



**ARMSTRONG  
FENTON**  
ASSOCIATES

**PROJECT:** Strategic Housing Development

**PLANNING STATEMENT** for proposed residential development at The Steeples Road / Longford Road, Duleek, Co. Meath.

**CLIENT:** DSPL Ltd

**DATE:** April 2022

**Planning &  
Development  
Consultants**



<b>TABLE OF CONTENTS</b>		<b>PAGE</b>
1.0	Introduction	3
2.0	Site Location & Description	4
3.0	Pre-planning Consultation	5
4.0	Planning History & Context	9
5.0	Proposed Development	11
6.0	Physical Infrastructure	22
7.0	Part V Proposal	25
8.0	Protected Structures	25
9.0	Likely Significant Effects on the Environment	25
10.0	Archaeology	26
11.0	Appropriate Assessment Screening	27
12.0	Ecological Assessment	28
13.0	Conclusion	29



## **1.0 Introduction**

### **1.1 Purpose of Statement**

This Planning Statement has been prepared on behalf of DSPL Ltd (the Applicant) to accompany drawings and details put forward as part of a planning application to An Bord Pleanála for Strategic Housing Development on lands located at the Longford Road / The Steeples Road, in the townland of Commons, Duleek, Co. Meath.

The proposed development comprises a Strategic Housing Development as defined within Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016. The Planning Statement has been prepared in accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2001 (as amended).

The purpose of this Planning Statement is to provide background information on the site, a description of the proposed development and the required Statements of Consistency to support the proposal. This Planning Statement along with an accompanying Statement of Consistency should be read in conjunction with the drawings, technical reports and documents listed within the enclosed Cover Letter by Armstrong Fenton Associates.

### **1.2 Accompanying Documents**

Section 8(1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016 provides that the applicant is to submit a statement setting out how the proposal will be consistent with the objectives of the relevant development plan or local area plan. In accordance with same, we also submit a Statement of Consistency of the proposed development in the townland of Commons, Duleek, Co. Meath with local and national planning policy - please refer to this separate, enclosed document / report.

The application is also supported by a comprehensive range of additional planning documentation including for, inter alia:

- Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion
- Social & Community Infrastructure Assessment

All of these planning documents have been prepared by Armstrong Fenton Associates and accompany the application as separate standalone documents.

In addition, the application is also supported by a comprehensive range of drawings and technical reports prepared by the various disciplines of applicant's design team. A full schedule of all supporting documentation, drawings and details, submitted as part of the application can be found in the cover letter prepared by Armstrong Fenton Associates which is submitted with the application.

This Planning Statement should be read in conjunction with all the supporting drawings, documentation and details submitted with the application.



### 1.3 Application Distribution

In accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2017, the application has been distributed as follows:

- **An Bord Pleanála** - 2 no. printed copies & 3 no. digital copies submitted (on USB sticks)
- **Meath County Council** - 6 no. printed copies & 1 no. digital copy submitted (on USB stick)

Furthermore, An Bord Pleanála's Notice of Pre-Application Consultation Opinion directed the applicant send copies of the application to 3 no. prescribed bodies as follows:

1. Minister for Culture, Heritage and the Gaeltacht (archaeology)
2. Irish Water
3. Meath County Childcare Committee

Prior to the submission of the application, each of the above-named prescribed bodies were contacted directly and asked if, given the Covid-19 pandemic and associated working restrictions related to same, if 1 no. digital copy only of the application would be sufficient for their assessment of the application. It should be noted that each of the prescribed bodies have been sent a softcopy of the application only (i.e. usb) as well an email link to the dedicated website set up for this application at [www.steeplestown.ie](http://www.steeplestown.ie)

## 2.0 Site Location and Description

**2.1** The subject site is a greenfield site which fronts onto the Longford Road/Steeple Road, a local road providing access to the centre of Duleek, Co Meath. The site is located within the settlement boundary of Duleek, in the townland of Commons. It has mature hedging around the entire perimeter of the site and is accessed via an agricultural entrance directly from Longford Road/Steeple Road to the front of the site. A residential estate to the north of the site, known as Stoneyford Green, consists of traditional two storey semi-detached dwellings and a row of detached dwellings that front onto and are accessed directly from Longford Road/Steeple Road. A number of detached bungalows set on large sites are positioned along the east and south of the site, access to two of these residences is from the Longford Road/Steeple Road and from Larrix Street for the other two. Directly opposite, on the other side of Longford Road/Steeple Road is another residential estate known as The Steeples which also has individual detached dwellings that are accessed directly from Longford Road/Steeple Road.

**2.2** The site comprises three large agricultural fields, no longer in productive use, having been deep ploughed and the vegetation allowed to grow unhindered. The proposed application site has a total area of 4.8Ha. For the most part the site is level, with a very slight rise north westwards towards Stoneyford Green housing estate. The site has road frontage along its western boundary. Laneways bound the north and southern boundaries. The northern laneway, apparently known as 'Julia Dunnes Lane', would have traditionally linked the Longford Road with Larrix Street.

**2.3** The southern laneway is actually two separate laneways. The first, known as 'Kennel Lane' provides access to two bungalows and an agricultural field; it is surfaced with gravel and well maintained. The second is a gated laneway and provides access to a single property, it is surfaced with tarmac and also well maintained. The general character of the area is defined by relatively recent single storey and two storey detached and semi-detached houses, with a small number of older single storey buildings along Larrix Street.



Fig. 1 – Subject site identified & outlined by the solid red line

### 3.0 Pre-planning Consultation

#### 3.1 Section 247 Pre-planning Consultation

A Section 247 pre-planning meeting took place with Meath County Council (hereafter MCC) on 22<sup>nd</sup> July 2021.

The proposed development was discussed in detail at this meeting with the applicant's agents represented, as well as representatives of MCC's Planning, Drainage and Roads Departments. Feedback from this pre-planning meeting is incorporated into the design and layout of the proposed development.

This meeting addressed issues related to the previous SHD application (Ref. ABP-307240-20) which was granted by An Bord Pleanála. Based upon the feedback received from Meath County Council which is incorporated into the design and layout of the proposed development, the subject proposal is now put forward for permission.

#### 3.2. Pre-Application Consultation with An Bord Pleanála

A tri-partite Pre-Application Consultation with An Bord Pleanála, under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016, was held online via Microsoft Teams on 1<sup>st</sup> December 2021. This meeting was chaired by Stephen O'Sullivan of An Bord Pleanála. The case reference for this meeting is ABP-311683-21.

The main topics for discussion at the tri-partite meeting related to the Core Strategy and proposed density of development, connectivity to adjoining lands and permeability, as well as traffic and transport issues.



### 3.3. An Bord Pleanála's Pre-Application Consultation Opinion

The An Bord Pleanála's Notice of Pre-Application Consultation Opinion (hereafter the 'Opinion') was received on 15<sup>th</sup> December 2021 under Case Reference ABP-311683-21.

Enclosed with the application is a separate document prepared by Armstrong Fenton Associates entitled '*Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion*'. This document fully addresses all of the matters raised in the Opinion – for full details please refer to same. For convenience, a summary of the matters raised in the Opinion is outlined as follows:

The Opinion identifies four items of additional specific information that are to be submitted with any application for permission, which area as follows:

- 1) *Notwithstanding that the proposal constitutes a reasonable basis for an application the prospective applicant is advised to address the following in the documents submitted:*
  - a) *Further consideration and/or justification of the documents as they relate to the proposed density for the site. The proposed development shall have regard to the requirement for the efficient use of lands as prescribed in the Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities and Objective DM OBJ 14 of the Meath County Development Plan 2021-2027, where densities of 25uph - 35uph are required in Duleek.*
  - b) *Further consideration and/or justification of documents for the provision of high-quality design strategy to ensure sufficient permeability into adjoining lands and ensure the level differences and boundary treatment along the east of the site will not impact the amenity of the existing residents of properties along the east. The documents submitted shall include cross sections of all existing and proposed levels/ gradient, in particular along the boundary with adjoining sites to the east and other documentation necessary to clearly demonstrate appropriate permeability to adjoining lands, having regard to the requirements of Design Manual for Urban Roads and Streets and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities.*
- 2) *A Taking in Charge Map.*
- 3) *A report prepared by a suitably qualified and competent person demonstrating specific compliance with the requirements set out in the Design Manual for Urban Roads and Streets, in particular the provision of a road hierarchy and compliance with section 4.4.3, and the National Cycle Manual, as well as a map illustrating pedestrian, cycle and vehicular links through and off the site.*
- 4) *A detailed landscaping plan clearly illustrating the quantum and functionality of all areas designated for communal and public open space. The landscaping details shall include, inter alia, designated communal open space, the inclusion of useable space for play provision necessary to comply with Section 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities and the design, a detailed tree survey and proposed tree planting scheme and shall clearly indicate the quantum and designated areas of useable public open space.*

Please refer to the separate submitted report titled "Statement of Response to An Bord Pleanála's Pre-Application Consultation Opinion Ref. ABP-311683-21" for full details of the applicant's response to the four items above. The following is a summary of same:



Item No.	Item Requested	Method of Response
<p>1(a)</p> <p>1(b)</p>	<p><i>Further consideration and/or justification of the documents as they relate to the proposed density for the site. The proposed development shall have regard to the requirement for the efficient use of lands as prescribed in the Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities and Objective DM OBJ 14 of the Meath County Development Plan 2021-2027, where densities of 25uph - 35uph are required in Duleek.</i></p> <p><i>Further consideration and/or justification of documents for the provision of high-quality design strategy to ensure sufficient permeability into adjoining lands and ensure the level differences and boundary treatment along the east of the site will not impact the amenity of the existing residents of properties along the east. The documents submitted shall include cross sections of all existing and proposed levels/gradient, in particular along the boundary with adjoining sites to the east and other documentation necessary to clearly demonstrate appropriate permeability to adjoining lands, having regard to the requirements of Design Manual for Urban Roads and Streets and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities.</i></p>	<p>The proposed development has been revised to provide a net density of 30 units per hectare in accordance with DM OBJ 14 of the Meath County Development Plan and the recommended density set out in the Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities.</p> <p>Details of the proposed boundary treatments and level differences between the subject site and adjoining properties and lane to the east are detailed and illustrated on the submitted site sections drawing (no.s 6204-P-012 &amp; 6204-P-400) and landscaping boundary masterplan drawing (drawing no. 02). The proposed development provides for pedestrian &amp; cyclist connectivity to the adjoining lanes to the north &amp; east.</p>
<p>2</p>	<p>A Taking in Charge Map.</p>	<p>Refer to the submitted drawing no. 6204-P-005 "Taken in Charge drawing" prepared by BDK architects.</p>
<p>3</p>	<p><i>A report prepared by a suitably qualified and competent person demonstrating specific compliance with the requirements set out in the Design Manual for Urban Roads and Streets, in particular the provision of a road hierarchy and compliance with section 4.4.3, and the National Cycle Manual, as well as a map illustrating pedestrian, cycle and vehicular links through and off the site</i></p>	<p>Please refer to the submitted report prepared by Punch Consulting Engineers which is titled "Movement &amp; Connectivity" which details the proposed development's compliance with:</p> <ul style="list-style-type: none"> <li>▪ Design Manual for Urban Roads and Streets (DMURS), 2019;</li> <li>▪ The National Cycle Manual, 2011;</li> <li>▪ Meath County Development Plan 2021-2027.</li> </ul>
<p>4</p>	<p><i>A detailed landscaping plan clearly illustrating the quantum and functionality of all areas designated for communal and public open space. The landscaping details shall include, inter alia, designated communal open space, the inclusion of useable space for play provision necessary to comply with Section 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities and the design, a detailed tree survey and proposed tree planting scheme and shall clearly indicate the quantum and designated areas of useable public open space.</i></p>	<p>Please refer to the enclosed drawings &amp; rationale prepared by the consultant Landscape Architects, RMDA.</p>



**3.4** The Opinion also directed the applicant send copies of the application to 3 no. prescribed bodies as follows:

1. Minister for Culture, Heritage and the Gaeltacht (archaeology)
2. Irish Water
3. Meath County Childcare Committee

Each of these prescribed bodies has been provided with a copy of the application as required.

**3.5** It is considered that the application now submitted to An Bord Pleanála for assessment appropriately addresses all the issues raised at the pre-application consultations, and in the Opinion, and contains all of the requested items of specific additional information as appropriate. Having regard to relevant national, regional, and local planning policy, the zoning objective attached to the site, the contextual location of the site, the development now put forward for permission is considered to represent a sustainable development and efficient use of an underutilised site zoned for new residential development.



## 4.0 Planning History & Context

### 4.1 Context

Set out below is a synopsis of the planning history attached to the site. However, it is also prudent to note the current planning context applicable to the site, which is also detailed in the accompanying Statement of Consistency.

The proposed development site is zoned objective A2 – New Residential: *“To provide for new residential communities with ancillary community facilities, neighbourhood facilities as considered appropriate under 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.*

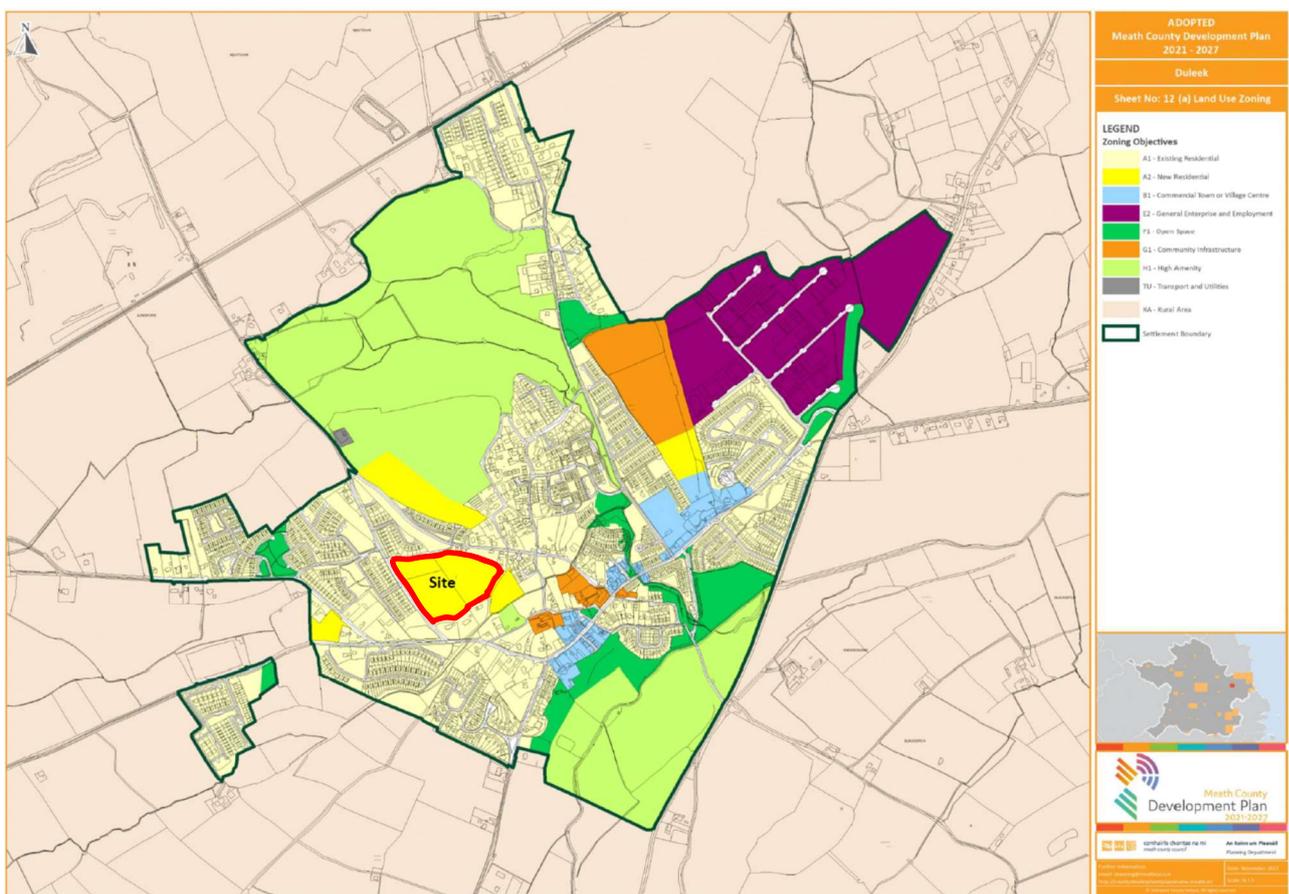


Fig. 2 – Meath County Development Plan Land Use Zoning Map for Duleek – site outlined in red

Chapter 11 of the CDP states that under the A2 zoning *“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”*. Therefore, the proposed residential development with associated creche is compliant with the A2 land use zoning objective attached to the site.



#### **4.2 Ref.s SA/802333 & SA/140396**

Approximately half of the subject site, i.e. 3.41ha, fronting onto the Longford Road / Steeples Road, previously had the benefit of planning permission for 70 no. dwellings, under Ref. SA/802333, which was granted permission on 02/06/2009. The duration of this permission was extended under Ref. SA/140396 and expired on 16/12/2018.

Under the 2013-2019 Meath County Development Plan, the subject site, while zoned objective A2 for new residential communities in its entirety, was evaluated in the Development Plan in terms of the release of lands for residential development in Duleek. The western portion of the lands, which were permitted for development under Ref. SA/140396, were ranked the second best in Duleek and identified as being developed as part of Phase 1 of the lifetime of the current Plan. At the time of the making of the 2013-2019 Plan, the western portion of the site was subject to an extant permission for 70 no. dwellings. Given it's zoned status, planning history and locational context in terms of proximity to the town centre, the proposal to develop the lands in their entirety have been considered in the past to be appropriate.

#### **4.2 Ref. ABP-307240-20**

On 19<sup>th</sup> August 2020, An Bord Pleanála issued an order to grant permission for a Strategic Housing Development on the subject site under Ref. ABP-307240-20. The development consisted of 167 no. dwellings and a 2 storey creche (415sq.m) on a site area of 4.8Ha. The residential dwellings will be comprised of 93 no. 2 storey houses and 74 no. duplex units & apartments accommodated in 5 no. 3 storey blocks. The proposed development consists of 8 no. 3 & 4 bed detached houses, 38 no. 3 & 4 bed semi-detached houses, 47 no. 3 & 4 bed terraced houses, and 74 no. 1 & 2 bed ground floor apartments with 3 bed duplex units overhead. The proposed development provides for all associated site development works, including the provision of a roadside footpath and cyclepath along The Steeples Road, 2 no. ESB sub-stations, car parking, bin & bicycle storage, public open spaces, hard and soft landscaping, boundary treatments and public lighting. Access to the development was to be via one new vehicular entrance off The Steeples Road.

**4.3** Given the planning history attached to the site, as well as the current A2 "New Residential" land use zoning objective attached to the site, it is considered that the principle of development of this site remains acceptable.



## 5.0 Proposed Development

**5.1** Our client, DSPL Ltd wishes to apply to An Bord Pleanála for permission for a strategic housing development on a site area of 4.8ha located at Longford Road / The Steeples Road, Duleek, Co. Meath in the townland of Commons. To the north-west of the site is the Stoneyford Green residential estate, to the west, on the opposite side of Longford Road / The Steeples Road, is The Steeples residential estate, with Larrix Mews / Kennel Lane to the east/south-east.

**5.2** The proposed development will consist of 141 no. dwellings and a 2 storey creche (415sq.m). The residential dwellings will be comprised of 131 no. 2 storey houses and 10 no. 1 bed apartments accommodated 4 no. 2 storey buildings. The proposed houses consist of 4 no. 4 bed detached houses, 18 no. 3 & 4 bed semi-detached houses, 102 no. 3 & 4 bed terraced houses and 7 no. 2 bed terraced houses.

**5.3** The proposed development also provides for all associated site development works, including the provision of a roadside footpath and cyclepath along Longford Road / The Steeples Road, sub-stations, car parking, bin & bicycle storage, public open space (c. 0.74Ha) & communal open spaces (c.770sq.m), hard and soft landscaping, boundary treatments and public lighting. Access to the development will be via one new vehicular entrance off Longford Road / The Steeples Road, with pedestrian / cyclist access provided along the northern & eastern boundaries.

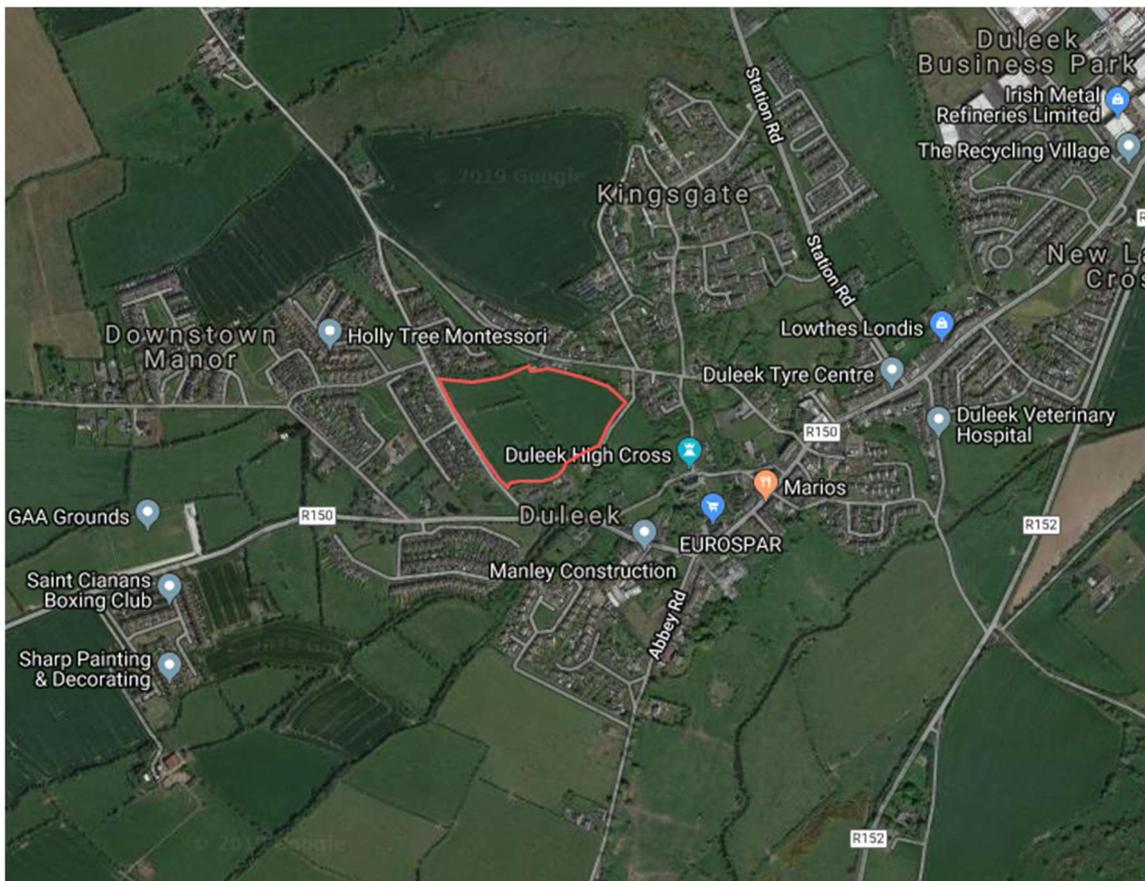


Fig. 3 – Proposed development site outlined in red (Extract from Google Maps)

**5.4** We enclose an Architectural Design Rationale prepared by BKD Architects, which sets out the design rationale of the proposed development and how the principles of urban design have been applied to proposed layout and building typologies.



**5.5** As can be seen from the enclosed site layout plan, the proposed development responds to its context by creating a strong street edge with new buildings fronting directly onto the Longford Road / Steeples Road and by providing units with back gardens along all sensitive boundaries within the site. The key focal point to the development is a central parkland with housing overlooking it to provide active surveillance.



**Fig. 4 – Proposed Site Layout Plan**

**5.6** The proposed site layout plan illustrates that a pedestrian connection is to be provided for at the north-eastern most corner of the site to facilitate access to the town via Larrix Mews and onto Larrix Street by the adjoining laneway and to create permeability through the site. Please refer to the enclosed site layout plan (drawing no. 6204-P-003) and to drawing no. 6204-P-501 “Future Pedestrian Access Ramp No. 3 – Details” which illustrates how pedestrian/cyclist connectivity is to be delivered from the development onto Larrix Mews.

**5.7** Similarly, the north-western boundary of the application site abuts a lane (apparently known as ‘Julia Dunnes Lane’) that is situated between the subject site and the Stoneyford Green residential development to the north-west. The enclosed site layout plan (drawing no. 6204-P-003) and drawing no. 6204-P-500 “Future Pedestrian Access Ramps No. 1 & 2 – Details” illustrate that two pedestrian / cyclist connection points are to be facilitated from the proposed development at the end of Roads 1 and 2 (adjacent to the proposed apartments units no.s 58-61 and 95-96) onto the north-western laneway abutting the site.

### **5.8 Character Areas**

The development is divided into two character areas each with a distinct architectural quality. These areas define recognizable neighbourhoods within the overall development which assist in wayfinding and create a sense of place in each instance. For the purpose of DMURS and general site accessibility the scheme provides for future access to routes through the site to adjoining lands, thus creating pedestrian and cyclist connections to the town by the adjoining laneways and allow permeability through the site, from the northwest boundary to the northeast corner.



### 5.8.1 Character Area 1 - The Steeples Road and the entrance to the development

Along the Steeples Road a new street edge is formed with two storey housing units fronting west. The main access point to the development is located within this street elevation and is defined by dual fronted corner units overlooking a landscaped strip either side of the roadway.

The primary material along this street elevation will be a cream coloured buff brick with small areas of self coloured render for visual interest and variation. Gable pitch roofs are introduced along the elevation in pairs and at the ends of terraces to break the eaves line and additional visual interest. This material palette is continued to the houses fronting onto Road 2 facing northeast, parallel to the Longford / Steeples Road. Each end unit provide side entrances for passive surveillance, by overlooking pedestrian and potential access points from Steeples Road to the site.

This colour brick is broken at the main entrance to the scheme where the units at the entrance form a high quality gateway on arrival at the development. The primary material facing street side here will be a red coloured brick which corresponds to character area 02. This connects the parkland to the main entrance, provides relief along the Longford Road / Steeples Road and helps define the entrance. In addition, the location of entrance doors and certain opes on the elevations will be defined and enhanced by the addition of light coloured render surrounds.



Fig. 5 – Proposed Character Area 1



## 5.8.2 Character Area 2 – Public Open Space

The heart of the development is the central park which will include a play ground and extensive landscaping. This space will become the focus of the development and an important amenity for the local residents and the residents of the surrounding area.

Two storey semi-detached houses overlook this space, providing active supervision and enclosing the space. The rear gardens back onto and secure a number of existing properties along the site boundary. All exposed corner units are proposed to have side entrances encouraging passive surveillance to functional areas and possible future site access points.

The central park proposes east/west and north/south pedestrian routes through the parkland which can encourage connections through the development to the adjoining lanes, in turn providing alternative pedestrian and cyclist routes into Duleek through the development.

Character Area 2 proposes the use of a vibrant, light coloured brick with a red tone and areas of self finished render. Houses fronting onto the park are given a rhythm by terraces bookended with gable pitched roofs or semi-detached pairs of gable pitched roofs, in a variety of unit types with a brick or rendered finish. Corner and end of street units have been designed with side windows or side entrances assisting with passive surveillance of adjoining spaces.



Fig. 6 – Proposed Character Area 2



## 5.9 Housing Mix

The proposed development for 141 no. dwellings provides for a mix of dwelling types comprised of:

- 4 no. detached houses (3%);
- 18 no. semi-detached houses (13%);
- 109 no. terraced houses (77%);
- 10 no. apartments (7%).

A mix of 1, 2, 3 and 4 bedroom dwellings are proposed and details of same are set out in Tables 1 - 4 over, with a full schedule of accommodation provided for in the enclosed Housing Quality Assessment prepared by BKD Architects.



Fig. 7 – Proposed Site Layout Plan & Housing Mix



**Proposed Houses:**

House Type	Description	No. of Units	Floor Area (m <sup>2</sup> )	Total Floor Area (m <sup>2</sup> )
A1	3 bed end of terrace	26	110	2,860
A2	3 bed mid terrace	65	110	7,150
A3	3 bed end of terrace	3	111	333
B1	3 bed semi-detached	4	109	436
C1	3 bed semi-detached	2	115	230
C2	3 bed semi-detached	2	115	230
D1	4 bed detached	2	132	264
D2	4 bed semi-detached	2	132	264
E1	4 bed semi-detached/end of terrace	15	117	1,755
E2	4 bed semi-detached	1	117	117
F1	4 bed detached	1	120	120
F2	4 bed detached	1	122	122
G1	2 bed end of terrace	2	91	182
G2	2 bed end of terrace	5	91	455
<b>Total</b>		<b>131</b>	<b>-</b>	<b>14,518m<sup>2</sup></b>

**Table 1: Proposed House Types**

House Type	2 bed	3 bed	4 bed	Total
<b>No. of Units</b>	7	102	22	<b>131</b>
<b>% Mix</b>	5%	78%	17%	<b>100%</b>

**Table 2: Total Proposed House Type Mix**

**Proposed Apartments:**

Unit Type	Description	No. of Units	Floor Area (m <sup>2</sup> )	Total Floor Area (m <sup>2</sup> )
H	1 bed / 2 person apartment	5	61	305
H1	1 bed / 2 person apartment	5	59	295
<b>Total</b>		<b>10</b>	<b>-</b>	<b>600m<sup>2</sup></b>

**Table 3: Proposed Apartments**



Dwelling Type	1 bed	2 bed	3 bed	4 bed	Total
Houses	0	7	102	22	131
Apartments	10	0	0	0	10
<b>Total</b>	<b>10</b>	<b>7</b>	<b>102</b>	<b>22</b>	<b>141</b>
<b>% Mix</b>	<b>7%</b>	<b>5%</b>	<b>72%</b>	<b>16%</b>	<b>100%</b>

**Table 4: Overall Proposed Dwelling Mix**

It is put forward that the current proposal provides for apartments and houses of varying size and type. The proposed mix of dwelling types is dispersed throughout the site to create a compact urban layout at an efficient density. In accordance with the National Planning Framework, which recognises the increasing demand to cater for one and two person households, a mix of 1 bed apartments and 2 bed houses are catered for, equating to 12% of the overall proposed unit types.

In designing the current proposal, regard has also been had to the locational context of the site as a greenfield site in Duleek, which can be described as falling into the Small Towns and Villages category as per the Guidelines on Sustainable Residential Development in Urban Areas (2009). Furthermore, the 2021-2027 CDP identifies Duleek as a “Self-Sustaining Town”.

### **5.10 Ancillary Services / Other Proposed Uses**

Non-residential uses within the current application comprise a proposed crèche facility of 415m<sup>2</sup> which is located at the junction of Roads 3 and 4 (in south-east corner of the site).

The proposed development comprises 141 no. dwellings consisting of 131 no. 2, 3 and 4 bed houses, and 10 no. 1 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 10 no. 1 bed units, the proposed development comprises 131 no. 2, 3 and 4 bed units which would give a requirement for c. 35 no. childcare places based on the standards of the Childcare Facilities Guidelines for Planning Authorities (2001).

The development provides a purpose built, standalone crèche of c. 415sq.m, located in the south-eastern part of the site, at the junction of Roads 3 and 4, and overlooking the large area of public open space, with an associated dedicated external play area to the rear (162m<sup>2</sup>) and a first floor outdoor play terrace of 82.8m<sup>2</sup>. The proposed crèche is also afforded 18 no. dedicated car parking spaces and 20 no. bicycle parking spaces in accordance with Tables 11.1 and 11.2 respectively of the CDP. The proposed floor area of the crèche exceeds the minimum requirement and includes sufficient additional floorspace to accommodate food prep area, toilets, sleep room, reception/office, circulation and escape route spaces, furniture and permanent fixtures as required, and caters for 45 no. children at a minimum, as well as an additional multi-purpose room. Details of the proposed crèche are set out on the enclosed BKD drawing no.s 6204-P-300, 301 & 302 – please refer to same.

The development also includes for all associated site development works including car parking, landscaping and open spaces and piped and wired services, sub-stations, all on an overall site area of approximately 4.8ha.



### 5.11 Gross Floor Space

The proposed residential accommodation comprises a total of 29,384sq.m gross floor area. The proposed non-residential elements comprise a crèche of 370sq.m. The total gross floor area proposed is 29,754sq.m.

- Residential floor space – 15,118m<sup>2</sup>;
- Crèche – 415m<sup>2</sup>;
- Total floor area – 15,533m<sup>2</sup>.

### 5.12 Plot Ratio

The proposed development has total floor area of 15,533sq.m (including the crèche) and based upon the gross site area of 48,000m<sup>2</sup>, produces a plot ratio of 0.32. If the net developable area is considered only (i.e. omitting all areas of public open space), the resultant plot ratio is 0.38.

Section 11.5.4 of the CDP refers to plot ratio and contains the following objective:

**DM OBJ 15:** *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.*

The proposed plot ratio complies with this objective.

### 5.13 Site Coverage

The proposed site coverage is 19%.

### 5.14 Density

The area of the red line of application is 4.8 hectares, with the net developable area being 4.7Ha, on which it is proposed to accommodate 141 no. residential units and a creche. Therefore, the proposed development has a gross and net density of 30 units per hectare.

Section 11.5.2 of the CDP “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. The following are the stated policies of the CDP:

<b>DM POL 5</b>	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.
<b>DM OBJ 14</b>	<p>The following densities shall be encouraged when considering planning applications for residential development:</p> <ul style="list-style-type: none"> <li>▪ Residential Development Beside Rail Stations: 50 uph or above</li> <li>▪ Regional Growth Centres/Key Towns: (Navan/Drogheda) - 35-45 uph</li> <li>▪ Self-Sustaining Growth Towns: (Dunboyne, Ashbourne, Trim, Kells): greater than 35uph</li> <li>▪ <b>Self-Sustaining Towns: 25uph - 35uph</b></li> <li>▪ Smaller Towns and Villages: 25uph - 35 uph</li> <li>▪ Outer locations: 15uph – 25uph</li> </ul>



The CDP identifies Duleek under the settlement typology of “Self-Sustaining Town”, which is required to deliver a residential density of between 25 to 35 units per hectare. In addition, it is considered that the subject site can also be described as being in a Small Town as per Chapter 6 of the Guidelines for Planning Authorities on ‘Sustainable Residential Development in Urban Areas’, and under section 6.11 of same, it is stated that net densities of 20-35 dwellings per hectare should generally be encouraged on edge of centre sites and that the form of development should include a wide variety of housing types from detached dwellings to terraced and apartment style accommodation. The proposed net density of 30 units per hectare is therefore consistent with the aforementioned guidelines as well as DM OBJ 14 which requires a density range of 25-35 units per hectare in Self-Sustaining Towns.

### **5.15 Building Heights**

The proposed development has building heights of 2 only, i.e. all dwellings and the creche are 2 storeys in height.

### **5.16 Aspect**

All of the proposed dwellings are dual aspect.

### **5.17 Public & Private Open Space Provision**

Public open space is provided for in the form of a large open space, centrally located to maximise its usability and also cater for meaningful open space. Given the shape of the site, the desire to provide a layout based upon good urban design principles and a compact form of residential development, the creation of one large open space is considered the optimum solution in terms of layout and size. Approx. 0.74Ha of public open space (which equates to almost 16% of the site area, thus in accordance with Development Plan standards) is provided for.

The public open space will cater for children’s play, details of which are set out on the submitted landscape drawings and details, prepared by Ronan MacDiarmada & Associates Landscape Architects, which include a Landscape Rationale, Landscape Masterplan, Boundary Treatments Plan etc. – please refer to same.

Private open space for the proposed houses is in the form of rear gardens, the areas of which exceed the minimum standards of the Development Plan (Table 11.2 of the CDP) which require 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. The submitted Housing Quality Assessment sets out the areas of private open space / rear gardens for all of the proposed dwellings – please refer to same.

Open space for the apartments is in the form of semi-private / communal open space to the rear of the proposed apartment buildings. Two dedicated areas of communal open space are proposed totalling 770m<sup>2</sup> which exceeds the target area of communal open space required to serve the 10 no. proposed 1 bed apartments (i.e. 50m<sup>2</sup>). These enclosed semi-private/communal spaces will be for the benefit of these units only and will be privately managed by a management company. Accommodated discretely either adjacent to or in these spaces will be secure bin store and bicycle parking facilities for these units – refer to the site location plan (drawing no. 6204-P-003) to identify same, with details of the proposed bin and bicycle stores provided on the submitted BKD drawing no.s 6204-P-402, 403 & 404.



## 5.18 Car Parking

Car parking is provided for at surface level only, there is no requirement for underground / basement parking for the proposed development. Car parking is provided in accordance with the standards of the Development Plan (i.e. Table 11.2 of the CDP). Please refer to section 11 of the enclosed Traffic and Transport Assessment Report prepared by Punch Consulting Engineers for details of the car parking to serve the proposed development.

All of the proposed houses have 2 no. car parking spaces afforded to them (131 no. units x 2 = 262 no. spaces). The majority of the car parking for houses is in the form of in-curtilage spaces. It should be noted that 14 no. visitor car parking spaces are also provided.

The apartments are provided with on-street car parking spaces, and in accordance with the Development Plan, the standards are:

- 2 per unit - 10 no. 1 bed units proposed = 20 no. spaces required;
- 1 visitor space per 4 apartments = 3 no. spaces required.

Total residential parking requirement = 306 no. spaces.

Total residential parking proposed = 317 no. spaces (including associated visitor car parking spaces).

The creche parking is calculated as follows:

- 1 per employee & dedicated set down area 1 space per 4 children;
- Total creche requirement based upon 9 no. employees and 45 no. children = 18 no. spaces.

Therefore, 18 no. dedicated car parking spaces are provided for adjacent to the creche – please refer to the enclosed site layout plan drawing no. 6204-P-003 to identify the 18 no. spaces located adjacent to the creche on Roads 3 and 4.

The proposed development caters for a total of 317 no. car parking spaces; it therefore accords with the standards of the CDP.

In relation to the provision of EV parking, this will be accommodated as part of the proposed development 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 10% of the spaces, with 8 no. dedicated EV parking spaces identified on the submitted site layout plan (drawing no. 6204-P-003) as “E”.

## 5.19 Bicycle Parking

Bicycle parking is provided for in accordance with the standards of the Development Plan (i.e. Table 11.4 of the CDP). Please refer to section 11 of the enclosed Traffic and Transport Assessment Report prepared by Punch Consulting Engineers for details of the proposed bicycle parking as part of the overall development.

For the proposed 10 no. apartments, the CDP requirement is 1 private secure bicycle space per bed space and 1 visitor bicycle space per two housing units, thus requiring 25 no. spaces which are provided in a dedicated bicycle store adjacent to unit no.s 95-96, the details of which are provided on the submitted BKD drawing no. 6204-P-402.



For the proposed creche, the bicycle parking requirements are “25% of pupil registration numbers/minimum of 10 spaces. Consider separate teacher/employee parking”. To that end, 15 no. spaces are required to serve the proposed creche with a total of 20 no. spaces catered for in the form of 10 no. visitor stands to the front of the creche, while in the southern corner, a dedicated store is provided accommodating a further 10 no. spaces, the details of which are set out on the submitted BKD drawing no. 6204-P-401 – please refer to same.

## 5.20 Proposals to Integrate with Surrounding Land Uses

The proposed development provides for pedestrian and cyclist connectivity to the surrounding environs as follows:

- Via The Steeples Road which connects directly to Main Street, Duleek;

The proposed development also provides for pedestrian and cyclist connectivity to the surrounding environs as follows:

- A pedestrian/cyclist connection is to be provided in the north-east corner of the site (at the end of Road 5) that will allow for connection onto the adjoining lane, Larrix Mews, which then connects directly to Larrix Street, which also directly connects to Main Street, Duleek, via Church Lane. At this point, a ramped and stepped access will be provided to allow for pedestrian and cyclist access from the development onto Larrix Mews. For details of this access, please refer the enclosed architect’s drawing no. 6204-P-501.
- Two pedestrian / cyclist connections are provided for on the north-western boundary of the site (at the end of Roads 1 and 2) that will allow for connection onto the adjoining lane, apparently known as ‘Julia Dunnes Lane’, between the subject site and the adjoining residential development Stoneyford Green. These access points will provide a direct connection between The Steeples Road and Larrix Street, which also directly connects to Main Street, Duleek, via Church Lane. Details of these connection points are set out on the enclosed architect’s drawing no. 6204-P-500 – please refer to same.

## 5.21 Phasing

It is envisaged that the proposed development will be delivered over two phases as follows:

- **Phase 1** – will consist of the delivery of the 77 no. houses, the central park public open space, crèche, internal roads, 2 no. pedestrian / cyclist access points on the northern and eastern boundaries and the proposed road works to The Steeples Road;
- **Phase 2** – will see the delivery of 54 houses and 10 no. apartments with their associated communal open space, bin and bicycle storage and the remaining pedestrian / cyclist access points on the northern boundary.

Please refer to the submitted BKD drawing no. 6204-P-004 for the illustration of the proposed phasing.



## 6.0 Physical Infrastructure

Punch Consulting Engineers have prepared the enclosed engineering drawings, engineering planning report, site specific flood risk assessment, traffic and transport assessment etc. – please refer to same for details. A summary of the proposed water services infrastructure is set out as follows:

### 6.1 Foul Drainage

An existing 225mm diameter public foul sewer is located on The Steeples Road / Longford Road. This foul sewer falls in a southerly direction along The Steeples Road / Longford Road towards the R150. A pre-connection enquiry was submitted to Irish Water, and in their response (Ref. CDS21008901 – copy enclosed in Appendix F of the submitted Punch Engineering Planning Report) they state that the proposed wastewater connection is feasible. It is proposed that the foul water from the proposed development shall be discharged by gravity to the 225 mm diameter public foul sewer on The Steeples Road / Longford Road. The outfall pipe from the site to the public foul sewer must pass over an existing 400mm diameter public surface water sewer, which is located at a similar invert to the existing public foul sewer. Please also refer to PUNCH drawing no. 172439-0100 for details of the proposed foul water drainage network; and drawing no. 172439-0502 for details of the proposed pipe crossing in the public road.

### 6.2 Water Supply

A 400mm diameter uPVC trunk watermain is located on The Steeples Road / Longford Road. There is also a 150mm diameter watermain located on Main Street, Duleek, which is 300m from the development. A pre-connection enquiry was submitted to Irish Water and a Confirmation of Feasibility was received in January 2022 under Ref. CDS21008901. A statement of design Acceptance was also received from Irish Water in March 2022, and both letters are set out in Appendix F of the submitted Punch Engineering Planning Report). Irish Water states that the proposed water connection is feasible subject to upgrades. The development is proposed to connect to the 150mm diameter main located on Main Street. The watermain will have to be extended approximately 90m up The Steeples Road to facilitate this connection. These works will be completed by Irish Water’s approved contractors as it is within the public realm.

It is proposed to serve the development with a 180mm OD PE100 SDR17 (150mm internal diameter) connection in order to provide potable and firefighting water to this proposed development. A bulk water meter shall be provided at the site boundary, i.e. on The Steeples Road. The watermain layout has been designed in accordance with “*Irish Water Code of Practice for Water Infrastructure*”. All watermains are to be constructed in accordance with Irish Water’s requirements. Please refer to the enclosed PUNCH drawing no. 172439-0300 for details of the proposed watermain layout.

### 6.3 Surface Water

There are no surface water sewers shown on the record drawings for The Steeples Road / Longford Road. However, a survey of the road indicated the presence of two surface water sewers located in The Steeples Road / Longford Road. David Barrett, Area Supervisor with Meath County Council confirmed the presence of surface water sewers in the road. The survey indicated that there is a 400mm diameter public surface water sewer located on the west side of The Steeples Road / Longford Road, which falls in a southerly direction towards Main St. Additionally, a 200mm/300mm diameter public surface water sewer was identified on the eastern side of The Steeples Road / Longford Road, which also falls in a southerly direction.



The site is currently a greenfield site with levels varying from 30.7m OD in the northwest corner to 27.18m OD in the south of the site. At present water within the site drains in a south easterly direction. There is no record of any existing water features with the site.

The drainage system has been designed with the aim of providing a sustainable drainage solution ensuring, in so far as feasible, that the development has a minimal impact on the existing public surface water sewer system. This is achieved with the incorporation of Sustainable urban Drainage Systems (SuDS) such as permeable paving systems, attenuation tanks, bio-retention zones, and tree root systems. The outflow from the site shall be restricted to the greenfield run-off rate. All surface water run-off from roof areas and hardstanding areas shall be collected in the site's drainage network. It is proposed to connect the drainage system to the existing public 400mm diameter surface water sewer located on The Steeples Road / Longford Road.

Please refer to Appendix C of the enclosed Punch Engineering Planning Report for detailed calculations related to proposed surface water drainage, and PUNCH drawing no.172439-0100 for details of the proposed surface water drainage system. It is proposed to attenuate all surface water collected via the drainage network using an attenuation tank. An arched chamber system is proposed, which includes an isolator row to facilitate the removal of suspended solids from the surface water. The attenuation tank has been sized to attenuate the 1:100 year return period storm event, plus 20% climate change. Please refer to the submitted Punch drawing no.s 172-387-0100 and 172-387-0500 for details of the proposed attenuation tank

A number of SuDS features have been proposed to manage surface water and pluvial flood risk within the site – details of same are set out under section 3.3.6 of the submitted Punch Engineering Planning Report. Surface water along the development's hardstanding areas where possible will discharge to a SuDS element for interception and treatment prior to entering the drainage network. These include permeable paving within private driveways, swales, bio-retention areas, and tree root systems.

## 6.4 Flood Risk

Punch Consulting Engineering 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. The enclosed SSFRA confirms that a review of the flooding and flood risk in the area was carried out as the site is located near the Paramadden Stream.

The Catchment Flood Risk Assessment and Management Study (CFRAMS) is a national programme which to date has produced both a series of Preliminary Flood Risk Assessments (PFRA) which cover the entire country, as well as more detailed flood maps in certain catchments across the country. The PFRA data indicates that a section of the subject site is within Flood Zone A for pluvial flooding. A surface water drainage network will be constructed as part of the development, which will reduce the pluvial flood risk so that it could be considered to be in Flood Zone C for pluvial flooding.

Flood Maps produced as part of the Fingal-East Meath CFRAMS were consulted to establish the Flood Zone. It was determined that the proposed development is currently located in Flood Zone C for fluvial flooding. A review of PFRA mapping shows portions of the site to be within Flood Zone A for pluvial flooding. However, we consider that the pluvial risk will be managed through the construction of a new surface water drainage network, and therefore the site will be in Flood Zone C for pluvial flooding. The site is not affected by coastal or groundwater flowing.



Appropriate measures have been taken to ensure that the proposed development will not be at risk of flooding. The lowest proposed finished floor levels are set at 27.17 mAOD, which is above the 1 in 1000 year flood level of 25.64 mAOD. Storm drainage for the development will be designed such that there will be no pluvial flooding at the site of the proposed development. The proposed attenuation storage will be utilised to ensure that runoff from the site does not exceed the greenfield runoff rate. This reduction in flow rate will ensure that the risk of flooding downstream of the site is not worsened by the proposed development.

No development will take place in the floodplain; as such no floodwaters will be displaced during extreme flooding events. The flood extents in the post-development scenario will remain unchanged.

## **6.5 Roads / Traffic & Connectivity**

The proposed development will be accessed via a new vehicular access directly off The Steeples Road / Longford Road. Houses to the front of the site will be directly accessed off The Steeples Road, in order to create a new, urban street frontage onto The Steeples Road. The proposed development also provides for pedestrian / cyclist connectivity to Larrix Mews in the north-east corner and onto an unused lane between the application site and the neighbouring Stoneyford Green residential estate.

Punch Consulting Engineers have prepared the enclosed Traffic and Transport Assessment Report (TTA), which confirms that an Automatic Traffic Counter was located on The Steeples/Longford Road, north of the R150 and classified traffic flows were recorded from Thursday 04/10/18 to Wednesday 10/10/18 inclusive. The counts were undertaken by NDC and the results are included in the enclosed TTA report.

For the purposes of the assessment carried out by Punch, the TRICS database was consulted to provide an equivalent trip rate for traffic from the proposed development including the houses, apartments and crèche. Capacity analysis was carried out on the proposed T-junction for the survey year 2018, the opening year 2024 and 15 years thereafter i.e. 2039. The data shows that average delays are imperceptible for traffic on the main road, as well as users entering / exiting the development, and thus users will experience imperceptible impact. The results of the Junction 9 traffic modelling are included in this report. It is evident that a dedicated right turn lane along The Steeples Road/Longford Road is not required to facilitate this development

The Design Manual for Urban Roads and Streets (DMURS) has been applied to the roads included in this project. In addition, Punch Consulting Engineers have prepared the submitted Movement and Connectivity Report, the purpose of which is to outline and place in context the strategies, decisions and intentions in the design of the streets, connectivity and the urban realm for this proposed development. In addition to a description of the sustainable movement, connectivity and transportation strategy for proposed development, it includes an illustration of compliance with:

- Design Manual for Urban Roads and Streets, 2019;
- The National Cycle Manual, 2011;
- Meath County Development Plan, 2021 – 2027.

Parking spaces for car and bicycle users, for both residents, visitors and users of the crèche have been provided. These comply with the requirements set out in the Meath County Development Plan.

The provision of a new footpath to link with existing footpaths, as well as the provision of a cycleway are included in the design of the project along The Steeples/Longford Road. The internal road and footpath system provides for a direct link to The Steeples / Longford Road and also permeability throughout the site. There is also access to adjoining pedestrian / cyclist routes such as Larrix Mews. The development therefore has good pedestrian access to Duleek and its environs. There is currently no public transport to directly service the site and a limited service is currently available to and within Duleek.



## 6.6 Other Services Infrastructure

There are no impediments to connections to existing natural gas and broadband services infrastructure in the area.

## 7.0 Part V Proposal

The applicant proposes to allocate 20% of the proposed units on site for social housing in compliance with Part V, Section 96 (3)(b)(i) of the Planning and Development Act 2000 (as amended). 28 no. units are proposed to be provided as Social Housing, i.e. 10 no. 1 bed apartments, 7 no. 2 bed houses & 11 no. 3 bed houses. The individual units are identified on the enclosed drawing no. 6204-P-013 "Proposed Part V Drawing" and we also enclose the associated costs for these units.

The information is intended to provide a reasonable estimate of the costs and values of the proposed Part V units based on construction costs and values prevailing at the time of this application. The information set out is for the purposes of facilitating a planning application and will be subject to finalisation and formal agreement with the Local Authority. The ultimate agreement with regard to compliance with Section 96 of the Act is dependent upon receipt of a final grant of permission and on the site value at the time the permission is granted. The applicant intends to fully comply with the requirements of Part V of the Planning and Development Act 2000 (as amended) and the Housing Strategy of Meath County Council with respect to the provision of Social Housing.

## 8.0 Protected Structures

There are no Protected Structures on or in the vicinity of the site.

## 9.0 Likely Significant Effects on the Environment

The proposed development is comprised of 141 no. dwellings, with associated crèche and all associated site development works. Therefore, the preparation of an Environmental Impact Assessment Report (EIAR), which also constitutes an Environmental Impact Statement (EIS) for the purposes of the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001 (as amended), will not form part of the future application for this proposed residential development. The proposed development falls below the threshold for environmental impact assessment as described at 10(b) of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended).

However, an Environmental Impact Assessment (EIA) Screening Report to assess the potential impacts on the environment of the proposed development has been prepared and is submitted with this SHD planning application. It is submitted that the development is below any threshold that would trigger the requirement for EIAR. The report has been assessed in accordance with the screening criteria set out in Annex III of the European Union 'EIA Directive'. Having regard to:

- a. the nature and scale of the proposed development on an urban site served by public infrastructure;
- b. the absence of any adverse impacts on any significant environmental sensitivities in the area, and
- c. the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended).

The report concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment.



## 10.0 Archaeology

The subject site has been subject to Archaeological Impact Assessment and we enclose the Archaeological Impact Assessment report undertaken by Archaeological Management Solutions Ltd (hereafter AMS) – please refer to same for details, a summary of which is as follows:

The enclosed report summarises the results of geophysical and archaeological testing of the subject site, carried out in advance of the proposed housing development. It also assesses the likely archaeological impact of the proposed development and makes recommendations for mitigation of predicted archaeological impacts.

As part of the previous development proposal for the site, as permitted under Ref. SA/802333, the site was the subject of geophysical survey (Leigh 2008a & b) and archaeological testing (Ó Maoldúin 2008a & b) by Archaeological Development Services Ltd (ADS) in 2008 (ADS are no longer trading).

The enclosed assessment summarises all previous archaeological works and assesses the potential archaeological impacts of the current development proposal. It also makes further recommendations for possible mitigation measures.

In terms of geophysical survey and archaeological test-trenching, the area of the proposed development was comprehensively surveyed and archaeologically tested in two phases, I and II (Leigh 2008a & b; Ó Maoldúin 2008a & b). The geophysical survey identified a series of linear and curvilinear responses in the southeast and along the southern boundary of the site (Figure 4 of the submitted assessment). These were interpreted as suggestive of an archaeological complex and possibly associated with the recorded ecclesiastical enclosure ME027-038019. Linear trending, potentially representing ridge and furrow cultivation, was noted elsewhere (Leigh 2008a & b).

Forty-eight archaeological test-trenches between 15m and 43m long and 2m wide were mechanically excavated, with six of these placed to target the geophysical anomalies noted along the south and southeast of the site and the other 42 were placed to test the remainder of the area of the development.

The test-trenching confirmed the presence of archaeological remains in those areas where geophysical anomalies were noted and suggests that the areas void of geophysical anomalies are also largely void of archaeological remains. In all, archaeological remains were encountered within seven, possibly eight, trenches, all within the south and southeast of the site.

The archaeological remains encountered included ditches, one of which forms a substantial enclosure likely appended to the ecclesiastical enclosure ME027-038019, postholes, stakeholes, pits and roughly-cobbled or tempered work surfaces. Artefactual evidence included medieval pottery, butchered animal bone and one sherd of possible prehistoric pottery. These remains constitute a significant archaeological resource that should either be preserved *in situ* or be the subject of full archaeological excavation in advance of the proposed project's construction stage (Ó Maoldúin 2008a & b).

The enclosed Archaeological Impact Assessment report concludes that significant archaeological remains were identified within the south-eastern and southern portions of the proposed development. These are likely to be mostly of early and later medieval date and be associated with the ecclesiastical/monastic origins of Duleek village but may also include a prehistoric element.

The enclosed report confirms that it was recommended in the original testing reports (Ó Maoldúin 2008a & b) that should development go ahead, two areas c.145x60m and 90x35m should be the subject of full excavation in advance of any construction works. It was further recommended that all subsequent topsoil stripping and/or invasive groundworks should be archaeologically monitored.



The enclosed report asserts that the updated project design still impacts upon the south-east and south of the development area, and therefore the recommendations made in 2008 (Ó Maoldúin 2008a & b) remain. It also states that should the development progress in its proposed form, two areas should be fully archaeologically excavated under licence, prior to the groundworks following consultation with the National Monuments Service (NMS) of the Department of Culture, Heritage and the Gaeltacht, and the National Museum of Ireland. The remainder of the development should be subject to a licensed monitoring/watching brief during all topsoil stripping or invasive groundworks outside of those areas.

All recommendations are subject to the approval of NMS and Meath County Council.

Please refer to the enclosed Archaeological Impact Assessment Report prepared by AMS, for further details.

## 11.0 Appropriate Assessment Screening

An Appropriate Assessment (AA) Screening Report has been prepared by Enviroguide Consulting Ecologists and is enclosed.

The screening report has evaluated the proposed development at Duleek to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use.

The Natura 2000 sites relevant to the subject site are:

- River Boyne and River Blackwater SAC;
- Boyne Coast and Estuary SAC;
- River Boyne and River Blackwater SPA;
- Boyne Estuary SPA;
- River Nanny Estuary and Shore SPA .

The submitted AA Screening Report concludes that the proposed development has been assessed taking into account:

- the nature, size and location of the proposed works and possible impacts arising from
- the construction works.
- the qualifying interests and conservation objectives of the European Sites.
- the potential for in-combination effects arising from other plans and projects.

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that, on the basis of objective information; the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European Sites listed below:

- River Boyne and River Blackwater SAC (002299)
- Boyne Coast and Estuary SAC (001957)
- River Boyne and River Blackwater SPA (004080)
- Boyne Estuary SPA (004080)
- River Nanny Estuary and Shore SPA (004158)



The submitted report states that in carrying out this AA screening, **mitigation measures have not been taken into account**. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

Further to the screening exercise presented, the report concludes that on the basis of the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, **can be excluded**. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required.

## 12.0 Ecological Assessment

Enviroguide Consulting have prepared the submitted Ecological Impact Assessment Report (EclA) which assesses the potential effects of the proposed development on habitats and species; particularly those protected by national and international legislation or considered to be of particular nature conservation importance.

The specific objectives of the study were to:

- Undertake baseline ecological surveys and evaluate the nature conservation importance of the site of the proposed development;
- Identify and assess the direct, indirect, and cumulative ecological implications or impacts of the proposed development during its lifetime;
- Where possible, propose measures to remove or reduce those impacts at the appropriate stage of the development.

Field surveys were carried out on the subject site, including habitat and invasive flora surveys, bat surveys, bird surveys, mammal surveys. The habitats within the site were examined and potential impacts of the proposed development on designated sites, fauna, bats and birds assessed. A series of mitigation measures are set out in the submitted EclA, which states that *“provided the mitigation measures proposed are implemented in full, there will be no significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the Proposed Development”*. The submitted EclA Report concludes that *“Based on the successful implementation of these measures and proposed works, to be carried out in accordance with the landscape plan, there will be no significant negative ecological impacts arising from the Construction and Operational Phases of the Proposed Development”*. Please refer to the submitted EclA Report in full for further details.



## 13.0 Conclusion

**13.1** The subject site has a lengthy planning history associated with it, with the lands zoned for residential land use for many years and permission previously permitted on part of the subject site. Permission was also granted for a SHD under Ref. ABP-307240-20 on the subject site for 167 no. dwellings and a creche.

**13.2** The development proposal now put forward for permission takes into consideration the planning history associated with the subject site and the Development Plan requirements.

**13.3** It should be noted that since the issuing of the order to grant permission for the previous SHD on the subject site, that the applicant has engaged with neighbours of the site. Based upon those discussions, we would like to point out a number of issues that are pertinent to the proposed development that have been considered by the applicant as a direct result of consultation with neighbours.

- i. No three storey buildings are proposed, with all of the proposed dwellings being 2 storeys. Local residents were not content with the provision of 3 storey buildings on the site.
- ii. To the rear of the creche and the adjoining house no.s 115 -118, the proposed rear boundary treatment to those proposed buildings is a 3m high stone wall and this is proposed in response to a direct request from the adjoining neighbour to the south.

**13.4** It is put forward that the current proposal for 141 no. dwellings, at a net density of 30 units per hectare, represents an efficient density for this zoned, serviced site, according with national planning guidance set out in the Guidelines on Sustainable Residential Development in Urban Areas as well as DM OBJ 14 of the CDP which requires that Self-Sustaining Towns, such as Duleek be developed at a density range of 25 – 35 units per hectare. The proposed site layout plan is based upon the principles of DMURS and good urban design as set out in the Urban Design Manual – a Best Practice Guide. The enclosed Architectural Design Rationale clearly demonstrates how the key criteria such as context, connections, inclusivity, variety and distinctiveness are catered for in the proposed development.

**13.5** There is a good mix of dwelling types, variation in design and character areas to establish a sense of place throughout the scheme. Good street frontage is proposed so as to create a strong urban edge along same. The public open space will be passively overlooked, cater for a range of recreation types, while linkages to adjoining lands is catered for.

**13.6** Having regard to the policies and objectives in the 2021-2027 Meath County Development Plan, along with guidance set out in the following:

- the Rebuilding Ireland Action Plan for Housing and Homelessness 2016;
- Housing for All – a New Housing Plan for Ireland (2021);
- the National Planning Framework (2018);
- the Design Manual for Urban Roads and Streets (DMURS) (2019);
- the Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual – a Best Practice Guide (2009);
- the Sustainable Urban Housing: Design Standards for New Apartments, (2020);
- Urban Development and Building Heights Guidelines for Planning Authorities (2018);

along with the nature, scale and design of the proposed development and the pattern of existing and permitted development in the area, it is put forward that the proposed development accords with the proper planning and sustainable development of the area.



13.7 Judicious consideration has been paid to the previous planning decisions regarding the subject site, as well as the locational context of the site, in order to provide an appropriate form of residential development on the subject site. It is considered that the current proposal caters for variety and distinctiveness, creates a sense of place and is a good urban design response to the site. A variety of dwelling types are dispersed throughout the site in an efficient manner that accords with best urban design practice, whilst also providing for an adequate and acceptable level of density that accords with national guidance.

A summary of the site statistics are set out in Table 5:

<b>Site Area</b>	4.8Ha
<b>No. of Dwellings</b>	141
<b>Density (Net)</b>	30 units / Ha
<b>No. of Houses</b>	131
<b>No. of Apartments</b>	10
<b>Building Height</b>	2 storeys
<b>No. of Car Parking Spaces</b>	317
<b>Site Coverage</b>	19%
<b>Plot Ratio (total site area)</b>	0.32
<b>Active Open Space Provision</b>	0.74Ha / 16% of the site area
<b>Creche</b>	415m <sup>2</sup>

Table 5 – Site Statistics

13.8 We have taken into account the planning history associated with the subject site and the submitted planning application drawings and details have been carefully prepared to provide for an improved housing development that accords with the proper planning and sustainable development of the area.

13.9 This Planning Statement, along with the accompanying Statement of Consistency, and Environmental Impact Assessment Screening Report provide the background information on the site and the proposed development and required supplementary information to support this application for permission to An Bord Pleanála. We therefore respectfully request that the permission being sought be granted.

Yours sincerely,

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**Armstrong Fenton Associates.**

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