trees, open spaces and the stream running to the south of the development. This creates focal points for the development. This will be further enhanced by the landscaping of the scheme. The existing boundary conditions will largely remain unchanged. Mature trees and vegetation will be retained where possible. The development will in addition provide amenity open spaces and green links that will become an asset to the current and future residents of the area.
2. Connections	<p>How well connected is the new neighbourhood?</p> <ul style="list-style-type: none"> The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. The proposed layout is highly permeable. Primary north/south pedestrian and cycle linkages have been facilitated along the western and eastern edge of Character Areas 3 & 4 interconnecting with completed Phase 1 development with enhanced linkages east along Drumree Road towards Main Street. This will be supplemented by a pedestrian / cycle path running east-west along the Skane River.

	<ul style="list-style-type: none"> • It is intended that this route will further connect to and through the adjoining Dunshaughlin Community College lands to facilitate an additional segregated pedestrian and cycle link east to Dunshaughlin Town Park and Main Street. There will be attractive looped walking and cycling routes within the proposed development connecting further with surrounding areas. • The proposed access to Character Area 6 is via 1no. vehicular entrance along Drumree Road (south of the site). • Access to Character Areas 3 & 4 is served via 2no. vehicular junctions off the Dunshaughlin Link Road. Further access will be provided through Character Area 2 (north of the subject site – currently under construction) which will ultimately connect to the Drumree Road. Provision has also been made on the southern edge of Character Areas 4 to provide future connection to the undeveloped lands to the east and south of the subject site. • The general layout is organised around a clear hierarchy of streets including the provision of ‘homezones’ based on best practice guidance within DMURS. Generally, the layout of the proposed development will prioritise pedestrians/cyclists. • The street layout is designed to provide well-defined neighbourhood block layouts, which respect and respond to existing tree and hedgerow lines where possible. This block layout provides a coherent hierarchy of streets, promoting connectivity through the scheme and into the surrounding areas. • The internal looped and onward connecting cycle / walking routes will encourage and facilitate more walking and cycling within the proposed development. • The scheme is within 1km (12 minutes’ walk) of local convenience stores and services on Dunshaughlin Main Street. Other services such as petrol stations, salons, post office and gym are available at less than a 1km from the site. Also, bus routes 109 and 109B serve Blanchardstown Shopping Centre and 109/109A serve Navan shopping centre. • M3 Parkway PACE Railway Station with 1,200no. free park and ride car parking spaces provides a high frequency commuter service during peak hours of one train every 15 minutes to Connolly Station and Docklands South Station in Dublin City Centre with an anticipated journey time of c. 30 minutes. M3 Parkway Rail station is located c. 12km (c. 10 minute drive) to the south east of the subject lands immediately adjacent the M3 Motorway. The NDP states that the future Dunboyne / M3 Parkway rail line extension to Dunshaughlin and Navan will be considered during the next review of the National Transport Authority (NTA) Greater Dublin Area (GDA) Transport Strategy (2016 – 2035). The NTA is required to review its GDA Transport Strategy prior to the end of 2021. The proposed development is located within 1km of the future Train Station. • Pedestrian permeability through the site is promoted in the residential layout enabling future residents to access the development from multiple points to access the existing network of pedestrian, cycle and public transport facilities.
<p>3. Inclusivity</p>	<p>How easily can people access and use the new development?</p> <ul style="list-style-type: none"> • A holistic approach has informed the design, including architecture, landscaping, servicing, drainage, sustainable transportation and energy management with the intention of delivering a healthy, integrated and natural urban environment, fostering a sense of community. • The proposed units are designed to provide high quality homes and choice to the full range of prospective purchasers. The development is also focused on providing homes in the immediate future to match the aspirations set out in ‘Rebuilding Ireland’ to increase housing provision. • The range of house types in the area and will facilitate a wider range of homeowners including individuals, the elderly, couples, empty nesters, small and large families. The development will allow for families and individuals to upgrade or downgrade within the scheme. The broad range of unit types proposed will cater to the changing tenure needs. • The scheme has been designed for ease of access throughout and is fully compliant with Part M of the Building Regulations. • A childcare facility (approximately 409 sq. m) will be provided as part of the proposed development.

	<ul style="list-style-type: none"> The overall landscape approach is to provide a variety of hard and soft landscaped spaces (including play areas) that create a high-quality public realm. The public spaces are legible which is further assisted by the connectivity of the linear spaces which allows the user to intuitively navigate the entire scheme.
4. Variety	<p>How does the development promote a good mix of activities?</p> <ul style="list-style-type: none"> The proposal will contribute to the housing mix of the area and will increase population creating additional demand for educational, sports and retail services all of which are provided close to the development. Dunshaughlin has significant potential for employment growth therefore the scheme will thus provide residential options close to the workplaces for the people that are currently employed and to cater for future employment growth in the area. There is a range of apartments, duplexes and houses (detached, semi-detached and terraced) in 1 bed, 2 bed, 3 bed, 4 bed formats in buildings ranging in height from 2 to 5 storeys. The individual units range from 47 sq. m to 143 sq. m in size. The range of unit types and sizes being provided will facilitate a mix of family types and tenures emerging in this location. Please refer to the accompanying Housing Quality Assessment, prepared by O'Mahony Pike Architects A range of public open spaces will also be provided. In addition, pathways and cycle ways are provided throughout the development.
5. Efficiency	<p>How does the development make appropriate use of resources, including land</p> <ul style="list-style-type: none"> The site will achieve a net density of c. 42no. units per Ha. The development is proposing to include a pedestrian and cycle infrastructure to connect to the existing links to the surrounding development and into the town centre and associated bus routes further connect the site to surrounding Large Growth Towns and Dublin City Centre. The subject scheme provides for significant Public Open Space that (c. 27.4% of the site area which includes some lands zoned F1 – Open Space) will be provided across the entire scheme promoting biodiversity and providing residential amenity. The proposed layout incorporates existing natural features where practical and feasible into the new network of green spaces and green loops, in order to make efficient use of existing landscape features in achieving the required open space provision. The scheme is landscaped to ensure that the public open spaces benefit from the best solar orientation. All dwellings within the proposed development will be constructed to meet the current Part L Building Regulation with regard energy efficiency. The layout of the proposed development will optimise orientation to minimise the provision of north facing gardens / balconies / terraces thus optimising the benefits of passive solar gain for individual units.
6. Distinctiveness	<p>How do the proposals create a sense of place?</p> <ul style="list-style-type: none"> The proposed residential development will include a number of 'Character Areas' which will introduce differentiation in building form, materials finishes and landscape layout to provide interest and variety. The proposed Apartment Blocks will add distinction in terms of form, finishes and architectural quality. The street hierarchy of formal avenues and side streets will further enhance the sense of place within each character area.
7. Layout	<p>How does the proposal create people friendly streets and spaces?</p> <ul style="list-style-type: none"> The proposed layout is arranged as a series of well-defined neighbourhood blocks and streets set into a structure of green open spaces and green links. The streets are arranged in a hierarchy of street types with avenues, side streets and shared surface homezones. The building types are arranged to create an organised hierarchy of scales appropriate to their particular locations. A large range of dwelling types is proposed, with a well-integrated tenure mix.

	<ul style="list-style-type: none"> • Pedestrian permeability is a key design outcome for the scheme. All cycle and pedestrian paths have been designed to follow anticipated desire lines. • The scheme encourages walkability and provides the necessary desire lines within the site to allow users ease of access across the scheme. • The internal road network is designed to reduce the dominance of cars and encourage an environment that is pedestrian friendly. • The orientation and layouts of residential units ensures that all roads and public spaces benefit from passive surveillance. • The street network is designed to adhere to the provisions set out in the Design Manual for Urban Roads and Streets (2013) and National Cycling Manual. It is intended that the road layout supports a reduction the primacy of car usage, making it more conducive for those who wish to walk or cycle. • Street trees are provided along the network of streets in order to create people friendly places with distinctive character to aid legibility.
8. Public Realm	<p>How safe, secure and enjoyable are the public spaces?</p> <ul style="list-style-type: none"> • All public and communal spaces within the scheme are more than adequately overlooked. Play areas are facilitated within the scheme overlooked by houses and apartment blocks. • The public open spaces are an integrated feature of the design that allow users to naturally traverse the subject site without unnecessary barriers or dead ends. • The layout of the proposed development maximises the use of passive surveillance. Public open space and dedicated cycle / walking routes benefit from passive surveillance which will encourage their use and provide an effective deterrent for anti-social behaviour. • Public realm is integrated into the design of the development and forms part of the wider network of usable public spaces in Dunshaughlin. • The road layout is intended to reduce the speed of cars through reduced carriageway widths and junction radii, changed surface treatments and raised tables where necessary. • Parking is provided in a range of conditions including on curtilage of dwelling, banked on street parking, grouped courtyards and parking has been integrated with the overall landscape treatment and 'softened' with planting and other landscaping features. • All private open spaces including rear gardens, communal spaces and private balconies meet the requirements of the Meath County Development Plan 2013 – 2019 and Apartment Guidelines (2018).
9. Adaptability	<p>How will the buildings cope with change?</p> <ul style="list-style-type: none"> • The proposed units meet appropriate accessibility standards and are capable of internal modification to meet changing household needs. A number of house type have been included with optional extensions to ensure a range of options are available to prospective owners. • The scheme includes a range of energy efficient measures that assist in reducing the overall carbon footprint of the scheme over its lifetime. • A Building Lifecycle Report will set out how the apartment blocks are managed and maintained efficiently. • All units within the proposed development have been designed to meet Part L energy efficiency standards. • External materials have been selected to ensure longevity and minimal maintenance, the selected materials allow for future additions or changes to be readily constructible.
10. Privacy & Amenity	<p>How does the scheme provide a decent standard of amenity?</p> <ul style="list-style-type: none"> • Each unit will have access to dedicated private open space that meets the standards of the Quality Housing Guidelines (2007) and the Apartment Guidelines (2018) • Private and communal open space will meet the requirements of the Meath County Development Plan 2013 – 2019 and the Apartment Guidelines (2018). • Units will be laid out and orientated toward all major open spaces area to ensure that passive surveillance is maximised.

	<ul style="list-style-type: none"> • Adequate separation distance between opposing windows is achieved and overlooking is not considered an issue of the development particularly in relation to adjoining development. • Storage space will be provided within all units and will meet the requirements of the Meath County Development Plan 2013 – 2019 and the New Apartment Guidelines 2018. • 71% of the proposed apartment / duplex units within the proposal development are dual aspect.
11. Parking	<p>How will the parking be secure and attractive?</p> <ul style="list-style-type: none"> • Car parking is integrated into the layout of residential streets on-curtilage and banked on-street with additional visitor parking also provided for. • Car parking is provided adjacent to all duplexes and apartments at street level. • Bicycle storage will be provided for all apartment and duplexes to meets the requirements of the New Apartment Guidelines 2018. • Bicycle storage will be catered for in communal bike stores integrated into the local street to serve mid-terrace housing or, in the case of the apartments, bicycle parking has been provided at ground floor level of apartment blocks.
12. Detailed Design	<p>How well thought through is the building and landscape design?</p> <ul style="list-style-type: none"> • The building forms are designed to create clear, legible and well-defined street blocks. Street corners are designed with windows onto both sides of each corner, ensuring good animation and levels of passive overlooking consistently throughout the development. • The building heights proposed respond to the context of the site. 4- 5 storey elements are provided via 3no apartment blocks which have been strategically located addressing the R125 and principal areas of open space. This creates focal points within the development which supports greater legibility within the development and creates distinctiveness. A mix of 2 – 3 storey housing is proposed depending on local conditions and constraints. • The selection of materials and the elevational treatments are designed to deliver a sense of urban quality, and particular care has been taken to ensure a coherency of elevation treatment. • A wide range of house, duplex and apartment types are proposed to deliver a sustainable housing mix. Each unit type has been carefully designed to achieve the unit and individual room dimension requirements within an efficient plan form. • All of the apartment blocks have been oriented to maximise access to daylight / sunlight. The majority of apartment units are dual aspect. • High quality usable communal spaces are provided for prospective residents. • The overall layout is permeable and improves walkability and connectivity. • The open spaces are designed to be accessible, encourage active use and positive visual amenity within the overall scheme. • A high-quality landscape approach using a mixture of paving, textured finishes and planting to provide a public realm that is aesthetically pleasing, functional and practical in terms of facilitating maintenance. • Car parking within the local streets has been carefully managed to ensure it does not dominate the streetscape.

9.5.3 Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018)

The Guidelines contain a number of ‘*Specific Planning Policy Requirements*’ (SPPR). These specific planning policy requirements contained in these new Guidelines take precedence over policies and objectives of development plans, local area plans and strategic development zone planning schemes. The 2018 Guidelines outline that the scale and extent of apartment development should generally increase in relation to proximity to core urban centres and other relevant factors.

9.5.3.1 Apartment Mix (SPPR 1)

Specific Planning Policy Requirement 1 of the Apartment Guidelines, states: -

“Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development Plan(s).”

Applicant’s Response

The proposed development is compliant with Specific Planning Policy Requirement 1 of the Apartment Guidelines, for the following reasons: -

- No studio units are proposed and approximately 8% of the overall units being provided on-site are 1-bed units within the proposed development.
- Approx. 24% of the overall units are two bedroom units and range in size between 75 – 99 sq. m in area thereby providing a variety of possible accommodation and are capable of catering for households ranging in size between 3 – 4 people in line with the provisions of the New Apartment Guidelines (2018).

The proposed unit mix of 1-bed, 2-bed, 3-bed and 4-bed units is supported by the guidance and SPPRs set out in the New Apartment Guidelines (2018), which specify that no minimum requirement shall apply in respect of the provision of apartments with three or more bedrooms.

Notwithstanding the development’s compliance with the Apartment Guidelines, the proposed development will enhance the variety of dwelling types available in the local area, which is predominantly characterised by low density, low-rise housing (of three bedrooms or more) to the north and east of the subject site.

9.5.3.2 Flexibility of Unit Mix (SPPR2)

Specific Planning Policy Requirement 2 of the Apartment Guidelines, states: -

“For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha: Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units; Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th; For schemes of 50 or more units, SPPR 1 shall apply to the entire development.”

Applicant’s Response

The proposed development is greater than 50no. units at a site area greater than 0.25Ha. The provisions of SPPR 1 apply and are complied with as outlined above.

9.5.3.3 Apartment Floor Area (SPPR 3)

Specific Planning Policy Requirement 3 that the following minimum floor areas are achieved for apartments: -

Minimum Apartment Floor Areas	
Studio	37 sq. m
One bedroom	45 sq. m
Two bedroom (3 person)	63 sq. m
Two bedroom (4 person)	73 sq. m
Three bedroom	90 sq. m

Applicant's Response

All apartments in the proposed development exceed the minimum floor area requirements. The Housing Quality Assessment (HQA), prepared by O'Mahony Pike Architects, confirms this. The Table below compares the size of the proposed apartment units to the minimum standards of the Guidelines.

Apartments & Duplexes			
Unit Type	No. of Units	GFA (m ²) / Unit	Min. Size – Guidelines 2018
1 Bed Apartment	32	47.1 – 50.3	45
2 Bed Apartment – 4 Person	74	75.5 – 80.8	73
2 Bed Duplex – 4 Person	24	99 – 106	73
3 Bed Duplex	31	104 – 115	90
Total	161	Max. 10,342.2 sq. m	

9.5.3.4 Safeguarding Higher Standards

It is a policy requirement of the Guidelines that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).

Applicant's Response

All the proposed apartments will meet the floor area requirements set out the Guidelines. A Housing Quality Audit, prepared by O'Mahony Pike Architects, is contained in in this SHD Planning Application for reference which shows the vast majority of the units are at least 10% of greater than the minimum size required.

9.5.3.5 Dual Aspect (SPPR 4)

Specific Planning Policy Requirement 4 sets out that the minimum number of dual aspect apartments that may be provided in any single apartment scheme. In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

Specific Planning Policy Requirement 4 (SPPR4) of the Apartment Guidelines states: -

"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: -

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”

Applicant’s Response

The site is considered a suburban or intermediate location in the context of the Guidelines. Of the 161no. apartments / duplexes proposed, approximately 71% are dual aspect. A HQA, prepared by O’Mahony Pike Architects shows the proportion of dual aspect apartments. There are no north facing single aspect units.

This SHD Planning Application is accompanied by a Daylight and Sunlight Analysis and EIAR which includes Daylight & Sunlight Chapters, prepared by the IN2 Engineering Design Partnership. The assessment includes the impact of the proposed development in terms of daylight and sunlight within the development and on surrounding existing development. It is generally concluded that in the sample of envisaged representative and worst-case scenario apartments and duplexes identified, daylight / sunlight in excess of the minimum levels recommended is achieved.

9.5.3.6 Floor to Ceiling Height (SPPR 5)

The Guidelines advise that the minimum floor to ceiling height must accord with the Building Regulations requirement of 2.4m. However, *Specific Planning Policy Requirement 5* sets out that ground level apartment floor to ceiling heights shall be a minimum of 2.7m.

Specific Planning Policy Requirement 5 (SPPR5) states: -

“Ground level apartment floor to ceiling heights shall generally be a minimum of 2.7m and shall be increased, either at ground level only or in conjunction with all floors in an apartment block or building, in certain circumstances. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.”

Applicant’s Response

As illustrated on the enclosed Section drawings prepared by O’Mahony Pike Architects, the ground floor apartments have a general floor to ceiling height of 3m, thus complying with the above standard.

9.5.3.7 Lift and Stair Core (SPPR 6)

Specific Planning Policy Requirement 6 (SPPR 6) states: -

“A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.”

Applicant’s Response

The apartment blocks are serviced generally by 1no. stair and lift cores which accommodates between 4 -10no. apartments per floor per core.

We refer the Planning Authority to the Apartment Floor Plans prepared by O’Mahony Pike Architects for further details.

9.5.3.8 Build to Rent Apartments (SPPR 7 & 8)

Specific Planning Policy Requirement 7 & 8 relate to the provision of Build to Rent Apartments.

Applicant's Response

The development proposed is not a designated Build to Rent scheme.

9.5.3.9 Shared Living Apartments

Specific Planning Policy Requirement 9 relates to the provision of Shared Living Apartments.

Applicant's Response

The development proposed is not a Shared Living scheme for the purposes of these Guidelines and as such, SPPR 9 is not applicable.

9.5.4 Other Design Standards for New Apartments**9.5.4.1 Private & Communal Open Space**

As per the Guidelines, the minimum requirement for private amenity space is as follows: -

Minimum Floor Areas for Private Amenity Space	
Studio	4 sq. m
One bedroom	5 sq. m
Two bedroom (4 person)	7 sq. m
Three bedroom	9 sq. m
Minimum Floor Areas for Communal Amenity Space	
Studio	4 sq. m
One bedroom	5 sq. m
Two bedroom (4 person)	7 sq. m
Three bedroom	9 sq. m

Applicant's Response

Each apartment is provided with a private balcony / terrace which exceeds the above requirements, as demonstrated in the apartment Floor Plans and HQA prepared by O'Mahony Pike Architects that accompany this SHD Planning Application.

Based on the Guidelines' standards set out in the table above, the 106no. apartments and 55no. duplexes proposed would require a minimum communal amenity space quantum of c. 1,125 sq. m.

The communal amenity space provided as part of the proposed development provided in a number of ground level gardens / landscaped areas adjoining the apartments / duplexes and a rooftop terrace specific to Block A. The total amount of communal open space provided as part of the proposed development amounts to c. 1,813 sq. m. which comfortably exceeds the standards set out in the Guidelines.

We refer the Board to the Site Layout Plans, prepared by O'Mahony Pike Architects and the Landscape Plans, prepared by Doyle + O'Triothigh Landscape Architects for further details on the layout and treatment of these spaces.

9.5.4.2 Car Parking

The Guidelines set out the following broad proximity and accessibility considerations for Apartments are generally defined under the following categories: -

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

In the context of car parking provision, it is considered that the subject lands fall in to the ‘Peripheral and/or Less Accessible Urban Locations’ category which is defined as: -

“As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.”

Applicant’s Response

The SHD Planning Application is accompanied by a Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers which provides a rationale as to why the site is considered as a Peripheral and/or Less Accessible Urban Locations.

161no. car parking spaces are allocated for apartment and duplexes. Car parking for apartments is provided at surface level adjacent to the apartment blocks. Banks of car parking spaces are located adjacent to the duplex blocks. 1no. car parking space is provided as a designated space for each individual apartment and duplex. When visitor parking is taken into account the ratio of car parking for the apartments and duplexes increases to c. 1.3 spaces available per apartment / duplex.

Car parking provisions for apartments and duplexes are in accordance with car parking provisions of the New Apartment Guidelines (2018), which suggests a reduction from normal Development Plan standards, depending on location

We refer the Board to Dwg. No. 1217A-OMP-00-ST-DR-A-1030 ‘Car Parking Plan’, prepared by O’Mahony Pike Architects which show the allocation of car parking across the proposed development.

9.5.4.3 Bicycle Parking

The Guidelines set out with regard to bicycle parking that new development proposals in suburban/urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.

Generally, 1no. dedicated bicycle space per bedroom and 1no. visitor bicycle space per 2no. units is required. Bicycle parking should be easily accessible and provided within a dedicated facility.

Applicant’s Response

In total, 415no. bicycle parking spaces are provided for apartments and duplexes which includes: -

- **Apartments:** 188no. dedicated bicycle parking spaces and 58no. visitor bicycle parking spaces are provided for the apartment blocks. Secure bicycle stores are located at ground floor level of the apartment blocks with visitor bicycle parking located externally adjacent to the blocks.
- **Duplexes:** 141no. dedicated bicycle parking spaces are provided for the duplexes (78no. bicycle parking spaces are provided within the communal rear gardens where appropriate and 63no. spaces are located within secure bicycle stores which are located adjacent to duplex blocks). 28no. visitor bicycle parking spaces are also provided for the duplex units.

We refer the Board to Dwg. 1217A-OMP-00-ST-DR-A-1050 ‘Bicycle Parking Plan’, prepared by O’Mahony Pike Architects which demonstrate the range of bicycle parking facilities across the proposed development. Careful consideration has been given to the location of bicycle stores in particular to ensure they are within convenient walking distance of dwellings.

9.5.4.4 Building Lifecycle Report

In line with the requirements of paragraph 6.13 of the Guidelines, a Building Lifecycle Report will accompany proposal for multi-unit developments.

Applicant's Response

In line with the requirements of paragraph 6.13 of the Guidelines, a Building Lifecycle Report, prepared by Castlethorn Construction is enclosed with this SHD application.

9.5.5 Quality Housing for Sustainable Communities (2007)

The 'Typical Dwelling Sizes' standards of these Guidelines are the most relevant to the provision of quality housing.

9.5.5.1 Typical Dwelling Sizes

Having regard for Table 5.1 of the Guidelines (below) with regard the space provision and room sizes for typical dwellings, all houses within a proposed development should adhere to these standards.

Table 5.1: Space provision and room sizes for typical dwellings

DWELLING TYPE	TARGET GROSS FLOOR AREA	MINIMUM - MAIN LIVING ROOM	AGGREGATE LIVING AREA	AGGREGATE BEDROOM AREA	STORAGE
	(m ²)	(m ²)	(m ²)	(m ²)	(m ²)
Family Dwellings - 3 or more persons					
4BED/7P House (3 storey)	120	15	40	43	6
4BED/7P House (2 storey)	110	15	40	43	6
4BED/7P House (1 storey)	100	15	40	43	6
4BED/7P Apartment	105	15	40	43	11
3BED/6P House (3 storey)	110	15	37	36	6
3BED/6P House (2 storey)	100	15	37	36	6
3BED/6P House (1 storey)	90	15	37	36	6
3BED/6P Apartment	94	15	37	36	10
3BED/5P House (3 storey)	102	13	34	32	5
3BED/5P House (2 storey)	92	13	34	32	5
3BED/5P House (1 storey)	82	13	34	32	5
3BED/5P Apartment	86	13	34	32	9
3BED/4P House (2 storey)	83	13	30	28	4
3BED/4P House (1 storey)	73	13	30	28	4
3BED/4P Apartment	76	13	30	28	7
2BED/4P House (2 storey)	80	13	30	25	4
2BED/4P House (1 storey)	70	13	30	25	4
2BED/4P Apartment	73	13	30	25	7
2BED/3P House (2 storey)	70	13	28	20	3
2BED/3P House (1 storey)	60	13	28	20	3
2BED/3P Apartment	63	13	28	20	5
1BED/2P House (1 storey)	44	11	23	11	2
1BED/2P Apartment	45	11	23	11	3

Unit Type	No. of Units	GFA (m ²) / Unit	Min. Size – Guidelines 2007
House Type 01 – 3-Bed Deep Plan.	102	105.6 – 114	92
House Type 02A – 4-Bed Deep Plan.	19	129.1	110
House Type 02B – 4-Bed Deep Plan with Bay Window.	2	130.8	110
House Type 03A – 3-Bed Wide Plan	20	103.2	92
House Type 03B – 3-Bed Wide Plan with Bay Window.	20	105	92
House Type 04A – 3-Bed Wide Plan + Garage.	21	104.5	92
House Type 04B – 3-Bed Wide Plan + Garage	8	104.9	92
House Type 04C – 3-Bed Wide Plan + Garage	4	104.6	92
House Type 05 – 4-Bed Wide Plan Corner Unit Detached House.	6	136.3	110
House Type 06 – 3-Bed Deep Plan.	10	102.4	92
House Type 07A – 4-Bed Deep Plan	3	143.4	110
House Type 07B – 4-Bed Wide Plan House.	3	146.1	110
House Type 08A – 4-Bed Deep Plan Terraced House.	22	141.4	120
House Type 08B – 4-Bed Deep Plan Terraced House.	1	142.2	120
House Type 08C – 4-Bed Deep Plan Terraced House.	1	142.2	120
House Type 09A – 2-Bed House	6	70.8	60
House Type 09A – 3-Bed House	6	118.9	92
Total	254	Max. 29,202.1 sq. m	

9.5.6 Urban Development & Building Heights Guidelines for Planning Authorities (2018)

These Guidelines include ‘*Specific Planning Policy Requirements*’ (SPPR) that are intended to take precedence over any conflicting policies and objectives of development plans, local area plan and strategic development zone planning schemes.

The Guidelines are prepared in order to achieve the objective of the National Planning Framework (NPF) which amongst other things, identifies building height as an important measure for urban areas to deliver and achieve compact growth. National Planning Objective 13 states: -

“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”

Specific Planning Policy Requirement 1 & 2 of these Guidelines relate specifically to the role of building height and the preparation of a Development Plan. It is considered that these are not entirely relevant in this case.

Specific Planning Policy Requirement 3 provides the ability for the Planning Authority or An Bord Pleanála, “to approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise”.

In this instance what is being proposed is a development comprising of a mix of houses and apartments that range in height between 2 – 5 storeys. There does not appear to us to be any conflicting policies or objectives in the County Development Plan that would preclude these heights. As such, we do not consider that SPPR 3 is applicable in this case either.

The Guidelines set out under Section 3.4 – Building Height in Suburban / Edge Locations (City and Town) that these locations are characterised by newer housing developments outside city and town centres and inner suburbs and typically now include town-houses (2 – 3 storeys), duplexes (3 – 4 storeys) and apartments (4 storeys upwards). Such developments deliver medium densities, in the range of 35 – 50no. dwellings per Ha net and provide an adequate mix of units. This mix addresses the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends. The Guidelines note that this form of development, where well designed and integrated, also facilitate the development of an attractive street-based traditional town environment.

In this context, the Guidelines consider that development should include an effective mix of 2, 3 and 4-storey+ development which integrates into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets. Therefore, of particular relevance to the proposed development is SPPR 4: -

SPPR 4

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 (2007)” 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.*

Prospective Applicant’s Response

The proposed development is considered to be compliant with the Building Height Guidelines recommendations for suburban/edge locations, and with Specific Planning Policy Requirement 4 in respect of appropriate density, mix of units for this type of location and the established surrounding character of the area.

The proposed development achieves a density of approximately c. 42no. units per Ha. The proposed development will deliver a new residential neighbourhood on land zoned for residential use. The land is well connected to road transport networks and within walking distance of Dunshaughlin town centre which include a number of public transport options. Pedestrian and cycle connectivity is prioritised within the development with clear connections toward the town centre.

The scheme, in general, provides a sustainable mix of houses and apartments to support full life cycle approach to sustainable communities which can support units for families (houses with rear gardens), the elderly (bungalows) and downsizers / young professionals (apartment units) for example.

The building heights proposed are utilised to provide a defined ‘urban edge’ toward the R125 (4 / 5 storey apartment blocks) with the units proposed towards the eastern edge of the site also providing variety in terms of height onto the main open space areas.

The proposal responds to its overall natural and built environment and it makes a positive contribution to the urban context.

The materials and finishes of the proposed blocks will be designed to a high architectural standard. The materials and finishes have also been considered with regard to the surrounding existing pattern of development and material palette in the locality. It is considered that the proposed development is in keeping with the character and context of the area.

It is respectfully submitted that the proposed development has had regard to the planning policy framework as set out in the building height guidelines and National Planning Framework. The provision of residential development at this location between 2 – 5 storeys is supported by the height guidelines which encourages increased density and building heights. The proposed development complies with such objectives therefore is considered to be in accordance with the provisions of national policy guidelines.

9.5.7 The Planning System and Flood Risk Management (2009)

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

Applicant's Response

A Site Specific Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers in accordance with the recommendations in the Strategic Flood Risk Assessment produced as part of the Meath County Development Plan 2013 – 2019 and the Planning System and Flood Risk Management Guidelines for Local Government (2009).

The Site Specific Flood Risk Assessment (SSFRA) confirms that: -

“All housing aspects of the proposed development are in Flood Zone C. In Zone B, only less vulnerable aspects of the proposed development are situated, such as open spaces, paths, outdoor sports and recreation amenities. There is no need to perform the justification test.”

The SSFRA goes on to conclude that: -

“Through careful design and appropriate mitigation measures, the risks and consequences of flooding have been mitigated across the development.

Surface water runoff from the site is limited to Greenfield runoff and does not impact on developments upstream or downstream of the subject site.”

The subject lands have been analysed for risks from flooding from the Irish Sea, fluvial flooding, pluvial flooding, groundwater and failures of mechanical systems. Through careful design and appropriate mitigation measures, the risks and consequences of flooding have been mitigated across the development. The residual risk associated with flooding from the Irish Sea, fluvial flooding, pluvial flooding, groundwater and failures of mechanical systems is categorised as low on the basis that mitigation measures are fully implemented.

9.5.8 Design Manual for Urban Roads and Streets (2013)

The stated objective of Design Manual for Urban Roads and Streets (DMURS) is to achieve better street design in urban areas. This will encourage more people to choose to walk, cycle or use public transport by making the experience safer and more pleasant. It will lower traffic speeds, reduce unnecessary car use and create a built environment that promotes healthy lifestyles and responds more sympathetically to the distinctive nature of individual communities and places. The implementation of DMURS is intended to enhance how we travel to and from business; enhance how we interact with each other and have a positive impact on our enjoyment of the places to and through which we travel.

Applicant's Response

We refer the Board to the DMURS Statement of Consistency, prepared by Waterman Moylan Consulting Engineers which sets out the rationale for the proposed road design of the scheme.

The proposed residential scheme is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2013. The scheme proposals are the outcome of an integrated design approach that seeks to foster a sustainable community connected by well-designed streets which deliver safe, convenient and attractive networks.

9.5.9 Childcare Facilities, Guidelines for Planning Authorities (2001)

Section 2.4 of the Guidelines set out general standards for the land use planning issues related to childcare provision in Ireland. In relation to 'New Communities / Larger New Housing Developments', it is noted that: -

"Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary or where there are adequate childcare facilities in adjoining developments."

The Guidelines outline that crèche provision should be made on the basis of 20no. childcare spaces for every 75no. dwellings permitted in a scheme.

The Design Standards for New Apartments: Guidelines for Planning Authorities published in 2018 provides further clarification with regards to childcare provision: -

"One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms."

Applicant's Response

It is proposed to provide a childcare facility as part of the development of c. 409 sq. m. The proposed childcare facility will accommodate up to 80no. children and will include an outdoor garden and play area (c. 430 sq. m).

Having regard for the New Apartment Guidelines (2018) the 32no. 1 bed apartment units and 74no. 2 bed apartment units (133no. units in total) have been discounted on the basis that these typologies are less likely to attract families in a location such as Dunshaughlin.

On that basis of the above, 293no. units of the proposed development are likely to create childcare demand. Based on the provision of the Childcare Guidelines this would generate demand for approximately 78no. childcare spaces.

It is submitted to the Board that given the context of the proposed development with a large number of 1-bedroom and 2-bedroom units, that this is a sufficient number of childcare spaces to cater for the proposed development and to be of benefit to the wider area also.

It is noted also that a further childcare facility is also already being provided in Phase 1 of Dún Ríoga. As such, there will be two childcare facilities, with a combined capacity of 125no. children to cater for approx. 568no. units (combined Phase 1 – 142no. unit and proposed development 462 no. unit).

Notwithstanding, we refer the Board to the Childcare Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants which generally concludes that the childcare facility proposed in combination with the permitted childcare facility in Phase 1 and existing childcare facilities in the Dunshaughlin area have sufficient capacity to meet future childcare demands.

10 STATUTORY PLANNING CONTEXT – STATEMENT OF CONSISTENCY

10.1 Meath County Development Plan 2013 – 2019

The Meath County Development Plan 2013 – 2019 (hereafter referred to as the Development Plan) came into effect on the 22 January 2013 and is the statutory land-use plan governing the subject lands at this time. In line with the statutory provisions, this Plan remains the statutory plan for the area pending the adoption of the new Development Plan for Co. Meath.

This Statement of Consistency is understood to be intended to provide the Board with adequate comfort that the provisions of the Statutory Development Plan have been taken in to account in devising the draft proposals.

In completing this exercise, we have compiled a List of Objectives, quoted the text in italics and provided the Prospective Applicant's Response to this beneath each Objective in turn.

10.1.1 Land Use Zoning

Under the Development Plan, the site is subject to the zoning objective 'A2' and 'F1', as are the lands in the immediate vicinity of the site.

The zoning objective for A2 reads as follows: -

"To provide for new residential communities with ancillary community facilities, neighbourhood facilities and employment uses as considered appropriate for the status of the centre in the Settlement Hierarchy."

A portion of the lands between Character Area 3 & 4 of the subject site are zoned Objective F1, the objective of which is: -

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

The subject lands are primarily zoned as objective A2 – New Residential with some of the lands proposed as Open Space being zoned Objective F1.

A large portion of the Objective A2 lands are currently designated as Phase II – Post 2019 residential lands under the current Development Plan.

Please refer to Section 7 of this Report which sets out a comprehensive response to the issues raised in the An Bord Pleanála Opinion which regard the Core Strategy and the phasing provisions of the Development Plan.

It should be noted that regard has also been given to the Land Use Zoning of the Draft County Development Plan 2020 – 2026 currently on display. The subject lands have been zoned A2 – New Residential (Residential land not available for development until post 2026). The portion of the lands to the northwest are proposed to be de-zoned under the Draft Development Plan.

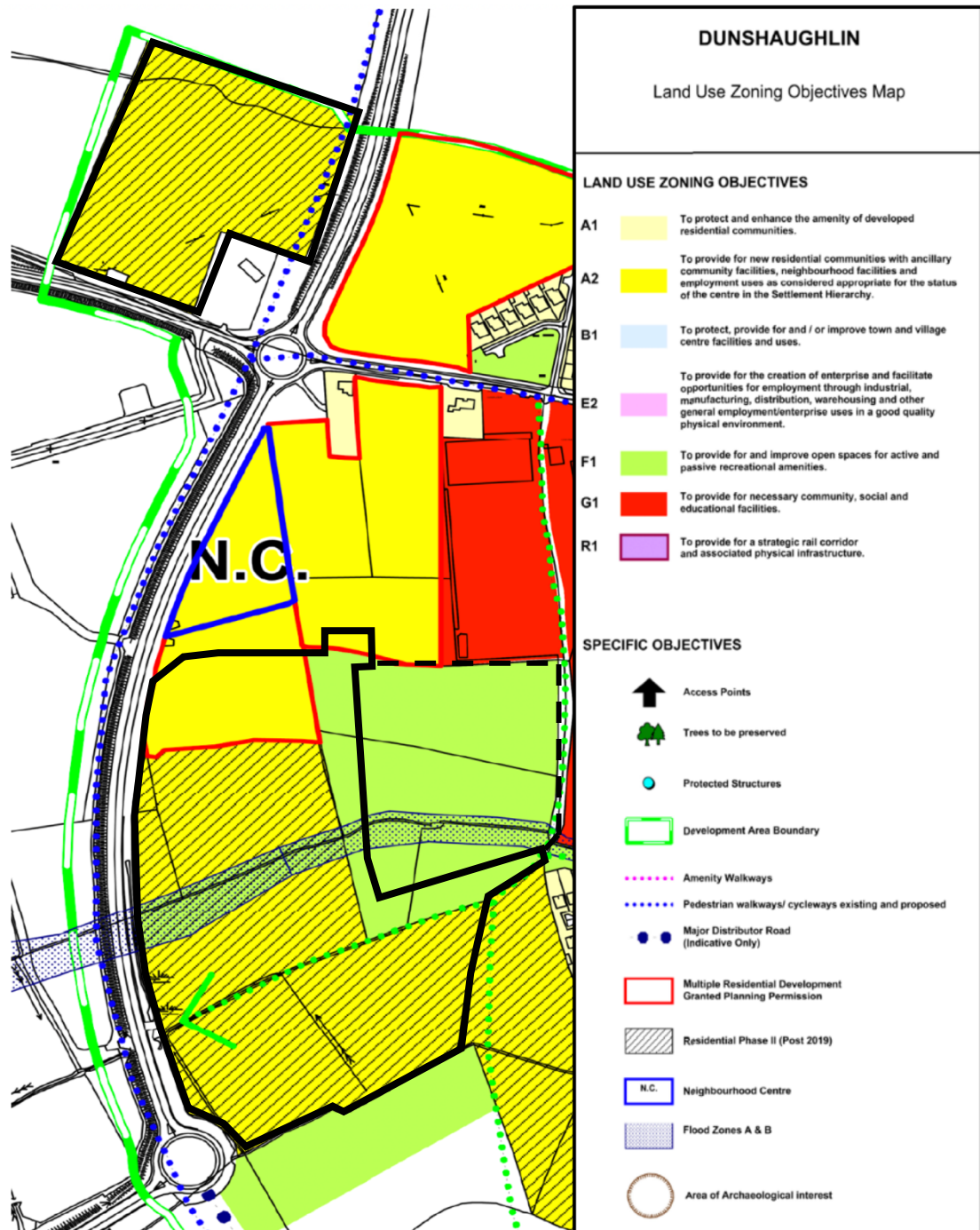


Figure 5: Extract from the zoning map for Dunshaughlin in the Meth County Development Plan 2013 – 2019 with site outlined indicatively in solid black line. The lands zoned F1 – Open Space which are outside the application site but also under the control of the Applicants are indicated in a dashed black line (Overlay by SLA).

The Development Plan lists a range of ‘permissible uses’ and uses that are ‘open for consideration’ as set out in the following table.

Objective A2 – New Residential	Objective F1 – Open Space
Permitted Uses	Permitted Uses
B & B / Guest House, Bring Banks, Community Facility / Centre, Childcare Facility , Convenience Outlet, Children Play / Adventure Centre, Education (Primary or Second Level), Halting Site / Group Housing, Home Based Economic Activities, Leisure / Recreation / Sports Facilities, Residential / Sheltered Housing , Retirement Home / Residential Institution / Retirement Village, Water Services / Public Services	Car Park for Recreational Purposes, Craft Centre / Craft Shop, Community Facility / Centre, Cultural Facility, Cycleways / Greenways / Trail Development , Leisure / Recreation / Sports Facilities , Playing Pitches, Water Services / Public Services .
Open for Consideration	Open for Consideration
Allotments, Bank / Financial Institution, Betting Office, Caravan Park, Cultural Facility, Education (Third Level), Enterprise Centre, Health Centre, Healthcare Practitioner, Hotel / Motel / Hostel, Offices <100 sq. m., Offices 100 to 1000 sq. m., Petrol Station, Place of Worship, Public House, Restaurant / Café, Supermarket, Shop, Take-Away / Fast Food Outlet, Veterinary Surgery.	Allotments, Bring Banks, Childcare Facility, Place of Public Worship.

Applicant's Response

We refer the Board to Dwg. No. 1217A-OMP-00-ST-DR-A-1070 'Zoning Plan Comparison', prepared by O' Mahony Pike Architects which overlays the zoning that applies to the site.

The map clearly demonstrates that the residential elements of the proposed development are contained within the area zoned A2 – New Residential. Residential development is permitted on lands zoned A2 – New Residential. As can be seen from the table above the inclusion of a childcare facility is a permissible use on lands zoned A2 – New Residential.

Landscaping, pedestrian / cycle pathways and a limited amount of underground water services are proposed on lands zoned F1 – Open Space. This type of development is permitted on land zoned F1 – Open Space as can be seen from the table above.

The proposed development provides a generous provision of high-quality open space green infrastructure across both sites which will serve future residents and be accessible to members of the community from the wider area. This includes green links, pocket parks, multi-functional central open spaces, a linear park to the east of Character Area 3 & 4 and wildflower meadows in the vicinity of the existing attenuation pond (permitted under MCC Reg. Ref. DA/120987).

Allowances for future connections has also been provided between Character Area 4 and potential future residential development to the southeast and employment lands to the south. The eastern and southern extensions of these vehicular and/or pedestrian/cycle facilities are in line with the 'Dunshaughlin Land Use Zoning Objectives Map' within the Meath County Council Development Plan 2013 – 2019 and will provide a future enhanced network for pedestrians and cyclists across a wider area.

Should the Board consider that the road connection between Character Area 3 and 4 is not permissible in term of land use zoning consideration has been given to an alternative layout where this vehicular link is omitted.

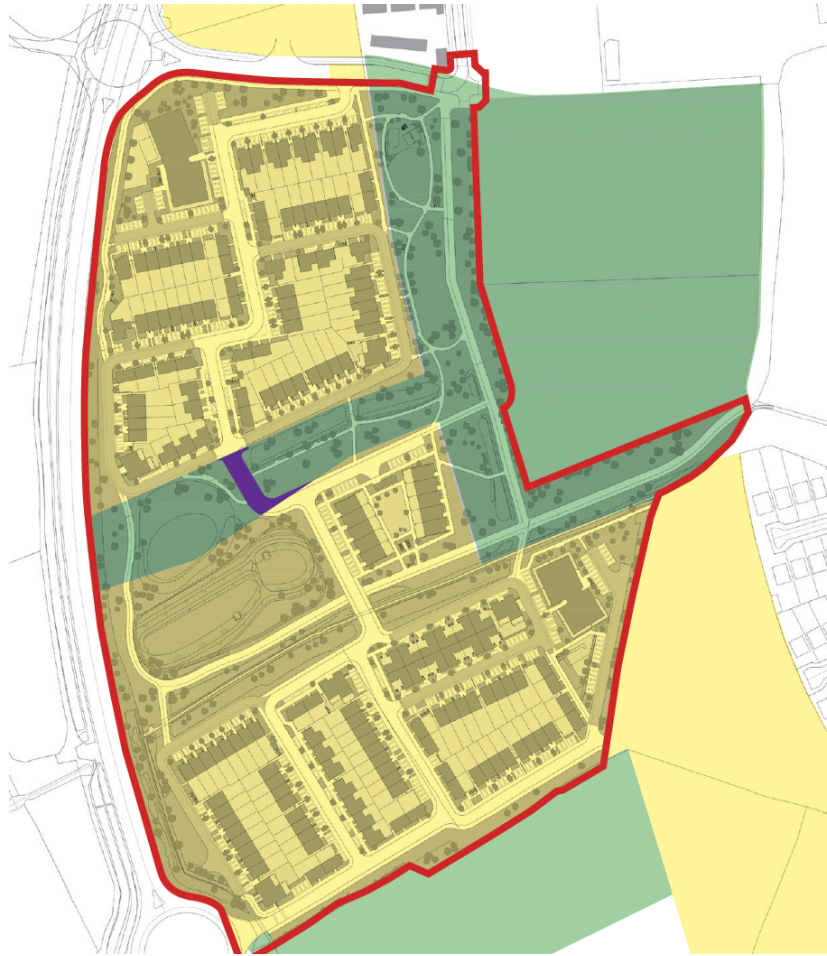


Figure 6: Extract from the Design Statement, prepared by O’Mahony Pike Architects showing the road connection between Character Area 3 and Character Area 4 through lands zoned F1 – Open Space.

The Design Team have included an option whereby the road connection between Character Area 3 & 4, across F1 zoned land, is omitted and the layout including pedestrian connectivity is amended to suit the alternative layout. We refer the Board to the Dwg. No. 12-081A - P171 ‘Road Options Across F1 Zoned Land’, prepared by Waterman Moylan Consulting Engineers which illustrates the alternative option which is simply a matter of omitting the road link and rationalising the road layout where the road would connect with Character Area 3 and Character Area 4 respectively.

We refer the Board to the Landscape Design Development Report, prepared by Doyle + O’Troithigh Landscape Architects which illustrate how the landscaping approach is amended to respond to the omission of the road link.

To provide sufficient comfort to the Board, the Environmental Impact Assessment Report also considers the potential impact of this minor alteration. It was found that no significant impact would arise from the omission of this road link from the proposed development.

While not strictly permitted on lands zoned F1 – Open Space the subject road link has a very limited effect on the use of the lands zoned for public open space. It does not in any way impeded access to these and by virtue of the inclusion of the associated pedestrian footpaths secures greater access through the site and the wider open space lands. The road represents a nominal incursion into the open spaces lands and we submit can be considered ‘*de minimus*’ matter. It is further submitted that the proposed vehicular link between Character Area 3 & 4 is preferable and more in accordance with DMURS and best practice but we have provided the two options as part of this SHD application including modelling of traffic impacts and movements in the submitted Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers with or without this proposed road link.

We wish to confirm that the Applicant would have no issue with the Board attaching a condition to any grant of planning permission that omits this road link between Character Area 3 & 4 across F1 zoned lands as indicated on the above referenced Waterman Moylan drawing should the Board consider this road link to be inappropriate from a land use planning perspective.

10.1.2 Core Strategy and Settlement Strategy

The Core Strategy states that “...Meath occupies a strategic location in the Greater Dublin Area (GDA) and benefits from a wealth of natural resources. As a constituent of the GDA, it is part of the largest market in the county and at the centre of Ireland’s primary economic hub.”

The Development Plan has identified Dunshaughlin as a ‘Moderate Sustainable Growth Town’. The Development Plan notes that all of the Moderate Sustainable Growth Towns should develop in a self-sufficient manner and levels of growth should be balanced to ensure that any increase in population will be in tandem with employment opportunities, capacity in physical and social infrastructure and will not be based on long distance commuting.

Applicant’s Response

Please refer to Section 7 of this Report which sets out a comprehensive response to the issues raised in the An Bord Pleanála Opinion which regard the Core Strategy and the phasing provisions of the Development Plan.

10.1.3 Housing

Section 3.6.6 of the Development Plan sets out policies in relation to the design of residential development, as follows: -

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

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

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

HS POL 4: “To promote energy efficiency both during the construction phase and during the lifetime of residential development by sensitive design and layout taking into account topography, orientation and surrounding features.”

HS POL 6: “To support the concept of independent living for older people and people with disabilities and ensure where possible that housing for such groups is integrated with mainstream housing in their existing communities. Such housing shall generally be located close to existing or committed community and convenience retail facilities, where possible.”

HS POL 9: “To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner, with regard to the Lifetime Homes guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’(2007)”.

HS POL 10: “To support a sequential approach to residential development in which the first choice location for new housing is within the built up area of towns and villages maximising under-utilised and brownfield lands within and adjoining town and village centres in the first instance and thereafter moving sequentially outwards.”

Applicant's Response

The proposed development is fully in accordance with the above housing policies. The proposed development provides a variety of unit types and sizes including houses, duplexes and apartments ranging from 1 to 4 bedrooms. The design of the development is consistent with the local context, is appropriate to the character and landscape setting of both sites and will integrate well with the permitted Phase 1 residential and surrounding development.

Some of the residential units are designed specifically to be adaptable for long term use and changing needs of occupants. The subject site is sequentially suited to the provision of the proposed development, as the lands are contiguous to the existing built up area of the town, are in close proximity to the town centre and are adjacent to existing and future employment uses.

We refer the Board to the Design Statement, Schedule of Accommodation and Housing Quality Assessment, prepared by O' Mahony Pike Architects for further detail.

10.1.4 Social Strategy / Community Infrastructure

The Development Plan outlines the following relevant policies relating to social and community infrastructure: -

SOC POL 1: *"To support the provision and distribution of a range of social infrastructure facilities in accordance with the Settlement and Core Strategies to meet the needs of the County's population in liaison with other statutory, voluntary, private sector and community groups."*

SOC POL 2: *"To ensure that, where practicable, community, recreational and open space facilities are clustered, with the community facilities being located in local centres or combined with school facilities as appropriate. Community facilities should be located close to or within walking distance of housing, accessible to all sectors of the community and facilitate multi-use functions through their design and layout."*

SOC POL 5: *"To require as part of all new large residential and commercial developments, and in existing developments where appropriate, that provision is made for facilities including local / neighbourhood shops, childcare facilities, schools and recreational facilities, and to seek their provision concurrent with development."*

Applicant's Response

The proposed development consists of a residential scheme. Additional physical and social infrastructure / facilities are proposed to be provided in the form of (*inter alia*) large swathes of high quality public open spaces and a childcare facility and associated play area. It is proposed to provide the option for small retail unit (160 sq. m) should An Bord Pleanála consider such provision to be necessary or desirable.

To the east of the subject lands are the sports grounds associated with Dunshaughlin Community College and a Community/Leisure centre and Dunshaughlin GAA clubhouse and playing pitch is also located to the east of the subject lands. An additional junior GAA pitch was constructed on community zoned lands that were previously transferred by Castlethorn without charge to Dunshaughlin GAA.

Under the Applicant's landholding there are lands zoned F1 – Open Space. These lands are located to the east of the landholding and are adjacent Dunshaughlin GAA Dunshaughlin Community Centre and Dunshaughlin Community College. There is c. 2.7 Ha of unallocated F1 zoned Open Space that is intended for transfer to Meath County Council and/or its nominees to be put to an appropriate recreational and / or community use.

Furthermore, the subject site is within 1km of Dunshaughlin vibrant Main Street which hosts a range of shops and services including a large Supervalu, Lidl and Spar supermarkets, café/deli's, restaurant and public houses, boutiques, motor repair shops, financial services, own door offices, library and health and dental facilities. The lands are proximate to a number of educational facilities including a primary school, Gael Scoil Na Rithe and post primary school, Dunshaughlin Community College (and community centre) are located along Drumree Road and immediately accessible from the subject lands.

It is evident that there is a wide range of existing amenities, services and community infrastructure within close proximity to the site. The proposed development including the transfer of remaining F1 zoned lands will further augment the provision of such community infrastructure within the town.

10.1.5 Transport and Mobility

The following policies relate to transport in the Development Plan: -

TRAN SP 2: *“To promote the sustainable development of walking, cycling, public transport and other more sustainable forms of transport as an alternative to the private car, together with the development of the necessary infrastructure and promotion of the initiatives contained within ‘Smarter Travel, A Sustainable Transport Future 2009 – 2020’.”*

TRAN SP 5: *“To promote the location of quality employment and residential developments in proximity to each other in order to reduce the demand for travel and dependence on private car transport whilst development must be increasingly related to a significantly enhanced public transport system.”*

TRAN POL 16: *“To encourage, where appropriate, the incorporation of safe and efficient cycleways, accessible footpaths and pedestrian routes into the design schemes for town centres / neighbourhood centres, residential, educational, employment, recreational developments and other uses.”*

TRANS POL 21: *“To make provision for cycle lanes as part of road improvement / redesign schemes on identified cycle networks, consistent with the NTA National Cycle Manual.”*

TRAN POL 23: *“To require planning applications for major developments to demonstrate proposals to address accessibility for pedestrians and cyclists.”*

Applicant’s Response

Please refer to Section 7 of this Report which sets out a comprehensive response to the issues raised in the An Bord Pleanála Opinion which regard connections between the proposed development and the rest of Dunshaughlin.

The proposed development incorporates a high standard of pedestrian and cycle infrastructure, including a network of segregated pedestrian and cycle routes. The proposed development includes an upgrade of existing pedestrian and cycle facilities along Drumree Road along the southern boundary of Character Area 6 to link east across the roundabout to the completed facilities at the entrance to the Phase 1 Dun Rioga development, provision of dedicated pedestrian and cycle routes throughout the residential scheme providing strong linkages within the development and which link to wider surrounding areas.

The residential layout is arranged to facilitate and maximise pedestrian and cycle permeability throughout the scheme in the form of looped pedestrian and cycleway links which have been designed to connect to the permitted Phase 1 pedestrian/cycleway route to the north (MCC Reg Ref. DA120987 refers) providing access to Drumree Road, Dunshaughlin Link Road, and neighbouring areas.

The development facilitates and will precipitate further pedestrian and cycle links with the adjoining community college lands and further east to Dunshaughlin Town Park and Main Street. The quality of the pedestrian and cycle infrastructure proposals is demonstrated in the TTA report prepared by Waterman Moylan Consulting Engineers, which includes specific sections on the compliance of the scheme with DMURS and the National Cycle Manual.

10.1.6 Childcare Facilities

Section 5.8 of the Development Plan sets out the policy of the Council in relation to childcare facilities. The Plan recognises that such facilities constitute key infrastructure required to enable increased participation in the workforce. Policies of note are as follows: -

SOC POL 21: *“To encourage, promote and facilitate the provision of quality affordable childcare facilities in accordance with national policy and relevant guidelines.”*

Policy SOC POL 23: “To promote and encourage the provision of a network of childcare facilities that reflects the distribution of the residential population in the county and to minimise travel distance and maximise opportunities for disadvantaged communities.”

SOC POL 25: “To require the provision of childcare facilities of an appropriate type and scale in suitable locations throughout the County. In particular, the development of childcare facilities at the following locations will normally be required: -

- Areas of concentrated employment and business parks.
- Neighbourhood centres.
- Large retail developments and retail warehouse parks.
- In schools or major educational facilities.
- Adjacent to public transport nodes, and; within new and existing residential developments.”

Applicant’s Response

The proposed development is providing a childcare facility of c.409 sq. m. The proposed childcare facility will accommodate up to 80no. children and will include an outdoor garden and play area (c. 430 sq. m).

The proposed location of the childcare facility will provide for ease of access from the wider development on foot or by bicycle, and significantly will thereby reduce the level of driving necessary to access childcare in the area.

We refer the Board to the Childcare Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants which generally concludes that the childcare facility proposed in combination with the permitted childcare facility in Phase 1 and existing childcare facilities in the Dunshaughlin area have sufficient capacity to meet future childcare demands.

10.1.7 Energy

Section 8.10.1 of the Development Plan sets out the policy of the Council in relation to energy efficiency for new development which include: -

EC POL 6: “To encourage that development proposals maximise energy efficiency through siting, layout, design or which incorporate best practice in energy technologies, conservation and implementation of smart technology.”

Applicant’s Response

An Energy Statement, prepared by Waterman Moylan Consulting Engineers is enclosed with this SHD Planning Application. This analysis determined an energy and servicing strategy to enable compliance with the standards set out under the following: -

- Building Regulations Technical Guidance Document Part L 2019.
- EU Directive for Near Zero Energy Buildings.
- Building Energy Rating A2.

The implementation of these standards will ensure that the proposed development will meet the energy requirements set out in the Development Plan.

10.1.8 Cultural & Natural Assets

Archaeological Heritage

Section 9.6.9 of the Development Plan sets out the requirement of the Council in relation to protection of archaeological heritage. It is noted that: -

“Meath County Council recognises the value and significance of the county’s archaeological heritage, and the importance of fostering a greater public appreciation of this heritage.... they seek to ensure the effective protection, conservation and enhancement of archaeological sites, monuments and their settings.”

Applicant’s Response

We refer the Board to the EIAR Chapter 17: Cultural Heritage (Archaeological), prepared by Archaeology Plan Consultancy. No significant impacts are predicted, subject to appropriate mitigation measures as identified in the EIAR.

Architectural Heritage

Section 9.6.10 of the Development Plan sets out the policy of the Council in relation to protection of architectural heritage which include: -

***CH POL 10:** “To conserve and protect the architectural heritage of Meath.”*

Applicant’s Response

We refer the Board to the EIAR Chapter 18: Cultural Heritage (Architectural), prepared by Cathal Crimmins Conservation Architect. No significant impacts are predicted on architectural heritage as identified in the EIAR.

Green Infrastructure

Section 9.7.3 of the Development Plan sets out the policy of the Council in relation to protection of green infrastructure which include: -

***GI POL 1:** “To protect existing green infrastructure within the County and to provide additional green infrastructure, where possible.”*

Applicant’s Response

We refer the Board to the Landscape Masterplan and Landscape Design Development Report, prepared by Doyle + O’Troithigh Landscape Architects and the Tree Survey Drawings and Arboricultural Assessment, prepared by The Tree File Ltd. for a detailed assessment of the retention of existing tree and hedgerows (where practical and feasible) as part of the proposed development.

A series of existing natural features are to be retained. Broadly these are set out as follows: -

- **Hedgerow 5** – Located centrally within the Character Area 3 &4.
- **Hedgerow 9** – Located to the south-east of the site of Character Area 4.
- **Hedgerow 10** – Located along the southern boundary of Character Area 4.
- **Tree grouping** located within the proposed linear park to the east of Character Area 3 &4

The featured hedgerows (pertaining to the large southern site – Character Areas 3 & 4) scheduled for retention along with their tree population. It is furthermore noted where hedgerows are scheduled for retention infilling / augmentation will be carried out to ensure the hedgerow’s lifespan is extended and improved in the long term. This will provide an opportunity to increase the site’s biodiversity while improving linkages of green infrastructure and wildlife corridors to connect with habitats with the surrounding environment.

Notwithstanding, arising from detailed design the trees and hedgerow along the western edge of Character Area 3 & 4 will require removal. It is accepted that this is a departure from what was discussed at Pre-Planning consultation stage, however, given the alterations in site levels, slope formations to address nearby pathway links and landscape arrangements, the incorporation of fencing (for safety and noise mitigation purposes) the retention of the existing tree and hedgerow is not feasible. We refer to the Arboricultural Assessment, prepared by The Tree File Ltd. generally summaries that: -

“The site supports a broadly unremarkable vegetation profile, dominated by a highly variable thorn-based field hedge format that supports a variable emergent tree population.

Of the 45no. trees reviewed in the survey, all but two are Ash, and none are of a format or nature to suggest deliberate planting.

The dominance of Ash within the review population raises great concern about tree sustainability in light of the development of Chalara canker across the country. The progression of this disease strongly suggests that regardless of any development, many of these trees may be lost to the disease over the next few years.”

To ensure that this boundary suitably supplemented a reinvigorated largely native woodland mix is proposed along the western edge where it will support some natural screening as the scheme becomes established. We refer to the Landscape Masterplan, Landscape Sections and Boundary Treatment Drawings, prepared by Doyle + O’Troithigh Landscape Architects for further detail.

Views & Prospects

Section 9.10 of the Development Plan sets out the policy of the Council in relation to protection of the landscape in term of capacity to absorb development. Policy includes: -

LC POL 2 *“To require that any necessary assessments, including landscape and visual impact assessments, are provided when undertaking, authorising, or approving development.”*

Applicant’s Response

We refer the Board to the EIAR Chapter 13: Landscape & Visual Impact Assessment, prepared by Doyle + O’Troithigh Landscape Architects. Generally, the Chapter set out that when the development becomes operational: -

*“The proposed development will incorporate the existing retained natural features such as the Skane River and sections of mature hedgerows...The landscape design for the area around the Skane includes the use of native species that will enhance the river side setting and integrate the natural feature into the development. Significant native species hedgerow planting and native species woodland planting will create a strong planted edge to the R125 roadway screening views into the site...and this planting will enhance the development and **assist the integration of the site into the landscape of the wider area.**”*

10.1.9 Development Management Standards

Separation Distances

The Development Plan states that a minimum of 22 metres, between directly opposing windows shall be observed for houses. Where sufficient private open space is provided and privacy is maintained, this depth may be reduced for single storey dwellings. Appropriate design solutions may be acceptable in other circumstances where the windows of non-habitable rooms are within 22 metres of each other.

Applicant’s Response

The proposed development includes some housing blocks which incorporate innovative house types that allows the scheme to diverge in places from the traditional suburban housing block format (with 22m separation distance between opposing first floor windows). Wide frontage houses on one side of the block have been introduced which have no rear facing first floor habitable rooms, which allows the separation distance to be reduced to c. 17-18m. There is no loss to residential amenity or privacy and private rear gardens are provided that are fully in compliance with the Development Plan standards.

This approach results in a more efficient and compact form and introduces greater variety of house types within the streetscape without impact on residential amenity.

We refer the Board to the Site Layout Plans and Design Statement, prepared by O' Mahony Pike Architects which demonstrates compliance with the separation distances set out in Section 11.2.2.2 of the Development Plan.

Private Open Space

Table 11.1 of the Development Plan sets out the minimum private open space standards for houses.

Minimum Floor Areas for Private Open Space	
One / Two bedrooms	55 sq. m
Three bedrooms	60 sq. m
Four bedroom or more	75 sq. m

Applicant's Response

It is considered that the proposed development is in accordance with the development management standards for Meath County Council. All of the housing units meet the minimum area of private open space required.

We refer the Board to the Site Layout Plans and the HQA, prepared by O' Mahony Pike Architects which identifies the areas of all rear gardens and demonstrates compliance with the minimum standards for private open space.

Public Open Space

The Development Plan states that public open space shall be provided for in residential development at a minimum rate of 15% of total site area.

Applicant's Response

The overall development meets the public open space standards set out in the Development Plan. The proposed development will provide c. 4.07 Ha of public open space across both sites which equates to c. 27.6% of the red line area (15.4% of gross site area excl. attenuation, F1 Zoned Lands and Landscape Buffer Zones).

Character Area	Class 1	Class 2	Lands Zone 'F1' – Open Space	Total Hectares (% of Site Area)
Character Area 3 & 4	0.82 Ha	0.5 Ha	2.18 Ha	3.5 Ha*
Character Area 6	-	0.57 Ha	-	0.57 Ha
Total	0.82 Ha	1.07 Ha	2.18 Ha	4.07 Ha (27.4%)

When the lands zoned F1 – Open Space are excluded both Character Area 3 & 4 and Character Area 6 meet the minimum requirements of 15% public open space independently.

We refer the Board to the Design Statement, prepared by O' Mahony Pike Architects and the Landscape Masterplan and the Landscape Design Report, prepared by Doyle + O'Troithigh Landscape Architects which accompanies this SHD Planning Application.

Boundary Treatment

Section 11.2.6 of the Development Plan sets out the requirements for boundaries and screen walls in new housing developments.

Applicant's Response

We refer the Board to the Boundary Treatment Drawings and the Landscape Design Report, prepared by Doyle + O'Troithigh Landscape Architects which accompanies this SHD Planning Application for details in relation to boundaries proposed throughout the site.

In relation to boundary treatments between rear gardens, concrete post and timber panel fencing is proposed. The proposal is considered to be cost effective, low maintenance, attractive and a suitably robust treatment between rear gardens.

Communal Open Space

Section 11.2.3 of the Development Plan sets out the development standards and guidelines for apartments and states that communal open spaces should not be unduly overshadowed by the blocks and be laid out in such a fashion to provide for ease of maintenance.

Applicant's Response

Each apartment is provided with a private balcony / terrace which exceeds the above requirements, as demonstrated in the apartment Floor Plans and HQA prepared by O'Mahony Pike Architects that accompany this SHD Planning Application.

Based on the Guidelines' standards set out in the table above, the 106no. apartments and 55no. duplexes proposed would require a minimum communal amenity space quantum of c. 1,125 sq. m.

The communal amenity space provided as part of the proposed development provided in a number of ground level gardens / landscaped areas adjoining the apartments / duplexes and a rooftop terrace specific to Block A. The total amount of communal open space provided as part of the proposed development amounts to c. 1,813 sq. m. which comfortably exceeds the standards set out in the Guidelines.

All communal open space areas proposed are south facing to maximise the usability and attractiveness of space. The spaces associated with Block 2 and Block 3 are situated directly adjacent and are enclosed to clearly define them as being separate from the main public open space and they are finished with good quality robust materials.

We refer the Board to the Site Layout Plans, prepared by O'Mahony Pike Architects and the Landscape Plans, prepared by Doyle + O'Troithigh Landscape Architects for further details on the layout and treatment of these spaces.

Traffic & Transport Assessment

Section 11.1.8 of the Development Plan sets out that a Traffic & Transport Assessment is required for all development with 200+no. units proposed.

Applicant's Response

We refer the Board to the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers. In relation to traffic impact the Report concludes that: -

"The results of the junction assessment indicate that all assessed junctions are operating within capacity in 2020 during both peak hours and will continue to do so in the future assessment year of 2039..."

Car Parking

Table 11.9 of the County Development Plan sets out the car parking standards for new developments and those standards applicable to this application are set out as follows: -

Land Use – Residential	Car Spaces
Dwellings	2 per conventional dwelling
Flats / Apartments	1.25 per 1 & 2 Bed 2 per 3-4 Bed In all cases, 1 visitor space per 4 apartments
Land Use – Residential	Car Spaces
Childcare Facility	1 per employee & dedicated set down area 1 per 5 children

Applicant's Response

664no. car parking spaces are proposed in total within the development, the breakdown as follows: -

- **Houses:** 442no. car parking spaces are provided for the proposed houses. Parking is provided in a mix of on curtilage and allocated and unallocated on-street parking. The number of car parking spaces provided for houses results in a ratio of 1.7 per house.
- **Apartments / Duplexes:** 161no. car parking spaces are allocated for apartment and duplexes. Car parking for apartments is provided at surface level adjacent to the apartment blocks. Banks of car parking spaces are located adjacent to the duplex blocks. 1no. car parking space is provided as a designated space for each individual apartment and duplex. When visitor parking is taken into account the ratio of car parking for the apartments and duplexes increases to c. 1.3 spaces available per apartment / duplex.
- **Residential (Visitor):** 47no. car parking spaces are dispersed throughout the development.
- **Universal Car Parking:** 6no. universal car parking spaces are provided within the development.
- **Childcare Facility:** 6no. car parking spaces are allocated to cater for car parking generated by the childcare facility.

The car parking proposals are in line with the County Development Plan's Core Principle "to promote and support the integration of land use and transport and a modal shift to greater use of sustainable modes of transport, including public transport, walking and cycling".

The site is accessible to local services and to numerous frequent bus routes and is a short drive away from high capacity commuter transport option at M3 Parkway (Pace) Railway Station with 1,200no. free park and ride car parking spaces which provides direct links to Dublin City Centre.

It is anticipated that the proposed parking provision will be sufficient to meet the needs of the future residents. We refer the Board to the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers which concludes that the car parking provision is generally in accordance with the Meath County Development Plan 2013 – 2019 and the New Apartment Guidelines (2018).

We refer the Board to the Mobility Management Plan, prepared by prepared by Waterman Moylan Consulting Engineers which provides the rationale for the provision of car parking and its management having regard to the proximity of the application site to existing public transport.

Furthermore, we refer the Board to Dwg. No. 1217A-OMP-00-ST-DR-A-1030 'Car Parking Plan', prepared by O'Mahony Pike Architects which show the allocation of car parking across the proposed development.

Cycle Parking

Section 11.9.2 of the County Development Plan sets out the bicycle parking standards for new developments and those standards applicable to this application are set out as follows: -

“Secure cycle parking facilities shall be provided in new office, residential, retail and employment generating developments... The number of stands required will be a third of the number of car spaces required for the development, subject to a minimum of one stand.”

Applicant’s Response

In total, 568no. bicycle parking spaces are proposed within the development, the breakdown as follows: -

- **Apartments:** 188no. dedicated bicycle parking spaces and 58no. visitor bicycle parking spaces are provided for the apartment blocks. Secure bicycle stores are located at ground floor level of the apartment blocks with visitor bicycle parking located externally adjacent to the blocks.
- **Duplexes:** 141no. dedicated bicycle parking spaces are provided for the duplexes (78no. bicycle parking spaces are provided within the communal rear gardens where appropriate and 63no. spaces are located within secure bicycle stores which are located adjacent to duplex blocks). 28no. visitor bicycle parking spaces are also provided for the duplex units.
- **Mid-Terrace Houses:** 101no. dedicated bicycle parking spaces are allocated to the terraced houses within secure bicycle stores which are conveniently located within the street and adjacent open space areas. 52no. visitor bicycle parking spaces are provided for the houses and are dispersed throughout the development.

For houses with direct access to gardens, bicycle parking can be readily accommodated within the rear curtilage of the property.

We refer the Board to the Traffic & Transport Assessment, prepared by Waterman Moylan Consulting Engineers which concludes generally that the bicycle parking provision exceed the requirements set out in the Meath County Development Plan 2013 – 2019 and the New Apartment Guidelines (2018).

Furthermore, we refer the Board to Dwg. 1217A-OMP-00-ST-DR-A-1050 ‘Bicycle Parking Plan’, prepared by O’Mahony Pike Architects which demonstrate the range of bicycle parking facilities across the proposed development. Careful consideration has been given to the location of bicycle stores in particular to ensure they are within convenient walking distance of dwellings.

Waste Management

The Development Plan states that *“...in residential schemes, bin storage areas should be provided to the front of terraced dwellings. These areas should be screened and the design should be integrated with the dwelling. Apartment developments should make provision for waste segregation and recycling. Shared bin storage areas shall be located conveniently for the residents of the development and collection service providers.”* and *“In assessing all significant construction / demolition projects, the developer shall include construction and demolition waste management plans.”*

Applicant’s Response

An Operational Waste Management Plan prepared by AWN Consulting is enclosed with this application and as an appendix to the EIAR. This plan provides a strategy for storing, handling, collecting and transporting wastes generated at the subject site in accordance with the current legal and industry standards. The plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible, and provides guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution. The plan estimates the type and quantity of waste to be generated from the proposed development during the operational phase and provides a strategy for managing the different waste streams.

Furthermore, we refer the Board to Dwg. No. 1217A-OMP-00-ST-DR-A-1040 'Bin Storage Plan', prepared by O'Mahony Pike Architects which show the allocation of bin store across the site. Consideration has been given to the location of stores to ensure they are within convenient access of all units where communal waste areas are required. All apartment blocks will be served by dedicated waste storage rooms. We refer the Board to Dwg. No. 1217A-OMP-00-00-DR-A-5000 'Bin Stores & Bike Stores' for details of plans and elevation of the proposed bin stores.

A Construction and Demolition Waste Management Plan prepared by AWN Consulting is enclosed with this application as an appendix to the EIAR. The plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

10.1.10 Dunshaughlin Written Statement and Development Objectives for Urban Centres

Volume 5 of the County Development Plan 2013-2019 provides a range of specific policies and objectives for Dunshaughlin.

Strategic Policy SP1 states the following: -

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

Applicant's Response

Please refer to Section 7 of this Report which sets out a comprehensive response to the issues raised in the An Bord Pleanála Opinion which regard the Core Strategy and the phasing provisions of the Development Plan.

10.2 Dunshaughlin Local Area Plan 2009 – 2015 (As Extended)

Sitting below the County Development Plan in the development plan hierarchy is the Dunshaughlin Local Area Plan 2009 – 2015 (hereafter, the 'LAP'). This is a statutory plan, the objectives of which are required to be consistent with the County Development Plan. Where a policy conflict arises, it is the objectives of the County Development Plan that take precedence.

As set out in Section 10.1 above, the zoning map and key policies and objectives from the LAP are incorporated into the County Development Plan. One of the key principles which directs the housing policies within the LAP is the delivery of a high-quality living environment with a range of housing types and community facilities and the provision of neighbourhoods rather than traditional housing estates.

This Statement of Consistency is understood to be intended to provide the Board with adequate comfort that the provisions of the Local Area Plan have been taken in to account in devising the draft proposals.

In completing this exercise, we have compiled a List of Objectives, quoted the text in italics and provided the Applicant's Response to this beneath each Objective in turn.

10.2.1 Residential Development

Section 5.2 sets out the residential policies which are considered relevant to the current planning application, as follows: -

Development of Dunshaughlin

LAP Policy Res-2: *"Provide for the expansion of Dunshaughlin on lands close to the town centre, which may be developed with least infrastructural expenditure and which provide good access to the range of social, educational and economic facilities available in the town."*

Applicant's Response

The proposed development will intensively develop a remaining vacant site in the LAP lands, predominantly for residential use with a childcare facility and potentially a small scale retail use that are located proximate to and entirely ancillary to the existing uses in the town centre. The proposed development would capitalise on the considerable infrastructural investment that has taken place both within Dunshaughlin as a whole and within the immediate western environs of the town, much of which has been facilitated and indeed carried out by the Applicant.

It is set out that the subject site is 'shovel ready' and can be readily facilitated. This is in large part due to the fact that the existing Dún Ríoga development (Phase 1) provides access to footpaths, cyclepaths, roads and services. The following infrastructure is available (Please refer to the Design Statement, prepared by O'Mahony Pike Architects for further detail): -

- Foul Drainage Capacity and Water Supply Capacity – confirmed by Irish Water in Confirmation of Feasibility for the proposed Strategic Housing Development for Phase 2 lands.
- Road infrastructure (including a new roundabout on the R125 to facilitate direct access to the landholding which is being delivered as part of the first phase of Castlethorn's development). The subject lands are unique within the town in terms of adjoining distributor road infrastructure having been completed.
- Surface water attenuation pond within the current Phase 2 landholding that is sized to serve both Phase 1 and Phase 2 development.
- Trunk foul main and surface water outfall already in place in the Phase 2 lands of the landholding.
- Furthermore, the lands are considered spatially sequential and positioned adjacent to the existing built-up footprint of Dunshaughlin and contiguous to existing developed lands, facilities and amenities.

Housing Mix

LAP Policy Res-4: *"Seek a balance and mix in the provision of social, affordable and private housing and in the type and size of units in order to promote a social and demographic balance within the town and to respond to the increasing trend towards smaller household sizes. Social housing will be provided in accordance with the housing Strategy set out in the County Development Plan."*

Applicant's Response

The Applicant's Part V proposal responds to this objective in terms of both the mix of dwelling types proposed and the trend towards smaller household sizes. It is a valid Part V offer based on our client's understanding of social housing needs in the town but is naturally subject to agreement with the Housing Department of Meath County Council.

In the Section 247 Pre-Planning Meeting held on 7 February 2020 the type of social housing which Meath County Council required was discussed. It was noted that housing more suited to people with disabilities and older people for 'downsizing' was in particular demand. Meath County Council noted that positive consideration would be given a 'bungalow typology' whereby own door level access could be provided. A relaxation of the Development Management standards in terms of private open space and car parking would be considered to allow for the creation of an efficient typology understanding the overriding requirement to meet appropriate densities.

It was further noted that the Board have previously granted permission for residential development in Meath using similar typologies with the understanding that the 10% requirement would not need to be fully achieved to facilitate these non-standard dwelling types.

The proposal provides 41no. Part V units including 12no. 2/3 Bed bungalows which respond specifically to the feedback received from Meath County Council.

Road Infrastructure

LAP Policy Res-5: “Ensure that road infrastructure other infrastructural improvements, community and recreational facilities match the needs of new residents. Housing development will be phased to correspond to the provision of these facilities.”

Applicant’s Response

The subject site is unique in Dunshaughlin in terms of its location immediately adjoining completed distributor roads infrastructure (i.e. Dunshaughlin Link Road) which provides direct access to the M3 Motorway.

Much of the supporting physical infrastructure required for these Phase 2 lands has, and is, being delivered as part of the Phase 1 permission (MCC Reg. Ref. DA/803421 refers). This includes foul trunk main, surface water outfall and large wetland attenuation area. Phase 1 will also see the construction of a new roundabout junction on Dunshaughlin Link Road.

The subject site is well served by its close proximity to Dunshaughlin town centre (c. 1km) and the full range of facilities and services therein. It is also situated adjoining important educational and sporting facilities comprising the Dunshaughlin GAA grounds, Dunshaughlin Community College and Dunshaughlin Community Centre and associated playing fields and ballcourts.

Pedestrian / Cycle Links

LAP Policy Res-6: “Provide safe and high-quality pedestrian and bicycle links between residential areas and retail, recreational and educational facilities in the town.”

Applicant’s Response

Please refer to Section 7 of this Report which sets out a comprehensive response to the issues raised in the An Bord Pleanála Opinion which regard pedestrian / cyclist connectivity within the proposed development, to Dunshaughlin town centre and facilitation and commitment to further connections east along the Skane River to and through the adjoining community college lands.

Energy Performance

LAP Policy Res-7: “All new developments shall meet the low energy performance as set out in the Building Regulations as pre-requisite to receiving planning approval (a calculation report to be submitted with the planning application). Each building’s energy performance calculation will be demonstrated on the basis of simple approved method carried out by a qualified or accredited expert.”

Applicant’s Response

An Energy Statement, prepared by Waterman Moylan Consulting Engineers is enclosed with this SHD Planning Application. This analysis determined an energy and servicing strategy to enable compliance with the standards set out under the following: -

- Building Regulations Technical Guidance Document Part L 2019.
- EU Directive for Near Zero Energy Buildings.
- Building Energy Rating A2.

The implementation of these standards will ensure that the proposed development will meet the energy requirements set out in the Development Plan.

Pedestrians and Cyclists

LAP Objective PC-1: *“To provide the network of pedestrian and cycle facilities illustrated on the land use zoning objectives map. All new and upgraded road proposals shall provide for such facilities.”*

LAP Objective PC-2: *“To provide for the incorporation of a pedestrian and cycle link east along the River Skane to the open space area south of the school.”*

Applicant’s Response

Please refer to Section 7 of this Report which sets out a comprehensive response to the issues raised in the An Bord Pleanála Opinion which regard pedestrian / cyclist connectivity within the proposed development, to Dunshaughlin town centre and facilitation and commitment to an extended connection east along the Skane River to and through the adjoining community college lands to Dunshaughlin Town Park and Main Street.

The DMURS Statement of Consistency, prepared by Waterman Moylan Consulting Engineers confirms that the layout of the proposed development prioritises both pedestrians and cyclists in terms of movement within the development.

Furthermore, the proposed layout has been subject to a safety audit to ensure compliance with the relevant standards set out by Transport Infrastructure Ireland. The layout is deemed compliant from a road safety perspective.

11 ADDITIONAL SUPPORTIVE PLANNING POLICY

We wish to highlight to the Board that the below guidelines do not require a Statement of Consistency response. However, they have been included in this Report to further support the proposed development.

11.1 REBUILDING IRELAND – ACTION PLAN FOR HOUSING AND HOMELESSNESS 2016

The overarching aim of this Action Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs. It sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

The plan has 5 key pillars: Pillar 1- address homelessness; Pillar 2 - accelerate social housing; Pillar 3 - build more homes; Pillar 4 - improve the rental sector and Pillar 5- utilise existing housing. Pillars 3 & 4 are particularly relevant in terms of the subject site, as they seek to increase the output of private housing to meet demand and to address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

The action related to Pillar 3 is to deliver 25,000 units per annum in the period until 2021. The proposed development supports the delivery of this action.

The proposed development is consistent with Pillar 3 to build more residential units. The overall development provides for c. 415no. new residential units, adding significantly to the housing stock of the town, providing a broad variety of types and tenures to cater to the increasing demand in the area and helping to somewhat redress the spatial imbalance of recent expansions of the town solely to the east of Dunshaughlin.

11.2 National Development Plan 2018 – 2027

The companion to the NPF is the National Development Plan, a ten-year strategy for public capital investment of almost €116 Billion. The NPF notes the documents align *'our investment strategy with our strategic planning documents to, for the first time in the history of our State, create a unified and coherent plan for the country'*.

Ten National Strategic Outcomes are outlined in the NPF. In alignment with the NPF, the NPD sets out the new configuration for public capital investment over the next ten years to secure the realisation of each of the National Strategic Outcomes. This is to improve the way public capital investment is planned and co-ordinated in a modern and growing society, leading to improved public services and quality of life. The 10 National Strategic Outcomes of the NPF & NDP are: -

1. Compact Growth.
2. Enhanced Regional Accessibility.
3. Strengthened Rural Economies and Communities.
4. Sustainable Mobility.
5. A Strong Economy, supported by Enterprise, Innovation and Skills.
6. High-Quality International Connectivity.
7. Enhanced Amenity and Heritage.
8. Transition to a Low-Carbon and Climate-Resilient Society.
9. Sustainable Management of Water and other Environmental Resources.
10. Access to Quality Childcare, Education and Health Services.

Of the ten National Strategic Outcomes, the most relevant to the proposed development are Compact Growth and Sustainable Mobility.

Compact Growth aims to secure the sustainable growth of more compact urban and rural settlements supported by jobs, houses, services and amenities, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and co-ordinated investment in urban, rural and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns and villages. This will give scope for greater development densities in areas that are centrally located.

The National Development Plan 2018 – 2027 sets out the main investment projects, programmes and priorities envisaged over the next decade in order to drive the implementation of the NPF. The NDP states that in 2016 as part of the preparation of the Greater Dublin Area Transport Strategy, a cost benefit analysis of an extension of the Dunboyne / M3 Parkway line to Dunshaughlin and Navan was conducted by the National Transport Authority (NTA).

The NTA is required to review its Greater Dublin Area Transport Strategy before the end of 2021. This review will include a reappraisal of the project taking into account the scale of new and planned development along the route and will allow for its consideration during the Mid Term Review. The Transport Strategy for the Greater Dublin Area (GDA) 2016 – 2035 sets out that: -

“The Transport Strategy also states that the corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.”

Meath County Council sets out as part of Pre-Planning consultations for the Strategic Housing Development for Phase 2 lands that Dunshaughlin can become a ‘multi-modal’ town with the provision of the train link. Dunshaughlin is well served by public transport, and the Planning Authority have acknowledged that further growth will support the viability of further public transport provision in the medium to longer term.

Additional housing will provide additional critical mass to support this aspiration of Meath County Council for Dunshaughlin to become a ‘multi-modal’ town. The location allows for strong linkages with the town centre and are considered sequentially suited to consolidate the western side of Dunshaughlin town.

12 JUSTIFICATION OF MATERIAL CONTRAVENTION

As confirmed in Section 10 of this Report, the lands are zoned in the Meath County Development Plan as ‘Objective A2 – New Residential’ and ‘Objective F1- Open Space’.

The proposed development is for a residential use and the residential units proposed are located only on lands zoned Objective A2, with amenity open spaces proposed on the lands zoned Objective F1.

These uses comply with these objectives.

Thereafter, the Housing & Residential Tenancies Act 2016, provides that the Board may grant permission for an SHD proposal even where it would materially contravene the relevant Development Plan, other than in relation to the zoning of land. In addition, where specific planning policy requirements of the relevant Development Plan differ from specific planning policy requirements (SPPRs) set out in Section 28 Guidelines, then the SPPRs shall, to the extent that they so differ, apply instead of the provisions of the Development Plan.

In the case of the proposed development at the Dunshaughlin SHD site, there have arisen some inconsistencies between the objectives of the current Meath County Development Plan 2013-2019, the current Dunshaughlin LAP 2009 – 2015 (as extended) and the more recent national and regional planning policy published since the local statutory plans were adopted. Notably, this relates to the following aspects of the proposed development: -

- **Core Strategy & Housing Allocation:** The proposed development of 415no. units at the Dunshaughlin SHD site may in tandem with similar development at other undeveloped land banks exceed the housing allocation for this settlement as envisaged by the LAP and Development Plan core strategy. This is not however considered to be contrary to strategic planning policy at local, regional and national levels, relevant to the regeneration and development at the application site. Indeed, we have identified in other sections of this report how the proposed land use and density is compliant with planning and land use policy and ministerial guidance for this location.
- **Land Use Zoning:** A vehicular link is proposed between Character Area 3 & 4 through lands zoned F1 – Open Space. While not strictly permitted on lands zoned F1 – Open Space it has a very limited effect on the use of the lands zoned for public open space and provides broader vehicular permeability in a controlled manner in line with DMURS guidance. It does not in any way impede access to these open space zoned lands and by virtue of the inclusion of the associated pedestrian footpaths secures greater access through the site and the wider open space lands. The road represents a nominal incursion into the open spaces lands and we submit should be considered a ‘*de minimus*’ matter.

Should the Board consider that the road connection between Character Area 3 and 4 is not permissible in term of land use zoning consideration has been given to an alternative layout where this vehicular link is omitted. Further discussion in relation to land use zoning is set out in Section 10 of this Report.

The Design Team have included an option whereby the road connection is omitted and the layout including pedestrian connectivity is amended to suit the alternative layout. We refer the Board to the Dwg. 12-081A - P171 ‘Road Options Across F1 Zoned Land’, prepared by Waterman Moylan Consulting Engineers which illustrates the alternative option which is simply a matter of omitting the road link and rationalising the road layout whereby vehicular access to Character Area 3 would be solely from the north and vehicular access to Character Area 4 would be solely from the south.

We refer the Board to the Landscape Design Development Report, prepared by Doyle + O’Troithigh Landscape Architects which illustrate how the landscaping approach is amended to respond to the omission of the road link.

To provide sufficient comfort to the Board, the Environmental Impact Assessment Report also considers the potential impact of this minor alteration. It was found that no significant impact would arise from the omission of this road link from the proposed development.

Ultimately, the Applicants preferred solution is to include the vehicular link between Character Area 3 & 4. Notwithstanding, the Applicant will accept a condition as part of any grant of permission seeking the omission of the road if the Board deem it unacceptable from a land use planning perspective.

In this regard, we refer the Board to the accompanying 'Material Contravention Statement', prepared by Stephen Little & Associates, which provides justification for any material contraventions of the Development Plan and/or Local Area Plan where the Board forms the opinion that the proposed development will give rise to such a material contravention.

The role of the competent authority (the Planning Authority / An Bord Pleanála) is recognised in deciding on the matter of whether or not the proposed development represents a material contravention of the objectives of the Development Plan or Local Area Plan in this case.

13 SCREENING FOR APPROPRIATE ASSESSMENT

The SHD Planning Application is accompanied by an Appropriate Assessment Screening Report, prepared by Scott Cawley Ecological Consultants which concludes that: -

“Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded,... In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.

Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS).”

14 ENVIRONMENTAL IMPACT ASSESSMENT REPORT

The revised 2014 EIA Directive (Directive 2014/52/EU amending Directive 2011/92/EU) uses the term environmental impact assessment report (EIAR) rather than the previous environmental impact statement (EIS). Where current national guidelines and regulations refer to an Environmental Impact Statement or EIS, this can be taken to mean an Environmental Impact Assessment Report (EIAR).

Projects requiring environmental impact assessment are listed in Parts 1 and 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended). Schedule 5 (Part 2) of the Planning & Development Regulations 2001 (as amended) set mandatory thresholds for each project class above which EIAR is required. Sub-sections 10(b) (i) and 10(b) (iv) addresses ‘infrastructure projects’ referring to housing and urban developments, and require that the following classes of project, relevant to this project, be subject to EIAR: -

“Class 10(b) (i). Construction of more than 500 dwelling units.”

“Class 10(b) (iv). Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.”

The proposed development involves the construction of 415no. residential units, a childcare facility, open space amenity areas and associated infrastructure on a site of 12.22 Ha (gross) with a net development area of 9.95 Ha.

The proposed number of residential units in combination with the 142no. residential units permitted on Phase 1 lands (permitted under Reg. Ref. DA/12097, as extended under Reg. Ref. RA/171431) the cumulative number of units amounts to 557no. in total and therefore falls within the threshold requiring an EIAR as it comprises of 500no. dwellings or more. An EIAR is therefore being prepared for submission with the ultimate planning application to An Bord Pleanála.

As such, an Environmental Impact Assessment Report is submitted to An Bord Pleanála with this SHD Planning Application.

15 CONCLUSION

It is our considered professional planning opinion that the proposed development which is the subject of this SHD Planning Application complies with the proper planning and development of the area in the context of the relevant strategic and local planning policy, as primarily expressed in: -

- Rebuilding Ireland – Action Plan for Housing & Homelessness.
- National Planning Framework, Ireland 2040.
- Eastern & Midlands Regional Spatial & Economic Strategy and Dublin Metropolitan Area Spatial Plan (DMASP).
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).
- Quality Housing for Sustainable Communities (2007).
- Sustainable Urban Housing: Design Standards for New Apartments (2018).
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018).
- Meath County Development Plan 2013 – 2019.
- Dunshaughlin Local Area Plan 2009 – 2013 (as extended).
- Other relevant national and regional planning strategies, objectives and planning design guidelines for achieving sustainable urban residential development in the Dublin area.

The proposed development which is the subject of this SHD Planning Application should be supported by the Board as an appropriate proposal for Strategic Housing Development, on the grounds that: -

- The subject site can be considered ‘Tier 1 Serviced Zoned Land’ in the context of the NPF. It is set out that the landholding is ‘shovel ready’ and development can be readily facilitated with exceptional capacity identified for both wastewater and water supply and an existing trunk foul main and surface water outfall as well as a large surface water attenuation pond already in-situ in these subject Phase 2 lands. The lands are also unique in Dunshaughlin in terms of key distributor road infrastructure directly adjoining and serving these lands having been completed i.e. the R125 Dunshaughlin Link Road. Furthermore, the lands are spatially sequential and positioned adjacent to the existing built-up footprint of Dunshaughlin and contiguous to existing developed lands, facilities and amenities.
- The regional based objectives for the Eastern and Midlands area set out in the NPF suggest that future residential growth will be linked to increased employment opportunities / investment within settlements such as Dunshaughlin.
- The proposed development consolidates growth within Dunshaughlin (a Moderate Sustainable Growth Town), providing a development with a sustainable density which utilises a site which is zoned and fully serviced for residential development.
- The RSES acknowledges the need to increase the delivery of housing across the county and projects that at least half of all new homes to be built nationally up to 2040 will be required in the Eastern and Midland Region with Regional Policy Objective (RPO 3.2) requiring that all new homes in towns outside of cities to be located ‘*within and close to the existing built up area*’.
- The proposed residential development will provide additional critical mass to support the development of the proposed future railway extension to Navan and a railway station on the western edge of Dunshaughlin, close to the subject lands.
- It has been demonstrated that Dunshaughlin does not possess the housing supply to meet current demand. The proposed development will respond to the demand and need for affordable residential development within close proximity to the centre of Dunshaughlin and adjoining existing residential areas as well as educational and community facilities. The proposal is exceptionally well located in terms of the immediately accessible road infrastructure to Dublin

and Navan and is also well served by public transport in terms of both existing and planned future provision.

- The scheme represents a well-designed and thought out development which achieves a sustainable density of residential development, having regard to the Council's settlement and housing strategy for the County, in an accessible urban edge, supported by community facilities and open space amenities.
- The proposed development will provide associated facilities including a dedicated creche and generous provision of well-landscaped public open space which will serve as a significant amenity to residents and through an extensive network of footpaths and cyclepaths will provide looped amenity routes and facilitate greater connectivity to surrounding areas. The public open spaces are passively overlooked and well-supervised by the proposed dwellings, are of high quality and comfortably exceed the quantitative standards set out in the Development Plan and planning guidelines.
- The proposed development will also provide for the transfer of an additional c. 2.84 Ha of F1 zoned land under the control of the Applicant to Meath County Council without charge, which represents a considerable planning gain for the wider community in Dunshaughlin.
- The proposed development has been subject of comprehensive design and environmental assessment, including an Environmental Impact Assessment Report, to ensure that it is representative of sustainable residential development that meets the needs of existing and future generations for good quality housing at this location, and without detracting from the sustainable expansion or consolidation of other settlements.
- Castlethorn have been patient and proactive and worked closely with Meath County Council and other statutory and local stakeholders over many years in facilitating and delivering infrastructural solutions and wider community gain at this western side of the town. It is submitted that the subject zoned and serviced lands are particularly well-placed to facilitate a sustainable and sequential western expansion of the built-up area of the town without further delay in order to counterbalance the eastern expansion of the town in recent years and to capitalise on all the completed road, drainage, water supply and social infrastructure that is in place immediately adjacent to their lands.

We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

16 ENCLOSURES

1. Planning Fee € €66,894.80 (Cheque Enclosed).
2. Planning Application Form.
3. Newspaper Notice.
4. Site Notice.
5. Letter of Consent from Meath County Council.
6. Letter of Consent from the Newall Family.
7. Letter of Support for Skane Greenway from Louth Meath Educational Training Board.
8. Confirmation of Feasibility Statement from Irish Water, dated 20 February 2020.
9. Design Acceptance Statement from Irish Water, dated 04 September 2020.
10. Confirmation from Environmental Impact Assessment Portal.
11. Part V Proposal, prepared by Castlethorn Construction.
12. Planning & Statement of Consistency Report (including Statement of Response to An Bord Pleanála Opinion), prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
13. Material Contravention Statement, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
14. Childcare Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
15. Educational Needs Assessment, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
16. Architect's Drawings, prepared by O'Mahony Pike Architects (see schedule of drawings attached with each bundle).
17. Schedules of Accommodation, prepared by O'Mahony Pike Architects.
18. Housing Quality Assessment, prepared by O'Mahony Pike Architects.
19. Design Statement, prepared by O'Mahony Pike Architects.
20. Part V Statement (including Part V Layout), prepared by O'Mahony Pike Architects.
21. Landscape Drawings, prepared by Doyle + O'Troithigh Landscape Architects (see schedule of drawings attached with each bundle).
22. Landscape Design Report, prepared by Doyle + O' Troithigh Landscape Architects.
23. Photomontages and CGIs, prepared by Modelworks.
24. Arboricultural Report & Tree Survey Drawings, prepared by The Tree File Consulting Arborists Ltd. (see schedule of drawings attached with each bundle).
25. Engineering Drawings (including Roads and Drainage), prepared by Waterman-Moylan Consulting Engineers (see schedule of drawings attached with each bundle).
26. Engineering Assessment Report (including Roads and Drainage), prepared by Waterman-Moylan Consulting Engineers.

27. Flood Risk Assessment and Statement of Consistency, prepared by Waterman-Moylan Consulting Engineers.
28. Traffic & Transportation Assessment, prepared by Waterman-Moylan Consulting Engineers.
29. Design Manual for Urban Roads and Streets Statement of Consistency, prepared by Waterman-Moylan Consulting Engineers.
30. Mobility Management Plan, prepared by Waterman-Moylan Consulting Engineers.
31. Stage 1 Road Safety Audit, prepared by Burton Consulting Engineers.
32. Environmental Impact Assessment Report, co-ordinated by Stephen Little & Associates Chartered Town Planners & Development Consultants.
33. Appropriate Assessment Screening Report, prepared by Scott Cawley Ecological Consultant's.
34. Daylight and Sunlight Analysis, prepared by IN2 Engineering Design Partnership.
35. Construction Management Plan, prepared by Waterman Moylan Consulting Engineers.
36. Energy Statement, prepared by Waterman Moylan Consulting Engineers.
37. Building Lifecycle Report, prepared by Castlethorn Unlimited Company.
38. Lighting Plans & Outdoor Lighting Report, prepared by Sabre Electrical Services Ltd. (see schedule of drawings attached with each bundle).
39. Socio-Economic Study, prepared by Future Analytics Consulting Ltd.
40. Copy of Cover Letter sent to Prescribed Bodies with copy of the SHD Planning Application.
41. Copy of Cover Letter sent to Meath County Council with copies of the SHD Planning Application.

Stephen Little & Associates are committed to progressing and achieving sustainable development goals.

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