



# ARMSTRONG FENTON

ASSOCIATES

**PROJECT:** Strategic Housing Development

**STATEMENT of CONSISTENCY:**

for proposed residential development at  
Baltrasna & Milltown, Ashbourne, Co.  
Meath

**CLIENTS:** Arnub Ltd. & Aspect Homes (ADC) Ltd

**DATE:** September 2022

Planning &  
Development  
Consultants



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## 1.0 Executive Summary

This Statement of Consistency demonstrates that the proposed Strategic Housing Development on a site in the townlands of Baltrasna and Milltown in Ashbourne, Co. Meath, is consistent with the relevant planning policies pertaining to the site at local, county and national levels.

The proposed development is described as follows:

**Arnub Ltd. & Aspect Homes (ADC) Ltd. intend to apply to An Bord Pleanála for permission for a strategic housing development, on an overall site of c. 20.04 hectares, located in the townlands of Baltrasna and Milltown, Ashbourne, County Meath. The application site is located to the west / south-west of Dublin Road (R135), south-west of Cherry Lane, west of the existing dwellings at The Briars and Cherry Court, south of the existing dwellings at Alderbrook Heath, Alderbrook Downs & Alderbrook Rise, east / south-east of the existing dwellings at Tara Close & Tara Place, and north-west and south-west of Hickey's Lane.**

The development will consist of the following:

- (1) Demolition of all existing structures on site, comprising 3 no. single storey dwellings and their associated outbuildings (total demolition area: c.659m<sup>2</sup>).**
- (2) Construction of 702 no. residential dwellings comprised of: 420 no. 2 & 3 storey 2, 3, 4, & 5 bed houses, 38 no. 2 & 3 bed duplex units in 19 no. 3 storey buildings, and 244 no. 1, 2, & 3 bed apartments in 20 no. buildings ranging in height from 3 to 6 storeys.**
- (3) The development also includes for the following non-residential uses: (i) 2 no. childcare facilities located in Blocks A and A1 (c. 289m<sup>2</sup> & c.384m<sup>2</sup> respectively), (ii) 4 no. retail units comprised of: 2 no. units in Block A (c.106m<sup>2</sup> & c.174m<sup>2</sup> respectively), 1 no. unit in Block A1 (c.191m<sup>2</sup>), & 1 no. unit in Block B1 (c.469m<sup>2</sup>), and (iii) 1 no. GP practice / medical use unit located in Block A1 (c.186m<sup>2</sup>).**
- (4) The development provides for a basement level car park located under Block A1 (c. 4,095m<sup>2</sup>) and, 2 no. undercroft car parks located at the ground floor level of Block A (c. 466m<sup>2</sup>) and Block B1 (c. 1,466m<sup>2</sup>).**
- (5) The development provides for an area of c.1 hectare reserved for a future school site and playing pitch at the western boundary of the site.**
- (6) Vehicular access to the development will be via 2 no. access points as follows: (i) from Cherry Lane, located off Dublin Road (R135), in the north-east of the site and, (ii) from Hickey's Lane, located off Dublin Road (R135), to the east of the site. The development includes for road upgrades / improvement works to both Cherry Lane and Hickey's Lane and their junctions with Dublin Road (R135). A new east-west access road through the development site extending from Cherry Lane to the western boundary of the site and all associated site development works is proposed. The development includes for 1 no. pedestrian / bicycle green link access point from Dublin Road (R135) and pedestrian and cycle paths throughout the development site.**
- (7) The development also provides for (i) all ancillary / associated site development works above and below ground, (ii) public open spaces (c.28,885m<sup>2</sup> total), including hard & soft landscaping, play**



equipment & boundary treatments, (iii) communal open spaces (c.3,180m<sup>2</sup> total) (iv) undercroft, basement, and surface car parking, including for EV, mobility impaired, and car share parking spaces (total 1,262 no. car parking spaces) (v) 869 no. dedicated bicycle parking spaces at undercroft and surface level, including for external bicycle stores & visitor spaces (vi) bin storage, (vii) public lighting, (viii) signage (ix) plant (M&E) & utility services, including for 7 no. ESB sub-stations (x) green roofs, all on an overall application site area of 20.04 hectares.

## 2.0 Introduction

### 2.1 Legislative Context

In accordance with Section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act, (as amended)(the “2016 Act”), Arnub Ltd. & Aspect Homes (ADC) Ltd, as joint applicants, intend to apply for planning permission in respect of proposed Strategic Housing Development (SHD) at Baltrasna and Milltown in Ashbourne, Co. Meath. This report constitutes the Statement of Consistency to support the application and pursuant to the requirement under Section 8(1)(a)(iv) of the 2016 Act.

### 2.2 Outline of this Report

This Statement of Consistency provides a description of the subject site location and proposed development followed by a list of the various statutory and strategic policy documents considered. The Statement continues to demonstrate full consistency with *inter alia* the relevant Development Plan and S.28 Ministerial Guidelines, National and Regional Policy.

## 3.0 Policy Documents Considered

The following policy documents have informed this Statement of Consistency:

### 3.1 National Planning Context / Strategic Policy Documents

- Project Ireland 2040 - National Planning Framework (2018);
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);
- Housing For All - A new Housing Plan for Ireland (2021).

### 3.2 Section 28 Ministerial Guidelines

- Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009, and its companion document Urban Design Manual – A best practice guide, 2009;
- Urban Development and Building Heights Guidelines for Planning Authorities, 2018;
- Sustainable Urban Housing: Design Standards for New Apartments, 2020;
- Guidelines for Planning Authorities for Child Care Facilities, 2001;
- The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009;
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018).



### 3.3 Regional Planning Context

- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy (June 2019)

### 3.4 Local Planning Context / Statutory Policy Documents

- Meath County Development Plan 2021-2027

## 4.0 Statement of Consistency

The following sets out the proposed development's compliance with a range of relevant national and local planning guidelines and policies.

### 4.1 National Planning Context:

#### 4.1.1 Project Ireland 2040 - National Planning Framework

The Government published the National Planning Framework (NPF) in 2018 which is the Government's high-level strategic plan for shaping the future growth and development of the country out to the year 2040. A key element of the NPF's strategy is compact growth with the key features being:

- *Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.*
- *Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.*
- *Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency.*



By 2040 there will be roughly an extra one million people living in our country, with the NPF recognising that *"this population growth will require hundreds of thousands of new jobs and new homes"*.

Objective 1a states that the projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined. National Policy Objective 1b states that in the context of around one million additional people in Ireland by 2040, it means planning for 490,000 - 540,000 additional people (i.e. a population of around 2.85 million in the Eastern and Midland Region).

The NPF is divided into 11 Chapters as follows:

- Chapter 1 The Vision
- Chapter 2 A Way Forward
- Chapter 3 Effective Regional Development
- Chapter 4 Making Stronger Urban Places



- Chapter 5 Planning for Diverse Rural Places
- Chapter 6 People, Homes & Communities
- Chapter 7 Realising our Island and Marine Potential
- Chapter 8 Working with Our Neighbours
- Chapter 9 Realising Our Sustainable Future
- Chapter 10 Implementing the National Planning Framework
- Chapter 11 Assessing Environmental Impact

Each chapter contains National Policy Objectives that promote coordinated spatial planning, sustainable use of resources and protection of the environment and the Natura 2000 network. The National Policy Objectives most relevant to the current application are as follows:

- **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;

#### **Statement of Consistency:**

In accordance with the National Policy Objectives of the NPF, the current application will deliver a medium density development of modern and adaptable new homes, within an existing urban area in close proximity to existing public transport and local service provision, and meets the objective of providing new homes at locations that can support sustainable development and at an appropriate scale of provision relative to its location, in particular that the location of new housing be prioritised in existing settlements, i.e. National Policy Objectives 3a and 4.

- **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;

#### **Statement of Consistency:**

The proposed development is located on lands zoned for residential use (A2) and community infrastructure use (G1) within the Meath County Development Plan 2021-2027. The subject site is located c.1.5km south of the centre of Ashbourne which offers a range of shops, services and employment opportunities all within a c.10 minute walk of the site. To the north of the town centre is the Ashbourne Business Park and Ashbourne Industrial Estate, both c.2.5km from the site which cater for a range of employment opportunities. The proposed development will create increased footfall for shops and services in the area.

- **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 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;



### **Statement of Consistency:**

The proposed development will provide for a high-quality residential scheme through the design, quality, materials and finishes proposed. In addition, the proposed units are in excess of the minimum apartment size requirement as stated in the Sustainable Urban Housing: Design Standards for New Apartments, 2020 (hereafter Apartment Guidelines) and the Quality Housing for Sustainable Communities – Design Guidelines (2007) and provide well orientated spacious units. Furthermore, car parking for the proposed development is not visually dominant and is provided at a rate that accords with the relevant standards as set out in sections 4.3 and 5 of the submitted Traffic and Transport Assessment (TTA) prepared by DBFL Consulting Engineers. The density of the proposed development accords with the requirements set out in the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009, and as demonstrated in the submitted Planning Statement (section 6.13).

- **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;

### **Statement of Consistency:**

The submitted TTA confirms (under section 2.3 Existing Transportation Infrastructure) that the subject site is well served in terms of public transport provision. Several bus routes connect the area with Dublin City Centre, Dublin Airport, Blanchardstown, Ratoath, Swords or Balbriggan. These routes include 103 (Dublin – Ashbourne – Ratoath – Tayto Park), 103x (Dublin – Ashbourne – Navan), 105 (Drogheda – Ashbourne – Ratoath – Blanchardstown), 109a (Kells – Navan – Dunshaughlin – Ratoath – Ashbourne – Dublin City Centre), 193/194 (Ashbourne/Ratoath – Dublin), 197 (Swords – Ashbourne) and a Local Link 195 (Ashbourne – Balbriggan). Four no. bus stops are highly accessible from the subject site. These are served by bus routes no. 103, 103x, 105, 109a, 193 & 194. Most routes link with Dublin City Centre, except for most services of 109a heading to Dublin Airport, and services of 105 heading to Blanchardstown. All bus stops are located within 300-400m from the subject site. All the aforementioned bus services operate mostly on a daily basis and offer relatively frequent schedules. The site is already strategically located to avail of excellent sustainable travel options in the form of public transport as well as walking links. A number of current schemes being developed by the National Transport Authority will see further improvements to infrastructure and services thereby increasing the attractiveness of the use of sustainable modes as means for accessing the development.

The proposed development includes a number of dedicated pedestrian and cycle paths into and through the development which encourages more sustainable modes of transport thus encouraging same so as to access the proposed dwellings, open spaces, non-residential uses and future school site.

- **National Policy Objective 32** - To target the delivery of 550,000 additional households to 2040;

### **Statement of Consistency:**

The proposed development seeks to deliver 702 no. dwellings which will contribute to the housing stock.

- **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;



**Statement of Consistency:**

County Meath is identified as being within the Core Region for development in the the Eastern and Midland Region and is expected to accommodate 231,500 persons by 2035. Ashbourne is identified as being a “Self-Sustaining Town”, which acts as a regionally important local driver, providing a range of functions for their resident population and their surrounding catchments including housing. The delivery of housing in such a town will contribute to the principle of compact growth and the proposed 702 no. dwellings will provide new residential development on this zoned site.

- **National Policy Objective 34** - Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time;

**Statement of Consistency:**

The proposed houses have been designed to be adaptable and can cater for internal alteration and extension.

- **National Policy Objective 35** - Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights;

**Statement of Consistency:**

The proposed development will provide a medium - high density residential scheme of varying unit typologies and building heights, within the existing settlement of Ashbourne, in close proximity to the town centre.

Chapter 10 of the NPF relates to Implementation and for the Eastern and Midland Region it notes a target population growth to 240,000 – 265,000 by 2026; 335,000 – 375,000 by 2031; and 490,000 – 540,000 by 2040.

Appendix 2 of the NPF sets out the “population and employment in urban settlements in the Eastern and Midland Regional Assembly area, Census of Population 2016” and identifies Ashbourne in same, as follows:

Settlement Name	Population 2016	Resident Workers	Total Jobs	Jobs: Resident Workers
Ashbourne	12,679	6,144	1,963	0.319

**Evaluation of Consistency:**

In accordance with the National Policy Objectives of the NPF, the current application for permission will deliver an efficient density of development of modern and adaptable new homes, within an existing urban area in close proximity to existing public transport and local service provision, and meets the objective of providing new homes at locations that can support sustainable development and at an appropriate scale of provision relative to its location i.e. National Policy Objectives 3a and 4, in particular that the location of new housing be prioritised in existing settlements.





The proposed development will provide a high-quality residential scheme in a sustainable location and help to achieve the NPF's overall aims. Development of these lands is considered to be fully in accordance with the recommendations of the NPF and sustainable growth patterns. The proposed development will increase the local population and support existing public transport, services and facilities in the area. Furthermore, the site's accessible location will encourage walking, cycling and public transport use as alternatives to the car.

It is considered that the location of the proposed development within the development boundary of Ashbourne meets the NPF's requirement to provide 30% of all new housing within existing urban footprints of towns outside Dublin. The proposal has been carefully considered in relation to matters such as density, urban design, building height and car parking to ensure that they meet the objectives of National Policy Objectives 3a, 4 and 13. The provision of 702 new residential units would help meet National Policy Objective 32 and Chapter 10 to deliver 550,000 additional households to 2040. It is considered that the overall proposal at Baltrasna and Milltown in Ashbourne meets the aforementioned National Policy Objectives.

#### 4.1.2 Rebuilding Ireland – Action Plan for Housing and Homelessness, 2016

Rebuilding Ireland is the Government's Action Plan for Housing and Homelessness, launched in 2016. The overarching aim of the *Action Plan* is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs.

The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the *Action Plan* which states that:

*"locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while delivering on sustainability objectives related to efficiency in service delivery and investment provision".*

The proposed development is located on zoned, serviced lands, within c.1.5km of the town centre of Ashbourne and its facilities and services. The development is proximate to existing residential areas and amenities which is in line with the provisions of the Action Plan.

The Plan contains five key pillars of which Pillars 2 and 3 are most relevant in this instance. The proposed development in Ashbourne is consistent with Pillar 3 to 'Build More Homes', as the scheme is proposing to construct a total of 702 no. dwellings on a greenfield site that enjoys close proximity to a wide range of facilities and services in Ashbourne.

- **Pillar 2 – Accelerate Social Housing:** Increase the level and speed of delivery of social housing and other State supported housing.
- **Pillar 3 – Build More Homes:** Increase the output of private housing to meet demand at affordable prices.

#### **Statement of Consistency:**

The proposed development is consistent with Pillar 3 to build more homes. The proposed development provides for 702 no. new dwellings. The provision of these units will substantially add to the residential





accommodation availability of the area and cater to the increasing housing demand. The proposed development of 702 no. units will provide a wide mix of unit types and will be suitable for a range of household types and needs. The proposal will also deliver 10% of units for Part V requirements (Pillar 2).

#### 4.1.3 Housing For All - A new Housing Plan for Ireland (2021).

Launched in September 2021, 'Housing for All, A new Housing Plan for Ireland' is the Government's new plan (superseding 'Rebuilding Ireland') to boost the supply of housing to 2030; to increase availability and affordability of housing; and to create a sustainable housing system into the future.

The aim of the plan is that everyone should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life.

The plan contains a range of actions and measures to ensure over 300,000 new social, affordable, cost rental and private homes are built by 2030. The actions outlined in the Plan are backed by over €4 billion in annual guaranteed State investment in housing over the coming years, including through Exchequer funding, the Land Development Agency and Housing Finance Agency investment. The plan commits to over €20 billion in State investment in housing over the next five years. The plan is set out across four pathways to address the pressing housing challenges facing the State:

- "Pathway to supporting homeownership and increasing affordability;
- Pathway to eradicating homelessness, increasing social housing delivery and supporting social inclusion;
- Pathway to increasing new housing supply;
- Pathway to addressing vacancy and efficient use of existing stock".

These pathways are underpinned by long-term actions to address systemic challenges. It aims to create a housing system which has environmental, social and economic sustainability at its heart and which meets the needs of all.

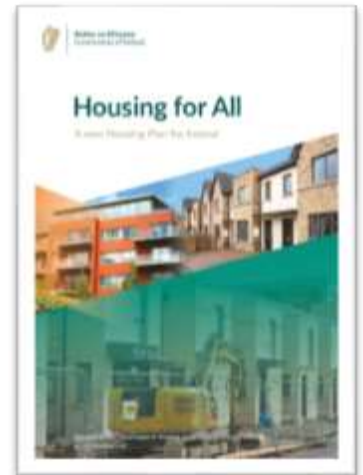
#### **Statement of Consistency:**

The proposed development will support the achievement of this Plan by providing housing at an appropriate scale and location, including social housing. While the detail of this Plan has yet to be fully understood, this application is in accordance with the intention and ambition of the Plan.

#### 4.2 Section 28 Ministerial Guidelines

The Section 28 Ministerial Guidelines relevant to the current application are, and referred to in preparing the current proposal:

1. Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009, and its companion document Urban Design Manual – A best practice guide, 2009;
2. Urban Development and Building Heights Guidelines for Planning Authorities, 2018;
3. Sustainable Urban Housing: Design Standards for New Apartments, 2020;

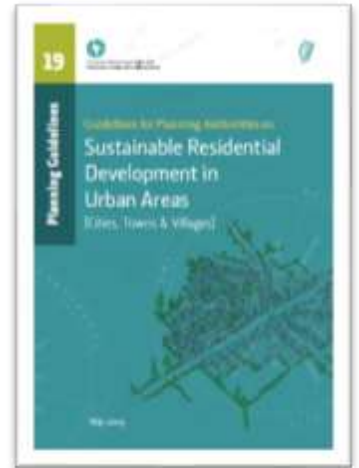




4. Guidelines for Planning Authorities for Child Care Facilities, 2001;
5. The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009;
6. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018).

#### 4.2.1 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and associated Urban Design Manual Best Practice Guidelines (both 2009)

The Guidelines on Sustainable Residential Development in Urban Areas set out the key planning principles for the preparation and assessment of applications for residential development in urban areas. The Guidelines set out recommended densities for development and how density is to be measured. The Guidelines are also accompanied by the Urban Design Manual which illustrates how the policy principles can be translated into practice by developers. The principles contained within the Guidelines are translated into the planning and design objectives and standards contained in the Meath County Development Plan. These objectives and standards have informed the nature, scale and form of development within the current application and ensure a plan-led approach to the development of the site.



The Urban Design Manual provides a series of criteria against which residential developments can be assessed at the levels of the neighbourhood, the site and the home.

Consistency with the 12 Design Criteria is set out over in a tabular format, while details of how urban design principles have been applied to the proposed site layout plan are set out in the enclosed Architectural Design Statement prepared by the project Architects, Davey-Smith, - please refer to same.

#### **Statement of Consistency:**

The proposed layout, design and built form is guided by the principles set out within the Guidelines and the 12 design criteria within the Design Manual which ensures that the proposed development provides a variety of residential dwellings and character areas within the development. The proposed development is afforded connections to the town centre and is accessible to existing retail and local services.

Compliance with the 12 urban design criteria is set out in the following tables, which demonstrates that the proposed development has been assessed against the Design Criteria and Indicators contained in the Urban Design Manual – Best Practice Guide, which is also in accordance with the requirements of the Development Plan (Chapter 3 – Settlement & Housing Strategy).

The proposed net density of development i.e. c.40 units per hectare, adheres to the guidance for sustainable residential development as the subject site can be described as an Outer Suburban / Greenfield Site and complies with section 5.11 of the guidelines, which define such sites as “as open lands on the periphery of cities or larger towns”. The guidelines state that “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”. The proposed net density of 40 units per hectare is consistent with the aforementioned guidelines.

Given the locational context close to the town centre (c.1.5km), the level of public transport and other services in the area, it is considered that the proposed density is consistent with the aforementioned guidelines.

In combination, it is put forward that the proposed site layout plan addresses key urban design criteria such as context, connections, inclusivity, variety and distinctiveness. Please also refer to section 7 of the submitted Architectural Design Statement which provides an assessment of how the 12 urban design criteria have been applied to the proposed development.

In addition, the following sets out consistency with the 12 Design Criteria:

	<b>1. Context - How does the development respond to its surroundings?</b>
The development seems to have evolved naturally as part of its surroundings.	The site has been identified and is acceptable in principle as being suitable to accommodate housing of the scale and character proposed. A key objective for the proposed scheme is to deliver an appropriate quantum of dwellings respectful of the established character of the environs.
Appropriate increases in density respect the form of buildings and landscape around the site’s edges and the amenity enjoyed by neighbouring users.	The proposed density is consistent with guidance for same in the Development Plan and national guidelines, given Ashbourne’s status as a Self-Sustaining Growth Town. The site is of an appropriate size and has landscape features that will benefit this development in terms of creating a unique residential character. The proposed layout respects its environs and will not deter the amenities enjoyed by the neighbouring users.
Form, architecture and landscaping have been informed by the development’s place and time.	The design and density of the development reflects the context of the site yet is a modern and high-quality scheme reflecting the type of development that is currently occurring in other parts of the county. The height, scale and massing are considered appropriate given its context within the site and the surrounding developments in the wider area.
The development positively contributes to the character and identity of the neighbourhood	The proposal creates an identity and a sense of place for the new neighbourhood, via the proposed uses and open spaces. The proposal’s attractive layout and design is integrated into its natural setting.
Appropriate responses are made to the nature of specific boundary conditions	The development has sought to incorporate the natural features and hedgerows as much as possible.

	<b>2. Connections – How well connected is the new development?</b>
There are attractive routes in and out for pedestrians and cyclists.	New vehicular/pedestrian/cyclist accesses into the site are proposed from the R135 Dublin Road, via Cherry Lane & Hickey’s Lane, with a new internal east-west access road/link street catering for a new connection to lands to the west in the future. Pedestrian/cyclist connections to adjoining residential estates to the north and west can also be facilitated by the proposed layout.
The development is located in or close to a mixed-use centre.	The site is within a reasonable walking distance (c.5-10mins) of local shops and services within the centre of Ashbourne, and is c.12km from Swords to the south-east, a major urban centre.



The layout links to existing movement routes and the places people will want to get to.	Pedestrian permeability through the site is promoted in the residential layout enabling future residents to access the development. The site layout plan also facilitates possible future pedestrian connections to the north, east and west.
Appropriate density, dependent on location, helps support efficient public transport.	The density accords with national guidelines at c.40/Ha. The subject site is c.1.5km walking distance from the centre of Ashbourne. The existing public transport provision is in the form of bus services on the R135 Dublin Road which connect the area with Dublin City Centre, Dublin Airport, Blanchardstown, Ratoath, Swords or Balbriggan.

	<b>3. Inclusivity – How easily can people use and access the development?</b>
New homes meet the aspirations of a range of people and households.	New apartments and houses will meet the needs of a wide range of future occupants from first time buyers, families with children, empty nesters etc. The range of housing typologies and quality of internal spaces and private open space and communal spaces will fulfil the requirements of all future residents.
Design and layout enable easy access by all.	The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations.
There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.	The scheme provides amenity in the form of centrally located open spaces, that cater for meaningful recreation for a range of different ages including children, adults and the elderly. The landscape strategy aims to integrate the new built development with the existing landscape and create attractive useable open space while contributing to the local biodiversity. The reserved G1 lands facilitate a playing pitch in the western part of the site, with a MUGA also proposed to the south of same.
Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.	The public open space will be openly accessible to all and is clearly defined.
New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.	The layout is designed to maximise visual and physical fluidity throughout the scheme and will not hinder movement. All dwellings (where possible) are oriented towards the public spaces contributing to the passive surveillance and overall security of the scheme. The proposed buildings along either side of the new internal access road create a strong urban edge onto same, which all internal / estate roads are passively supervised by housing.

	<b>4. Variety – How does the development promote a good mix of activities?</b>
Activities generated by the development contribute to the quality of life in its locality.	The proposal will significantly improve the housing mix of the area and will increase population creating additional demand for educational, sports and retail services all of which are provided in Ashbourne, close to the development.
Uses that attract the most people are in the most accessible places.	The large spine of open space is specifically centrally located to provide easy accessibility to residents and the public. A mix of non-residential uses create variety in the scheme of a local nature to serve the needs of future residents & are dispersed through the site.
Neighbouring uses and activities are compatible with each other.	The area is characterised by residential, community infrastructure and open space uses; as such the proposed uses are compatible with the surrounding area.



Housing types and tenure add to the choice available in the area.	A mix of apartments, duplexes and houses will further improve the range of housing typologies in the area available to various household formations. Please refer to the accommodation schedule for more information – section 6.8 of the submitted Planning Statement.
Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.	The scheme is within a 5-10 minute walk of Ashbourne centre which has a range of local retail and other services.

	<b>5. Efficiency - How does the development make appropriate use of resources, including land?</b>
The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.	The development density of c.40/Ha is considered to be appropriate for the site and is characteristic of the character of the environs, as well as the Self-Sustaining Growth Town status of Ashbourne. The development is proposing to include a pedestrian and cycle path to provide along the new east-west link street that will provide direct connection to the reserved school site and playing pitch, as well as onwards to lands to the west in the future. Pedestrian/cyclist connections are also facilitated that lead into the centre of Ashbourne and adjoining residential areas.
Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.	The proposal provides for high quality, landscaped public open space as part of the residential element of the development. The scheme incorporates SuDS, promoting biodiversity and providing residential amenity. Where possible existing trees and hedgerows have been retained around the site. In addition to this, the public realm will be planted with a diverse mix of plants and tree species to create tree lined avenues. We refer to CSR landscape drawings for more information.
Buildings, gardens and public spaces are laid out to exploit the best solar orientation	100% of the houses & duplexes are dual aspect. Approx. 32% of the apartments are single aspect but there are no north facing units proposed. The houses & duplex units are all orientated to get the most amount of daylight into the units. All units and open spaces will enjoy sufficient sunlight and daylight provision.
The scheme brings a redundant building or derelict site back into productive use	This is a underutilised, zoned greenfield site which can be directly serviced by roads and drainage services.
Appropriate recycling facilities are provided.	Each house will undertake its own recycling with collection by municipal services. The apartments and duplex apartments will have communal bin facilities, including recycling facilities/bins.

	<b>6. Distinctiveness - How do the proposals create a sense of place?</b>
The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.	The layout of the scheme allows for the creation of distinctive streets and open spaces which will instil a sense of place for future residents.
The scheme is a positive addition to the identity of the locality.	The proposal will provide an attractive new residential development at an appropriate scale and quantum for Ashbourne. It will be a positive addition to the residential character in the southern side of the town.



The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.	The proposed layout seeks to incorporate the existing planting along the site boundaries as much as possible, and seeks to develop them as a feature within the new residential scheme.
The proposal successfully exploits views into and out of the site.	The views have been carefully considered in order to enhance the area and is sensitive to the character of the surrounding area.

<b>7. Layout - How does the proposal create people friendly streets and spaces?</b>	
Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.	Pedestrian permeability is a key design outcome for the scheme. All cycle and pedestrian paths have been designed to follow the desire line to the town centre whilst future connections to adjoining lands to the north and west are also pre-empted.
The layout focuses activity on the streets by creating frontages with front doors directly serving the street.	The proposed streetscape is well defined and seeks to reduce car speeds and provide a better balance of modal use with pedestrians and cyclists.
The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.	
Traffic speeds are controlled by design and layout rather than by speed humps.	
Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.	The open space strategy for the scheme creates a large, central spine of open spaces that can cater for various recreational activity. A MUGA is also proposed, with a site reserved for a future playing pitch. Areas of communal space are catered for around the apartments which are designed by CSR Landscape Architects to provide high quality space.

<b>8. Public Realm - How safe, secure and enjoyable are the public areas?</b>	
All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.	All spaces are overlooked and surveyed by the residential units offering natural passive surveillance.
The public realm is considered as a usable integrated element in the design of the development.	Public realm is properly integrated into the design of the development and forms an attractive feature of the development.



Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood. Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.	Play areas are facilitated within the scheme which are overlooked by houses and apartment blocks.
There is a clear definition between public, semiprivate, and private space.	This is achieved. Please refer to the drawings and documentation submitted by CSR Landscape Architects
Roads and parking areas are considered as an integral landscaped element in the design of the public realm.	The scheme provides for 1,262 no. of car parking spaces throughout the scheme. Car parking is provided in a combination of surface, undercroft and basement parking so as to minimise visual impact. The integration of landscape elements and car parking areas has been a key element for the scheme's high-quality design approach.

<b>9. Adaptability - How will the buildings cope with change?</b>	
Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.	There is a variety of housing typologies including apartments, duplexes, detached, semi-detached, and terraced houses. All of the houses have the ability to be altered / extended in the future.
The homes are energy-efficient and equipped for challenges anticipates from a changing climate	The new dwellings will be constructed in accordance with the energy efficiency standards in place. The design practices and proposed materials will militate against the effects of climate change
Homes can be extended without ruining the character of the types, layout and outdoor space.	The houses can all be extended without having a detrimental impact on the surrounding residential amenities and character. All of the houses can accommodate conversions and extensions, as appropriate. The internal space is also flexible and allows for the removal / addition of walls etc. to create different spaces according to needs.
The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.	
Space in the roof or garage can be easily converted into living accommodation.	





	<b>10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?</b>
Each home has access to an area of useable private outdoor space.	Yes, each unit has its own private open space in accordance with the minimum residential standard. These are in the form of private balcony / terrace / rear garden in line with the relevant standards for specific unit types.
The design maximises the number of homes enjoying dual aspect	100% of the houses & duplex units are dual aspect which accords with national policy. Approx. 32% of the proposed apartments are single aspect but there are no north facing single aspect units, all in accordance with the Apartments Guidelines which require a minimum of 50% of the units to be dual aspect on greenfield sites.
Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout	All units will be designed to prevent sound transmission in accordance with current building standards
Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units	All units have been oriented to minimise overlooking. Adequate separation distance between opposing windows is achieved and overlooking is not considered an issue. Landscaping strips and boundary treatments at ground floor level ensure that ground floor areas will have an adequate level of privacy
The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables	All units are provided with storage space in line with relevant DoE requirements

	<b>11. Parking – How will the parking be secure and attractive?</b>
Appropriate car parking is on-street or within easy reach of the home's front door	Car parking for the proposed houses is either on-curtilage or on-street, proximate to the units, and directly overlooked, thereby being within easy reach of each residential unit. Parking for the apartments and duplex units will be provided in a mix of surface (grouped on-street arrangement), undercroft & basement parking, all in close proximity to the units.
Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation	The quantum of surface parking provided for the houses is in line with the car parking ratios required in Meath's County Council's Development Plan. Car parking for apartments is provided in accordance with the Apartment Guidelines. A total of 1,262 no. spaces are provided including visitor parking, EV parking and GoCar spaces.
Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.	For the proposed duplexes and apartments, 1,122 no. spaces are proposed, in addition to 101 no. visitor parking spaces, as per the Apartment Guidelines standards.
Materials used for parking areas are of similar quality to the rest of the development	Please refer to the enclosed landscaping plans which detail the materials for car parking are consistent with the overall design approach applied to the development.
Adequate secure facilities are provided for bicycle storage	Dedicated bicycle stores are provided for the apartments, as well as stands in the undercroft/basement parks for each block. The houses can accommodate bicycle parking within the curtilage of the individual properties. For the non-residential uses, bicycle parking is provided for in the form of dedicated stands close by.

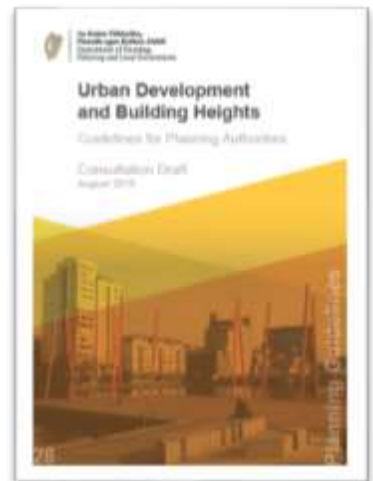


	<b>12. Detailed Design – How well thought through is the building and landscape design?</b>
The materials and external design make a positive contribution to the locality.	The overall choice of materials and elevations will reflect development in the surrounding area and will be an attractive feature in the landscape. This development is of sufficient size that it can, and has, created its own architectural modern language but which is complementary to the surrounding area. Please refer to the submitted Design Statement by Davey-Smith Architects.
The landscape design facilitates the use of the public spaces from the outset.	The public realm has been designed to ensure spaces are easily accessible, safe and secure and aesthetically complement the built form. Open space will be provided in tandem with the residential development.
Design of the buildings and public space will facilitate easy and regular maintenance.	The layout of the houses, apartments and the landscaped areas will be accessible for easy and regular maintenance.
Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.	Parking at surface level has been carefully located to ensure it does not dominate the environment, with appropriate street planting.
Care has been taken over the siting of flues, vents and bin stores.	Bin stores are located discretely near the apartments.

#### 4.2.2 Urban Development and Building Heights Guidelines for Planning Authorities (2018)

The Urban Development and Building Heights Guidelines (hereafter “Building Heights Guidelines”) have been approved as Section 28 Ministerial Guidelines, which carry forward the National Policy Objectives from the National Planning Framework in relation to securing more compact forms of urban development.

Essentially, the Building Heights Guidelines seek to reinforce wider national policy objectives to provide more compact forms of urban development and to consolidate and strengthen the existing built up area. The Building Heights Guidelines do not encourage blanket limitations on height. As they are Ministerial Guidelines, they clearly state that Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPRs) of the guidelines, in carrying out their functions. The Building Heights Guidelines also state that the SPPRs stated in the document take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.



The Building Heights Guidelines also state that in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.

Section 3 of the Building Heights Guidelines sets out the requirements for assessing building height as part of planning applications. The Building Heights Guidelines state *that “it is Government policy that building*



*heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility”.*

The Guidelines also state that *“In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:*

***At the scale of the relevant city / town***

- *The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*
- *Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into / enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.*
- *On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.*

**Statement of Consistency**

- The application site is located in close proximity / within walking distance to existing public transport services in the form of bus services on the R135 Dublin Road which connect the area with Dublin City Centre, Dublin Airport, Blanchardstown, Ratoath, Swords or Balbriggan.
- The layout of the proposed development and the distribution of varying building heights has taken into account the topography of the site, the need to create good urban street frontage and the submitted verified views, CGIs and landscape visual assessment demonstrate that the proposed building heights will not impact on the receiving environment.
- A wide variety in housing typology is proposed, as are varied building heights of 2, 3, 3-4, 4-5, & 4-6 storey buildings. The submitted Architectural Design Statement demonstrates that various character areas (5 no.) are proposed throughout the development which respond to the locational context of the site, which is also detailed in section 6.5 of the submitted Planning Statement – please refer to both documents.

***At the scale of district / neighbourhood / street***

- *The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape*
- *The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*
- *The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).*
- *The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*
- *The proposal positively contributes to the mix of uses and / or building / dwelling typologies available in the neighbourhood.*



## **Statement of Consistency**

- The application site occupies a greenfield, outer suburban site and the proposed development is comprised of housing of a scale and character that is in keeping with existing and permitted development in the surrounding environs. Buildings address the streets creating good street frontage and new open spaces for use by the wider community are created, thus improving the local environment.
- The design of the buildings is modern, allowing them to directly overlook the streets / spaces they address, with the facades well fenestrated. There are no large, blank walls / gables proposed. The distribution of materials across the entire development has been carefully considered in the creation of character areas within the scheme, details of which are set out in the submitted Architectural Design Statement and in the Planning Statement (section 6.5).
- The proposed development has been subject to flood risk assessment, as detailed in the submitted Site Specific Flood Risk Assessment (SSFRA) by DBFL Consulting Engineers. The SSFRA states that the Eastern CFRAM Study indicates that the subject site is located within Flood Zone C i.e. is outside the 0.1%AEP (Annual Exceedance Probability). Therefore, the proposed development is appropriate for the subject site. Following assessment of the flood risks to the Site and available flood data, the entirety of the site is within Flood Zone Category C as defined by the Guidelines. The residential type of development proposed is therefore appropriate for this flood zone category. The Guidelines Sequential Approach is therefore met and the 'Avoid' principal achieved.
- The taller buildings in the scheme, i.e. the duplexes and apartment buildings are all carefully positioned addressing streets, the entrance to the development facing onto the Dublin Road, adjacent to and enclosing open spaces and an urban plaza in the western part of the site, all of which contributes to the legibility of the scheme and creates good urban street frontage and aids way finding through the development.
- The proposed development accommodates 2 and 3 storey detached, semi-detached and terraced houses, duplex units in no. 2 and 3 storey buildings, and apartments in 20 no. buildings ranging in height from 3, 3-4, 4-5, & 4-6 storeys. The taller buildings (i.e. Blocks A, A1, B1) accommodate a mix of uses such as retail, childcare facility etc. It is considered that the wide range of housing typologies proposed across the scheme, as well as uses, in a variety of buildings and associated heights positively contributes to the mix dwelling typologies and uses available in the neighbourhood.

### ***At the scale of the site / building***

- *The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*
- *Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.*
- *Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.*



## **Statement of Consistency**

The project architects have carefully considered the scheme layout and modulation in order to ensure that the development improves legibility in the area and will integrate into the surrounding context. This has been achieved by providing a range of heights strategically distributed throughout the site and by breaking down the massing provided, in addition to creating new open spaces and permeable links throughout the site.

A daylight / sunlight assessment report has been prepared by 3D Design Bureau and is submitted the application as a separate document – for full details please refer to same. The following is a summary of the findings of the report:

The assessment has been broken down into the following two main categories, of which there are sub categories summarised further below:

- **Impact assessment:** Effect on the surrounding environment and properties, which includes Vertical Sky Component (VSC), Annual and Winter Probable Sunlight Hours (APSH/WPSH) and Sun On Ground (SOG) analysis. The effects were assessed in the baseline state versus the proposed state;
- **Scheme Performance:** Daylight and sunlight assessment of the proposed development, which includes Sun On Ground (SOG) in the proposed public and communal open spaces, Sunlight Exposure (SE) and Spatial Daylight Autonomy (SDA) to the habitable rooms of the proposed apartments.

The impact assessment that was carried out for the purpose of this report has studied the potential levels of effect the surrounding existing environment and/or properties would sustain should the proposed development be built as proposed.

This impact assessment covers the following categories:

- Effect on daylight (VSC) to surrounding properties;
- Effect on sunlight to surrounding properties;
- Effect on sun on ground (SOG) in the rear gardens of the following neighbouring properties was assessed:

The BRE Guidelines recommend that if any part of a new building or extension, measured in a vertical section perpendicular to a main window wall of an existing building, from the centre of the lowest window, does not subtend an angle of more than 25° to the horizontal, then the daylighting and sunlighting of the existing building are unlikely to be adversely affected. Using this guidance as a rule of thumb, the surrounding context was carefully considered to ensure all properties and amenity spaces that may potentially experience a level of effect were included in the study.

The impact assessment has shown very positive results, with a negligible level of effect to VSC in the vast majority of assessed windows, and full compliance with the BRE Guidelines for impact to SOG and APSH/WPSH.

The scheme performance assessment of the proposed development included an analysis of the levels of sun on ground (SOG) to the proposed public and communal open spaces, as well as sunlight exposure (SE) and spatial daylight autonomy (SDA) in the habitable rooms of the proposed apartments within the development. All external amenity spaces as identified by the architect were assessed for SOG and an SE and SDA assessment was carried out in the 4 main apartment blocks (Blocks A, B, A1 & B1) and a sample of Apartment Type F and Duplex type G1. The scheme performance assessment has shown very favourable results with a high rate of compliance across all studies carried out. For details, please see section 1.2 and 1.3 of the submitted daylight / sunlight assessment report for a detailed breakdown of results. Section 1.2 “Impact



Assessment Results Overview” of the submitted report asserts that it is the opinion of 3D Design Bureau that the above results demonstrate that the proposed development would not cause a perceptible level of effect to daylight and sunlight received by the existing neighbours. Section 1.3 “Scheme Performance Results Overview” states the it is the opinion of 3D Design Bureau that the results demonstrate a high level of compliance with the appropriate daylight and sunlight standards which indicates the proposed apartment units would be in receipt of sufficient levels of daylight and sunlight.

The submitted report has taken into account the recently published BRE - Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice (2022). This document will be referred to as *the BRE Guidelines* in the submitted report. 3D Design Bureau asserts that at the time of writing the submitted report, the BRE Guidelines are in the third edition (BRE 209). The BRE Guidelines sets out recommendations for appropriate levels of daylight and sunlight within a proposed development, as well as providing guidance on impacts arising from a proposed development to surrounding properties and amenity areas. Whilst the primary reference document for the BRE Guidelines is BS EN 17037, there are some subtle differences between BRE 209 and BS EN 17037. For the purposes of this report, the BRE Guidelines (BRE 209) is considered the primary reference. A detailed description of the various recommendations for impact assessment and scheme performance is contained in section “4.0 Assessment Overview” on page 16 of the submitted report by 3D Design Bureau – please refer to same.

The submitted report notes that the BRE Guidelines (*BRE 209*), will be the primary reference document for this report as it is referenced in both *Sustainable Urban Housing: Design Standards for New Apartments (2020)* and *Urban Development and Building Heights (2018)*. For daylight within proposed developments, a supplementary study will be carried out under the criteria of *I.S. EN 17037*. Neither the British Standard, European Standard, British Annex to the European Standard nor the BRE Guide set out rigid standards or limits. They are all considered advisory documents.

The BRE Guide is preceded by the following very clear statement as to how the design advice contained therein should be used: *“The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”* That the recommendations of the BRE Guide are not suitable for rigid application to all developments in all contexts, is of particular importance in the context of national and local policies for the consolidation and densification of urban areas or when assessing applications for highly constrained sites (e.g. lands in close proximity or immediately to the south of residential lands).

Section 8.2.3 “Spatial Daylight Autonomy (SDA)” of the submitted report refers to internal daylighting and quotes section 6.7 of the *Sustainable Urban Housing: Design Standards for New Apartments December 2020*, which states the following: *“Where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which planning authorities should apply their discretion in accepting taking account of its assessment of specific (sic). This may arise due to design constraints associated with the site or location and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”*

The submitted report states that *“where rooms are compliant with the criteria of BRE 209 and non-compliant with I.S. EN 17037, it could be considered that this is due to the exceptionally high standards required to achieve compliance with I.S. EN 17037 rather than an indication of insufficient daylight”*.

The submitted report also clearly states that *“based on the above statements, compensatory measures have been incorporated into the design of the proposed development where rooms do not achieve the daylight provision targets in accordance with the standards they were assessed against within the primary study (BRE*



209)”. Section 8.2.3 sets out a list of all units / rooms that do not achieve the recommended level of daylight with regards to BRE 209 and the compensatory design measure for each – please refer to same. In addition, the submitted report states that *“the SDA compliance rate for the assessed apartments within the proposed development is particularly high. Notwithstanding the handful of rooms that do not achieve the recommended minimum level of daylight, it is the opinion of 3DDB that the proposed development as a whole has demonstrated exceptional levels of daylight provision”*. The complete results for the study on SDA can be seen in section 7.4 on page 114 of the submitted daylight / sunlight assessment report.

The submitted report by 3D Design Bureau (3DDB) provides a daylight assessment, sunlight assessment and shadow study for the proposed development. The impact assessment for the report has quantified the effect the proposed development would have on the level of daylight and sunlight received by neighbouring properties/environment that are in close proximity to the proposed development. The report asserts that *“the vast majority of neighbouring properties would experience a negligible level of effect to the daylight received with all properties meeting the criteria as set out in the BRE Guidelines for impact to sunlight in the windows and rear gardens”*.

The scheme performance assessment for this report has also quantified the level of daylight and sunlight within the proposed development. The report states that *“the study of spatial daylight autonomy has shown that future residents would enjoy good levels of daylight within the proposed apartments. There is a high level of compliance across the assessed apartments for sunlight access which is a result of the extensive provision of dual aspect units”*.

The report also states that *“the majority of proposed public and communal open areas being capable of excellent levels of sunlight”*.

The report concludes that *“it is the recommendation of 3D Design Bureau, that the results contained within this daylight and sunlight assessment should be viewed favourably by the planning authority”*.

3D Design Bureau have been involved in the design process since the beginning of the project. A number of design changes were made throughout the design process to ensure that all of the proposed units and public / communal open spaces achieve acceptable level of daylight / sunlight. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.



## ***Specific Assessments***

To support proposals at some or all of these scales, specific assessments may be required and these may include:

- *Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.*
- *In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.*
- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*
- *An assessment that the proposal maintains safe air navigation.*
- *An urban design statement including, as appropriate, impact on the historic built environment.*
- *Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.*

(our emphasis added)

### **Statement of Consistency:**

- With the proposed development, given the site's context and predominant proposed heights of 2 to 3 storeys, with limited taller buildings, as well as the locational context of the application site, it is not considered necessary to provide a specific impact assessment of the micro-climatic effects such as downdraft.
- Scott Cawley, Consultant Ecologists undertook a ground-level assessment of trees and structures/buildings within the subject lands, to examine their suitability to support roosting bats and potential to act as important landscape features for commuting/foraging bats, was based on guidelines (see Table 5.3) in Bat Surveys for Professional Ecologists: Good Practice Guidance (Collins ed., 2016) and included inspections of trees and structures/buildings for potential roost features (PRFs), and for signs of bats (staining at roost entrances, droppings, carcasses, insect remains). Full details of same are set out in Chapter 4 "Biodiversity" of the submitted EIAR – please refer to same. The assessment included internal access of barns/shed and buildings (where possible) to assess for the actual presence of bats. Residential buildings were not accessed due to Covid 19 restrictions in 2020 and 2021, however, all buildings were assessed externally, and barns/farm buildings were assessed internally and externally. The residential houses in the north of the site were inspected internally in 2022. Due to access issues, the residential house in the south of the house was not inspected internally. This was undertaken on the 31<sup>st</sup> August 2020, 16<sup>th</sup> February 2021, and the 20<sup>th</sup> April 2022.
- Five separate bat activity surveys were undertaken within the lands by surveyors who are experienced in bat transect surveys and bat roost presence/absence surveys. The aim of the surveys was to both document the usage of the proposed development site by bats, and to determine whether any buildings within the proposed development site were bat roosts. Four surveys involved completion of a walked transect within the proposed development site, and four surveys were preceded/ followed by bat roost emergence/re-entry surveys at the buildings/structures within the proposed development site. Observations of bat activity were recorded, and where necessary, data collected in the field was analysed using specialist software (Elekon BatExplorer) to aid in the identification of bat species by their calls.
- Breeding bird surveys were undertaken on the 23<sup>rd</sup> April 2021, on the 31<sup>st</sup> May 2021, on the 11<sup>th</sup> June 2021 and on the 20<sup>th</sup> April 2022. The study area covered the lands within the proposed development site, of





which were slowly walked in a manner allowing the surveyor to come within 50m of all habitat features. Birds were identified by sight and song, and general location and activity were recorded using the British Trust for Ornithology (BTO) species and activity codes. Any buildings/structures within the lands were assessed for nesting bird species, including barn swallows, house martins and barn owls. Survey details are provided in Chapter 4 of the EIAR.

- Wintering bird surveys were undertaken 16<sup>th</sup> February 2021, on the 3<sup>rd</sup> March 2021, on the 25<sup>th</sup> March 2022. The study area covered the lands within the proposed development site. Lands were initially surveyed visually using binoculars/scope from a vantage point(s) at the edge of the study area followed by a walkover of the area to identify birds which may not be visible from a distance (e.g. waders) and evidence of usage by wildfowl such as swans or geese (e.g. droppings). Birds were identified by sight and general location and activity were recorded using the British Trust for Ornithology (BTO) species and activity codes.
  
- Chapter 4 of the EIAR asserts that the impact on birds as a result of the operational stage of the proposed development *“is not likely to affect the conservation status of breeding bird species and will not result in a likely significant negative effect, at any geographic scale”*. In relation to bats, the EIAR asserts that during the operational stage of the proposed development, and in the absence of any mitigation, *“it is anticipated that the proposed development will result in an increase in lighting of the site. Light spill will originate both from installation of public lighting in the residential areas, as well as from the residential properties themselves (e.g. incidental light pollution from house windows). The increase in light spill will be in the central areas of the site, however a green spine is proposed to transverse the site from east - west and north - south, with a number of treelines/hedgerows being retained, which will allow bats to commute and forage along. However; in the absence of mitigation disturbance impacts on bats from the increase in lighting during operation is likely to result in a likely significant effect, at a local scale”*.
  
- A series of mitigation measures are set out in Chapter 4 of the EIAR for both the construction and operational stages of the proposed development including *inter alia* the following relation to bats: *“Lighting of the site during construction is designed in accordance with the following guidance:*
  - *Guidance Notes for the Reduction of Obtrusive Light GN01 (Institute of Lighting Professionals, 2020)*
  - *Bats & Lighting - Guidance Notes for Planners, Engineers, Architects and Developers (Bat Conservation Ireland, December 2010)*
  - *Bats and Lighting in the UK – Bats and the Built Environment Series (Bat Conservation Trust UK, January 2008).*

*During construction, any external lighting to be installed, including facilitating night-time working or security lighting, on the site shall be sensitive to the presence of bats in the area, downlighting, and time limited. Lighting of sensitive wildlife areas and primary ecological corridors (e.g. along the hedgerows/treelines, boundaries of the site) and light pollution in general will be avoided. Light levels during construction in these areas will be maintained at baseline levels where possible, at a Lux level of 0.1 or below.*

*Monitoring of light levels along the treelines and hedgerows will be undertaken pre-construction, during-construction and post-construction to identify any areas where light spill is affecting background levels during construction. Where monitoring detects light spill is affecting these habitat areas, remedial measures, such as censored lighting or low column height lights, and will be implemented to ensure that background light levels are maintained”*.

- Mitigation measures for fauna, during the operational stage of the proposed development, in relation to bats, asserts that there will be an increase in lighting levels across the site during operation, as the site is largely currently unlit. Mitigation measures can be undertaken to reduce this impact on foraging and



commuting local bats. This will include careful consideration of light placement on buildings, column heights and luminaire design. Luminaires will be selected which do not emit UV light (e.g. metal halide and fluorescent light sources should be avoided), and luminaires are designed using full cut off to ensure there is no direct upward light. The threshold increment is included in the lighting calculations to ensure that luminaires are not a glare source, with the lighting designed to dim by 25% from 00:00 to 06:00.

- Mitigation measures for birds at the operational stage of the proposed development include re-planting of treeline, hedgerow and scrub habitats within/alongside the proposed development as detailed in the landscape drawings will over time provide suitable compensatory habitat for the breeding bird species to expand, and disturbance/displacement impacts occurring during the construction phase should reduce.
- To further minimise the effects of breeding habitat loss, a total of 15 nest boxes will be erected by a qualified ecologist. The siting and type of nest boxes will be decided on by an ecologist at locations adjacent to where new trees will be planted or at suitable retained vegetation along the proposed development boundary.
- Given the locational context of the site, its topography and the proposed building heights being predominantly 2-3 storeys but rising up to a maximum of 6 storeys (i.e. part of Block A facing onto the Dublin Road at the junction of Cherry Lane), it is considered that the proposed building heights will not negatively impact air navigation and as such it is submitted that an assessment is not required.
- An Architectural Design Statement has been prepared by the project architects Davey-Smith and is enclosed with the application as separate document – please refer to same for further details. Section 4.2.1 above also outlines the compliance of the proposed development with the 12 urban design criteria set out in the Urban Design Manual.
- The proposed development has been subject to an AA Screening prepared by Scott Cawley Ecological Consultants. The AA screening 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, for the reasons set out in Section 3.3 above. 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 a Stage Two Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)”*.
- The proposed development has also been subject to a comprehensive Environmental Impact Assessment Report (EIAR). The EIAR has considered the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures are included for to reduce impacts on the environment where considered necessary. These mitigation measures have been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate. For full details please refer to the EIAR which accompanies the application. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

The Building Heights Guidelines go on to state that *“Where the relevant planning authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).*



### SPPR 3

*It is a specific planning policy requirement that where;*

- (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and  
2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

*then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.*

- (B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme*
- (C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.*

In relation to building height in suburban/edge locations (City and Town), the Building Heights Guidelines state that newer housing developments at the suburban edges of towns and cities, “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 35-50 dwellings per hectare net. Such developments also address the need for more 1- and 2-bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more bedroom homes across a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer periods of time without necessitating relocation”. In light of this, the Building Heights Guidelines require that “development should include an effective mix of 2, 3 and 4-storey development which integrates well 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”.

The Building Heights Guidelines consider that such development patterns are generally appropriate outside city centres and inner suburbs for both infill and greenfield development and should not be subject to specific height restrictions. Where DMURS principles are incorporated, the Building Heights Guidelines encourage more compact urban forms and require the relevant planning authority and An Bord Pleanála to apply Specific Planning Policy Requirement 4 which states:



## 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.*

### **Statement of Consistency:**

Given the locational context of the site, the proposed development is put forward for consideration in compliance with these guidelines, namely it provides for an urban design led layout that creates legibility through the site and caters for future integration with adjoining lands in a cohesive manner. The proposal also positively contributes to the dwelling typologies available in the area. The proposed dwelling typology is designed to reflect the existing character of the environs while the dispersion of varied building heights throughout the layout has been carefully considered to create variety, legibility and to appropriately frame and enclose public areas.

The proposed development provides an appropriate density of development to ensure an efficiency in zoned land usage and will provide a compact urban form with a mix of 2, 2-3, 3, 3-4, 4-5 and 4-6 storey buildings, thus the proposed heights comply with the guidance set out in the Building Heights Guidelines. In addition, the proposed housing mix is acceptable and is in accordance with SPPR 4 of the Building Heights Guidelines. The provision of apartments within the scheme and at this greenfield / edge of centre site is also in accordance with the guidance set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, which under section 5.11 sets out in that the greatest efficiency in land usage of outer suburban/greenfield sites will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare, that such densities should be encouraged generally, and that development at net densities of less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency. The proposed net density of c.40 uph on these A2 residentially zoned lands is in accordance with the guidance for outer suburban/greenfield sites.



The proposed development of 702 no. dwellings is comprised of the following mix:

Dwelling Type	1 bed	2 bed	2-3 bed	3 bed	3-4 bed	3-5 bed	4 bed	4-5 bed	5 bed	Total
Houses	-	31	17	175	41	25	81	38	12	420
Apartments	47	170	-	27	-	-	-	-	-	244
Duplex	-	19	-	19	-	-	-	-	-	38
<b>Total No.</b>	<b>47</b>	<b>220</b>	<b>17</b>	<b>221</b>	<b>41</b>	<b>25</b>	<b>81</b>	<b>38</b>	<b>12</b>	<b>702</b>
<b>% Mix</b>	7%	31%	2%	31%	6%	4%	12%	5%	2%	100%

**Table 1: Proposed Housing Typology Mix**

Section 2 of SPPR4 requires a greater mix of building heights and typologies in suburban locations. Table 1 above illustrates that a range of 1, 2, 3, 4 and 5 bedroom homes in a variety of housing typologies which will genuinely contribute to a greater housing mix and variety in Ashbourne. Homes for a range of household formations are catered for within the proposed development from starter homes right through to those who may be seeking to downsize or single occupier households. In consideration of the context of Ashbourne as a “Self-Sustaining Growth Town” and the subject site being an outer suburban greenfield site in such a town, as well as the established character of the receiving environs, it is considered that the proposed buildings with heights of 2, 2-3, 3, 3-4, 4-5 and 4-6 storeys is appropriate, while also catering for variety in housing mix and tenure.

With respect to item 3 of SPPR 4, the proposed site layout plan forms a strong urban edge along the R135, and along the new proposed internal link street, with the overall proposal creating a new, urban design led, residential community in Ashbourne, of a scale that is respectful of the receiving environs.



#### 4.2.3 Sustainable Urban Housing: Design Standards for New Apartments (2020)

The Sustainable Urban Housing Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018, and updated in December 2020 (in respect of Shared Accommodation only). These Guidelines (hereafter “Apartment Guidelines”) update the “*Sustainable Urban Housing: Design Standards for New Apartments*” guidelines, published by the Department in 2015. The Apartment Guidelines are supported by legislation which introduces powers whereby the Minister may expressly state Specific Planning Policy Requirements which must be applied by planning authorities, or An Bord Pleanála, in the exercise of their functions.



Where specific planning policy requirements are stated in the Guidelines, the Minister intends that such requirements must take precedence over policies and objectives of development plans, local area plans or SDZ planning schemes.

The 2020 Guidelines specify planning policy requirements for:

- Internal space standards for different types of apartments, including studio apartments;
- Dual aspect ratios;
- Floor to ceiling height;
- Apartments to stair/lift core ratios;
- Storage spaces;
- Amenity spaces including balconies/patios;
- Room dimensions for certain rooms.

In accordance with paragraph 6.13 of the 2020 Guidelines, a Building Lifecycle Report is submitted as part of this SHD planning application – please refer to same.

The Guidelines identify a range of urban locations where higher density apartment developments are to be promoted. In this regard the application site is considered to be a “Peripheral and/or Less Accessible Urban Location”, and state that “*such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:*

- *Sites in suburban development areas that do not meet proximity or accessibility criteria;*
- *Sites in small towns or villages”.*

The Guidelines also outline a range of policy requirement relating to the mix and design of apartment developments. These are reviewed overleaf:



**Specific Planning Policy Requirement 1**

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).

**Statement of Consistency:**

The overall proposed dwelling mix is illustrated in Table 2 below:

Dwelling Type	1 bed	2 bed	2-3 bed	3 bed	3-4 bed	3-5 bed	4 bed	4-5 bed	5 bed	Total
Houses	-	31	17	175	41	25	81	38	12	420
Apartments	47	170	-	27	-	-	-	-	-	244
Duplex	-	19	-	19	-	-	-	-	-	38
<b>Total No.</b>	<b>47</b>	<b>220</b>	<b>17</b>	<b>221</b>	<b>41</b>	<b>25</b>	<b>81</b>	<b>38</b>	<b>12</b>	<b>702</b>
<b>% Mix</b>	<b>7%</b>	<b>31%</b>	<b>2%</b>	<b>31%</b>	<b>6%</b>	<b>4%</b>	<b>12%</b>	<b>5%</b>	<b>2%</b>	<b>100%</b>

**Table 2: Overall Proposed Dwelling Mix**

In terms of apartments only, the proposed mix of apartment types is:

Apartment Type	1 bed / 2 person	2 bed / 3 person	2 bed / 4 person	3 bed / 5 person	3 bed / 6 person	Total
No. of Units	47	3	166	16	11	243
% Mix	19	1	68	7	5	100

**Table 3: Total Type of Proposed Apartments**

Therefore, the proposed mix accords with SPPR1.



### ***Specific Planning Policy Requirement 2***

*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.*

#### **Statement of Consistency:**

SPPR 2 is not relevant to the proposed development.

### ***Specific Planning Policy Requirement 3***

*Minimum Apartment Floor Areas:*

- *Studio apartment (1 person) 37 sq.m*
- *1-bedroom apartment (2 persons) 45 sq.m*
- *2-bedroom apartment (4 persons) 73 sq.m*
- *3-bedroom apartment (5 persons) 90 sq.m.*

Section 3.6 of the Apartment Guidelines also states that ‘*planning authorities may also consider a two-bedroom apartment to accommodate 3 persons, with a minimum for areas of 63 square meters, in accordance with the standards set out in Quality Housing for Sustainable Communities...*’. Appendix 1 of the Guidelines includes a specific standard for 2-bed three person apartments with a minimum floor areas of 63sq.m.

The Apartment Guidelines also suggest that “*it would not be desirable that, if more generally permissible, this type of two-bedroom unit would displace the current two-bedroom four person apartment. Therefore no more than 10% of the total number of units in any private residential development may comprise this category of two-bedroom three-person apartment*”.

#### **Statement of Consistency:**

As per the submitted Housing Quality Assessment, the proposed unit sizes accord with SPPR3.

There are 47 no. 1 bedroom apartments proposed as part of the current scheme, which range is area from 49.01sq.m each to 69.04sq.m each thus exceeding the minimum floor area requirement of 45sq.m.

There are 170 no. 2 bedroom apartments proposed as part of the current scheme, which range is area from the smallest unit (1 no.) being 74.64sq.m up to each to 109.9sq.m each thus exceeding the minimum floor area requirement of 73sq.m.

Of the 170 no. 2 bed apartments, 3 of those units are 2 bed / 3 person units ranging in size from 68.69sq.m to 69.06sq.m.

In the duplex blocks the smallest 2 bed unit is 78.81sq.m while the 3 bed units are all 132sq.m, therefore





exceeding the minimum floor area requirements of 73sq.m and 90sq.m respectively.

**Specific Planning Policy Requirement 4**

*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.*

**Statement of Consistency:**

The proposed development provides for 243 no. apartments accommodated in Blocks A, B, A1, B1 as well as the 16 no. F and F-O type 3 storey buildings.

All of the F and F-O type units (48 no. 2 bed units) are dual aspect.

All of the units in Block A are dual aspect.

In Blocks A1, B and B1, a total of 78 apartments are single aspect which equates to a total of 32% of the overall quantum of proposed apartments being single aspect.

Apartment Block	No. of Units	No. Dual Aspect	No. Single Aspect
A	32	32	0
B	14	8	6
A1	92	34	58
B1	57	43	14
F / F-O	48	48	0
<b>Total</b>	<b>243</b>	<b>165 (68%)</b>	<b>78 (32%)</b>

**Table 4 – Aspect of Proposed Apartments**

Under section “Dual Aspect Ratios” of the Apartment Guidelines, and specifically SPPR4 of same, there is a requirement that: *“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”*. Based upon the submitted drawings and table 4 above, it is evident that the proposed development complies with the requirements of the aforementioned Apartment Guidelines, with 68% of the proposed apartments being dual aspect. It should also be noted that there are no north facing single aspect units proposed. The Apartment Guidelines (under section 3.17) also state that *“Ideally, any 3 bedroom apartments should be dual aspect”* – we note that in Block A1, 4 of the proposed 3 bed units that are single aspect are east facing and have a direct view over the adjoining large area of public open space which provides visual amenity and will have good morning light. A further 7 no. 3 bed units in Block A1



are west facing and have direct views of the G1 lands to the west and will enjoy good evening light. In conclusion, the proposed development exceeds the minimum requirement of having 50% of the proposed apartments dual aspect on greenfield sites, with 68% of the proposed apartments being dual aspect.

#### ***Specific Planning Policy Requirement 5***

*Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.*

#### **Statement of Consistency:**

As per the submitted architect's drawings of the proposed apartments, ground level apartment floor to ceiling heights are a minimum of 2.7m.

#### ***Specific Planning Policy Requirement 6***

*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.*

#### **Statement of Consistency:**

Within the proposed Blocks A, B, A1 and B1, the following sets out the maximum number of units within each building that are accessed off a single core:

- Block A – 5 no. units;
- Block B – 4 no. units;
- Block A1 – 7 no. units;
- Block B1 – 7 no. units.

**Specific Planning Policy Requirements 7, 8 and 9** relate to Build to Rent (BTR) and Shared Accommodation are not relevant to the current proposal.

A key inclusion in the Apartment Guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The Apartment Guidelines identify locations in cities and towns that may be suitable for apartment development as follows:

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

#### **Statement of Consistency:**

The subject site is located in a within a Peripheral and/or Less Accessible Urban Location, with the Apartment Guidelines stating that “such locations are generally suitable for limited, very small-scale (will vary subject to



location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net)". As such this site is an appropriate location for the density proposed, i.e. c.40 units per hectare net, on a zoned site in the Peripheral and/or Less Accessible Urban Location.

Section 4.16 of the Apartment Guidelines identifies that cycling "provides a flexible, efficient and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes."

### **Statement of Consistency:**

Bicycle parking is provided for in accordance with the standards the Apartment Guidelines and this is detailed in the submitted TTA prepared by DBFL Consulting Engineers – please refer to sections 4.4 & 5.6 and Table 4.6 of same.

For the 282 no. proposed apartments and duplex units, 817 no. cycle parking spaces are being provided, comprised of 610 spaces dedicated to residents and 207 no. visitor parking spaces, which exceeds CDP requirements (751 no.), and exceeding Apartment Guidelines standard (704 no.).

Section 4.18 of the Apartment Guidelines states that 'the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria.'

### **Statement of Consistency:**

Section 4.22 of the Apartment Guidelines, i.e. "Peripheral and/or Less Accessible Urban Locations" states that "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" – it is considered this is applicable to the proposed apartments.

For the proposed Apartments/Duplexes, a total of 383 no. spaces are proposed, comprising 282 no. resident and 101 no. visitor spaces. The residential car parking is provided at a ratio of 1.36 spaces per apartment unit (1 space for residents, 0.36 spaces for visitors), a reduced quantum from the development Plan requirements of 2 spaces per unit. This reduced provision is in accordance with the Apartment Guidelines requirement, "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".

The proposed allocation of spaces is as follows:

- 840 no. car parking spaces for the housing units;
- 383 no. car parking spaces for the apartment/duplex units (282 no. resident spaces and 101 no. visitor spaces) including:
  - 22 no. Accessible/Mobility Impaired Parking spaces;
  - 2 no. GoCar spaces;
  - 84 no. Electric Vehicle spaces.

Refer to the submitted architects drawings and Fig,s 5.1 to 5.4 of section 5 of the submitted TTA to identify the location of EV spaces and mobility impaired spaces provided in the basement and undercroft car parks as well as the location of the proposed 2 no. GoCar spaces within the development.



The Apartment Guidelines state that all apartments should include private and communal open space.

**Statement of Consistency:**

Each of the proposed apartments is provided with private open space that either meets or exceeds the minimum requirements and this is clearly set out in the submitted Housing Quality Assessment – please refer to same.

In relation to communal open space, appendix 1 of the 2020 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities sets out the required minimum floor areas and standards, including minimum floor areas for communal amenity space. In accordance with same, communal open space for the apartments (Blocks A, B, A1 & B1 – 195 no. units) is in the form of centrally located semi-private / communal open spaces, some in the form of a podium (i.e. Blocks A & B1).

Unit Type	No. of Units	Communal Open Space per unit (m <sup>2</sup> )	Total Communal Open Space Required (m <sup>2</sup> )
1 bed	47	5	235
2 bed / 3 person	3	6	18
2 bed / 4 person	118	7	826
3 bed	27	9	243
<b>Total</b>	<b>195</b>		<b>1,322m<sup>2</sup></b>

**Table 5 – Required Communal Open Space for Blocks A, B, A1 & B1**

The tables below set out the communal open space requirement for the individual blocks A, B, A1 and B1:

Block	Unit Type	No. of Units	Communal Open Space required per unit (m <sup>2</sup> )	Total Communal Open Space required (m <sup>2</sup> )
A	1 bed	6	5	30
A	2 bed / 4 person	26	7	182
<b>Total</b>		<b>32</b>		<b>212 m<sup>2</sup></b>



**Table 6 – Required Communal Open Space for Block A**

Block	Unit Type	No. of Units	Communal Open Space required per unit (m <sup>2</sup> )	Total Communal Open Space required (m <sup>2</sup> )
B	1 bed	4	5	20
B	2 bed / 4 person	10	7	70
<b>Total</b>		<b>14</b>		<b>90 m<sup>2</sup></b>

**Table 7 – Required Communal Open Space for Block B**

Block	Unit Type	No. of Units	Communal Open Space required per unit (m <sup>2</sup> )	Total Communal Open Space required (m <sup>2</sup> )
A1	1 bed	27	5	135
A1	2 bed / 3 person	1	6	6
A1	2 bed / 4 person	48	7	336
A1	3 bed	16	9	144
<b>Total</b>		<b>92</b>		<b>621m<sup>2</sup></b>

**Table 8 – Required Communal Open Space for Block A1**

Block	Unit Type	No. of Units	Communal Open Space required per unit (m <sup>2</sup> )	Total Communal Open Space required (m <sup>2</sup> )
B1	1 bed	10	5	50
B1	2 bed / 3 person	2	6	12
B1	2 bed / 4 person	34	7	238
B1	3 bed	11	9	99
<b>Total</b>		<b>57</b>		<b>399m<sup>2</sup></b>

**Table 9 – Required Communal Open Space for Block B1**



For the 195 no. apartments accommodated in Blocks A, B, A1 & B1, a minimum of 1,322m<sup>2</sup> communal open space is required. The following is the proposed communal open space provision for those blocks:

- Block A: 280m<sup>2</sup>
- Block B: 180m<sup>2</sup>
- Block A1: 919m<sup>2</sup>
- Block B1: 1152m<sup>2</sup> (upper) + 99m<sup>2</sup> (lower)
- **Total provision = 2,630m<sup>2</sup>.**

In addition, there are 48 no. F and F-O type, 2 bed / 4 person apartments, which require a total of 336m<sup>2</sup> of communal open space. Each of the 16 buildings, which accommodate 3 no. F/F-O type, 2 bed units, requires a minimum of 21m<sup>2</sup> of communal open space. In total, 550m<sup>2</sup> of communal open space is afforded to the 16 no. F/F-O type blocks, which exceeds the minimum standards.

In total, the 243 no. proposed apartments require a minimum of 1,658m<sup>2</sup> communal open space, with the proposed development providing a total of 3,180m<sup>2</sup> communal open space for the use of those units. The proposed communal open spaces will be for the benefit of these units only and will be privately managed by a management company.

The proposed private and communal open spaces provided for the apartments exceed the requirements of the Apartment Guidelines.

#### **4.2.4 Childcare Facilities – Guidelines for Planning Authorities (2001)**

The Childcare Facilities Guidelines for Planning Authorities 2001 refer to a benchmark of an average of one facility (with 20 childcare spaces) for 75 houses and also provide broader guidance on internal standards for childcare facilities.

The proposed development comprises 702 no. dwellings consisting of 420 no. 2, 3, 4 and 5 bed houses, 39 no. 2 and 3 duplex units and 243 no. 1, 2 and 3 bed apartments. As set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020), 1 bed units should not generally be considered to contribute a requirement for childcare provision.

Excluding the proposed 47 no. 1 bed units, the proposed development comprises 655 no. 2, 3, 4 and 5 bed units which would give a requirement for c. 175 no. childcare spaces based on the standards of the 2001 Guidelines.

The 2001 Guidelines apply a minimum floor space per child of 2.32sq.m, exclusive of kitchen, bathroom and hall, furniture or permanent fixtures. Applying that standard, a childcare facility to serve the proposed development and meeting the requirement for c. 175 childcare spaces would need to be a minimum of c. 406sq.m net floor area.





## **Statement of Consistency:**

The proposed development provides for 2 no. childcare facilities as follows:

- Block A – 289m<sup>2</sup>
- Block A1 – 384m<sup>2</sup>
- Total childcare floor space = 673m<sup>2</sup>

Both creches are located at ground floor level with independent access and dedicated play areas. The proposed floor area of the combined crèches exceeds the minimum requirement and includes sufficient additional floorspace to accommodate food prep, toilets, sleep room, reception/office, circulation and escape route spaces, furniture and permanent fixtures as required, and cater for 175 no. children.

Notwithstanding the current proposal to provide creches to cater for the childcare needs of the proposed development, the site is in close proximity to Ashbourne Town Centre which is well serviced by existing crèche facilities. Under section 4.3 of the submitted Social Infrastructure Assessment, a list and map of the existing childcare facilities in the local area are provided – please refer to same.

In consideration of the overall gross floor area of the proposed creches, along with the availability of existing childcare facilities in the environs, the proposed creches are of an appropriate size and scale to cater for the proposed development.

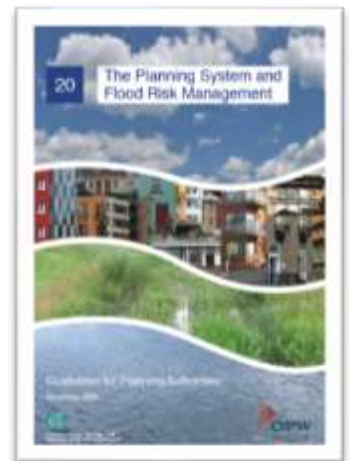
### **4.2.5 The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009).**

The Planning System and Flood Risk Management – Guidelines for Planning Authorities, 2009, (hereafter ‘the FRMG’) provide detailed guidance on the role that flood risk should play at different levels of the planning system. Planning authorities must implement these FRMG to ensure that, where relevant, flood risk is a key consideration in development plans and local area plans and in the assessment of planning applications. The FRMG should also be utilised by developers and the wider public in addressing flood risk in preparing development proposals.

The FRMG introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process and set out the following core objectives:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

Chapter 2 of the Guidelines identify types and causes of flooding, details on flood risk, the stages of flood risk assessment and flood zones. Chapter 3 of Guidelines sets out the principal actions when considering flood risk management, including the sequential approach, justification test. Chapter 5 provides guidance on flooding and the development management process including the application of the justification test in assessing a planning





application.

**Statement of Consistency:**

DBFL Consulting Engineers has prepared the enclosed Site Specific Flood Risk Assessment (SSFRA) which has been carried out in accordance with “*The Planning System & Flood Risk Management Guidelines*” published by the Department of the Environment, Heritage and Local Government in November 2009.

There are no watercourses in the immediate vicinity of the site and the site is located approximately 19km west of the Irish Sea (air distance). The nearest EPA designated watercourse is the Broadmeadows located approx. 720m of the site’s eastern boundary (air distance).

The Eastern CFRAM Study indicates that the subject site is located within Flood Zone C i.e. is outside the 0.1%AEP (Annual Exceedance Probability). Therefore, the proposed development is appropriate for the subject site. Following assessment of the flood risks to the subject site and available flood data, the entirety of the site is within Flood Zone Category C as defined by the Guidelines. The type of development proposed is therefore appropriate for this flood zone category. The Guidelines Sequential Approach is therefore met and the ‘Avoid’ principal achieved.

The Site-Specific Flood Risk Assessment for the proposed development at Cherry Lane, Ashbourne was undertaken in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities”, November 2009. Following the flood risk assessment stages, and it was determined that the lands are within Flood Zone C as defined by the Guidelines.

It is concluded that the:

- Residential development proposed is appropriate for the Site’s flood zone category.
- Planning System and Flood Risk Management Guidelines Sequential Approach is met and the ‘Avoid’ principal achieved.

The development was concluded as having a good level of flood protection up to the 100- year return event. For pluvial floods exceeding the 100-year capacity of the drainage system then proposed flood routing mitigation measures are recommended.





#### **4.2.6 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018).**

These Guidelines are issued to Planning Authorities and An Bord Pleanála under section 28 of the Planning and Development Act 2000, as amended (the Act), and both are required to have regard to the Guidelines in the performance of their functions under the Act. They replace Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment issued by the Department of the Environment, Community and Local Government in March 2013.

These Guidelines provide practical guidance to planning authorities and An Bord Pleanála and result in greater consistency in the methodology adopted by consent authorities. The proposed development is comprised of 660 no. dwellings, a crèche and all associated site development works. Therefore, an Environmental Impact Assessment Report (EIAR) is required under Part 2(10) (b) of the Planning and Development Regulations 2001 (as amended). The EIAR accompanying this application has been prepared in accordance with these Guidelines and Directive 2011/92/EU *on the assessment of the effects of certain public and private projects on the environment* as adopted and amended by Directive 2014/52/EU.



#### **Statement of Compliance:**

An Environmental Impact Assessment Report (EIAR), has been prepared and forms part of this application for permission for the proposed residential development. Please refer to the submitted EIAR and Non-Technical Summary of same.

#### **NOTE:**

**The following sections 4.2.7 to 4.2.10 provide details of other relevant planning guidance documents (that are not Section 28 Ministerial Guidelines but) to which the proposed development has had regard to / complies with.**



#### 4.2.7 Quality Housing for Sustainable Communities – Design Guidelines (2007)

The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in. The policy statement is accompanied by Best Practice Guidelines that promotes quality sustainable residential development in urban areas having regard to the following:



- *promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*
- *encourage best use of building land and optimal of services and infrastructure in the provision of new housing;*
- *point the way to cost effective options for housing design that go beyond minimum codes and standards;*
- *promote higher standards of environmental performance and durability in housing construction;*
- *seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and*
- *provide homes and communities that may be easily managed and maintained.*

The following criteria indicate the 7 no. essential requirements new residential developments should have regard to when carrying out development:

##### **1. Socially & Environmentally Appropriate:**

*“The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces.”*

##### **Statement of Consistency:**

The proposed development provides an appropriate mix of 1, 2, 3, 4 and 5 bedroom dwellings. The proposal seeks to integrate usable open spaces distributed throughout a number of character areas and all interconnected. All open spaces will be overlooked by the proposed dwellings.

##### **2. Architecturally Appropriate:**

*“The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage.”*

##### **Statement of Consistency:**

The design and layout of the scheme creates a liveable and visually pleasing residential environment. The design is appropriate and mindful of its locational context, the site constraints, and architectural character of the adjoining areas.



### **3. Accessible & Adaptable**

*“There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime.”*

#### **Statement of Consistency:**

The design of the proposed dwellings has been carried out in accordance with the requirements of the Building Regulations (including Part M re accessibility). All floors and associated facilities of the apartment buildings are accessible via a lift. A Universal Design Statement has also been submitted with this planning application. Careful consideration has been paid to the topography of the site to ensure all dwellings are directly accessible from the street.

### **4. Safe, Secure & Healthy**

*“The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives.”*

#### **Statement of Consistency:**

The scheme provides good segregation of vehicle and pedestrians/cyclists. A very safe walking and cycling environment will be provided for future residents and the existing residents in the area by the development of strong walking and cycling links through the site, with connections to adjoining lands.

The interconnectivity of the scheme will ensure access for all while creating a walkable environment for inhabitants of the scheme. The continuity of path networks will assist natural way-finding in the scheme. Public areas shall be overlooked and well lit as far as practicable to achieve maximum passive surveillance.

### **5. Affordable**

*“The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development.”*

#### **Statement of Consistency:**

The scheme will be built, managed and maintained at reasonable cost.

### **6. Durable**

*“The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works”.*

#### **Statement of Consistency:**

The scheme endeavours to use the best available materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the scheme.



## **7. Resource Efficient**

*“Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised.”*

### **Statement of Consistency:**

The scheme is considered to accord with the aforementioned sustainable development principles. The site is located in an accessible location in Ashbourne and the density proposed for this site is appropriate to its location. It has been laid out in a way to ensure that it maximise passive solar gain and meets the best practice for sustainable development.

Chapter 5 – Dwelling Design – of the Guidelines also provides guidance on the internal layout and space provision within houses including target gross floor areas and minimum room sizes.

### **Statement of Consistency**

The submitted Housing Quality Assessment and the submitted house types / floor plans prepared by Davey-Smith Architects confirm that the proposed dwellings within the development are designed in accordance with the standards of these Guidelines.

### **Evaluation of Consistency:**

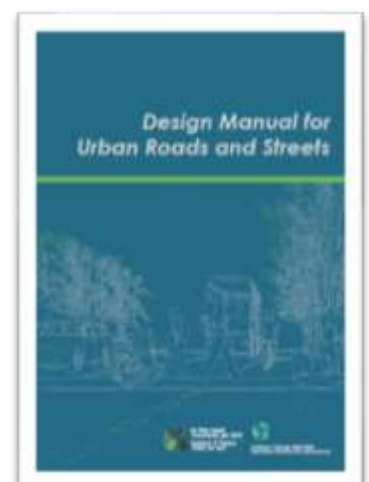
The enclosed Housing Quality Assessment and associated floor plans also confirm that the proposed housing units are designed in accordance with the Quality Housing for Sustainable Communities Guidelines.

## **4.2.8 Design Manual for Urban Roads and Streets (DMURS), (2019)**

The Design Manual for Urban Roads and Streets (DMURS) was first published in 2013 and an updated version was released in May 2019. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. DMURS outlines 4 no. design principles for new developments, which are addressed below:

### **Design Principle 1 - Connected Networks**

*“To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.”*





### **Statement of Consistency**

The proposed layout and design ensure a permeable and legible development for all users. The internal road and street layout combined with the proposed walkways through the open spaces ensures a permeable and legible layout for all users.

### **Design Principle 2 – Multi-Functional Streets**

*“The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.”*

### **Statement of Consistency**

The layout ensures that all open spaces and routes are overlooked providing a strong sense of safety and creating a self-regulating environment.

### **Design Principle 3 – Pedestrian Priority**

*“The quality of the street is measured by the quality of the pedestrian environment.”*

### **Statement of Consistency**

Pedestrian priority is of the utmost importance. The passive surveillance provided by overlooking dwellings creates a strong sense of safety for pedestrians. Vehicular speeds through the development will be reduced to create a safe environment for pedestrians.

Pedestrian permeability through the site is promoted in the residential layout enabling future residents to access the development from multiple points and to access the existing and planned network of pedestrian, cycle and public transport facilities in the environs.

### **Design Principle 4 – Multi-Disciplinary Approach**

*“Greater communication and cooperation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.”*

### **Statement of Consistency**

The design of the development results from a multi-disciplinary plan-led approach through the co-operation of architects, engineers, ecologists, landscape architects and planners.

### **Evaluation of Consistency:**

DMURS recommendations have been incorporated into the street and building design of the development and we submit with the application a report called “DMURS Design Statement”, prepared by DBFL Consulting Engineers, which confirms that the proposed development layout has been prepared with careful consideration of optimising connectivity between key local areas through the provision of a high degree of permeability and legibility for all network users and particularly prioritising sustainable forms of travel. The provision of a Link Street with segregated cycle tracks and quality footpaths on both side of the carriageway, as well as the 4m wide shared



pedestrian and cyclists greenway extending from Dublin Road (R135) running through the site to adjoining lands west of the development will provide better connectivity and permeability.

The proposed residential scheme delivers greater modal and route choices along direct, attractive and safe linkages to a range of amenities, public transport nodes and local service destinations as illustrated in the supporting proposed transportation linkages plan (DBFL drawing no. 20059-DBFL-TR-SP-DR-C- 1102) submitted as part of the planning application. The development will be accessed primarily via Cherry Lane which will be upgraded to a signalised junction. The site will have a secondary site access via Hickeys Lane.

The design approach also sought to achieve a high quality 'sense of place' by incorporating several open green spaces areas including a large linear park along the northern and southern edges of the development. Appropriately sized blocks, together with filtered permeability delivers an overall street network that is highly permeable, legible and accessible in nature for all road users.

The overall design approach successfully achieves an appropriate balance between the functional requirements of different network users, whilst also providing for an enhanced sense of place. The implementation of a self-regulating street network will actively manage movement by offering real modal and route choices in a low speed, high quality residential environment.

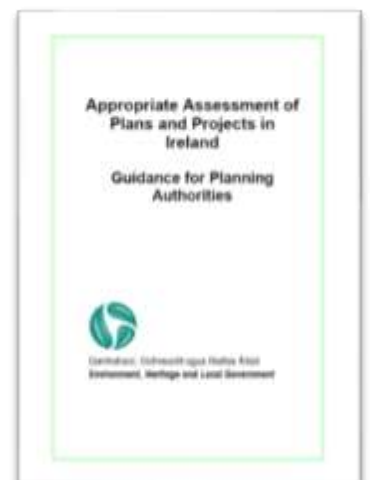
Consequently, the proposed residential development is the outcome of an integrated design approach which will ultimately deliver safe, convenient and attractive networks in addition to promoting real and viable alternatives to car-based journeys.

The adopted design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The implementation of an efficient car parking provision and a high bicycle parking provision actively promotes a modal shift to alternative forms of transport while also creating high-quality open spaces as part of the development. This scheme prioritises pedestrians and cyclists throughout the development. For further detail of compliance with DMURS please refer to submitted documentation prepared by DBFL Consulting Engineers.

#### **4.2.9 Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009).**

The Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009, (hereafter 'the AA Guidelines') were prepared jointly by the NPWS and Planning Divisions of DECLG, and set out the different steps and stages that are needed in establishing whether a plan or project can be implemented without damaging a Natura 2000 site.

The AA Guidelines indicate the role to be played by professional ecologists and other professionals in identifying and assessing potential impacts. The AA Guidelines addresses issues of mitigation and avoidance of impacts, and also the Article 6.4 derogation provisions in circumstances in which there are no alternatives and there are imperative reasons of overriding public interest requiring a plan or project to proceed.





## **Statement of Consistency:**

In accordance with these Guidelines, an Appropriate Assessment Screening Report has been undertaken by Scott Cawley Consulting Ecologists and is enclosed as a standalone document – please refer to same for full details. Scott Cawley, consulting ecologists, (hereafter SCE) have been appointed by the applicants to undertake Appropriate Assessment (AA) for the proposed development, which provides information on, and assesses the potential for, the proposed development to impact on the Natura 2000 network. An AA is required if significant effects on European sites arising from a proposed development cannot be ruled out at the screening stage, either alone or in combination with other plans or projects. It is the responsibility of the competent authority to make a decision as to whether or not the proposed development is likely to have significant effects on European sites, either individually or in combination with other plans or projects. The submitted AA Screening Report states that *“For the reasons set out in detail in this AA Screening Report, a Stage Two **Appropriate Assessment of the proposed development is not required in this instance** as it can be concluded, on the basis of objective information, that the proposed development, either individually or in combination with other plans or projects, will not have a significant effect on any European sites”*.

The submitted AA Screening Report outlines the various surveys undertaken on the subject site which include:

- A habitat survey was undertaken of the proposed development site on the 31<sup>st</sup> August 2020, on the 18<sup>th</sup> June 2021 and 20<sup>th</sup> April 2022.
- Fauna surveys, i.e. terrestrial fauna surveys (excluding bats) were undertaken on the 31<sup>st</sup> August 2020, and resurveyed on the 18<sup>th</sup> June 2021 and 20<sup>th</sup> April 2022. The presence/absence of terrestrial fauna species were surveyed through the detection of field signs such as tracks, markings, feeding signs, and droppings, as well as by direct observation. The habitats on site were assessed for signs of usage by protected/red-listed fauna species, and their potential to support these species. Surveys to check for the presence of badger setts within the study area, and to record any evidence of use, were also undertaken.
- Several breeding bird surveys were undertaken on the following dates; 23<sup>rd</sup> April 2021, 1<sup>st</sup> June 2021, 11<sup>th</sup> June 2021, and on the 20<sup>th</sup> April 2022. Lands within the study area were slowly walked in a manner allowing the surveyor to come within 50m of all habitat features. Birds were identified by sight and song. The barns and sheds within the proposed development site were also checked for nesting suitability and evidence of barn swallows, house martins, and barn owls.
- Wintering bird surveys were undertaken on the 16<sup>th</sup> February 2021, on the 3<sup>rd</sup> March 2021, on the 25<sup>th</sup> March 2022. Lands were surveyed by a walkover of the area to identify birds which may be using the fields for foraging and identifying evidence of usage by wildfowl such as swans or geese (e.g. droppings).

Chapter 4 “Biodiversity” of the submitted EIAR notes that five separate bat activity surveys were undertaken within the lands by surveyors who are experienced in bat transect surveys and bat roost presence/absence surveys. The aim of the surveys was to both document the usage of the proposed development site by bats, and to determine whether any buildings within the proposed development site were bat roosts. Four surveys involved completion of a walked transect within the proposed development site, and four surveys were preceded/ followed by bat roost emergence/re-entry surveys at the buildings/structures within the proposed development site. Observations of bat activity were recorded, and where necessary, data collected in the field was analysed using specialist software (Elekton BatExplorer) to aid in the identification of bat species by their calls.

The submitted AA Screening Report provides an assessment of the receiving environment in terms of habitats, hydrology, flora and fauna. It examines the potential impacts associated with the proposed development,



examines whether there are any European sites within the Zone of Influence (Zoi) of effects from the proposed development, and assesses whether there is any risk of the proposed development resulting in a significant effect on any European site, either alone or in combination with other plans or projects. The report asserts that *“The potential impacts associated with the proposed development do not have the potential to affect the receiving environment and, consequently, do not have the potential to affect the conservation objectives supporting the qualifying interest/special conservation interests of any European sites. Therefore, the proposed development is not likely to have significant effects on any European sites”*.

The AA Screening Report 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, for the reasons set out in Section 3.3 above. 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 a Stage Two Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)”*.

## 4.2 Regional Planning Context

### 4.3.1 Regional Spatial & Economic Strategy 2019-2031 - Eastern & Midland Regional Assembly

The Eastern and Midland Regional Assembly published the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland region came into force in June 2019, superseding the Regional Planning Guidelines for the Midland Region. The RSES is a high-level plan that seeks to support the implementation of the NPF by providing a strategic planning and economic framework for the region’s sustainable growth and development. It echoes the NPF in emphasising sustainable development patterns and seeks to focus growth within the footprint of existing urban areas and in key regional growth settlements.



The RSES states that *“at the core of the RSES is the consideration of a settlement hierarchy for the Region, which sets out the key locations for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs. This will set the framework for the development plans of each local authority and subsequently the quantum of residential and employment generating zoned land required”*.

The Growth Strategy for the Eastern and Midland Region will:

- Support the continued growth of Dublin as our national economic engine;
- Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP);
- Target growth of our Regional Growth Centres of Athlone, Drogheda and Dundalk as regional drivers;
- Support our vibrant rural areas with a network of towns and villages;
- Facilitate the collaboration and growth of the Dublin – Belfast Economic Corridor;
- Embed a network of Key Towns through the Region to deliver sustainable regional development;
- Support the transition to a low carbon, climate resilient and environmentally sustainable Region.

The Eastern and Midland Regional Assembly published the Regional Spatial and Economic Strategy (RSES).





The RSES states that *“at the core of the RSES is the consideration of a settlement hierarchy for the Region, which sets out the key locations for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs. This will set the framework for the development plans of each local authority and subsequently the quantum of residential and employment generating zoned land required”*.

The RSES’s objectives are in line with the NPF, with County Meath and therefore Ashbourne, located within the Core Region. Growth enablers for the Core Region 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.*

Appendix B to the RSES set out Strategic Planning Area and County Population Tables and it notes Meath’s population was 195,000 in 2016 but this will increase to 216,000 – 221,000 in 2026 and 225,500 – 231,500 in 2031.

Section 4.7 of the RSES refers to Self-Sustaining Growth Towns and Self-Sustaining Towns, with Ashbourne being identified within the RSES as a Self-Sustaining Town. Section 4.7 of the RSES states: *“Supporting the regional driver role of Key Towns, Self-Sustaining Growth Towns and Self-Sustaining Towns, are settlements that act as regionally important local drivers providing a range of functions for their resident population and their surrounding catchments including housing, local employment, services, retail and leisure opportunities”*.

The RSES go onto state that *“Self-Sustaining Towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery”*. It is also stated that *“Population growth in these towns shall be at a rate that seeks to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision, to be set out in the core strategies of county development plans”*. Some towns, including Ashbourne, are noted as having *“the potential to strengthen their employment base and develop as important centres of employment due to their strategic location, connectivity with surrounding settlements, and the availability of a skilled workforce”*.

### **Statement of Consistency:**

County Meath is identified as being within the Core Region for development in the the Eastern and Midland Region and is expected to accommodate 231,500 persons by 2035. Ashbourne is identified as being a “Self-Sustaining Town”, which acts as a regionally important local driver, providing a range of functions for their resident population and their surrounding catchments including housing. The delivery of housing in such a town will contribute to the principle of compact growth.



## 4.4 Local Planning Context

### 4.4.1 Meath County Development Plan 2021-2027

This section contains an assessment of the consistency of the proposed development with the Meath County Development Plan 2021-2027, which was adopted on 22<sup>nd</sup> September 2021 and came into effect on 3<sup>rd</sup> November, 2021. The Meath County Development Plan 2021-2027 (hereafter the CDP) is the current statutory Development Plan for the area.

The application site is subject to three separate land use zoning objectives, namely:

- i. Land use zoning objective A2 – New Residential: *“To provide for new residential communities with ancillary community facilities, neighbourhood facilities as considered appropriate”*. Circa 19 Ha is zoned A2.
- ii. Land use zoning objective G1 - Community Infrastructure: *“To provide for necessary community, social, and educational facilities”*. Circa 1 Ha is zoned G1.
- iii. A small portion of the site, to the south-east, occupied by a single dwelling & associated outbuilding, of c.0.2Ha, is zoned objective A1 – Existing Residential: *“To protect and enhance the amenity and character of existing residential communities”*.

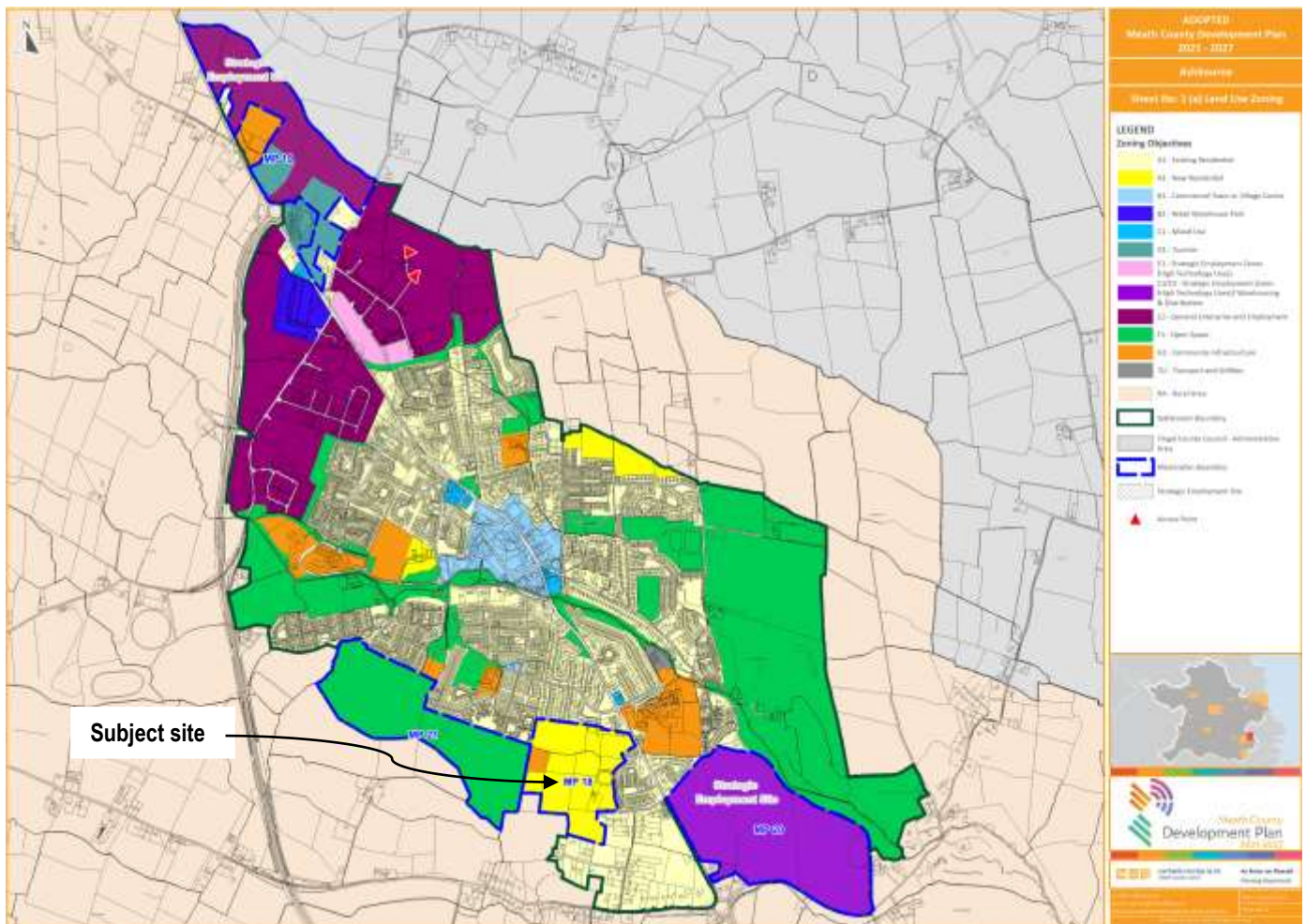


Fig. 1 – Copy of Meath County Development Plan Land Use Zoning Map for Ashbourne



Volume 2 of the CDP sets out the Written Statement for Ashbourne, which includes a development strategy for the town and an approved land use zoning map (refer to Fig. 1). We note that the Written Statement for Ashbourne contained in the current CDP states that “a detailed Local Area Plan for the town will be prepared during the life of this Plan” – at the time of submitting this application for permission, a new Local Area Plan (LPA) has not been prepared. The previous LAP, Ashbourne LAP 2009-2015, has not been updated, but in consideration of the more up to date, statutorily adopted County Development Plan 2021-2027, which contains a written statement for Ashbourne, it is considered that the 2009-2015 Ashbourne LAP is no longer relevant and has been superseded by the current Development Plan and the Written Statement for Ashbourne contained in Volume 2 of the CDP.

## Land Use Zoning

Chapter 11 (Section 14) of the CDP sets out the general land use and zoning policies and objectives of this Plan. The zoning strategy for the County is based upon a number of principles, including *inter alia*:

- To ensure that sufficient lands are zoned to allow the aims of the Core Strategy to be realised;
- To support the intensification of development in centres in the upper tiers of the settlement hierarchy adjacent or close to public transport nodes and corridors to maximise the use of public transport, minimise trip generation and distribution and to promote sustainable development;
- To support the creation of compact settlements by following the sequential approach in the identification of lands for development.

The subject lands are zoned objectives A1, A2 and G1 under the Meath CDP 2021-2027.

As noted above, a small portion of the site, to the south-east, occupied by a single dwelling and associated outbuilding, of c.0.2Ha, is zoned objective “A1 – Existing Residential”, the objective of which is “to protect and enhance the amenity and character of existing residential communities”. The CDP’s guidance for A1 land use zoning states that “Lands identified as ‘Existing Residential’ are established residential areas. Development proposals on these lands primarily consist of infill developments and the extension and refurbishment of existing properties. The principle of such proposals is normally acceptable subject to the amenities of surrounding properties being protected and the use, scale, character and design of any development respecting the character of the area”.

**Under the A1 zoning, the following are uses that are permitted or open for consideration:**

### Permitted Uses:

**Residential**, Sheltered Housing, B & B / Guest House, Community Facility / Centre, Home Based Economic Activities, Utilities.

### Open for Consideration Uses:

Bring Banks, Convenience Outlet, Childcare Facility, Halting Site, Healthcare Practitioner, Leisure / Recreation / Sports Facilities, Bar, Retirement Home / Residential Institution / Retirement Village, and Veterinary Surgery



The A2 land use objective is: “To provide for new residential communities with ancillary community facilities, neighbourhood facilities as considered appropriate”. The CDP’s guidance for the A2 land use zoning states that *“this is the primary zone to accommodate new residential development. Whilst residential zoned lands are primarily intended for residential accommodation, these lands may also include other uses that would support the establishment of residential communities. This could include community, recreational and local shopping facilities. These facilities must be at an appropriate scale and cannot interfere with the primary residential use of the land. The detail of ancillary uses to be provided as part of a residential development shall form part of pre-application discussions in respect of any planning proposal unless otherwise indicated in Volume 2 of the Development Plan. Individual convenience stores in neighbourhood centres on A2 zoned lands should generally not exceed 1,000m<sup>2</sup> net retail floorspace unless otherwise identified in a Local Area Plan”*.

**Under the A2 zoning, the following are uses that are permitted or open for consideration:**

Permitted Uses:

**Residential** / Sheltered Housing, 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, Retirement Home / Residential Institution / Retirement Village, Utilities, (emphasis added).

Open for Consideration Uses:

Betting Office, Caravan Park, Cultural Facility, Education (Third Level), Enterprise Centre, Health Centre, **Healthcare Practitioner**, Hotel / Motel / Hostel, Offices <100m (not for visiting members of the public), Place of Public Worship, Bar/ Restaurant / Café, Take-Away / Fast Food Outlet, Veterinary Surgery, (emphasis added).

**Under the G1 zoning, the following are uses that are permitted or open for consideration:**

Permitted Uses:

Allotments, Car Park (incl. Park and Ride), Cemetery/Crematorium, Children Play / Adventure Centre, Childcare Facility, Community Facility / Centre, Cultural Facility, **Education**, Health Centre, Hospital, Leisure / Recreation / Sports Facilities, Place of Public Worship, **Playing Pitches**, Playgrounds, Recycling Facility (Civic & Amenity), Utilities, (emphasis added).

Open for Consideration Uses:

Bring Banks, Funeral Home, Gymnasium, Halting Site / Group Housing, Healthcare Practitioner, Residential / Sheltered Housing, Restaurant / Café, Retirement Home / Residential Institution / Retirement Village, Telecommunication Structures

**Statement of Consistency:**

The proposed development site is primarily governed by two land use zoning objectives, namely A2 which provides for new residential development and G1 which provides for community infrastructure.

The majority of the application site c. 19Ha is zoned A2 and the proposed uses to be developed on same include residential, retail, childcare facility and GP practice/medical suite. Each of the aforementioned uses (and quantum/scale of same) is either permitted or is open for consideration and should therefore be deemed acceptable.



On the G1 zoned part of the application site, which is c.1Ha in area, this part of the application site is to be reserved for future use as a school site and playing pitch, in line with the Masterplan for the lands. The reservation of the site for the development of a future school will remain as such dependent on confirmation from the Department of Education and Skills. It is considered that the layout of the future school site should be determined prior to the installation of a playing pitch as a playing pitch may impede the optimum layout for a school building on these lands. Consideration ought to be given as to how the lands reserved for the school and playing pitch will integrate with the adjoining F1 Open Space and future Masterplan 21 for same. Notwithstanding same, the proposed future use of the G1 lands, within the application site, as a school and playing pitch, accord with the permitted uses under the G1 zoning objective, and should therefore be deemed acceptable.

## **Core Strategy**

Chapter 2 of the CDP sets out the Core Strategy for the County, the vision of which is: *“To continue to support the creation of socio-economically progressive vibrant, dynamic, and healthy communities throughout the County and ensure that future growth is based on the principles of sustainable development that delivers a high-quality living and working environment that meets the needs of all residents, in accordance with National and Regional Guidance”*.

Ashbourne is identified as being within the Settlement Typology of “Self-Sustaining Growth Towns” which are described as: *“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”*.

Section 2.10.2 of Core Strategy states: *“In the Self-Sustaining Growth Towns of Ashbourne, Kells, Trim, Dunboyne and Dunshaughlin there will be a focus on consolidation and the provision of employment opportunities in tandem with population growth in order to allow these centres to become more self sufficient. The availability of infrastructural services and community infrastructure will also be an important factor in determining the quantum of new housing and population growth that these settlements could absorb”*.



Table 2.12 “Core Strategy Table, Population and Household distribution to 2027” identifies that Ashbourne has a proposed household allocation of 1,349 no. units over the lifetime of the Development Plan. Column E of the Core Strategy Table states that 209 no. units in Ashbourne have an extant permission thus leaving headroom for 1,140 no. units to be delivered within the lifetime of the CDP, therefore the proposed development complies with the Core Strategy.

Column A	B	C	D	E	F	G	H	I	J	K
Settlement	Population 2016	Projected population increase to 2027	Projected population 2027	Approximate household units completed 2016-2019	Extant units not yet built	Household allocation 2020-2027	Potential units to be delivered on infill/brownfield lands	Quantum of land zoned for residential use (ha)	Quantum of land zoned for existing residential use (ha)	Quantum of land zoned for mix of uses (ha)
Ashbourne	12,679	3,200	15,879	632	209	1,349	351	31.48	218.27	18.62

Excerpt from: Table 2.12 “Core Strategy Table, Population and Household distribution to 2027” from CDP

The following are the relevant policies and objectives set out in the Core Strategy of the CDP:

- **CS POL 1:** To promote and facilitate the development of sustainable communities in the County by managing the level of growth in each settlement to ensure future growth is in accordance with the Core Strategy and County Settlement Hierarchy in order to deliver compact urban areas and sustainable rural communities.
- **CS OBJ 1:** To secure the implementation of the Core Strategy and Settlement Strategy, in so far as practicable, by directing growth towards designated settlements, subject to the availability of infrastructure and services.
- **CS OBJ 2:** To ensure that sufficient zoned lands are available to satisfy the housing requirements of the County in designated settlements over the lifetime of the Plan.
- **CS OBJ 3:** To ensure the implementation of the population and housing growth household allocation set out in the Core Strategy and Settlement Strategy, in so far as practicable. Meath County Council will monitor the number of units that are permitted and under construction/built as part of the implementation of this objective.
- **CS OBJ 4:** To achieve more compact growth by promoting the development of infill and brownfield/regeneration sites and the redevelopment of underutilised land within and close to the existing built up footprint of existing settlements in preference to edge of centre locations.
- **CS OBJ 5:** To deliver at least 30% of all new homes in urban areas within the existing built up footprint of settlements.



- **CS OBJ 12:** To ensure that all settlements, in as far as practicable, develop in a self-sufficient manner with population growth occurring in tandem with the provision of physical and social infrastructure.
- **CS OBJ 14:** To support the economic growth of Meath as set out in the Regional Spatial and Economic Strategy and the Economic Development Strategy for County Meath 2014-2022.

### **Statement of Consistency:**

It is considered that the proposed development meets principles of the Core Strategy of the CDP. The location of the proposed residential development meets the requirement of **CS POL1 and CS OBJ** by way of Ashbourne's designation as a Self-Sustaining Growth Town.

The subject site is zoned for development with the proposed uses according with the relevant land use zoning objectives and therefore **CS OBJ 2**.

The quantum of units proposed adheres to the household allocation of the Core Strategy for Ashbourne therefore complying with **CS OBJ 3**.

The subject site is the largest residential land bank in Ashbourne that is currently in agricultural use. The coming together of two adjoining landowners provides an opportunity for a comprehensive and well planned development that provides an efficient development on zoned lands that are currently underutilised and within the settlement boundary of Ashbourne, thus complying with **CS OBJ 4**.

The proposed development of 702 no. dwellings in Ashbourne represents c. 52% of the household allocation for Ashbourne in the Core Strategy, with the subject site being located within the existing built up footprint of Ashbourne, thus complying with **CS OBJ5**.

The proposed development provides for the necessary associated social and physical infrastructure required to serve it and the immediate environs such as open spaces, new link streets, green links, childcare facilities, retail units, GP practice as well as play areas, MUGA and lands reserved for a new school and playing pitch, thus complying with **CS OBJ12**.

County Meath is identified as being within the Core Region for development in the the Eastern and Midland Region and is expected to accommodate 231,500 persons by 2035. Ashbourne is identified as being a "Self-Sustaining Town", which acts as a regionally important local driver, providing a range of functions for their resident population and their surrounding catchments including housing. The CDP recognises that rapidly growing settlements such as Ashbourne, which is the second largest town in the County, will continue to perform an important function in the provision and delivery of services on the edge of the Metropolitan Area. The delivery of housing in such a town will contribute to the principle of compact growth, and therefore, the proposed development is in compliance with **CS OBJ 14**.



## Settlement & Housing Strategy

Chapter 3 (Settlement & Housing Strategy) of the CDP details the settlement strategy, policy and objectives in respect of housing for County Meath over the lifetime of the Plan. It is complementary to the aims of the Core Strategy to create sustainable communities and maximise the potential for creating critical mass of population at strategic locations in Meath which will enhance the economic assets of the County.

Table 3.1 sets out the settlements in Meath that recorded the highest levels of population with Ashbourne’s population having increased by almost 12% from 2011 to 2016:

Settlement	Population 2011	Population 2016	Actual change	% change
Ashbourne	11,355	12,679	1,324	11.7%

Excerpt from: Table 3.1 “Settlements in Meath that recorded highest levels of growth 2011-16” from Meath County Development Plan

Section 3.4.1.1 “Compact Growth” of the CDP cites the objective of both the NPF and RSES that at least 30% of all new homes will be delivered within or close to the existing built up areas of settlements.

Section 3.4.2 “Settlement Hierarchy” identifies Ashbourne as Self-Sustaining Growth Town (Table 3.4 – Meath Settlement Hierarchy).

Section 3.4.3 “Future Settlement Growth” states that the *“Self-Sustaining Growth Towns have a solid employment base with capacity to accommodate further expansion. There will be a greater emphasis on achieving a greater balance between employment and population growth in these settlements. Rapidly growing settlements such as Ashbourne, which is the second largest town in the County, will continue to perform an important function in the provision and delivery of services on the edge of the Metropolitan Area”*.

Section 3.4.8 describes “Self-Sustaining Growth Towns” as *“those settlements that have a solid employment base and a broad range of services and have the capacity to accommodate additional growth on a sustainable platform”*. There are five such settlements in the County, with Ashbourne being one.

Section 3.4.8 of the CDP also states that Ashbourne is the second largest town in the County, and *“the rapid expansion of the town from a small village to a large urban centre is primarily related to its proximity to Dublin Airport and Dublin City Centre”*. The CDP recognises that *“the completion of the new town centre development in Ashbourne has significantly improved the retail provision in the town”*.

The CDP notes that employment and enterprise in Ashbourne benefits from its proximity to Dublin Airport, its strong links with the Dublin Metropolitan Area, and its location along the N2 strategic road corridor. It states that *“as Dublin Airport continues to expand, it is anticipated that the strategic importance of Ashbourne as a place of employment in Meath and the wider region will increase”*. The CDP identifies *“the strategic importance of Ashbourne and will support and facilitate industry, employment, and enterprise in the settlement as it continues its transition to a Metropolitan Centre”*.

Section 3.7 of the CDP “The Settlement Hierarchy and Future Population Growth in Meath” is stated to be consistent with the approach set out in the NPF and RSES *“in that it will encourage consolidation of existing*





urban centres with an emphasis on delivering more compact growth”. The CDP also states that “the future expansion of the Self-Sustaining Growth Towns other than Dunbooyne will be more moderate than Navan and Drogheda and will focus on the delivery of social and physical infrastructure in tandem with residential growth and employment. Ashbourne and Dunshaughlin are two Self-Sustaining growth settlements that have the capacity to absorb further growth”. It also goes on to state that “Ashbourne’s link to Dublin Airport and Dublin City Centre provides a solid basis for the settlement continuing to expand. There will be a stronger emphasis on the provision of employment and necessary social and physical infrastructure with any continued residential growth”.

Sections 3.7 and 3.8 of the CDP set out the following relevant “Settlement Strategy” and “Housing” policies respectively of the CDP. Section 3.8 states that “the delivery of housing in the appropriate location and the creation of attractive neighbourhoods with a range of housing options and a strong sense of place and community are key objectives of this Plan”.

The following are the relevant stated Settlement and Housing policies and objectives:

<b>SH POL 1</b>	<i>To ensure that all settlements, in as far as practicable, develop in a self-sufficient manner with population growth occurring in tandem with the provision of physical and social infrastructure.</i>
<b>SH POL 2</b>	<i>To promote the consolidation of existing settlements and the creation of compact urban forms through the utilisation of infill and brownfield lands in preference to edge of centre locations.</i>
<b>SH POL 3</b>	<i>To support the creation of healthy and sustainable communities that encourages and facilitates walking and cycling and general physical activity through the implementation of best practices in urban design that promotes permeability and interconnecting spaces.</i>
<b>SH POL 4</b>	<i>To promote social integration and the provision of a range of dwelling types in residential developments that would encourage a mix of tenure, particularly in any State funded house building programmes.</i>
<b>SH POL 5</b>	<i>To secure a mix of housing types and sizes, including single storey properties, particularly in larger developments to meet the needs of different categories of households.</i>
<b>SH POL 6</b>	<i>To support the provision of accommodation for older people and for people with disabilities that would allow for independent and semi-independent living in locations that are proximate to town and village centres and services and amenities such as shops, local healthcare facilities, parks and community centres.</i>
<b>SH POL 7</b>	<i>To encourage and foster the creation of attractive, mixed use, sustainable communities that include a suitable mix of housing types and tenures with supporting facilities, amenities, and services that meet the needs of the entire community and accord with the principles of universal design, in so far as practicable.</i>



<b>SH POL 8</b>	<i>To support the creation of attractive residential developments with a range of housing options and appropriate provision of functional public and private open space that is consistent with the standards and principles set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the associated Urban Design Manual – A Best Practice Guide, DEHLG (2009) and any subsequent Guidelines.</i>
<b>SH POL 9</b>	<i>To promote higher residential densities in appropriate locations and in particular close to town centres and along public transport corridors, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).</i>
<b>SH POL 10</b>	<i>To require that applications for residential development take an integrated and balanced approach to movement, place making, and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTS and DECLG (2013 and updated in 2019).</i>
<b>SH POL 11</b>	<i>To encourage improvements in the environmental performance of buildings by promoting energy efficiency and energy conservation in existing and new developments in line with best practice</i>
<b>SH POL 12</b>	<i>To promote innovation in architectural design that delivers buildings of a high-quality that positively contributes to the built environment and local streetscape</i>
<b>SH POL 13</b>	<i>To require that all new residential developments shall be in accordance with the standards set out in the Development Management Standards and Land Use Zoning Objectives set out in Chapter 11 of this Plan, in so far as is practicable</i>
<b>SH OBJ 1</b>	<i>To secure the implementation of the Core Strategy and Settlement Strategy, in so far as practicable, by directing growth towards designated settlements, subject to the availability of infrastructure and services.</i>
<b>SH OBJ 3</b>	<i>To ensure the implementation of the population and housing growth allocations set out in the Core Strategy and Settlement Strategy.</i>
<b>SH OBJ 14</b>	<i>To support the delivery of social housing in Meath in accordance with the Council’s Social Housing Delivery Programme and Government Policy as set out in Rebuilding Ireland: Action Plan for Housing and Homelessness.</i>
<b>SH OBJ 15</b>	<i>To apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000, as amended, to land zoned for residential use, or for a mixture of residential and other uses, except where the development would be exempted from this requirement.</i>
<b>SH OBJ 22</b>	<i>To require that, where relevant, all new residential developments shall be in accordance with SSPR 1 to SPPR 4 of the Urban Development and Building Heights Guidelines for Planning Authorities, December 2018 as well as SPPR 1 to SPPR 9 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2018. All new residential development should comply with the densities outlined in Chapter 11 of this plan.</i>



<b>SH OBJ 24</b>	<i>To require that all new residential development applications of 50 units or more are accompanied by a Social Infrastructure Assessment (SIA) to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents in accordance with the requirements of policy SOC POL 6 in the 'Community Building Strategy' (Chapter 7).</i>
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**Statement of Consistency:**

**Compliance with SH POL 1 & SH POL 2:** The subject site is zoned for development and located within the settlement boundary of Ashbourne. The quantum of development complies with the household allocation for Ashbourne in the Core Strategy. The proposed development provides for the necessary associated social and physical infrastructure required to serve it and the immediate environs such as open spaces, new link streets, green links, childcare facilities, retail units, GP practice as well as play areas, MUGA and lands reserved for a new school and playing pitch, thus complying with SH POL 1 and SH POL 2 of the CDP.

**Compliance with SH POL 3:** Pedestrian and cyclist paths and routes have been provided throughout the proposed development providing connectivity to adjoining lands and making the proposed layout highly permeable. Direct links from the Dublin Road into the scheme via a variety of dedicated pedestrian and cyclist paths are catered for.

**Compliance with SH POL 4, SH POL 5, SH POL 6 & SH POL 7:**

The overall proposed dwelling mix is illustrated in Table 10 below:

Dwelling Type	1 bed	2 bed	2-3 bed	3 bed	3-4 bed	3-5 bed	4 bed	4-5 bed	5 bed	Total
Houses	-	31	17	175	41	25	81	38	12	<b>420</b>
Apartments	47	170	-	27	-	-	-	-	-	<b>244</b>
Duplex	-	19	-	19	-	-	-	-	-	<b>38</b>
<b>Total No.</b>	<b>47</b>	<b>220</b>	<b>17</b>	<b>221</b>	<b>41</b>	<b>25</b>	<b>81</b>	<b>38</b>	<b>12</b>	<b>702</b>
<b>% Mix</b>	7%	31%	2%	31%	6%	4%	12%	5%	2%	100%

**Table 10: Overall Proposed Dwelling Mix**

It is evident from Table 10 above that there is a wide range of housing typologies provided for as part of the proposed development thus catering for all household formations, and various life cycle stages. In addition, the proposed dwelling types come in a range of sizes with all dwellings designed in accordance with the Building Regulations for Part M as well as the Universal Design Guidelines For Homes in Ireland, 2015. As outlined above, supporting facilities and amenities such as open spaces including play areas and MUGA, childcare facilities, retail units and a GP practice unit are all provided for as part of the proposed development, thus meeting the local needs of this new community at Milltown.



## Compliance with SH POL 8 & SH POL 9:

The proposed layout, design and built form is guided by the principles set out within the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)*, and the 12 design criteria within the accompanying Urban Design Manual which ensures that the proposed development provides a variety of residential dwellings, open spaces with varying function, and character areas within the development. Compliance with the 12 urban design criteria is set out in the preceding section 4.2.1 of this Statement of Consistency, which demonstrates that the proposed development has been assessed against the Design Criteria and Indicators contained in the Urban Design Manual – Best Practice Guide, which is also in accordance with the requirements of the Development Plan (Chapter 3 – Settlement & Housing Strategy), with further details also set out in the submitted Architectural Design Statement (section 7).

The proposed net density of development i.e. c.40 units per hectare, adheres to the guidance for sustainable residential development as the subject site can be described as an Outer Suburban / Greenfield Site and complies with section 5.11 of the guidelines, which define such sites as “*as open lands on the periphery of cities or larger towns*”. The guidelines state that “*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*”. The proposed net density of 40 units per hectare is consistent with the aforementioned guidelines.

Given the locational context close to the town centre (c.1.5km), the level of public transport and other services in the area, it is considered that the proposed density is consistent with the aforementioned guidelines.

**Compliance with SH POL 10:** DMURS recommendations have been incorporated into the street and building design of the development and we submit with the application a report called “DMURS Design Statement”, prepared by DBFL Consulting Engineers, which confirms that the proposed development layout has been prepared with careful consideration of optimising connectivity between key local areas through the provision of a high degree of permeability and legibility for all network users and particularly prioritising sustainable forms of travel.

The proposed residential scheme delivers greater modal and route choices along direct, attractive and safe linkages to a range of amenities, public transport nodes and local service destinations as illustrated in the supporting proposed transportation linkages plan (DBFL drawing no. 20059-DBFL-TR-SP-DR-C- 1102) submitted as part of the planning application. The development will be accessed primarily via Cherry Lane which will be upgraded to a signalised junction. The site will have a secondary site access via Hickeys Lane.

The design approach also sought to achieve a high quality ‘sense of place’ by incorporating several open green spaces areas including a large linear park along the northern and southern edges of the development. Appropriately sized blocks, together with filtered permeability delivers an overall street network that is highly permeable, legible and accessible in nature for all road users.

The overall design approach successfully achieves an appropriate balance between the functional requirements of different network users, whilst also providing for an enhanced sense of place. The implementation of a self-regulating street network will actively manage movement by offering real modal and route choices in a low speed, high quality residential environment.

Consequently, the proposed residential development is the outcome of an integrated design approach which will ultimately deliver safe, convenient and attractive networks in addition to promoting real and viable alternatives to car-based journeys.



The adopted design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The implementation of an efficient car parking provision and a high bicycle parking provision actively promotes a modal shift to alternative forms of transport while also creating high-quality open spaces as part of the development. This scheme prioritises pedestrians and cyclists throughout the development. For further detail of compliance with DMURS please refer to submitted documentation prepared by DBFL Consulting Engineers.

**Compliance with SH POL 11:** the proposed buildings have been designed to comply with the requirements of Part L of the Building Regulations. This application is accompanied by a Building Life Cycle Report and a Energy and Sustainability Report – please refer to both documents for details of the energy efficiency of the proposed development.

**Compliance with SH POL 12:** a high quality of design has been applied to the proposed development and details of the character areas and distribution of materials throughout the development are set out in the submitted Architectural Design Statement – please refer to same.

**Compliance with SH POL 13:** the remainder of this Statement of Consistency sets out the proposed development’s compliance with the Development Management Standards of the CDP.

**Compliance with SH OBJ 1 & SH OBJ 3:** the proposed development is located on zoned lands within the settlement boundary of Ashbourne, with the proposed development also catering for the necessary physical and social infrastructure as outlined above that will serve the needs of the local community. The quantum of units proposed to be delivered on the subject site is in accordance with the household allocation for Ashbourne i.e. Table 2.12 “Core Strategy Table, Population and Household distribution to 2027” of the CDP.

**Compliance with SH OBJ 14 & SH OBJ 15:** the proposed development caters for a 10% Social Housing provision with 70 no. dwellings identified as social housing within the overall scheme. The proposed “Part V” units are identified on the enclosed drawing no. D2101.S.11 “Site Layout - Part V” and we also enclose the associated costs for these units.

**Compliance with SH POL 22:** the proposed development has been designed to accord with the SPPRs set out in both the Building Heights Guidelines and the Apartment Guidelines, with full details of this compliance set out in the preceding sections 4.2.2 and 4.2.3 respectively of this Statement of Consistency – please refer to same. The remainder of this Statement of Consistency sets out the proposed development’s compliance with the Development Management Standards of Chapter 11 of the CDP.

## **Sustainable Communities**

3.8.7 “Sustainable Communities” states that *“the creation of a sustainable community can be achieved through well designed buildings and spaces, which promote social interaction, ensure ease of access, and create an open and safe environment”*. The CDP states that it will continue to *“promote the development of sustainable communities by supporting a suitable mix of housing units, services, employment, community facilities, and associated infrastructure in appropriate locations”*. It goes onto state that a *“key element of a sustainable community is the provision of social and recreational amenities. As the population of settlements increase, existing facilities can sometimes struggle with the associated increased demands on these amenities. In order to ensure there is an appropriate provision of such facilities and amenities, it is a requirement of this Plan that a Social Infrastructure Assessment is included with planning applications for the development of 50 units or more. This Assessment will be required to determine whether or not existing social and recreational facilities are sufficient to cater for the needs of the future residents of the development”*.



### **Statement of Consistency:**

This SHD planning application is accompanied by a detailed Social Infrastructure Assessment, in accordance with **SH OBJ 24**, which includes an assessment of factors such as:

- Health & Wellbeing Facilities / Services;
- Childcare Facilities;
- Education - Primary, Post Primary;
- Sports & Recreation - Parks, Playgrounds, Sports Clubs, Fitness Facilities and Recreation; and
- Other Community Services – Centre, Retail, Religion or emergency services.

Notwithstanding the foregoing, the development proposal includes for local mixed uses to serve the new resident community including proposed 4 no. retail units, 2 no. crèches and a GP practice / medical use unit, a wide range of open spaces and play areas, green infrastructure and an urban plaza, in addition to the reserved school site and playing pitch on the G1 lands.

### **Design & Density Criteria for Residential Development**

Section 3.8.9 relates to “Design Criteria for Residential Development” and section 3.8.10 relates to “Densities”, and states that *“applications for new residential developments should strive to create a sense of place by responding positively to local surroundings”* and that *“new developments should include a suitable mixture of house types that will support the creation of a sustainable community”*.

The CDP requires that *“the principles of good urban design should be embraced”* and this *“includes the creation of permeable streets that promote walking and cycling and provide direct and safe routes to adjoining developments and town/village centres in accordance with the principles and recommendations set out in the Design Manual for Urban Roads and Streets (DMURS)”*.

In relation to density, the section 3.8.10 of the CDP states that *“Building at higher densities makes more efficient use of land and allows for a more compact form of development”*. It goes on to state that *“density policy is informed by the Guidelines for Planning Authorities on ‘Sustainable Residential Development in Urban Areas’ (2009) and the National Planning Framework, which supports higher densities in city and town centres”*. This section of the CDP also states that *“in the Self-Sustaining Growth Towns and Self-Sustaining Towns a density of up to 35 units/ha on all lands will normally be required”*.

### **Statement of Consistency:**

The proposed development has a net density of 40 units per hectare which complies with the guidance set out in the 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas. The overall development provides for a wide mix in housing typologies and thus tenure as well as a mix of supporting facilities, and amenities such as local retail uses, childcare facilities, medical use, open spaces and a reserved site for future educational use, all of which are considered appropriate to meet the needs of the entire community.

It is put forward that the proposed development of 702 no. units on lands zoned A1 and A2, which produces a net density of 40 units per hectare and a gross density of 35 units per hectare, accords with Ashbourne’s status as a Self Sustaining Growth Town as set out in the CDP.

The proposed design has taken guidance from both the Urban Design Manual and the Building Heights Guidelines (as set out in the preceding Sections 4.2.1 & 4.2.2). In addition, the roads layout and street hierarchy is based upon the principles of DMURS – as confirmed in the submitted DMURS Design Statement.



## Chapter 7 – Community Building Strategy

### Childcare Facilities & School Site

#### *Childcare Facilities*

Sections 7.7.3.3 and 11.7.3 of the CDP set out the policies and objective in relation to Childcare and Childcare Facilities.

Section 7.7.7.3 states that 2001 Planning Guidelines on Childcare Facilities set out guidance on policies and objectives to be included in the Development Plan in respect of childcare provision. These guidelines identify appropriate locations for childcare facilities including in the vicinity of concentrations of work places, of schools, of neighbourhood, district and town centres etc. It states that “*new childcare facilities, whether in existing or developing areas, should not create a nuisance for the existing and future residents*”, and that “*detailed requirements and standards with childcare development projects are set out in Chapter 11 Development Management Standards*”.

Section 11.7.3 states that there is a continuing demand for suitable high-quality childcare facilities in the County and also sets out the following policies and objectives:

<b>DM POL 25</b>	<i>To facilitate the provision of childcare facilities in appropriate locations as set out in accordance with the provisions of the DoEHLG ‘Childcare Facilities Guidelines for Planning Authorities’ (2001).</i>
<b>DM POL 26</b>	<p><i>Development of childcare facilities at the following locations will normally be encouraged:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Areas of concentrated employment and business parks;</i></li> <li>▪ <i>Within new and existing residential developments;</i></li> <li>▪ <i>Neighbourhood Centres;</i></li> <li>▪ <i>Large retail developments;</i></li> <li>▪ <i>Schools or major educational facilities;</i></li> <li>▪ <i>Adjacent to public transportation; and</i></li> <li>▪ <i>Villages and Rural Nodes.</i></li> <li>▪ </li> </ul>
<b>DM OBJ 68</b>	<p><i>Planning applications for childcare facilities shall be assessed for compliance with the following criteria:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Suitability of the site for the type and size of facility proposed.</i></li> <li>▪ <i>Impact on residential amenity of surrounding residential development;</i></li> <li>▪ <i>Adequate availability of indoor and outdoor play space;</i></li> <li>▪ <i>Convenience to public transport nodes, pedestrian and cycling facilities;</i></li> <li>▪ <i>Local traffic conditions;</i></li> <li>▪ <i>Safe access and sufficient convenient off-street car parking and/or suitable drop-off and collection points for customers and staff;</i></li> </ul> <p>▪ <i>Number of such facilities in the area. In this regard, the applicant shall submit a map showing the locations of childcare facilities within the vicinity of the subject site and demonstrate the need for an additional facility at that location.</i></p>



<b>DM OBJ 69</b>	<p><i>All applications for childcare facilities shall comprehensively set out the following as part of a pre-application discussion and/or planning application proposal:</i></p> <ul style="list-style-type: none"><li>▪ <i>The type of childcare facility proposed – Full day care; sessional service including</i></li><li>▪ <i>playgroups, preschools and Montessori; Child minding;</i></li><li>▪ <i>No. of children;</i></li><li>▪ <i>No. of employees</i></li><li>▪ <i>Proposed hours of operation;</i></li><li>▪ <i>Car-parking provision; (please refer to Section 11.9.1)</i></li><li>▪ <i>Location of secure external play area including secure site boundaries</i></li></ul>
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### **Statement of Consistency:**

The Childcare Facilities Guidelines for Planning Authorities 2001 refer to a benchmark of an average of one facility (with 20 childcare spaces) for 75 houses. The proposed development comprises 702 no. dwellings consisting of 420 no. 2, 3, 4 and 5 bed houses, 38 no. 2 and 3 duplex units and 244 no. 1, 2 and 3 bed apartments. As set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020), 1 bed units should not generally be considered to contribute a requirement for childcare provision. Therefore, excluding the proposed 47 no. 1 bed units, the proposed development comprises 655 no. 2, 3, 4 and 5 bed units which would give a requirement for c. 175 no. childcare spaces based on the standards of the 2001 Guidelines.

The 2001 Guidelines apply a minimum floor space per child of 2.32sq.m, exclusive of kitchen, bathroom and hall, furniture or permanent fixtures. Applying that standard, a childcare facility to serve the proposed development and meeting the requirement for c. 175 childcare spaces would need to be a minimum of c. 406sq.m net floor area.

The proposed development provides for 2 no. childcare facilities as follows:

- Block A – 289m<sup>2</sup>
- Block A1 – 384m<sup>2</sup>
- Total childcare floor space = 673m<sup>2</sup>

Both creches are located at ground floor level with independent access and dedicated play areas (c.269 m<sup>2</sup> combined). The proposed floor area of the combined crèches exceeds the minimum requirement and includes sufficient additional floorspace to accommodate food prep, toilets, sleep room, reception/office, circulation and escape route spaces, furniture and permanent fixtures as required, and cater for 175 no. children.

### ***Social Infrastructure Assessments***

Sections 7.7.2 of the CDP sets out the policies in relation to Social Infrastructure Assessments and states that “it is a requirement of the Council that planning applications for multiple developments (i.e. 50 residential units or greater) be accompanied by a Social Infrastructure Assessment (SIA) undertaken by the developer, to determine if facilities in the area are sufficient to provide for the needs of the future residents (of all age cohorts) and where deficiencies are identified, proposals will be required to either rectify the deficiency (through direct provision or development contributions) or suitably restrict or phase the development in accordance with the capacity of existing or planned services. The assessment should identify membership and non-membership facilities which allow access for all groups. Where facilities are deemed to be required, the type of facility shall be determined by the Planning Authority through the Development Management process”.





The following are the relevant policies in relation to same:

<b>SOC POL 3</b>	<i>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.</i>
<b>SOC POL 5</b>	<i>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.</i>
<b>SOC POL 6</b>	<i>To require that all new residential development applications of 50 units or more on zoned lands are accompanied by a Social Infrastructure Assessment (SIA) to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents (of all age cohorts). This should include details regarding the following essential facilities: Playgrounds, parks and other green spaces, education, childcare, health and others such as shops, banks, post offices, community meeting rooms/centres and recreational facilities. The assessment should identify membership and non-membership facilities which allow access for all groups. Where deficiencies are identified, proposals will be required to accompany the Planning application to address the deficiency. In certain cases however, residential development under these thresholds may, at the discretion of the Planning Authority, require the submission of a SIA.</i>

**Statement of Consistency:**

The proposed development provides for a wide range of open spaces that are interconnected throughout the development and easily accessible to both future residents and the immediate environs outside of the site via the proposed 4m green link, which will lead pedestrians and cyclists from the Dublin Road into the scheme, through the development and onto the local centre and G1 lands that are to accommodate a future school and playing pitch.

The development proposal includes for local mixed uses to serve the new resident community including proposed 4 no. retail units, 2 no. crèches and a GP practice / medical use unit, a wide range of open spaces and play areas, green infrastructure and an urban plaza, in addition to the reserved school site and playing pitch on the G1 lands.

This SHD planning application is accompanied by a detailed Social Infrastructure Assessment (SCIA) which includes an assessment of factors such as:

- Health & Wellbeing Facilities / Services;
- Childcare Facilities;
- Education - Primary, Post Primary, Third Level and Further Education & Training;
- Sports & Recreation - Parks, Playgrounds, Sports Clubs, Fitness Facilities and Recreation; and
- Other Community Services - Social Service or Information Centre, Retail, Religion or emergency services.

The SCIA confirms that the study area that the proposed development is located within is well served by existing social and community infrastructure, and that the future population of the development will be readily supported



by same – please refer to the submitted SCIA for more details.

**Education Facilities**

Section 7.7.3.1 of the CDP states that the Department of Education has identified that Ashbourne is likely to require additional school facilities/ reservation of sites over the plan period, namely a new primary school. The CDP also states that it makes provision for “future educational facilities through the identification and reservation of potential new sites/ sites to accommodate the potential future expansion /relocation of existing facilities. In the identification of sites, consideration needs to be given both to the co-location of childcare provision and the potential use of school facilities by the wider community outside of school hours and during school holidays. Future school provision, within new growth areas specifically, will be planned and implemented in tandem with residential development”.

The following are the relevant policies and objectives in relation to same:

<b>SOC POL 16</b>	<i>To ensure the provision of preschool, primary and post primary education facilities in conjunction with the planning and development of residential areas, maximises opportunities for use of walking, cycling and use of public transport</i>
<b>SOC POL 17</b>	<i>To ensure that adequate lands and services are zoned and reserved to cater for the establishment, improvement or expansion of all educational facilities in the County. The Council also supports the concept of multi-campus educational facilities</i>
<b>SOC OBJ 4</b>	<i>To facilitate the Department of Education, LMETB, other statutory and non-statutory agencies in the necessary provision of preschool, primary, post primary and third level educational facilities throughout the County by reserving lands for such uses.</i>

**Statement of Consistency:**

The proposed development site includes lands that are zoned G1 and within same an area of approx. 1 hectare is proposed to accommodate a school site and a playing pitch should the Department of Education and Skills (DES) require same. The site shall remain reserved until confirmation is received from the DES regarding their need for this site. A copy of this application is being sent to DES in their capacity as a prescribed body. The submitted Architectural Design Statement demonstrates that a 16 classroom primary school can be accommodated on the G1 lands that are within the application site.

**Chapter 8 – Cultural & Natural Heritage**

Section 8.6 refers to Archaeological Heritage and contains the following relevant policies and objectives:

<b>HER POL 1</b>	<i>To protect sites, monuments, places, areas or objects of the following categories:</i> <ul style="list-style-type: none"> <li>• Sites and monuments included in the Sites and Monuments Record as maintained by the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht;</li> <li>• Monuments and places included in the Record of Monuments and Places as established under the National Monuments Acts;</li> <li>• Historic monuments and archaeological areas included in the Register of Historic Monuments as established under the National Monuments Acts;</li> <li>• National monuments subject to Preservation Orders under the National Monuments Acts and national monuments which are in the ownership or guardianship of the Minister for Culture, Heritage and the Gaeltacht or a local authority;</li> </ul>
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	<ul style="list-style-type: none"> <li>• <i>Archaeological objects within the meaning of the National Monuments Acts; and Wrecks protected under the National Monuments Acts or otherwise included in the Shipwreck Inventory maintained by the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht.</i></li> </ul>
<b>HER POL 2</b>	<i>To protect all sites and features of archaeological interest discovered subsequent to the publication of the Record of Monument and Places, in situ (or at a minimum preservation by record) having regard to the advice and recommendations of the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht and The Framework and Principles for the Protection of the Archaeological Heritage (1999).</i>
<b>HER POL 3</b>	<i>To require, as part of the development management process, archaeological impact assessments, geophysical survey, test excavations or monitoring as appropriate, for development in the vicinity of monuments or in areas of archaeological potential. Where there are upstanding remains, a visual impact assessment may be required</i>
<b>HER POL 4</b>	<i>To require, as part of the development management process, archaeological impact assessments, geophysical survey, test excavations or monitoring as appropriate, where development proposals involve ground clearance of more than half a hectare or for linear developments over one kilometre in length; or developments in proximity to areas with a density of known archaeological monuments and history of discovery as identified by a suitably qualified archaeologist.</i>
<b>HER POL 5</b>	<i>To seek guidance from the National Museum of Ireland where an unrecorded archaeological object is discovered, or the National Monuments Service in the case of an unrecorded archaeological site.</i>

**Statement of Consistency:**

There are no known Recorded Monuments on the application site, nor any Protected Structures or ACA's on or in the vicinity of the site.

The application site has been subject to archaeological assessment and testing. The submitted EIAR contains Chapter 12 "Cultural Heritage" which details the impact of the proposed development on archaeology, cultural and architectural heritage. It also includes details of the testing carried out on site as well as recommended mitigation measures, subject to approval from the National Monuments Service – please refer to Chapter 12 of the EIAR for full details.

**Section 8.9 refer to Biodiversity and contains the following relevant policy:**

<b>HER POL 31</b>	<i>To ensure that the ecological impact of all development proposals on habitats and species are appropriately assessed by suitably qualified professional(s) in accordance with best practice guidelines – e.g. the preparation of an Ecological Impact Assessment (EclA), Screening Statement for Appropriate Assessment, Environmental Impact Assessment, Natura Impact Statement (NIS), species surveys etc. (as appropriate).</i>
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**Statement of Consistency:**

The application site does not overlap with any European sites. The nearest European sites are Malahide Estuary SAC and Malahide Estuary SPA, located c.12.6km and c.12.7km east of the site, respectively. The nearest surface water feature to the site, the Fairyhouse Stream is located c.300m south of the site. This stream flows c.3.2km downstream in a south-easterly direction, where it joins with the Broadmeadow River. The Broadmeadow River flows for a further 11.3km downstream where it ultimately discharges into the Malahide Estuary, and subsequently, the European sites therein i.e., Malahide Estuary SAC and Malahide Estuary SPA. Rogerstown Estuary SAC and



Rogerstown Estuary SPA are the only other European sites within c.15km of the Masterplan site, located c.13.1km and c.14km east of the site.

The proposed development has been subject to Appropriate Assessment Screening, and the associated Screening Report, prepared by Scott Cawley Ecologists is submitted as part of the application, which states “*For the reasons set out in detail in this AA Screening Report, a Stage Two Appropriate Assessment of the proposed development is not required in this instance as it can be concluded, on the basis of objective information, that the proposed development, either individually or in combination with other plans or projects, will not have a significant effect on any European sites*”. The submitted AA Screening Report outlines the various surveys undertaken on the subject site which include a habitat survey, fauna surveys, breeding bird surveys and wintering bird surveys. The AA asserts that “*the application for consent for the proposed development does not require a Stage Two Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)*”.

In addition, the submitted EIAR contains a Chapter 4 “Biodiversity” – please also refer to same for further details, which provides an assessment of the potential ecological effects of the proposed development. The purpose of the chapter is to:

- Establish and evaluate the baseline ecological environment, as relevant to the proposed development;
- Identify, describe and assess all potentially significant ecological effects associated with the proposed development;
- Set out the mitigation measures required to address any potentially significant ecological effects and ensure compliance with relevant nature conservation legislation;
- Provide an assessment of the significance of any residual ecological effects;
- Identify any appropriate compensation, enhancement or post-construction monitoring requirements.

We refer the reader to the submitted EIAR and Chapter 4 of same, for details of the assessment of the ecological impact of the proposed development on habitats and species.

**Section 8.9.7 refers to Woodlands, Hedgerows & Trees can contains the following relevant policies:**

<b>HER POL 37</b>	<i>To encourage the retention of hedgerows and other distinctive boundary treatments in rural areas and prevent loss and fragmentation, where practically possible. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, mitigation by provision of the same type of boundary will be required</i>
<b>HER POL 39</b>	<i>To recognise the archaeological importance of townland boundaries including hedgerows and promote their protection and retention.</i>

**Statement of Consistency:**

An arboricultural impact assessment including a tree protection plan, prepared by Arborist Associates, is submitted as part of this planning application. 69 no. of the 185 individually surveyed trees included within the assessment area or 37%, along with c.1,859m of hedging out of a total of c.3,739 linear meters (49.7%) within the sites redline boundary are required to be removed to facilitate the proposed development works or as part of management. The loss of the above tree and hedge vegetation is to be mitigated against within the



landscaping of this completed development with the use of trees, shrubs, herbaceous plants, bulbs and hedging.

The submitted arboricultural impact assessment sets out the main elements of mitigation measures to be applied, including:

- The planting of native hedgerows linking to outward boundary hedgerows being retained.
- Infilling and augmenting of existing hedgerows.
- Developing new compensatory wetland planting and ‘native’ woodland areas where space allows and merging these with the existing hedgerow runs.
- Planting of semi-mature trees, with many flowering varieties which are beneficial for pollinators. (Refer to detailed planting plans provided by the project landscape architects for numbers and species proposed).
- Planting diverse meadow mixes, including naturalized bulb planting and managing key grass area zones as meadows and habitat areas.

The assessment asserts that the proposed planting as part of the landscaping will complement the development and its incorporation into the surrounding area. It will also help to provide good quality and sustainable long-term tree cover and as it establishes and grows in size, it will be continuously mitigating any negative impacts created with the loss of the existing hedgerow and tree vegetation to facilitate the proposed development. This planting will also help strengthen the existing field network of hedgerows and ensure good connectivity through the finished landscaped development.

The submitted EIAR (Chapter 12 “Cultural Heritage”) identifies that the east-west running parish boundary between Ratoath and Donaghmore and townland boundary between Baltrasna and Milltown divides the existing fields that comprise the application site into northern and southern allotments. This townland and parish boundary appears to follow the route of a watercourse used since prehistory. The assessment set out in Chapter 12 recommends that five sections should be excavated through this ditch to further assess whether there is any survival of earlier versions of the ditch elsewhere within the planning boundary, and that a strip 5m in width on either side of the ditch should be monitored under archaeological supervision to assess for additional prehistoric remains along the line of the ditch. The western side of the application site is bounded by the ditch forming the townland boundary between Milltown, Baltrasna, and Killekland. The parish boundary between Killekland and Ratoath also follows this ditch. It is recommended that the places where the proposed development impacts on this ditch should be monitored under archaeological supervision.

## Chapter 11 – Development Management Standards

Chapter 11 of the CDP sets out the Development Management Standards and Land Use Zoning Objectives and is one of the main implementation tools for the Core Strategy.

Section 11.4 sets out the General Development Standards including policies and objectives relating to Energy Efficiency, Access for All, Public Lighting and Trees and Hedgerows.

The following are the relevant policies and objectives:

<b>DM POL 2</b>	<i>Appropriate energy conservation strategies should be employed in location, design, mass, orientation and the choice of materials of all new and renovated developments.</i>
<b>DM OBJ 5</b>	<i>Building design which minimises resource consumption, reduces waste, water and energy use shall be incorporated where possible, in all new and renovated developments.</i>



<b>DM OBJ 6</b>	<i>Building design shall maximise natural ventilation, solar gain and daylight, where possible, all new and renovated developments.</i>
<b>DM OBJ 7</b>	<i>Sustainable Urban Drainage Systems (SuDS) measures are required to form part of the design of all developments.</i>
<b>DM OBJ 8</b>	<i>The Council will seek to encourage the implementation of best practice standards with regard to access in both indoor and outdoor environments.</i>
<b>DM POL 3</b>	<i>All public lighting proposals shall be in accordance with the Councils Public Lighting Technical Specification &amp; Requirements, June 2017, and the Council's Public Lighting Policy, December 2017, (or any updates thereof).</i>
<b>DM OBJ 11</b>	<i>Existing trees and hedgerows of biodiversity and/or amenity value shall be retained, where possible.</i>

**Statement of Consistency:**

The planning application is accompanied by a public lighting plan, as well as an Energy and Sustainability report. The buildings will be fully compliant with Building Regulations in terms of energy efficiency and we refer the reader to the submitted Building Life Cycle report. The proposed engineering, arborist and landscaping reports / proposals have been aligned to incorporate SUDS features as well as the retention of trees and hedgerows where possible.

**Residential Development Standards**

Section 5 outlines the policies and objectives relating specifically to Residential Development Standards and which will provide a framework for the assessment of the proposed development in terms of *inter alia* Urban Design (section 11.5.2), Density (section 11.5.3), Separation Distances (section 11.5.7), Dwelling Design, Size & Mix (section 11.5.8) etc.

**Section 11.5.2 Urban Design** – requires that design of development must demonstrate compliance with relevant National, Regional and Local planning policy while promoting best practice in architectural design incorporating the principles of sustainability, energy efficiency and accessibility. Development proposals shall demonstrate compliance with the key principles of good urban design are set out in the Urban Design Manual.

<b>DM POL 4</b>	<i>To require that all proposals for residential development demonstrate compliance with the Sustainable Residential Development in Urban Areas - Cities, Towns &amp; Villages (2009) and the Urban Design Manual-A Best Practice Guide, 2009 or any updates thereof.</i>
<b>DM OBJ 12</b>	<i>To encourage and facilitate innovative design solutions for medium to high density residential schemes where substantial compliance with normal development management considerations can be demonstrated.</i>
<b>DM OBJ 13</b>	<i>A detailed Design Statement shall accompany all planning applications for residential development on sites in excess of 0.2 hectares or for more than 10 residential units. The Design Statement shall:</i> <ul style="list-style-type: none"> <li>▪ <i>Provide a Site Analysis</i></li> <li>▪ <i>Outline the design concept;</i></li> </ul>



	<ul style="list-style-type: none"> <li>▪ <i>Clearly demonstrate how the 12 Urban Design Criteria have been taken into account when designing schemes in urban area (as per the 'Urban Design Manual - A Best Practice Guide (2009)');</i></li> <li>▪ <i>Set out how the development meets the relevant Development Plan Objectives, Local Area Plan, Masterplan, Public Realm Strategy, etc;</i></li> <li>▪ <i>Provide site photographs;</i></li> <li>▪ <i>Provide an open space/landscape strategy which identifies any areas of ecological interest and sets out proposals for same; and</i></li> <li>▪ <i>• Set out how energy efficiency measures have been incorporated into the project design process (Refer to DM POL 2).</i></li> </ul>
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**Statement of Consistency:**

The project architects Davey-Smith has prepared the submitted Architectural Design Statement which (a) sets out how urban design principles have been applied to the development proposal and (b) is in compliance with the aforementioned policy and objective of the Plan.

The preceding section 4.2.1 of this Statement of Consistency provides details of the proposed development's compliance with the Sustainable Residential Development in Urban Areas Guidelines and its accompanying Urban Design Manual and its 12 urban design criteria – please refer to same.

**Section 11.5.2 “Density”** requires that the number of units to be provided on a site should be determined with reference to the Guidelines for Planning Authorities on ‘Sustainable Residential Development in Urban Areas’ (2009) or any update thereof.

It is the **policy** of the Council:

<b>DM POL 5</b>	<i>To promote sustainable development, a range of densities appropriate to the scale of settlement, site location, availability of public transport and community facilities including open space will be encouraged.</i>
<b>DM OBJ 14</b>	<p><i>The following densities shall be encouraged when considering planning applications for residential development:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Residential Development Beside Rail Stations: 50 uph or above</i></li> <li>▪ <i>Regional Growth Centres/Key Towns: (Navan/Drogheda) - 35-45 uph</i></li> <li>▪ <i>Self-Sustaining Growth Towns: (Dunboyne, <b>Ashbourne</b>, Trim, Kells): greater than 35uph</i></li> <li>▪ <i>Self-Sustaining Towns: 25uph - 35uph</i></li> <li>▪ <i>Smaller Towns and Villages: 25uph - 35 uph</i></li> <li>▪ <i>Outer locations: 15uph – 25uph</i></li> </ul>

The CDP also states that *“it should be noted that SPPR 1 of the Urban Development and Building Heights Guidelines for Planning Authorities December 2018 shall be considered in the implementation of the above densities”*.

**Statement of Consistency:**

The CDP identifies Ashbourne under the settlement typology of “Self-Sustaining Growth Town”. In addition, it is considered that the subject site can also be described as an Outer Suburban / Greenfield Site and complies with



section 5.11 of the Guidelines for Planning Authorities on ‘Sustainable Residential Development in Urban Areas’, which define such sites as “as open lands on the periphery of cities or larger towns”. The guidelines state that “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”.

The proposed net density of 40 units per hectare is therefore consistent with the aforementioned guidelines as well as DM OBJ 14 which requires a densities of greater than 35 units per hectare.

Given the locational context close to the town centre (c.1.5km), the level of public transport and other services in the area, it is considered that the proposed density is is consistent with the aforementioned guidelines.

**Section 11.5.4 “Plot Ratio” & 11.5.5 “Site Coverage”**

<b>DM POL 15</b>	<i>As a general rule, the indicative maximum plot ratio standard shall be 1.0 for housing at edge of town locations with an indicative maximum plot ratio of 2.0 in town centre/core locations.</i>
<b>DM OBJ 16</b>	<i>Site coverage shall generally not exceed 80%. Higher site coverage may be permissible in certain limited circumstances such as adjacent to public transport corridors; to facilitate areas identified for regeneration purposes; and areas where an appropriate mix of both residential and commercial uses is proposed.</i>

**Statement of Consistency:**

The proposed development has total floor area of 79,807.76m<sup>2</sup> (including the non-residential uses) and based upon a total red line of application area of 20.04Ha the resultant plot ratio is 0.40, which is well below the indicative maximum plot ratio.

The proposed site coverage is 41%.

**Section 11.5.7 “Separation Distances” - It is an objective of the Council:**

<b>DM OBJ 18</b>	<i>A minimum of 22 metres separation between directly opposing rear windows at first floor level in the case of detached, semi- detached, terraced units shall generally be observed.</i>
<b>DM OBJ 19</b>	<i>A minimum of 22 metres separation distance between opposing windows will apply in the case of apartments/duplex units up to three storeys in height.</i>
<b>DM OBJ 20</b>	<i>Any residential development proposal which exceeds three or more storeys in height shall demonstrate adequate separation distances having regard to layout, size and design between blocks to ensure privacy and protection of residential amenity.</i>
<b>DM OBJ 21</b>	<i>A minimum distance of 2.3 metres shall be provided between dwellings for the full length of the flanks in all developments of detached, semi-detached and end of terrace houses</i>





**Statement of Consistency:**

The required minimum separation distance of 22m between first floor rear opposing windows has been catered for as part of the proposed development. In excess of 2.3m is provided between dwellings for the full length of the flanks for detached, semi-detached and end of terrace houses. All of the aforementioned can be clearly identified on the enclosed proposed site layout plan (drawing no. S.05 & S.06).

The proposed development includes 20 no. apartment buildings that range in height from 2 storeys up to a max height of 6 storeys, which are sufficiently set back from neighbouring properties so as to avoid any perceived negative overlooking / privacy impacts.

**Section 11.5.8 “Dwelling Design, Size & Mix”** - All residential schemes are to have an appropriate mix of housing typologies and unit sizes to support the provision of a variety of household types and tenures that accord with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.

Housing with long term adaptability and potential for flexibility allows for change as circumstances alter or families grow. Contemporary designs are welcomed and will be assessed having regard to the context of the site. All applications for residential development shall include a phasing plan.

It is the policy of the Council:

<b>DM POL 6</b>	<i>To require that the unit typologies proposed provide a sufficient unit mix which addresses wider demographic and household formation trends. The design statement required at DM OBJ 13 shall set out how the proposed scheme is compliant with same.</i>
<b>DM OBJ 22</b>	<i>The design of any housing scheme shall have regard to the requirement for connectivity between residential areas, community facilities etc. The design of any walkways, lanes or paths connecting housing estates or within housing estates shall be of sufficient width to allow for the safe movement of pedestrians and cyclists. They shall be adequately overlooked and lit and not be excessive in length.</i>
<b>DM OBJ 23</b>	<i>To require that all applications for residential development shall be accompanied by a detailed phasing plan which demonstrates the early delivery of key infrastructure associated with that scheme.</i>
<b>DM OBJ 24</b>	<i>To require the provision of EV charging points to serve residential development.</i>

**Statement of Consistency:**

The proposed development provides for houses, duplexes and apartments of varying sizes and typology, catering for a variety of household formations. Details of the mix of unit types is set out in section 6.8 of the accompanying planning statement. In the enclosed “Architectural Design Statement” details of the design and materiality of the dwellings are set out.

Distinct character areas are proposed, each with a distinct architectural quality, with all units proposed to be built of traditional long term durable materials. The house type layouts are designed to allow for adaptation according to the future needs of the owners. They include wide frontage units which maximise light, views and ventilation and allows extension to rear without distancing the centre of the house from natural light. A number of the units



have the potential for a ground floor rear extension to provide additional living space. Units can extend into the rear gardens without impacting on the character of the streets. Internal walls are lightweight partition walls which could facilitate internal alterations in the future and allows for adaption and subdivision. The development includes a range of own door single level unit types for improved accessibility. These units could be reconfigured with additional accessibility measures to cater for the elderly or occupants with disabilities. A number of house types can easily convert their attic space with the corresponding roof height and fenestration proposed as part of this application for permission.

The site layout plan has been designed in compliance with the principles of DMURS as confirmed by the enclosed DMURS Design Statement prepared by DBFL Consulting Engineers. Electrical Vehicle (EV) charging points will be provided for whereby the necessary infrastructure for the installation of EV charging points will be provided for all parking spaces. Prospective house purchasers will be offered as an optional extra, the provision of an external socket to ensure the appropriate hardware system for connection is available to suit various types of vehicles. EV parking for apartments will be provided at a rate of 20% of the spaces. Section 6.22 of the enclosed planning statement sets out details of the proposed phasing of the development, which is also illustrated on the submitted drawing no. D2101.S.10 "Overall Site Layout - Phasing Map".

### Open Space & Boundary Treatments

Section 11.5.10 "Open Space" - Public open space within residential developments should be designed so as to complement the residential layout and be informally supervised by residents. A variety of types and sizes of open spaces should be provided at suitable locations to cater for the active and passive recreational needs of children and adults of all ages.

The following are the relevant policies and objectives of the Council:

<b>DM OBJ 26</b>	<i>Public open space shall be provided for residential development at a minimum rate of 15% of total site area. In all cases lands zoned F1 Open Space, G1 Community Infrastructure and H1 High Amenity cannot be included as part of the 15%. Each residential development proposal shall be accompanied by a statement setting out how the scheme complies with this requirement.</i>
<b>DM POL 7</b>	<i>Residential development shall provide private open space Apartment schemes shall in accordance with the requirements set out in Table 11.1. Each residential development proposal shall be accompanied by a statement setting out how the scheme complies with the requirements set out in Table 11.1.</i>

Section 11.5.12 "Private Open Space" requires that all houses should have an appropriate and useable area of private open space, exclusive of car parking, to the rear of the front building line. The minimum area of private open space to be provided is set out in Table 11.1 (see copy below). Housing developments which provide private open space at the minimum standard throughout the scheme will be discouraged



House Type	Minimum Area of Private Open Space to be Provided
One/two bedroom	55sq.m.
Three Bedroom	60sq.m.
Four bedrooms or more	75sq.m.

Table 11.1 – Minimum Private Open Space Standards for Houses

Section 11.5.13 “Boundary Treatments” requires the following:

<b>DM POL 8</b>	<i>To require the provision of high quality, durable, appropriately designed and secure boundary treatments in all developments</i>
<b>DM POL 9</b>	<i>To support the retention of field boundaries for their ecological/habitat significance, as demonstrated by a suitably qualified professional. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, mitigation by provision of the same boundary type will be required.</i>
<b>DM OBJ 28</b>	<i>To require that boundaries between the rear of existing and proposed dwellings shall be a minimum of 1.8 metres high and shall be constructed as capped, rendered concrete block or brick walls, to ensure privacy, security and permanency. Alternative durable materials will be considered</i>
<b>DM OBJ 29</b>	<i>To require that all rear boundaries within the development shall be a minimum of 1.8 metres high and shall be constructed as capped, rendered concrete block or brick walls, to ensure privacy, security and permanency. Alternative durable materials will be considered.</i>
<b>DM OBJ 30</b>	<i>Open plan front gardens will generally be discouraged and will only be acceptable in innovative layouts and where a high level of safety is achieved and services can be accommodated at a location which meets the needs of service providers. Open plan gardens will not be permitted on main access roads. In general, front boundaries shall be defined by walls or fences at least 0.5 metres high in keeping with the house design and to a uniform scheme design.</i>
<b>DM OBJ 31</b>	<i>In the case of residential development where the layout does not provide for front boundaries, there will be a general prohibition against the erection of front boundaries.</i>
<b>DM OBJ 32</b>	<i>To encourage the use of measures specifically designed to enhance wildlife in residential schemes such as gaps/holes, should be considered and incorporated into boundary treatments to allow for passage of all wildlife including hedgehogs, bat boxes and swift bricks/boxes.</i>

**Statement of Consistency:**

Public open space is provided for across a number of spaces within the overall development. Running in an almost north-south direction, an interlinked necklace of spaces is provided through the centre of the scheme catering for play and green infrastructure etc. A total of 28,885sq.m (2.88Ha) of public open space is catered for which equates to over 15% of the site area (i.e. A1 & A2 zoned lands). In line with the architect’s design approach to creating individual character areas within the scheme, the proposed landscaping strategy also



caters for the landscape character of each area.

A playing pitch will be delivered on the G1 lands in the future once the location of the school is determined. It is envisaged that this pitch will be c. 2,000sq.m, and it will be in addition to the 15+% open space proposed on the A2 zoned lands, which also includes a MUGA.

Private open space for the proposed houses is in the form of rear gardens, with the houses all afforded the adequate quantum of private open space i.e. 55sq.m for 2 beds, 60sq.m for 3 beds and 75sq.m for 4+ beds. The area of the proposed rear gardens ensures the 22m separation distance from first floor opposing windows where necessary.

Private open space for the apartments is in the form of private terraces/patios at ground floor level with balconies overhead, all of which exceed the relevant standards. In addition for the apartments, dedicated semi-private/communal spaces of c. over 3,180sq.m are proposed, that will be for the benefit of these units only and will be privately managed, as a management company will be established for the long term maintenance of the apartments.

Trees and hedgerows are to be retained as much as possible to enhance wildlife and biodiversity, which will take into account the passage of wildlife including bat boxes etc.

The project landscape architects Cunnane Stratton Reynolds have prepared the submitted drawing no. 21659-3-105 “Boundary Treatments” which illustrates the proposed boundary treatments throughout the development, consisting of:

- 1-2m high brick pier with cap and rendered wall in between where boundaries to properties address the public realm;
- 400mm high dwarf wall with 600mm high estate railing – mostly provided at the wide frontage properties and where boundaries to properties address the public realm;
- 1.8m high fair faced pointed block work wall – predominantly provided as rear boundary treatments for houses
- 1.2m high play area railing enclosing public play areas
- 2m textured concrete panel fence with retained boundary hedges cut back, provided as rear boundary treatments.

## Apartments

Section 11.7.15 “Apartments” of the CDP sets out the following policies and objectives in relation to apartment development:

<b>DM POL 12</b>	<i>Apartment schemes shall generally be encouraged in appropriate, sustainable, locations, accessible to public transport in the following settlements: Drogheda, Navan, Dunboyne, Kilcock, Maynooth, Ashbourne and Dunshaughlin.</i>
<b>DM POL 13</b>	<i>In towns and villages, there will be a general presumption against apartment developments however there are opportunities for infill developments and consolidation which would contribute to the regeneration of these settlements.</i>
<b>DM POL 14</b>	<i>All planning applications for apartments are required to demonstrate compliance with ‘Sustainable Urban Housing; Design Standards for New Apartments’, Guidelines for Planning Authorities (2018) and any updates thereof. While these Guidelines set out minimum design standards, the Council strongly encourage the provision of</i>



	<i>apartments above these standards, in the interest of creating attractive living environments and sustainable communities</i>
<b>DM OBJ 39</b>	<p><i>An appropriate mix of units shall be provided to cater for a variety of household types and tenures. Apartment development proposals will be assessed having regard to the following requirements:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Aspect-dual aspect units are encouraged;</i></li> <li>▪ <i>Mix of units- to cater for different size households;</i></li> <li>▪ <i>Floor areas and room widths;</i></li> <li>▪ <i>Private and communal amenity space;</i></li> <li>▪ <i>Floor to ceiling height;</i></li> <li>▪ <i>Car and bicycle parking;</i></li> <li>▪ <i>EV Charging points;</i></li> <li>▪ <i>Lift/ stair core access;</i></li> <li>▪ <i>Storage provision;</i></li> <li>▪ <i>Adaptability.</i></li> </ul> <p><i>All planning applications for apartment development shall be accompanied by a statement which sets out how the scheme complies with this objective.</i></p>
<b>DM OBJ 40</b>	<i>A Design Statement is required to be submitted with any planning application for apartment development</i>

**Statement of Consistency:**

The proposed development provides for 38 no. 2 & 3 bed duplex units in 19 no. blocks, and 244 no. 1, 2 & 3 bed apartments accommodated across 20 no. buildings.

The proposed apartments have been designed to comply with the standards of the ‘Sustainable Urban Housing; Design Standards for New Apartments’, Guidelines for Planning Authorities (2020), while the provision of these unit types within the proposed development accords with the objectives of the National Planning Framework including *inter alia* the increasing demand to cater for one and two person households and that a wide range of different housing needs will be required in the future, along with National Policy Objective 35: “*Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights*”.

A Housing Quality Assessment (HQA) is submitted as part of this application to demonstrate compliance of the proposed apartments with the aforementioned guidelines – please refer to this stand alone document.

The subject proposal is accompanied by an Architectural Design Statement prepared by the project architects Davey-Smith – please refer to same.

**Waste Management**

Section 11.7.25 “Waste Management” states that “*regard should be had to the number of individual bins required to serve each residential unit at design stage and in particular the requirement for segregating waste for recycling and food waste*”.

It is the policy and objective of the Council:



<b>DM POL 16</b>	<i>All new residential schemes shall include appropriately sited and designed secure refuse storage areas, details of which shall be clearly shown in pre-application discussion and planning application documentation.</i>
<b>DM OBJ 52</b>	<i>In residential schemes, appropriately sized bin storage areas must be provided to the front of terraced dwellings in locations which are easily accessible by the householder. These areas shall be well screened and the design shall integrate with the dwelling.</i>
<b>DM OBJ 53</b>	<i>Apartment schemes shall make provision for waste segregation and recycling. Bin storage shall generally be on the ground floor level of development, be adequately ventilated, screened from public view and adjacent to the block it serves. Where appropriate, the bin storage area shall be a separate structure to the apartment building.</i>
<b>DM OBJ 54</b>	<i>Shared bin storage areas shall be located conveniently for residents and collection service providers with appropriate security measures</i>

**Statement of Consistency:**

A Resource & Waste Management Plan is submitted with this application – please refer to Volume III of the submitted EIA and Appendix 11.1 of same for detail, while Appendix 11.2 provides an Operational Waste Management Plan for the proposed development.

All of the proposed houses are designed to adequately accommodate bins within the curtilage of the property.

Bin storage for the apartments is in the form of individual stores which are easily accessible. Dedicated bin stores / storage areas for the apartments / duplex units are catered for as part of the proposed development. Refer to the submitted relevant plans for details.

**Childcare**

Section 11.9.2 “Childcare” of the CDP states that there is a continuing demand for suitable high quality childcare facilities in the County. Applicants are encouraged to seek the advice and support of the County’s Childcare Committee, Tulsa, HSE and other relevant bodies in the design and layout of proposed childcare facilities prior to the submission of a planning application.

Section 11.7.3 of the CDP sets out the following policies and objectives in relation to childcare:

<b>DM POL 25</b>	<i>To facilitate the provision of childcare facilities in appropriate locations as set out in accordance with the provisions of the DoEHLG ‘Childcare Facilities Guidelines for Planning Authorities’ (2001).</i>
<b>DM POL 26</b>	<p><i>Development of childcare facilities at the following locations will normally be encouraged:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Areas of concentrated employment and business parks;</i></li> <li>▪ <i>Within new and existing residential developments;</i></li> <li>▪ <i>Neighbourhood Centres;</i></li> <li>▪ <i>Large retail developments;</i></li> <li>▪ <i>Schools or major educational facilities;</i></li> <li>▪ <i>Adjacent to public transportation; and</i></li> <li>▪ <i>Villages and Rural Nodes.</i></li> </ul>



<b>DM OBJ 68</b>	<p><i>Planning applications for childcare facilities shall be assessed for compliance with the following criteria:</i></p> <ul style="list-style-type: none"><li>▪ <i>Suitability of the site for the type and size of facility proposed.</i></li><li>▪ <i>Impact on residential amenity of surrounding residential development;</i></li><li>▪ <i>Adequate availability of indoor and outdoor play space;</i></li><li>▪ <i>Convenience to public transport nodes, pedestrian and cycling facilities;</i></li><li>▪ <i>Local traffic conditions;</i></li><li>▪ <i>Safe access and sufficient convenient off-street car parking and/or suitable drop-off and collection points for customers and staff;</i></li><li>▪ <i>Number of such facilities in the area. In this regard, the applicant shall submit a map showing the locations of childcare facilities within the vicinity of the subject site and demonstrate the need for an additional facility at that location</i></li></ul>
<b>DM OBJ 69</b>	<p><i>All applications for childcare facilities shall comprehensively set out the following as part of a pre-application discussion and/or planning application proposal:</i></p> <ul style="list-style-type: none"><li>▪ <i>The type of childcare facility proposed – Full day care; sessional service including playgroups, preschools and Montessori; Child minding;</i></li><li>▪ <i>No. of children;</i></li><li>▪ <i>No. of employees</i></li><li>▪ <i>Proposed hours of operation;</i></li><li>▪ <i>Car-parking provision; (please refer to Section 11.9.1)</i></li><li>▪ <i>Location of secure external play area including secure site boundaries</i></li></ul>
<b>DM OBJ 70</b>	<p><i>In the case of proposals within an existing dwelling the Council will consider whether there is sufficient private open space remaining for the enjoyment of the occupant of the dwelling. The potential impact on the residential amenities of adjoining residences will also be considered. In such cases a significant residential component shall be retained.</i></p>

**Statement of Consistency:**

The proposed development includes 2 no. creches, a 289sq.m crèche facility located within Block A and a 384sq.m crèche facility located within Block A1, which combined cater for 175 no. children (63 no. spaces in Block A and 110 in Block A1).

The proposed development comprises 702 no. dwellings consisting of 420 no. 2, 3 and 4 bed houses, 39 no. duplex units and 244 no. 1, 2 and 3 bed apartments. Therefore, based upon the aforementioned housing mix, the proposed development has a requirement for c. 187 no. childcare spaces based on the standards of the 2001 Childcare Facilities Guidelines. However, if the 47 no. 1 bed units are discounted on the basis that such units would not generate a childcare requirement, it would result in the development requiring a childcare facility to cater for 175 no. childcare spaces.

The 2001 Guidelines apply a minimum floor space per child of 2.32sq.m, exclusive of kitchen, bathroom and hall, furniture or permanent fixtures. Applying that standard a childcare facility to serve the proposed development and meeting the requirement for c. 175 no. childcare spaces would need to be c. 406sq.m net floor area. The proposed development provides for 2 no. creches with a combined floor area of 673sq.m which is in excess of the required minimum of 406sq.m.



Both creches are located at ground floor level with independent access and dedicated play areas. The proposed floor area of the combined crèches exceeds the minimum requirement and includes sufficient additional floorspace to accommodate food prep, toilets, sleep room, reception/office, circulation and escape route spaces, furniture and permanent fixtures as required, and cater for 175 no. children.

### Parking & EV Charging Points

Sections 11.9.1 and 11.9.2 provide details of parking standards and EV charging points respectively.

The CDP acknowledges that *“the provision of sufficient car parking is important particularly in areas of the County which are currently poorly served by public transport networks. Therefore, the rationale for the application of car parking standards is to ensure that consideration is given to the accommodation of vehicles in assessing development proposals while being mindful of the need to promote a shift towards more sustainable forms of transport”*.

It is the objective of the Council:

<b>DM OBJ 89</b>	<i>Car parking shall be provided in accordance with Table 11.2 and associated guidance notes.</i>
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Land Use	Car Spaces
Dwellings	2 per conventional dwelling
Flats/ Apartments (Refer to the Design Standards for New Apartments in relation to reduced car parking requirements for development adjacent to existing and future rail stations and minimum requirements in peripheral/or less accessible urban locations)	2 per unit In all cases, 1 visitor space per 4 apartments
Food Retail	1 per 20 sq.m. gross floor area. Where the floor area exceeds 1,000 sq.m. gross floor area, 1 space per 14 sq.m. gross floor area. *Provision should be made for taxi drop off spaces.
Non-Food Retail	1 per 20 sq.m. gross floor area.
Crèches	1 per employee & dedicated set down area and 1 per 4 children plus dedicated set down area
Surgeries	2 per consulting room

Extract from Table 11.2 “Car Parking” of Development Plan





<p><b>DM OBJ 89</b></p>	<p><i>Car parking shall be provided in accordance with Table 11.2 and associated guidance notes</i></p>
<p><b>DM OBJ 93</b></p>	<p><i>New residential development should take account of the following regarding car parking:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Vehicular parking for detached and semi-detached housing should be within the curtilage of the house;</i></li> <li>▪ <i>Vehicular parking for apartments, where appropriate, should generally be at basement level. Where this is not possible, parking for apartments and terraced housing should be in small scale informal groups overlooked by residential units;</i></li> <li>▪ <i>The visual impact of large areas of parking should be reduced by the use of screen planting, low walls and the use of different textured or coloured paving for car parking bays;</i></li> <li>▪ <i>Consideration needs to be given to parking for visitors and people with disabilities; and</i></li> <li>▪ <i>Provision of EV Charging points.</i></li> </ul>

**Statement of Consistency:**

Car parking is provided for in the form of surface level parking, basement and undercroft parking. Section 4.3 of the submitted Traffic & Transport Assessment (TTA) outlines the proposed car parking provision – please refer to same for details.

Car parking is provided for in accordance with the standards of the Development Plan (i.e. Section 11.9 & Table 11.2), which also states that “Refer to the Design Standards for New Apartments in relation to reduced car parking requirements for development adjacent to existing and future rail stations and minimum requirements in peripheral/or less accessible urban locations”. In accordance with these guidelines, the subject development site is located within an “Peripheral Urban Location”.

The proposed development caters for a total of 1,262 no. car parking spaces, including visitor car parking, to serve 702 no. residential units and the non-residential uses.

For the non-residential uses in Blocks A, A1 and B1, it is proposed to provide 39 no. car parking spaces.

For the 702 no. dwellings, a total of 1,223 no. car parking spaces are proposed as part of the development, with 1,122 spaces for permanent residents and 101 no. visitor spaces.

In terms of the 420 no. houses, a total of 840 no. car parking spaces are proposed, the majority of which are in the form of in-curtilage spaces, in accordance with DM OBJ 93 which states that vehicular parking for detached and semi-detached housing should be within the curtilage of the house. Where this has not been achieved, dedicated on-street, car parking, in close proximity to the individual dwellings is provided for with the dedicated car parking spaces numbered on the submitted site layout plan to correspond with the relevant dwelling.

In terms of the Apartments/Duplexes, a total of 383 no. spaces are proposed, comprising 282 no. resident and 101 no. visitor spaces. The residential car parking is provided at a ratio of 1.36 spaces per apartment unit (1 space for residents, 0.36 spaces for visitors), a reduced quantum from the MCC requirements of 2 spaces per unit. This reduced provision is in accordance with the DHPLG requirement, “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”.



The proposed allocation of spaces is as follows:

- 840 no. car parking spaces for the housing units;
- 383 no. car parking spaces for the apartment/duplex units (282 no. resident spaces and 101 no. visitor spaces) including:
  - 22 no. Accessible/Mobility Impaired Parking spaces;
  - 2 no. GoCar spaces;
  - 84 no. Electric Vehicle spaces.

Refer to the submitted architects drawings and Fig,s 5.1 to 5.4 of section 5 of the submitted TTA to identify the location of EV spaces and mobility impaired spaces provided in the basement and undercroft car parks as well as the location of the proposed 2 no. GoCar spaces within the development.

On-street car parking will be broken up by hard and soft landscaping proposals.

Section 5 of the TTA also details the strategy for non-residential car parking provision within the scheme – please refer to same. It is considered that in accordance with DM OBJ 89 and the guidance note associated with Table 11.2 which states “*Non-residential car parking standards are set down as “maxima” standards*” that it is important to recognise the proposed development’s proximity to the town centre and the likelihood of cross visitation when assessing the proposed development and thus the demand for car parking associated with the non-residential uses. 39 no. spaces are allocated to cater for the proposed non-residential uses – details of which are set out in Table 4.4 of the TTA.

### Electric Vehicle Parking

A total of 20% of the development’s car parking provision will be provided with the necessary wiring and ducting to be capable of accommodating future Electric Vehicle charging points. This is equivalent to 84 no. spaces and is compliant with the CDP standards. Also, 10 no. fully functional charging points for Electric Vehicles will be provided which exceeds the minimum requirement of the CDP.

Further detail on the proposed car parking facilities and management regime is provided in the “Parking Management Strategy” (Section 5) of the submitted TTA – please refer to same.

### Cycling Parking

Section 11.9.3 “Cycling Parking” states that the Council will require an appropriate amount of cycle parking facilities to be provided with new development.

The following area the relevant objectives of the Council:

<b>DM OBJ 96</b>	<i>To require the provision of cycle parking facilities in accordance with the Design Standards for New Apartments (March 2018) and Table 11.4 Cycle Parking Standards.</i>
<b>DM OBJ 97</b>	<i>Cycle parking facilities shall be conveniently located, secure, easy to use, adequately lit and well sign posted. All long-term (more than three hours) cycle racks shall be protected from the weather</i>
<b>DM OBJ 99</b>	<i>In residential developments without private gardens or wholly dependent on balconies for private open space, covered secure bicycle stands should be provided in private communal areas</i>



Type of Development	Cycle Parking Standard
Apartments	1 private secure bicycle space per bed space (note – design should not require bicycle access via living area), minimum 2 spaces 1 visitor bicycle space per two housing units
Shops	1 space for every 10 car spaces or 1 space per till/checkout, whichever is greater
Other developments	1 bike space per car space, or 10% of employee numbers in general

Extract from Table 11.4 “Cycle Parking Standards” of Development Plan

**Statement of Consistency:**

**Bicycle parking**

Please refer to section 4.4 “Cycle Parking” of the TTA for full details regarding the allocation and provision of bicycle parking for the proposed development.

For the proposed 420 no. houses, dedicated cycle parking for the housing units with private gardens are not required, with bicycle parking to be accommodated within the curtilage of the individual properties.

For the 282 no. proposed apartments and duplex units, 817 no. cycle parking spaces are being provided, comprised of 610 spaces dedicated to residents and 207 no. visitor parking spaces, which exceeds CDP requirements (751 no.), and exceeding Apartment Guidelines standard (704 no.).

The non-residential uses will benefit from 52 no. spaces, higher than CDP requirement (25 no.).

**Masterplans**

Section 11.15 of the CDP refers to Masterplans and lists the masterplans within each settlement in the county. There are 38 masterplans in total with four no. masterplans identified for Ashbourne.

Settlement	Ref. No.	Address / Location
Ashbourne	MP18	Milltown, south of Ashbourne, off the N2.
Ashbourne	MP19	Rath, to north of Ashbourne, off the N2
Ashbourne	MP20	Donaghmore/Milltown, south of Ashbourne, west of the N2 & north of the R125
Ashbourne	MP21	Future public park lands

The application site is subject to Masterplan MP18.



## **Statement of Consistency:**

A Masterplan has been prepared for the subject lands, which has been agreed with Meath County Council and is submitted as part the planning application documentation. The proposed development has followed the design principles set out in the agreed Masterplan.

### **Written Statement for Ashbourne**

Volume 2 of the Meath County Development Plan 2021-2027 sets out the Written Statement for Ashbourne and in this regard the following sections are relevant:

#### **Section 2.0 – Town Context / Character**

Ashbourne is the second largest town in Meath and had a population of almost 13,000 in 2016. It is strategically located along the southern boundary of the County adjacent to Fingal with excellent transport links to Dublin Airport and City Centre. The town also benefits from local connectivity with Ratoath, Dunboyne and Dunshaughlin via the regional road network.

Ashbourne is an important centre for retail, services and employment providing jobs and services to a wide catchment population in the south of the County. Employment is concentrated in the northern part of the town where there is a cluster of Business and Industrial Parks that host a broad range of businesses including manufacturing, engineering, construction, and wholesale retail operations. The town centre is also an important location for employment, providing jobs in the retail and professional services sectors.

In addition to its function as an employment and service centre, Ashbourne is also a commuter settlement for the Dublin Region.

In response to the strong population growth additional services and facilities including a new Town Centre and Education Campus have been developed. It is recognised that additional community and recreational facilities are required.

Notwithstanding Ashbourne's key assets, the settlement is not multi-modal. This continues to inhibit the town's ability to realise its potential as a fully sustainable growth town transitioning to Metropolitan status.

#### **Section 3.0 – Vision**

The stated vision for Ashbourne is: *“For Ashbourne to develop as a vibrant, modern and integrated town around a strong employment and service centre, where future growth builds upon the town's expansion and investment to support a sustainable, diverse and attractive settlement”.*

#### **Section 5.0 – Land Use Strategy**

##### **Section 5.1 - Settlement and Housing**

Ashbourne is an attractive settlement that has experienced significant growth over the past decade due to its proximity to Dublin Airport and City Centre. There are a broad mix of house types and residential developments in the town that meet the needs of the growing population. Whilst in the past residential development has preceded community facilities, there has been recent investment in social and community facilities in the town including a new school campus and public library which has assisted in creating a more balanced and sustainable community. As the population grows further expansion of facilities will be required.

Residential growth in the town remains strong, with a number of large development sites in the town recently



completed or close to completion. These include Churchfields, Archerstown Demesne, Crenigans Banog, and Milltown Meadows. Alongside the development of these greenfield sites, there has also been an emphasis on compact growth with development recently completed on a number of infill sites including The Oaks and Walfre Lodge.

At the time of writing there were c.200 unbuilt extant units in Ashbourne. It is anticipated that these will be completed within the lifetime of this Plan.

The growth of Ashbourne will continue to be based around principles of compact, sustainable neighbourhoods that include a suitable mix of housing that meets the needs of people of all ages in locations within walking distance of services and facilities.

### **Section 5.6 - Movement**

The successful integration of land use and transport is essential for the sustainable growth of the town. As part of the strategy of supporting the integration of land use and transport planning the RSES requires the preparation of a Local Transport Plan for Ashbourne. This Plan is to be prepared in conjunction with the National Transport Authority and will assist in the identification of measures to reduce the need to travel, improve the efficiency of public transport, promote walking and cycling, and reduce dependence on the private car as the primary mode of transport.

The attractive urban form and compact nature of Ashbourne has helped to foster a strong walking and cycling mode share which is further supplemented by a number of frequent bus services offering good connections to Dublin and neighbouring towns. The town also benefits from its close proximity to the M2 transport corridor.

Building upon the strong active mode share in Ashbourne, opportunities exist to improve permeability within the town centre and introduce pedestrian and cycle upgrades on key corridors linking residential lands to the town centre.

In addition to improving access to bus services, consideration must also be given to the possibility of providing a rail link to Ashbourne in the long term. As part of the reappraisal of Phase II of the Navan Rail Project it is considered that there is an opportunity to examine the potential of including a spur from this rail line to Ashbourne (via Ratoath). It is an objective of this Plan to engage with Irish Rail and the National Transport Authority to examine the feasibility of providing this rail link.

### **Section 5.8 - Green Infrastructure and Open Space**

Green Infrastructure is the network of green spaces, habitats, and ecosystems that intersperse towns and villages. It includes open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage, and the open countryside. The purpose of identifying green infrastructure is to ensure a co-ordinated approach is taken to the management of this infrastructure that would be mutually beneficial to people and local ecosystems and habitats.

This Plan provides an opportunity to enhance the provision of green infrastructure in Ashbourne through the progression of the Linear Park. The first phase of the Linear Park, which included the delivery of a new play space, construction of an amphitheatre, and the installation of a pedestrian footbridge which provides a direct link to the town centre, was completed in 2019. The future public park, to the south east of the town centre easily accessible for the population which will be advanced during this Plan, will supplement the open spaces in the Linear Park and will provide further facilities and recreational areas for residents.



## Section 5.9 - Social Infrastructure

The completion of the Education Campus has been a considerable success and will ensure that residents of the town can avail of high-quality and accessible educational facilities. There is an opportunity to improve connectivity from the residential lands to the east to the campus along the Linear Park.

The town is well-served by sports clubs and other community facilities however is lacking a public park that is accessible to the entire community. In order to strengthen the community in Ashbourne and to make the town a more attractive place to live it is an objective of this Plan to prepare a Master Plan for the delivery of a public park. This space would be a gathering place for families and various groups and organisations, and would be an important resource in promoting an active and healthy lifestyle. A F1 Open Space zoning has been included to the southwest of the town centre to provide for a public park.

## Section 6.0 – Masterplans

There are 4 Master Plan areas identified in Ashbourne. The purpose of a Master Plan is to ensure an integrated approach is taken to the phasing, management, and development of lands within the Master Plan Area. A planning application will not be considered in the absence of the Master Plan being agreed in writing with the Executive of the Planning Authority.

Master Plan	Description	Status
<b>Master Plan 18</b>	Master Plan 18 relates to the lands at Milltown to the south of Ashbourne and has an area of c.19.9 hectares. It is intended that these lands shall provide a primary school site, lands for recreational uses, including playing fields, and lands for residential development. The development of the lands shall be on a phased basis to be agreed as part of the preparation of the Master Plan.	Awaiting Preparation

## Section 7.0 – Town Development Policies and Objectives

The following CDP policies and objectives are specific to Ashbourne:

<b>ASH POL 1</b>	<i>To support the consolidation of development of Ashbourne which facilitates the provision of residential development and employment, retail, community, and recreational facilities in order to create a more compact and self-sufficient settlement.</i>
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### Settlement and Housing

<b>ASH OBJ 1</b>	<i>To secure the implementation of the Core Strategy of the County Development Plan, in so far as is practicable, by ensuring the household allocation for Ashbourne as set out in Table 2.12 of the Core Strategy is not exceeded.</i>
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## Movement

<b>ASH OBJ 13</b>	<i>To examine the feasibility of a new junction on the R135 that could serve development lands on Hickeys Lane and facilitate a new access to Ashbourne Community College, in consultation with all relevant stakeholders.</i>
<b>ASH OBJ 19</b>	<i>To ensure that access to all zoned lands are provided for and that no zoned land becomes landlocked.</i>

## Social Infrastructure

<b>ASH OBJ 21</b>	<i>To facilitate the development of a primary school, in association with the department of Education, on suitably located lands that would meet the educational requirements of the future population of Ashbourne.</i>
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## Urban Design and Public Realm

<b>ASH OBJ 24</b>	<i>To support the utilisation of sustainable principles in the design, planning and development of residential schemes throughout the town.</i>
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### Statement of Consistency:

**Compliance with ASH POL 1:** Ashbourne is the second largest town in County Meath and the subject lands are predominantly zoned for residential land use, along with community infrastructure use. The proposed uses within the development are of a local scale to serve the needs of the new community in Milltown whilst also providing local services to the existing neighbouring community. The lands reserved to accommodate a future school and playing pitch will provide for a more self-sufficient settlement.

**Compliance with ASH OBJ 2:** The subject lands will cater for an increase in housing stock in line with and adhering to the Core Strategy figures for household allocation in Ashbourne and not exceeding same.

**Compliance with ASH OBJ 13 & ASH OBJ 19:** The proposed development will be accessed off the Dublin Road (R135), catering for vehicular, pedestrian and cyclist connections onto same. At the junction of Cherry Lane and the Dublin Road a new signalised junction will be provided which will facilitate the new proposed east-west link street that will traverse the lands, thus providing future access to the large tract of land the west which will create opportunities in the future for increased connectivity and permeability and will prevent land-locking.

**Compliance with ASH OBJ 21:** The proposed development is reserving the G1 zoned lands within the application site in order to facilitate the delivery of a school site and playing pitch in the western part of the site, adjacent to lands zoned open space and to master plan 21, and this is considered to supplement the neighbouring open space use and provide further facilities and recreational areas for residents.

**Compliance with ASH OBJ 24:** A masterplan has been prepared for the subject lands in accordance with Master Plan 18 that caters for the provision of a primary school site, lands for recreational uses, including playing fields, and lands for residential development. Details of the proposed phasing of the overall development of the subject site are set out in section 6.19 of the accompanying Planning Statement – please refer to same. In addition, an Architectural Design Statement, prepared by the project architects Davey-Smith, is submitted as



part of this application which demonstrates the principles of good design that have been applied to the proposed development.





## 5.0 Conclusion

This Statement of Consistency demonstrates the full compliance of the proposed development with the relevant national, regional and local planning policy context. Where the proposed development does not fully comply with the requirements of the Development Plan and/or Local Area Plan, these instances are highlighted and addressed in the submitted Material Contravention Statement. The proposed development is consistent with national policy and is generally consistent with the policies and objectives of the Meath County Development Plan. The proposed development will result in a very attractive place to live, on zoned serviced lands in close proximity to local services.

At a national and regional level, this statement has demonstrated the compliance of the development with the following:

- Project Ireland 2040 - National Planning Framework (2018);
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);
- Housing for All – a New Housing Plan for Ireland (2021);
- Eastern & Midland Regional Assembly - Regional Spatial & Economic Strategy (2019);
- Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, and its companion document Urban Design Manual – A best practice guide, (2009);
- Urban Development and Building Heights Guidelines for Planning Authorities, (2018);
- Sustainable Urban Housing: Design Standards for New Apartments, (2020);
- Quality Housing for Sustainable Communities - Best Practice Guidelines, (2007);
- Guidelines for Planning Authorities for Child Care Facilities, (2001);
- Irish Design Manual for Urban Roads and Streets, (2019);
- The Planning System and Flood Risk Management Guidelines for Planning Authorities, (2009);
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, (2009);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018).

At local level, this statement has demonstrated the compliance of the development with the following, statutorily adopted Plan for the administrative area within which the subject site is located:

- Meath County Development Plan 2021-2027 and Volume 2 of same which includes the Written Statement for Ashbourne

It is therefore put forward that the proposed development will provide an appropriate form of high quality residential and associated mixed use development for the subject lands which are zoned for new residential and community infrastructure lands uses, providing for an efficient use of lands in close proximity to the town centre of Ashbourne.

The design and layout of the proposed development has been prepared following pre-planning consultation with the Planning Authority and An Bord Pleanála. In conclusion, it is submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.

