



# ARMSTRONG FENTON

ASSOCIATES

**PROJECT:** Strategic Housing Development

**STATEMENT of CONSISTENCY:**

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

**CLIENT:** DSPL Ltd

**DATE:** April 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 townland of Commons, on The Steeples Road / Longford Road, Duleek, 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:

**DSPL Limited, intends 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.**

**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.**

**The proposed development provides for all associated site development works, including the provision of a roadside footpath and cyclepath along Longford Road / The Steeples Road, surface car parking (Total: 317 no. spaces), bin & bicycle storage, public open space (c. 0.74Ha) & communal open spaces (c.770sq.m), hard & soft landscaping, boundary treatments, sub-stations 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.**

## 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”), DSPL Ltd intends to apply for planning permission in respect of proposed Strategic Housing Development (SHD) at Longford Road / The Steeples Road, (in the townland of Commons) Duleek, Co. Meath.

Section 17(1) of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 (the “Act of 2021”) repealed Section 4(1) of the 2016 Act however, the proposed SHD application is being made pursuant to the transitional arrangements of Section 17(2) of the Act of 2021 i.e. Section 17(2)(a) & 17(2)(b) as follows:

*“(2) Notwithstanding the repeal of section 4(1) of the Act of 2016, a prospective applicant who on the date on which subsection (1) comes into operation has been issued with a notice under section 6(7)(b) of the Act of 2016 in relation to a proposed strategic housing development may, subject to complying with Part 2 of the Act of 2016, proceed to apply for permission in relation to such development in accordance with that subsection provided that-*



- (a) *the prospective applicant notifies the Board of the prospective applicant's intention to proceed with the application as soon as practicable after the date on which subsection (1) comes into operation, and*
- (b) *the application is made within the period of 16 weeks beginning on the date on which subsection (1) comes into operation."*

With regard to 2(a) above, Armstrong Fenton Associates submitted a letter to An Bord Pleanála, dated 1<sup>st</sup> February 2022, which informed An Bord Pleanála that the applicant intended to proceed with the application. With regard to 2(b) above, the application is being made within the period of 16 weeks beginning on the date the Act of 2021 came into operation.

This report constitutes the Statement of Consistency required 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 and National 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

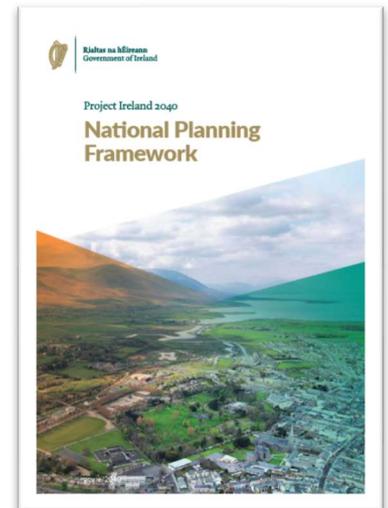
The following sets out the proposed development's compliance with a range of relevant national and local planning guidelines and policies.

### 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 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 residentially zoned lands within the Meath County Development Plan 2021-2027. The subject site is located c. 500m walking distance of the centre of Duleek which offers a range of local shops, services and employment opportunities all within a 10 minute walk of the site. 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 size requirement as stated in the Apartment Guidelines 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 section 11 of the submitted Traffic and Transport Assessment (TTA). 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 5.14).



- **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 proposed development seeks to deliver an appropriate form and scale of residential development close to the centre of Duleek, which is not well served by public transport. However, the proposed development provides for the necessary pedestrian and cyclist connectivity to the local environs via a variety of routes, which will enable sustainable modes of transport to the town centre and local services / facilities.

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

**Statement of Consistency:**

The proposed development seeks to deliver 141 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:**

Meath, and Duleek, is located within the Core Region of the Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy (hereafter 'RSES'). The RSES state that towns in the lower tiers should provide for commensurate population and employment growth, providing for natural increases and to become more economically self-sustaining, in line with the quality and capacity of public transport, services and infrastructure available. It is considered appropriate that population targets for these towns be defined in the core strategies of development plans, and be reflective of local conditions and place potential. The proposed 141 no. units 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 density residential scheme within the existing settlement of Duleek, close to the town centre.



- **National Policy Objective 75** - Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.

**Statement of Consistency:**

The subject application is accompanied by an Environmental Impact Assessment Screening Report and an Appropriate Assessment Screening Report, which are submitted as separate standalone documents – please refer to same for further details.

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 Duleek in same, as follows:

Settlement Name	Population 2016	Resident Workers	Total Jobs	Jobs: Resident Workers
Duleek	4,219	1,692	501	0.296

**Evaluation of Consistency:**

In accordance with the National Policy Objectives of the NPF, the current application will deliver an efficient density of development comprised of modern and adaptable new homes within the footprint of an existing settlement 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.

It is considered that the location of the proposed development within the development boundary of Duleek meets the NPF’s requirement to provide 30% of all new housing within existing urban footprints of towns outside Dublin. The proposals have 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 141 new residential units would help meet National Policy Objective 32 and Chapter 10 to deliver 550,000 additional households to 2040; furthermore, the location and design of the proposed development meets the objective of National Policy Objective 33.



#### 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 Plan contains five key pillars of which Pillars 2 and 3 are most relevant in this instance:

- Pillar 2 – Accelerate Social Housing
- Pillar 3 – Build More Homes

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

The development is consistent with Pillar 3 “Build More Homes” of the Action Plan i.e. *“to increase the output of private housing to meet demand at affordable prices.”* The development provides for 141 no. new dwellings on a greenfield site that enjoys close proximity to a range of facilities and services in Duleek. The provision of these units will substantially add to the residential accommodation available in environs of Duleek and caters for the increasing housing demand.

The development of 141 no. dwellings will provide a wide mix of unit types and will be suitable for a range of household types and needs. The proposed development is located on zoned, serviced lands, within c. 500m walking distance from the centre of Duleek, 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 development will also deliver 20% of the proposed no. of dwellings for Part V requirements (28 no. dwellings) and therefore supports Pillar 2 “Accelerate Social Housing” of the Action Plan.



#### 4.1.3 Housing for All – a New Housing Plan for Ireland (2021)

Housing for All - a New Housing Plan for Ireland was launched in 2021 and is the Government's housing plan to the year 2030. The Plan sets out how short, medium and long-term challenges of housing system will be addressed.

The overall aim of the Plan is that everyone in the State has access to a home to purchase or rent at an affordable price which is built to a high standard in the right place in support of climate action, offering a high quality of life.

The Plan is supported by additional funding and aims to work with all stakeholders, with a central element Plan being working with and enabling the private sector to deliver on housing.

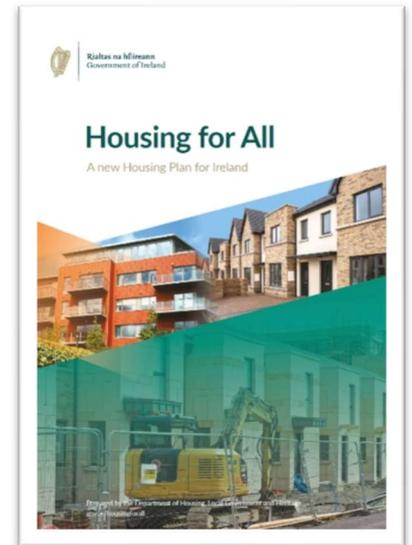
The Plan estimates that Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the NPF. To achieve these targets the Plan is based upon four pathways as follows:

- Supporting Homeownership and Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
- Increasing New Housing Supply;
- Addressing Vacancy and Efficient Use of Existing Stock.

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

The development is considered to be consistent with objectives of Housing for All - a New Housing Plan for Ireland. The development provides for 141 no. new dwellings on a greenfield site that enjoys close proximity to a range of facilities and services in Duleek. The provision of these units will substantially add to the residential accommodation available in environs of Duleek thus increasing new housing supply, which will ultimately aid the objective to increase affordability. It is envisaged that all, if not the majority, of the dwellings proposed will be for sale to individual buyers thereby supporting homeownership.

The development will also deliver 20% of the proposed no. of dwellings for Part V requirements (28 no. dwellings) and therefore supporting the aim to increase social housing delivery and support social inclusion.

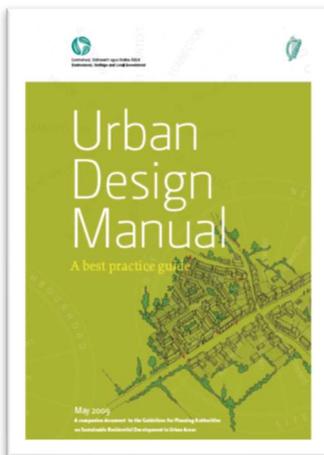
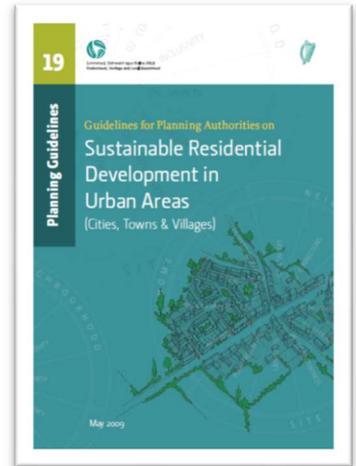




## 4.2 Section 28 Ministerial Guidelines

### 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, and is demonstrated in detail in the enclosed Architectural Design Rationale prepared by the project Architects, BKD, - 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 tables overleaf 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 11 – Development Management Standards & Land Use Zoning Objectives) and section 5.9 Urban Design and Public Realm of Volume 2 of the County Development Plan which sets out the Written Statement for Duleek.

The proposed density of development i.e. 30 units per hectare net, adheres to the guidance for sustainable residential development as the subject site is located within a Small Town and Chapter 6 of the Guidelines on Sustainable Residential Development in Urban Areas (2009) sets out density guidance for urban areas. Duleek



falls into the Small Towns and Villages category. Section 6.11 of the guidelines state 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 density of 30 units per hectare across the entire site is within this density range. Given the locational context close to the town centre, the level of public transport and other services in the area, it is considered that the proposed density is consistent with the aforementioned guidelines.

We note that section 6.3 (b) requires that new development should contribute to compact towns and villages and that this is to be achieved: *“Through planning and design, walking and cycling should be preferred over travel by car for local trips. Ireland’s small towns and villages have benefited from investment over many years in areas such as water services, schools, shops, libraries, health centres, childcare facilities and other physical and social infrastructure. It is appropriate that the investment in such services is utilised properly through the prioritisation of development that either re-uses brown-field development land such as central area sites and backlands or through the development of acceptable “green-field” sites at suitable locations within the immediate environs of the small town or village concerned”*.

Section 6.3(e) of the 2009 Guidelines states that “the scale of new residential schemes for development should be in proportion to the pattern and grain of existing development. Because of the scale of smaller towns and villages, it is generally preferable that overall expansion proceeds on the basis of a number of well integrated sites within and around the town/village centre in question rather than focusing on rapid growth driven by one very large site”.

In compliance with both section 6.3 (b) and (e), the subject site is identified as a Tier 1 site in Duleek being one of the largest sites zoned for residential land use in Duleek. The proposed development at 30 units per hectare is appropriate given the context of Duleek as a Small Town, with the proposed development also catering for sustainable modes of transport via pedestrian and cyclist linkages to the town centre. The proposal to deliver 141 no. dwellings on the subject site also accords with the Core Strategy figures for Duleek, with 336 no. new households allocated to the town for the lifetime of the current Development Plan 2021-2027.

Section 6.8 of the Guidelines sets out layout and design considerations, stating that for small towns and villages, the primary consideration, in respect of layout design and space standards, is that new development relates successfully to the structure of the smaller town or village. The Guidelines also state that *“In terms of overall scheme design, each residential scheme within a small town or village should be designed to make the most effective use of the site, having regard to the following criteria:*

- *make a positive contribution to its surroundings and take the best advantage of its location through the use of site topography, i.e. levels, views, context, landscape, design orientation (sunlight and daylight), to optimise sustainability;*
- *have a sense of identity and place appropriate to the character of the existing small town or village and a logical hierarchy of places within the scheme working from streets to semi-private and private areas;*
- *provide for effective connectivity, especially by pedestrians and cyclists so that over time, small towns and villages become especially amenable to circulation by walking and cycling rather than building up reliance on the car; and*
- *include a design approach to public areas such as streets, plazas and open spaces that is guided by the best principles of passive surveillance to encourage a safe sense of place, discourage anti-social behaviour and facilitate effective community policing”*.

The proposed development has been carefully designed to take into account the character of the receiving environs, the low level nature of adjoining dwellings, views into and from the site, the creation of a permeable layout that allows for pedestrian and cyclist connectivity throughout and to adjoining lands / lanes as well as creating distinct



characters within the development to achieve a sense of place. The large area of open space is well overlooked by the majority of dwellings, accessible and visually connected to the front of the site inviting people into the scheme from the Longford Road / Steeples Road.

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.

The following sets out consistency with the 12 Design Criteria – with further details also outlined in the enclosed Architectural Design Rationale prepared by BKD Architects.

	<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 was 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 Duleek's status as a small 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. 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.	A new vehicular/pedestrian/cyclist access into the site is proposed from Longford Road / The Steeples Road. Future pedestrian access to adjoining lands to the north/north-west and east/south-east is also to be facilitated to the existing lanes, i.e. to the north, onto what is apparently known as 'Julia Dunnes Lane', and to the east/south-east onto Kennel Lane/Larrix Mews, with both lanes providing direct access to Larrix Street, which itself connects to Main Street Duleek.
The development is located in or close to a mixed-use centre.	The site is within a reasonable walking distance (5mins) of local shops and services within the centre of Duleek, and is c.7km from Drogheda to the north-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/north-west and east/south-east.
Appropriate density, dependent on location, helps support efficient public transport.	The density accords with national guidelines at 30/ha. The subject site is c.500m walking distance from the centre of Duleek, however, the provision of public transport is limited in Duleek, and thus the development will not be generally serviced by public transport.



	<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 will provides a large amenity in the form of the centrally located open space, that caters 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 proposed apartments are also afforded dedicated communal open space for their shared use. The public open space provides for meeting, walking, formal and play.
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 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 the front of the site create a strong urban edge to The Steeples Road / Longford Road.

	<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 Duleek close to the development.
Uses that attract the most people are in the most accessible places.	The large open space is specially centrally location to make easily accessible to residents and the public.
Neighbouring uses and activities are compatible with each other.	The area is characterised by residential and open space uses; as such the proposed use is compatible with the surrounding area.
Housing types and tenure add to the choice available in the area.	A mix of apartments and houses will further improve the range of unit types in the area available to various household types. For more information, please refer to section 5.9 “Housing Mix” of the submitted Planning Statement for details of the accommodation schedule.
Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.	The scheme is within a 5 minute walk of Duleek 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 30 units/ha is considered to be appropriate for the site and is characteristic of neighbouring development and the Small Town status of Duleek. The development proposes to include a pedestrian and cycle path to provide for connection to the existing public footpaths that lead into the centre of Duleek along the front of the site as well as opening up access to the adjoining lanes.
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 RMDA landscape drawings for more information.
Buildings, gardens and public spaces are laid out to exploit the best solar orientation	100% of all units are dual aspect. None of the apartments are single aspect north facing units. The houses 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 greenfield site which is directly serviced by roads and 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 with recycling

	<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 character areas, 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 Duleek. It will be positive addition to the residential character on the northern 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 and its constraints and seeks to develop them as a feature within the new residential scheme.
The proposal successfully exploits views into and out of the site.	As can be seen from the contiguous elevations and the proposed plans, 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 east are also pre-empted.
The layout focuses activity on the streets by creating frontages with front doors directly serving the street.	Proposed dwellings are designed and oriented to provide for passive surveillance to streets with dual aspect units provided at corner locations.
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.	The proposed streetscape is well defined, DMURS compliant, seeks to reduce car speeds and provide a better balance of modal use with pedestrians and cyclists. For full details of the design principles applied to the proposed development, please refer to the submitted Statement of Consistency with DMURS prepared by Punch Consulting Engineers, entitled "Movement & Connectivity".
Traffic speeds are controlled by design and layout rather than by speed humps.	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, centrally positioned open space that can cater for various recreational activity. There is also an area of communal space around the apartments which are designed by RMDA Landscape Architecture 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 RMDA Landscape Architects
Roads and parking areas are considered as an integral landscaped element in the design of the public realm.	The scheme provides for 317 no. of car parking spaces throughout the scheme. Car parking is provided in a combination of on-street and in-curtilage spaces. 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 house types including apartments, 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 houses, duplexes and apartments will be constructed in accordance with the energy efficiency standards in place as per the Building Regulations. 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.	The proposed houses are designed to allow for future internal modifications as required.

<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 standards.
The design maximises the number of homes enjoying dual aspect	100% of the units are dual aspect which accords with national policy.
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 all units is either on-curtilage or proximate to the units in an on-street arrangement but are directly overlooked, thereby being within easy reach of each residential unit.
Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation	The quantum of parking provided for the houses, is in line with the car parking ratios required in Meath's County Development Plan.
Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.	For the 10 no. apartments, 23 no. on-street spaces are provided including visitor parking, as per the Development Plan standards.
Materials used for parking areas are of similar quality to the rest of the development	The submitted landscaping rationale illustrates the proposed hard landscaping finished throughout which ensures consistency. Parking areas will comprise quality surface treatments that promote sustainable drainage and are in keeping with palette and quality of building materials used elsewhere in the development.
Adequate secure facilities are provided for bicycle storage	A dedicated bicycle store is provided for the apartments & stands for the crèche. The houses can accommodate bicycle parking with the curtilage of the individual properties.

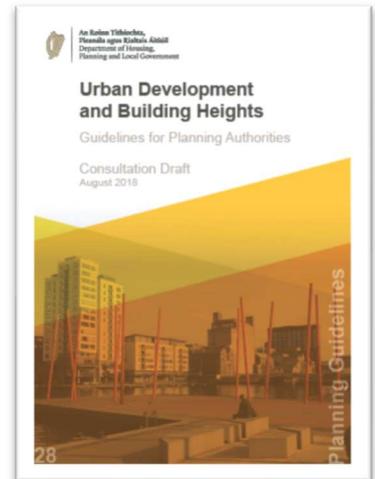
	<b>12. Detailed Design – How well thought through is the building and landscape design?</b>
The materials and external design make a positive contribution to the locality	The overall choice of materials and elevations will reflect the development in the surrounding area and will be an attractive feature 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 Architectural Design Rationale by BKD 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. The 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 Height 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 Height 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 Height 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 Height 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 Height 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 Height Guidelines sets out the requirements for assessing building height as part of planning applications. The Building Height 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"* (our emphasis added).

The Building Height Guidelines (section 3.2) 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**

- Duleek is not very well served by high frequency public transport provision. However, the Bus Eireann 105 service provides connection from Duleek to Drogheda, Ashbourne, Ratoath, Dunboyne, Clonee and Blanchardstown. The application site is located in close proximity / within walking distance c.500m to existing public transport services i.e. bus stops on Main Street.
- The layout of the proposed development has taken into account the locational context of the site and the characteristics of the receiving environs which are relatively low level in character, i.e. 1 – 2 storeys. Cognisance has also been paid to the need to create a strong urban street frontage and to maintain views towards to church spire at St. Mary’s Abbey to the east and the neighbouring church St. Kienan’s Church of Ireland.
- A wide variety in housing typologies is proposed with houses addressing the streets, corners and open spaces. The submitted Architectural Design Rationale responds to the locational context of the site.

### ***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 site and the proposed development is comprised of housing of a scale and character that is in keeping with existing development in the surrounding environs. Buildings address the existing road at Longford Road / the Steeples Road with the proposed housing creating good street frontage, with a visual connection to the new open space created within the scheme, all of which contributes to improving the local environment.
- The design of the buildings is modern, all of which 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 Rationale prepared by BKD Architects.
- The proposed development has been subject to flood risk assessment as detailed in the submitted Site Specific Flood Risk Assessment (SSFRA) by Punch Consulting Engineers, which confirms that the application site is located within Flood Zone C for pluvial flooding (the site is not affected by coastal



or groundwater flooding), as defined by the 2009 Planning System and Flood Risk Management Guidelines for Planning Authorities, therefore the development of housing on the subject site is appropriate for the site's flood zone category and a justification test as outlined in the Guidelines is not required. While the development constitutes 'highly vulnerable' development, it is appropriate for this flood zone and the scheme has been designed to ensure that the risk of flooding of the development is reduced as far as is reasonably practicable. The development does not increase the risk of flooding to adjacent area and roads once the mitigation measures set out in the submitted SSFRA are implemented.

- All of the proposed houses and apartment buildings are all carefully positioned addressing streets, and adjacent to and enclosing open spaces, 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 houses along the eastern and northern boundaries are provided with back gardens along these sensitive boundaries within the site. The heart of the scheme is a central parkland with housing and duplex units overlooking it to provide active surveillance. To add variety, the proposed development has been subdivided into two architectural character areas. A different range of residential unit types creates a sustainable mix and achieves variety across the development. The character areas are defined by their location within the development. This is further enhanced by the design and scale of the hard and soft landscaped areas and the architectural treatment of the adjoining buildings. This will give these places definition and legibility within the wider development. These are described more fully in the submitted Architectural Design Statement prepared by BKD Architects -please refer to same.
- The proposed development accommodates detached, semi-detached and terraced houses, and 2 storey apartments. A 2 storey crèche is also proposed. It is considered that the wide range of housing typologies proposed across the scheme in a variety of buildings 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, the receiving environs and the context of Duleek as a Self-Sustaining town, which the current Meath Development Plan states the focus of growth in the such towns will be on attracting employment and investment in services alongside a



limited population growth and a more balanced delivery of housing. The aim of the design rationale for the proposed development is to ensure that the development will integrate into its surrounding context. This has been achieved by providing a range of dwelling typologies throughout the site, in addition to creating new open spaces and permeability throughout the site from the entrance off the Longford Road / The Steeples Road to the proposed pedestrian / cyclists links to the adjoining lanes.

- The design and form of the proposed 2 storey apartment units, with all units being dual aspect, is similar to conventional two storey housing. The units are well oriented having an east-west orientation which ensures the units will not have an unacceptable or adverse impact on the units themselves or on the surrounding properties with regard to daylight and sunlight.

### **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.*

### **Statement of Consistency**

- With the proposed development, given the site's context and proposed heights of 2 storeys, it is not considered necessary to provide a specific impact assessment of the micro-climatic effects such as downdraft.
- With regards to the proposed developments proximity and impact to sensitive bird and / or bat areas, Enviroguide Consulting prepared on behalf of the Applicant an Ecological Impact Assessment Report which concludes that provided the mitigation measures proposed in the report are carried out in full, there will be "*no significant negative ecological impacts arising from the Construction and Operational Phases of the Proposed Development*".
- With the proposed development, it is deemed that the detailing through an assessment of how the proposal allows for the retention of important telecommunication channels, such as microwave links; is not applicable and as such not required.
- The proposed development, at a height of 2 storeys will not negatively impact air navigation and as such it is submitted that an assessment is not required.



- An Architectural Design Rationale has been prepared by the project architects BKD Architects and is enclosed with the application as separate document – please refer to same for 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 Appropriate Assessment Screening Report prepared by Enviroguide Consulting, Ecological Consultants. The AA screening concludes that upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, 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 in the AA Screening Report. Accordingly, a Stage 2 Appropriate Assessment (NIS) is not required to be carried out in relation to the Proposed Development.
- The proposed development has also been subject to Ecological Impact Assessment (EIA) Report with an Appropriate Assessment Screening Report submitted, also prepared by Enviroguide Consulting, which asserts that it is considered that provided the mitigation measures proposed are carried out 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. 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 Construction and Operational Phases of the proposed development.
- The proposed development has also been subject to Environmental Impact Assessment (EIA) Screening with an EIA Screening Report submitted. It assesses the potential impacts on the environment of the proposed development and 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'. The report concludes 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.

For full details please refer to the Ecological Impact Assessment (EclA) report, the Appropriate Assessment Screening Report and the Environmental Impact Assessment (EIA) Screening Report which accompany the application. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

The Building Height Guidelines go onto 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 accordance with SPPR 3 and sections (A), 1 and 2 of same, the forgoing sections demonstrate the proposed development's compliance with these requirements.

In relation to SPPR 3 (B) and (C), the Meath County Development Plan (CDP) 2021-2027 has been adopted and come into affect since the issuing of the Building Heights Guidelines.

Section 11.5.9 of the CDP states the following in relation to building height: *"the Urban Development and Building Height Guidelines (2018) require that Development Plans identify and provide policy support for specific geographic locations where increased building height is a fundamental policy requirement. In this regard in accordance with SPPR1 of the Guidelines, the following locations have been identified as suitable to accommodate increased building height in the County:*

- *Dunboyne at both Dunboyne Central and Pace rail stations,*
- *Maynooth Environs,*
- *Drogheda Environs,*
- *Navan".*

In addition, the CDP contains the following objective: **DM OBJ 25:** *"To require development with increased building height at the following locations;*

- *Dunboyne Central rail station*
- *Pace Rail Station*
- *Maynooth Environs*
- *Drogheda Environs*
- *Navan".*



The CDP also states: *“In all cases all proposals for buildings in excess of 6 stories at these locations shall be accompanied by a statement demonstrating compliance with the Urban Development and Building Heights, Guidelines for Planning Authorities (2018), or any updates thereof”.*

We note that the subject site, nor Duleek itself, is identified as being suitable for increased building height.

In relation to building height in suburban/edge locations (City and Town), the 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 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 Height Guidelines consider that *“such development patterns are generally appropriate outside city centres and inner suburbs, i.e. the suburban edge of towns and cities, for both infill and greenfield development and should not be subject to specific height restrictions”.* Where DMURS principles are incorporated, the 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 i.e. a Self-Sustaining Town, which is also described as “Small Town” in the 2009 Sustainable Residential Development in Urban Area Guidelines, as well as its separation from high frequency public transport infrastructure, the proposed development is put forward for consideration as it provides for an urban design led layout that creates legibility through the site and caters for potential



future integration with adjoining lands/access routes in a legible manner. The proposal also positively contributes to the dwelling typologies available in the area, with a mix of 1, 2, 3 and 4 bedroom units catered for. A strong urban edge is proposed onto Longford Road / The Steeples Road that is designed to reflect the existing character of the environs.

The subject site is located in a Small Town and is not well served by high frequency public transport infrastructure. The Building Height Guidelines promote increased building height and density in urban areas having due regard to the locational context, availability of public transport services and other associated infrastructure. The current proposal for a medium density, mixed conventional house and apartment scheme on the subject site, while it is strategic in nature, does not lend itself to increased building height given the Core Strategy vision for the town and the associated density requirements, and therefore the proposed building heights of 2 storeys are proposed.

The proposed development provides an appropriate density of development that complies with the Development Plan and national guidance, given the Small Town status of Duleek, i.e.:

- 1) Section 6.11 of the 209 Sustainable Residential Development in Urban Area Guidelines states that for “Edge of Centre Sites”, *“development of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of 20-35 dwellings per hectare will be appropriate including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation”*;
- 2) Section 11.5.3 of the CDP states that *“in general, 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”*, with the following policy stated: **DM POL 5:** *“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”*.

In addition, the CDP contains the following objective:

**DM OBJ 14:** *The following densities shall be encouraged when considering planning applications for residential development:*

- *Residential Development Beside Rail Stations: 50 uph or above*
- *Regional Growth Centres/Key Towns: (Navan/Drogheda) - 35-45 uph*
- *Self-Sustaining Growth Towns: (Dunboyne, Ashbourne, Trim, Kells): greater than 35uph*
- *Self-Sustaining Towns: 25uph - 35uph*
- *Smaller Towns and Villages: 25uph - 35 uph*
- *Outer locations: 15uph – 25uph*  
(our emphasis added)

Given Duleek’s status as a Small Town in the 2009 Guidelines and a Self-Sustaining Town in the CDP, both of which recommend the following density ranges: 20-35 units per hectare and 25-35 units per hectare respectively, the proposed density of 30 units per hectare net is in accordance with both of the aforementioned documents and therefore in accordance with SPP4 (2) of the Building Height Guidelines. Based upon the foregoing, the proposed heights of 2 storeys is considered to also comply with the guidance set out in the Urban Development and Building Heights Guidelines.



The proposed development of 141 no. dwellings is comprised of the following mix:

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 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 and 4 bedroom homes in a variety of house types as well as apartments are proposed which will genuinely contribute to a greater housing mix and variety in Duleek. 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 Duleek as a Small Town and the subject site not being an outer suburban greenfield site in a large town or city that requires a higher density of development, as well as the established character of the receiving environs, it is considered that the proposed building heights of 2 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 Longford Road / Steeples Road and is reflective of The Steeples residential estate on the opposite side of the road which is characterised by detached two-storey houses. The proposed layout plan presents at an appropriate scale and form in three main cells of back-to-back housing, an overlooked entrance and central parkland area and sensitively designed housing backing onto the north-eastern and south-eastern boundaries where there is an interface with existing, low level dwellings. The proposed development is sub-divided into two distinct character areas which are differentiated by finishes and layout, as described in the submitted Architectural Design Rationale.

We note that Volume 2 of the CDP and its Written Statement for Duleek states the following in relation to its land use strategy (section 5): *“Residential growth in the town will be reflective of the designation of Duleek as a self-sustaining town in the settlement hierarchy. There are a number of centrally located parcels of land in proximity to the town centre and Business Park that would create a link between the established residential areas and the urban core of the town whilst also ensuring any development takes place within the existing built up envelope”*. Under section 5.1, the Written Statement for Duleek states: *“Future residential development in the town will take a more sequential approach to development with priority given to lands closer to the town centre and Business Park in addition to under-utilised infill and brownfield lands. Any development should include an appropriate mix of housing that meets the needs of the entire community”*.

The following is a stated objective of the CDP / written statement for Duleek:

**DUL OBJ 2** – *“To support and encourage residential development on under-utilised land and/or vacant lands including ‘infill’ and ‘brownfield’ sites, subject to a high standard of design and layout being achieved”*.

In light of all of the foregoing, it is considered that the proposed development, its density and mix of housing

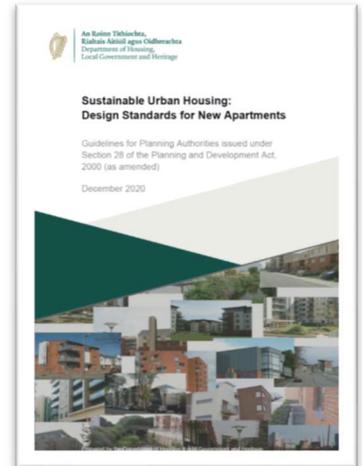


typology as well as the proposed building heights are appropriate for the subject site and that the urban design principles applied and creation of character areas provides for a high quality residential scheme that avoids mono-type building typologies.

#### 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.

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:

<b>Dwelling Type</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>Total</b>
<b>Houses</b>	0	7	102	22	131
<b>Apartments</b>	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 2: Overall Proposed Dwelling Mix**

There are 10 no. 1 bedroom proposed apartments within the overall development, which equates to 7% of the overall mix of housing units and therefore 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

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 10 no. 1 bedroom apartments proposes as part of the curent scheme, which range is area from 59sq.m each to 61sq.m each thus exceeding the minimum floor area requirement of 45sq.m.

#### ***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:*

- 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.*
- 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.*
- 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:**

All of the apartment units in the proposed development are dual aspect, complying with the requirement above.

#### ***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 architects 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:**

This is not applicable to the proposed development, as all of the proposed apartments are own door units with no internal common lobbies or cores.

**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. 30 units per hectare net, on a zoned site in the Peripheral Area.

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 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.

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. The proposed 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.

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.

Based upon the proposed quantum of apartments (10 no.), the following is a breakdown of the required communal open space to be provided as per the Apartment Guidelines, along with the proposed communal open space catered for as part of the proposed development – see Table 3 below:

Apartment Type	No. of Units	Communal Open Space Requirement Per Unit (m <sup>2</sup> )	Total Communal Open Space Requirement (m <sup>2</sup> )	Total Communal Open Space Provided (m <sup>2</sup> )
1 bed / 2 person	10	5 m <sup>2</sup>	50 m <sup>2</sup>	770 m <sup>2</sup>

**Table 3: Required & Provided Communal Open Space for Proposed Apartments**

The proposed development requires a total of 50m<sup>2</sup> of communal open space to serve the 10 no. apartments. In total, the proposed site layout plan caters for 770m<sup>2</sup> of semi-private / communal open space to serve apartments, in addition to the public and private open space provision. Please refer to the enclosed drawing prepared by BKD Architects, numbered 6204-P-003 and titled Proposed Layout Plan for exact locations of proposed communal open space and quantity of same.

The proposed public and communal open spaces exceed the requirements of the Apartment Guidelines. It is considered that the location of the public areas allows for free movement within the site increasing permeability and connectivity through the site. The public open space is a large area centrally located affording maximum accessibility and passive supervision while the communal open spaces form more privatised spaces for use by the apartment residents only.

*The proposed density on the subject site is c. 30 units per hectare. It is considered that the proposed density is appropriate in accordance with Section 6.11 of Guidelines for Planning Authorities on Sustainable Residential*



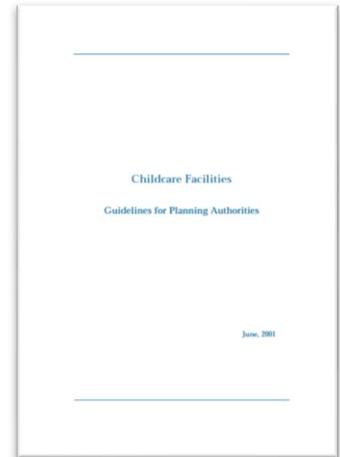
Development in Urban Areas (2009). This planning application is accompanied by a Housing Quality Assessment (HQA) which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the 2020 Apartment Guidelines – please refer to this separate document.

The proposed apartment buildings and units are considered to be suitably located on the subject site, integrated within the landscape and will provide a high-quality development on the subject site.

#### **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. Based upon the proposed development consisting of 141 no. dwellings, there is a requirement for c. 38 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. 38 no. childcare spaces would need to be c. 88sq.m net floor area.



#### **Statement of Consistency**

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 and car and bicycle parking. 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.

Notwithstanding the current proposal to provide a creche to cater for the childcare needs of the proposed development, it should also be noted that the site is in close proximity to Duleek which is well serviced by existing crèche facilities as demonstrated in the submitted Social and Community Infrastructure Assessment prepared by Armstrong Fenton Associates.

In consideration of the overall gross floor area of the proposed creche, along with the availability of existing childcare facilities in the environs, the proposed creche is considered to be of an appropriate size and scale to cater for the requirements of future residents of proposed development.

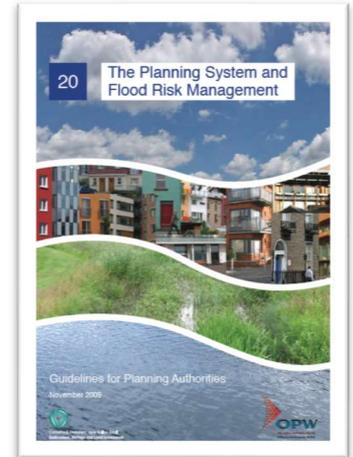


#### 4.2.5 The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009).

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 principle 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:**

Punch Consulting Engineering has prepared the enclosed Site Specific Flood Risk Assessment (SSFRA) which has been carried out in accordance with the Guidelines, which 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.

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.

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

These Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, 2018, (hereafter ‘the EIA Guidelines’) are issued to Planning Authorities and An Bord Pleanála under Section 28 of the Planning and Development Act 2000, as amended (‘Act of 2000’), and both are required to have regard to the Guidelines in the performance of their functions under the Act of 2000. The EIA Guidelines replace the 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.

The EIA Guidelines provide practical guidance to planning authorities and An Bord Pleanála and result in greater consistency in the methodology adopted by consent authorities.



#### **Statement of Consistency**

The development is comprised of 141 no. dwellings, a crèche and all associated site development works. Therefore, an Environmental Impact Assessment Report (EIAR) is not required under Part 2(10) (b) of the Planning and Development Regulations 2001 (as amended), as the development is below the threshold for the requirement of same.

Notwithstanding same, the development has been subject to Environmental Impact Assessment (EIA) Screening and the submitted EIA Screening Report concludes 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. Please refer to the submitted EIA Screening Report.



## **NOTE:**

The following sections 4.2.7 to 4.2.9 provide details of other relevant planning guidance documents (that are not Section 28 Ministerial Guidelines but) to which the development has had regard to / complies with.

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

The Quality Housing for Sustainable Communities – Design Guidelines, 2007, (hereafter ‘the Guidelines’) are the Department’s policy statement on Best Practice Guidelines for Delivering Homes, Sustaining Communities. The Guidelines provide 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 development provides an appropriate mix of 1, 2, 3 and 4 bedroom dwellings, thus caering for a wide variety of household formaitons and lie cycle stages. The proposed housing is located around a large central area of opens ace that is useable, accessible, passively supervised and caters for a range of recreational functions.





## **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). A Universal Design Statement has also been submitted with this 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 improved connections to the wider area.

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 are 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 Duleek 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.

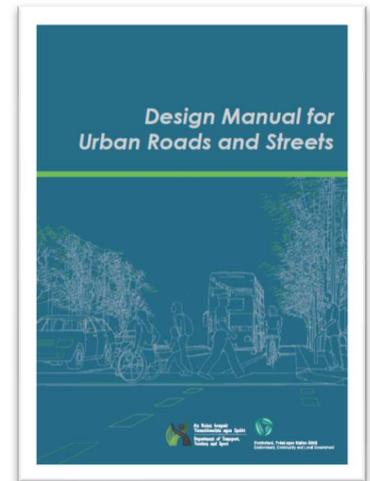
### **Statement of Consistency**

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



#### **4.2.8 Design Manual for Urban Roads and Streets (DMURS), (2013)**

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 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 DMURS Statement of Consistency prepared by Punch Consulting Engineers – please refer to same.

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. There will be one new vehicular access point off the Longford Road / Steeples Road into the scheme, with proposed pedestrian and cyclist connectivity provided for along the northern and eastern boundaries to the adjoining lanes. For further detail of compliance with DMURS please refer to submitted documentation prepared by Punch 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 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 .

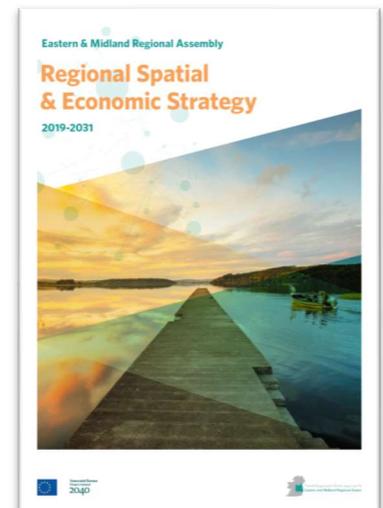
The submitted AA Screening Report concludes that the possibility may be excluded that the Proposed Development will have a significant effect on any of above mentioned sites. The report also states that in carrying out this AA screening, mitigation measures have not been taken into account. Standard 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 above, 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.

### 4.3 Regional Planning Context

#### 4.3.1 Eastern and Midland Regional and Spatial Economic Strategy (RSES) 2019-2031

The Eastern and Midland Regional Assembly recently 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 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 RSES's objectives are in line with the NPF with Co. Meath and therefore Duleek, 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 4.8 of the RSES refers to Rural Places: Towns, Villages and the Countryside stating: *“A key challenge is to ensure that in planning for rural places, responses are uniquely tailored to recognise the balance required between managing urban generated demand in the most accessible rural areas, typically in proximity to Dublin and other towns, whilst supporting the sustainable growth of rural communities and economies, including those facing decline”.*

The RSES go onto state that *“facilitating housing is paramount to ensuring the sustainability, vitality and viability of the rural places of the Region. Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth”.*

### **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. Whilst Duleek is not identified as a key town within the region, it's role as a “town / village” in the rural area is important in terms of accommodating housing in a sustainable manner and acting as a *“viable alternative to rural one-off housing”* and thus contributing to the principle of compact growth.

Meath, and Duleek, is located within the Core Region of the RSES. The RSES state that towns in the lower tiers should provide for commensurate population and employment growth, providing for natural increases and to become more economically self-sustaining, in line with the quality and capacity of public transport, services and infrastructure available. It is considered appropriate that population targets for these towns be defined in the core strategies of development plans, and be reflective of local conditions and place potential.

In addition, the RSES recognises the major contribution that rural places make towards regional and national development in economic, social and environmental terms. In terms of planning for housing, the RSES states that *“facilitating housing is paramount to ensuring the sustainability, vitality and viability of the rural places of the Region. Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth”.* Policy RPO 4.83 states: *“Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans”.*

While not specifically referenced in the RSES, Duleek has been identified as a Self-Sustaining Town in the Meath County Development Plan and the proposed development on lands zoned for residential land use will reaffirm the role of Duleek as a Self-Sustaining Town in the Core Region.



## 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.

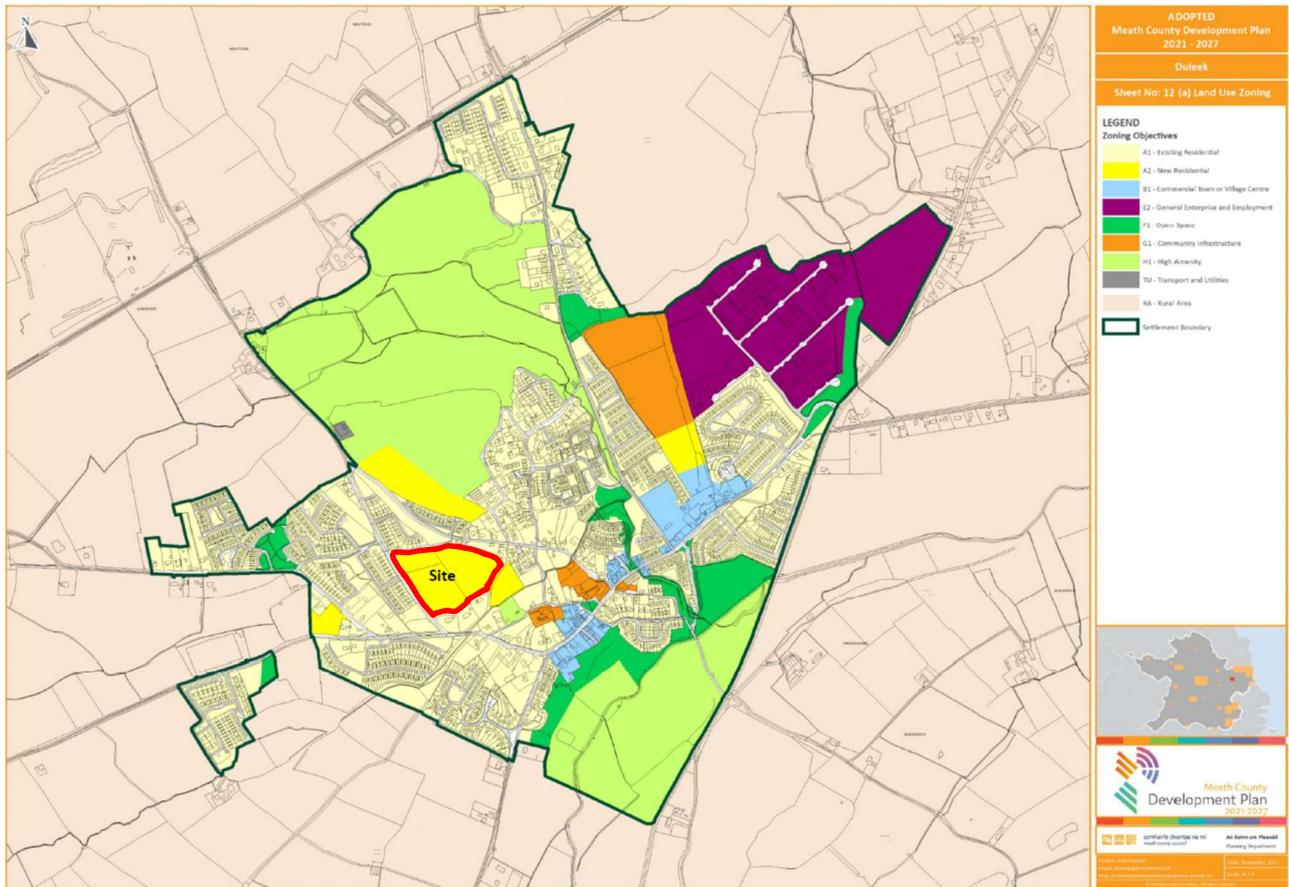


Fig. 1 – Meath County Development Plan Land Use Zoning Map for Duleek – site outlined in red

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”.

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”.

**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).

**Statement of Consistency:**

The proposed development site is zoned objective A2, therefore the proposed housing and creche are acceptable uses on the subject site and accord with the land use zoning objective attached to it.

**Chapter 2 - Core Strategy**

Chapter 2 (Core Strategy) of the CDP details residential zoned land requirements in each of the designated settlement centres in County Meath.

Duleek is designated as a Self-Sustaining Town which are described as “*Towns with high levels of population growth and a weak employment base which are reliant with other areas for employment and/or services and which require targeted ‘catch-up’ investment to become more self-sustaining*”. Section 2.10.2 of the CDP states that the focus of growth in the Self-Sustaining Towns of “*will be on attracting employment and investment in services alongside a limited population growth and a more balanced delivery of housing*”.

Table 2.12 “Core Strategy Table, Population and Household distribution to 2027” of the CDP sets out the projected household allocations for the lifetime of the current Plan and, as per same, the number of residential units envisaged to be necessary to meet the population growth of Duleek over the Plan period is 336.

Settlement	Population 2016	Projected population increase to 2027	Projected population 2027	Approximate household completions 2016-2019	Extant units not yet built	Household allocation 2020-2027 <sup>36</sup>	Potential units to be delivered on infill/brownfield lands <sup>37</sup>	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)
Duleek	4,219	500	4,719	36	85	336	250	10.9	96.33	6.14

Excerpt from: Table 2.12 “Core Strategy Table, Population and Household distribution to 2027” from Meath County Development Plan 2021-2027.

The following are the relevant policies and objectives are 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 9:** To prepare new local area plans for the following settlements within the lifetime of this Plan: Navan, Dunboyne, Ashbourne, Trim, Kells, Dunshaughlin, Ratoath, Bettystown-Laytown-Mornington East-Donacarne, **Duleek**, Enfield, Athboy, Oldcastle, Stamullen (emphasis added).
- **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 Draft CDP. The location of the proposed residential development meets the requirement of CS POL1 and CS OBJs 1, 2, 3, 4, 5, and 14.

The subject site is zoned for residential land use. Duleek is identified as a Self-Sustaining Town and is important in terms of accommodating housing in a sustainable manner and acting as a “*viable alternative to rural one-off housing*” and thus contributing to the principle of compact growth. There is an objective in 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.

The proposal to develop the site for 141 no. units is compliant with the household allocation for the town over the period 2021-2027 of 336 no. units, as set out in the Core Strategy of the Plan, and provides for compact urban growth.

### **Chapter 3 - Settlement 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.

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 Duleek as Self-Sustaining Town, with Table 3.4 setting out the settlement hierarchy in Meath:

Settlement Type	Description	Settlement
Self-Sustaining Towns	Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self sustaining.	Laytown/Bettystown/Mornington/ Donacarney Ratoath Enfield Duleek Stamullen Kilcock

Excerpt from: Table 3.4 “Meath Settlement Hierarchy”

Section 3.4.3 “Future Settlement Growth” states that the “*Self-Sustaining Towns in the County have experienced rapid population and household growth in the absence of supporting employment, services, and amenities proportionate to this growth. These settlements have developed as commuter towns and remain under considerable pressure for development. The focus in these settlements will be on managing residential growth and ensuring there is a greater emphasis on consolidation and the delivery of employment land and social and physical infrastructure*”.

Section 3.4.5 of the CDP refers to the preparation of Local Area Plans (LAP), stating that it is proposed to prepare a LAP for Duleek for the following reason: “*Duleek is an important settlement for enterprise and employment in the eastern part of the County that has the capacity to generate additional employment in the existing business park and facilitate residential growth on a number of infill sites. A detailed analysis of the potential opportunities for Duleek and how any future growth will be co-ordinated will be set out in a Local Area Plan*”.

Section 3.4.9 describes “Self-Sustaining Towns” as varying in size, built form and service provision. It notes that “*the location of these settlements has influenced their growth rate and function. The settlements in the commuter area of Dublin have experienced higher levels of growth and have the characteristics of dormitory settlements due to the high levels of outbound travel for employment. Growth in the more peripheral settlements has been*



*largely based on local growth”. The CDP notes that Duleek has developed on the basis of outbound commuting to Dublin, but also states that “whilst Duleek has experienced commuter-led residential development, employment in the town has also grown through the expansion of the Business Park. The continued expansion of the Business Park will be encouraged in order to provide a greater proportion of employment locally, consistent with the settlement’s role as a self-sustaining town proximate to a regional growth 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 *“in the Self-Sustaining Towns there will be a strong focus on consolidation and strengthening the employment base and improving services which will support the creation of more balanced and sustainable communities”*.

Section 3.7 of the CDP sets out the following relevant “Settlement Strategy” 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 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 5</b>	<i>To prepare new local area plans for the following settlements within the lifetime of this Plan: Navan, Dunboyne/Dunboyne North/Clonee, Ashbourne, Kells, Trim, Dunshaughlin, Ratoath, Enfield, Bettystown-Laytown-Mornington East-Donacarne-Mornington (East Meath), Oldcastle, Athboy, <b>Duleek</b>, and Stamullen. As part of the preparation of these Plans, a detailed infrastructure assessment, consistent with the methodology for a Tiered Approach to Zoning under Appendix 3 of the NPF will be undertaken for each settlement.</i>

**Statement of Consistency:**

It is considered that the location of the proposed development in Duleek, on a site zoned for new residential development, meets the criteria, policies and objectives of Chapter 3 of the Meath County Development Plan. The proposal to deliver 141 no. dwellings, reflects the objective to deliver compact growth. The site is well positioned within the town to have proximate access to local services and facilities and the proposed access arrangements facilitate walking and cycling as per SH POL 3. Duleek has been identified as being capable of accommodating further growth, with the proposed quantum of housing being within the identified housing



quantum for the town / settlement.

## Housing

Section 3.8 “Housing” of the CDP 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”.

Section 3.8 sets out the following “Housing” policies and objectives:

<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 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>

### Statement of Consistency:

The proposed development provides for a wide range of housing typologies (refer to Table 4 below) that will cater for a variety of household formations.

<b>Dwelling Type</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>Total</b>
<b>Houses</b>	0	7	102	22	131
<b>Apartments</b>	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 Residential Accommodation Mix



It is also proposed to provide 20% of the units to satisfy the Part V requirement equating to 28 no. units in total, comprised of the following:

- 10 no. 1 bed apartments;
- 7 no. 2 bed houses;
- 11 no. 3 bed houses.

The proposed “Part V” 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.

## **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 on to 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 application for permission is accompanied by a detailed Social and Community 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 submitted SCIA concludes that the social and community infrastructure in the area, including the proposed childcare facility, will be sufficient to cater for the needs of the proposed development. The submitted report demonstrates that there are sufficient childcare facilities within the area to cater for the childcare needs of existing residents and the likely increased demand arising from the proposed development. The proposed development is also supported by the proposal to build a dedicated childcare facility on site catering for c. 45 no. childcare places.

The extra demand created by the proposal for primary and post primary educational facilities will be relatively low in relation to current levels of local provision, and it is submitted that the likely demand for additional school spaces arising from the proposed development will not create undue strain on existing school facilities in the area. Health care, community and other facilities are all well-represented within the area and cater adequately for the existing residential population and proposed increase that will arise from this development.



There are a significant range of facilities for sports and recreation within a 5km radius of the site which are considered sufficient to cater for the needs of the additional population in the area which the proposed development will deliver, with a wide range and variety of clubs, pitches and related facilities within reasonable distance of the site.

### **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 density policy is informed by the Guidelines for Planning Authorities on ‘Sustainable Residential Development in Urban Areas’ (2009) and the National Planning Framework.

The “Housing Development” policies and objectives are set out as follows:

<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 22</b>	<i>To require that, where relevant, all new residential developments shall be in accordance with SSPPR 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 23</b>	<i>To seek that all new residential developments on zoned lands in excess of 20 residential units provide for a minimum of 5% universally designed units in accordance with the requirements of the 'Building for Everyone: A Universal Design' developed by the Centre for Excellence in Universal Design (National Disability Authority).</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>

**Statement of Consistency:**

The following sets out how the proposed development is in compliance with the aforementioned policies and objectives in chronological order:

The proposed development of 141 no. dwellings is appropriate in terms of scale, mix of housing typology, quantum and density, and accords with the CDP and national planning guidance. The proposed development includes a childcare facility that has adequate capacity to cater for the proposed development and more, thus contributing to the community infrastructure in the area. Details of the proposed housing mix are set out in section 5.9 of the submitted Planning Statement, a summary of which is as per Table 5 below:

<b>Dwelling Type</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>Total</b>
<b>Houses</b>	0	7	102	22	131
<b>Apartments</b>	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 5 – Overall Proposed Residential Accommodation Mix**

A large area of public open space of c. 0.7ha, which equates to 15% of the site area, is provided in a central location thus being accessible and passively overlooked and caters for meaningful recreation and play. All of the proposed dwellings are afforded sufficient private open space in accordance with the necessary standards



for same as confirmed in the details set out in the submitted Housing Quality Assessment – please refer to same. The apartments have also been provide with large areas of communal open space well in excess of the minimum standards for same.

The proposed development has a density of 30 units per hectare which complies with the guidance set out in the 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas for Small Towns and also meets objective DM OBJ 14 in chapter 11 of the CDP which states that a density of 25 – 35 units per hectare should be achieved in Self-Sustaining Towns.

The proposed site layout plan has been designed in accordance with the principles set out in DMURS as confirmed in the submitted DMURS Statement of Consistency prepared by Punch Consulting Engineers.

The architectural design applied to the proposed development provides for a high quality residential scheme that complies with the necessary Building Regulations in terms of energy efficiency and accessibility. Two distinct characters areas are created that are defined by their location within the development. They are defined by the use of materials and changes to elevational treatments across the different unit types provided. Their legibility is further enhanced with different hard and soft landscaping designs.

Further on in this Statement of Consistency, the proposed development’s compliance with the Development Management Standards of Chapter 11 of the CDP are set out (page 58). The preceding sections 4.2.2 and 4.2.3 of this Statement of Consistency set out the propose development’s compliance with the Urban Development and Building Heights Guidelines for Planning Authorities, 2018 and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020. This application is accompanied by a Universal Design Statement and a Social and Community Infrastructure Assessment – please refer to both documents.

## Chapter 7 – Community Building Strategy

Section 7.7.2 refers to Social Infrastructure Assessments while 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>	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).
<b>DM POL 26</b>	Development of childcare facilities at the following locations will normally be encouraged: <ul style="list-style-type: none"> <li>▪ Areas of concentrated employment and business parks;</li> <li>▪ Within new and existing residential developments;</li> </ul>



	<ul style="list-style-type: none"> <li>▪ Neighbourhood Centres;</li> <li>▪ Large retail developments;</li> <li>▪ Schools or major educational facilities;</li> <li>▪ Adjacent to public transportation; and</li> <li>▪ Villages and Rural Nodes.</li> </ul>
<b>DM OBJ 68</b>	<p>Planning applications for childcare facilities shall be assessed for compliance with the following criteria:</p> <ul style="list-style-type: none"> <li>▪ Suitability of the site for the type and size of facility proposed.</li> <li>▪ Impact on residential amenity of surrounding residential development;</li> <li>▪ Adequate availability of indoor and outdoor play space;</li> <li>▪ Convenience to public transport nodes, pedestrian and cycling facilities;</li> <li>▪ Local traffic conditions;</li> <li>▪ Safe access and sufficient convenient off-street car parking and/or suitable drop-off and collection points for customers and staff;</li> <li>▪ 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.</li> </ul>
<b>DM OBJ 69</b>	<p>All applications for childcare facilities shall comprehensively set out the following as part of a pre-application discussion and/or planning application proposal:</p> <ul style="list-style-type: none"> <li>▪ The type of childcare facility proposed – Full day care; sessional service including</li> <li>▪ playgroups, preschools and Montessori; Child minding;</li> <li>▪ No. of children;</li> <li>▪ No. of employees</li> <li>▪ Proposed hours of operation;</li> <li>▪ Car-parking provision; (please refer to Section 11.9.1)</li> <li>▪ Location of secure external play area including secure site boundaries</li> </ul>

**Statement of Consistency:**

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 and car and bicycle parking. 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.



Notwithstanding the current proposal to provide a creche to cater for the childcare needs of the proposed development, it should also be noted that the site is in close proximity to Duleek which is well serviced by existing crèche facilities as demonstrated in the submitted Social and Community Infrastructure Assessment prepared by Armstrong Fenton Associates.

In consideration of the overall gross floor area of the proposed creche, along with the availability of existing childcare facilities in the environs, the proposed creche is considered to be of an appropriate size and scale to cater for the requirements of future residents of proposed development.

It is anticipated that upon a grant of permission that the applicant will engage with appropriate childcare providers to operate the crèche and that details regarding the type of care to be provided shall be agreed with the Planning Authority. Notwithstanding same, the proposed creche is being put forward for permission in accordance with the Childcare Facilities Guidelines for Planning Authorities (2001) and is designed to cater for all types of care.

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

This application for permission is accompanied by a detailed Social and Community 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 submitted SCIA concludes that the social and community infrastructure in the area, including the proposed childcare facility, will be sufficient to cater for the needs of the proposed development. The submitted report demonstrates that there are sufficient childcare facilities within the area to cater for the childcare needs of existing residents and the likely increased demand arising from the proposed development. The proposed development is also supported by the proposal to build a dedicated childcare facility on site catering for c. 45 no. childcare places.

The extra demand created by the proposal for primary and post primary educational facilities will be relatively low in relation to current levels of local provision, and it is submitted that the likely demand for additional school spaces arising from the proposed development will not create undue strain on existing school facilities in the area. Health care, community and other facilities are all well-represented within the area and cater adequately for the existing residential population and proposed increase that will arise from this development.

There are a significant range of facilities for sports and recreation within a 5km radius of the site which are considered sufficient to cater for the needs of the additional population in the area which the proposed development will deliver, with a wide range and variety of clubs, pitches and related facilities within reasonable distance of the site.

**Chapter 8 Cultural and Natural Heritage Strategy**

Chapter 8 refers the built and natural heritage and states that the vision of the CDP is “to identify, protect, conserve and manage the cultural and natural heritage of the County and to encourage its sensitive integration into the sustainable development of the County for the benefit of present and future generations. The Plan



seeks to achieve a balance between the foregoing and economic prosperity and social integration”.

Section 8.6 deals with Archaeological Heritage and contains the following relevant policies:

<b>HER POL 3</b>	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.
<b>HER POL 4</b>	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.

**Statement of Consistency:**

This application for permission is accompanied by an Archaeological Impact Assessment carried out by Archaeological Management Solutions Ltd (hereafter AMS) – please refer to the submitted document for full details of the impact assessment undertaken. 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.

Section 8.9 of the CDP deals with Biodiversity and sets out the following relevant policies:

<b>HER POL 28</b>	To integrate in the development management process the protection and enhancement of biodiversity and landscape features wherever possible, by minimising adverse impacts on existing habitats (whether designated or not) and by including mitigation and/or compensation measures, as appropriate.
<b>HER POL 31</b>	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).

**Statement of Consistency:**

This application for permission is accompanied by an Appropriate Assessment Screening Report, Ecological Impact Assessment Report and an Environmental Impact Assessment Screening Report, all of are enclosed as separate stand alone documents – we refer the reader to same for further details.



## Chapter 11 - Development Management Standards and Land Use Zoning Objectives.

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>	Appropriate energy conservation strategies should be employed in location, design, mass, orientation and the choice of materials of all new and renovated developments.
<b>DM OBJ 5</b>	Building design which minimises resource consumption, reduces waste, water and energy use shall be incorporated where possible, in all new and renovated developments.
<b>DM OBJ 6</b>	Building design shall maximise natural ventilation, solar gain and daylight, where possible, all new and renovated developments.
<b>DM OBJ 7</b>	Sustainable Urban Drainage Systems (SuDS) measures are required to form part of the design of all developments.
<b>DM OBJ 8</b>	The Council will seek to encourage the implementation of best practice standards with regard to access in both indoor and outdoor environments.
<b>DM POL 3</b>	All public lighting proposals shall be in accordance with the Council's Public Lighting Technical Specification & Requirements, June 2017, and the Council's Public Lighting Policy, December 2017, (or any updates thereof).
<b>DM OBJ 11</b>	Existing trees and hedgerows of biodiversity and/or amenity value shall be retained, where possible.

### **Statement of Consistency:**

This application for permission is accompanied by a public lighting plan. The buildings are compliant with Building Regulations in terms of energy efficiency, with a Building Life Cycle report submitted as part of the application details. The proposed engineering and landscaping proposals have been aligned to incorporate SUDS features as well as the retention of trees and hedgerows where possible. A Universal Design Statement is also submitted as part of this planning application. A Tree and Hedgerow survey is also enclosed with the submitted Landscape Rationale outlining details of the proposed tree and hedgerow retention, with the proposed planting details provided on the submitted plans prepared by RMDA Landscape Architects – please refer to all of the aforementioned.



## 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>	To require that all proposals for residential development demonstrate compliance with the Sustainable Residential Development in Urban Areas - Cities, Towns & Villages (2009) and the Urban Design Manual-A Best Practice Guide, 2009 or any updates thereof.
<b>DM OBJ 12</b>	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.
<b>DM OBJ 13</b>	<p>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.</p> <p>The Design Statement shall:</p> <ul style="list-style-type: none"> <li>▪ Provide a Site Analysis</li> <li>▪ Outline the design concept;</li> <li>▪ 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)');</li> <li>▪ Set out how the development meets the relevant Development Plan Objectives, Local Area Plan, Masterplan, Public Realm Strategy, etc;</li> <li>▪ Provide site photographs;</li> <li>▪ Provide an open space/landscape strategy which identifies any areas of ecological interest and sets out proposals for same; and</li> <li>▪ • Set out how energy efficiency measures have been incorporated into the project design process (Refer to DM POL 2).</li> </ul>

### Statement of Consistency:

The project architects BKD have prepared the submitted Architectural Design Rationale 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 foregoing section 4.2.1 of this Statement of Consistency details how the 12 urban design criteria set out in the Urban Design Manual have been applied to the propose development.

**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>	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 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 Plan 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.

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

<b>DM POL 15</b>	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.
<b>DM OBJ 16</b>	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.

**Statement of Consistency:**

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.

The proposed site coverage is 19%.

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

<b>DM OBJ 18</b>	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.
<b>DM OBJ 19</b>	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.
<b>DM OBJ 20</b>	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.
<b>DM OBJ 21</b>	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

**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. 6204-P-003).

The proposed development includes 2 storey buildings, 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>	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.
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<b>DM OBJ 22</b>	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.
<b>DM OBJ 23</b>	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.
<b>DM OBJ 24</b>	To require the provision of EV charging points to serve residential development.

### **Statement of Consistency:**

The proposed development provides for houses and apartments of varying sizes catering for a variety of household formations. Details of the mix of unit types is set out in section 5.9 of the accompanying planning statement. In the enclosed “Architectural Design Rationale” details of the proposed design are set out, including details of the distinct character areas that 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.

The site layout plan has been designed in compliance with the principles of DMURS as confirmed by the enclosed DMURS statement of consistency prepared by Punch 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 10% of the spaces. Section 5.21 of the enclosed planning statement sets out details of the proposed phasing of the development.

### **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>	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.
<b>DM POL 7</b>	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.

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>	To require the provision of high quality, durable, appropriately designed and secure boundary treatments in all developments
<b>DM POL 9</b>	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.
<b>DM OBJ 28</b>	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
<b>DM OBJ 29</b>	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.
<b>DM OBJ 30</b>	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.
<b>DM OBJ 31</b>	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.
<b>DM OBJ 32</b>	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.

### **Statement of Consistency:**

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 15% of the site area, 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 enclosed 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, with the houses all afforded the adequate quantum of private open space i.e. a minimum of 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. 770sq.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. – please refer to the submitted arborist details.

### **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>	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.
<b>DM POL 13</b>	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.
<b>DM POL 14</b>	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 apartments above these standards, in the interest of creating attractive living environments and sustainable communities
<b>DM OBJ 39</b>	<p>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:</p> <ul style="list-style-type: none"> <li>▪ Aspect-dual aspect units are encouraged;</li> <li>▪ Mix of units- to cater for different size households;</li> <li>▪ Floor areas and room widths;</li> <li>▪ Private and communal amenity space;</li> <li>▪ Floor to ceiling height;</li> <li>▪ Car and bicycle parking;</li> <li>▪ EV Charging points;</li> <li>▪ Lift/ stair core access;</li> <li>▪ Storage provision;</li> <li>▪ Adaptability.</li> </ul> <p>All planning applications for apartment development shall be accompanied by a statement which sets out how the scheme complies with this objective.</p>
<b>DM OBJ 40</b>	A Design Statement is required to be submitted with any planning application for apartment development

**Statement of Consistency:**

The proposed development provides for 10 no. 1 bed apartments accommodated in 4 no. 2 storey buildings. The quantum and height of the proposed apartment buildings is appropriate for small towns and villages as per DM POL 13.

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"*.

This application is accompanied by a Housing Quality Assessment which demonstrates compliance of the proposed apartments with the aforementioned guidelines.



The subject proposal is accompanied by an Architectural Design Rationale prepared by the project architects BKD – 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>	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.
<b>DM OBJ 52</b>	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.
<b>DM OBJ 53</b>	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.
<b>DM OBJ 54</b>	Shared bin storage areas shall be located conveniently for residents and collection service providers with appropriate security measures

## Statement of Consistency:

A Construction and Demolition Waste Management Plan and Operational Waste Management Plan is submitted as part of this planning application. Bin storage for the apartments is in the form of individual stores which will be easily accessible, with the details of same set out on the submitted drawing no.s 6204-P-402 & 403.

All of the proposed houses are designed to adequately accommodate bins within the curtilage of the property. For terraced houses, the proposed bin storage details are set out on the submitted drawing no. 6204-P-404.

Dedicated bin stores / storage areas for the apartments are catered for as part of the proposed development.

## 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>	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).
<b>DM POL 26</b>	Development of childcare facilities at the following locations will normally be encouraged: <ul style="list-style-type: none"> <li>▪ Areas of concentrated employment and business parks;</li> <li>▪ Within new and existing residential developments;</li> <li>▪ Neighbourhood Centres;</li> <li>▪ Large retail developments;</li> <li>▪ Schools or major educational facilities;</li> <li>▪ Adjacent to public transportation; and</li> <li>▪ Villages and Rural Nodes.</li> </ul>
<b>DM OBJ 68</b>	Planning applications for childcare facilities shall be assessed for compliance with the following criteria: <ul style="list-style-type: none"> <li>▪ Suitability of the site for the type and size of facility proposed.</li> <li>▪ Impact on residential amenity of surrounding residential development;</li> <li>▪ Adequate availability of indoor and outdoor play space;</li> <li>▪ Convenience to public transport nodes, pedestrian and cycling facilities;</li> <li>▪ Local traffic conditions;</li> <li>▪ Safe access and sufficient convenient off-street car parking and/or suitable drop-off and collection points for customers and staff;</li> <li>▪ 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</li> </ul>
<b>DM OBJ 69</b>	All applications for childcare facilities shall comprehensively set out the following as part of a pre-application discussion and/or planning application proposal: <ul style="list-style-type: none"> <li>▪ The type of childcare facility proposed – Full day care; sessional service including playgroups, preschools and Montessori; Child minding;</li> <li>▪ No. of children;</li> <li>▪ No. of employees</li> <li>▪ Proposed hours of operation;</li> <li>▪ Car-parking provision; (please refer to Section 11.9.1)</li> <li>▪ Location of secure external play area including secure site boundaries</li> </ul>
<b>DM OBJ 70</b>	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.

**Statement of Consistency:**

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 and car and bicycle parking. 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.

Notwithstanding the current proposal to provide a creche to cater for the childcare needs of the proposed development, it should also be noted that the site is in close proximity to Duleek which is well serviced by existing crèche facilities as demonstrated in the submitted Social and Community Infrastructure Assessment prepared by Armstrong Fenton Associates.

In consideration of the overall gross floor area of the proposed creche, along with the availability of existing childcare facilities in the environs, the proposed creche is considered to be of an appropriate size and scale to cater for the requirements of future residents of proposed development.

It is anticipated that upon a grant of permission that the applicant will engage with appropriate childcare providers to operate the crèche and that details regarding the type of care to be provided shall be agreed with the Planning Authority. Notwithstanding same, the proposed creche is being put forward for permission in accordance with the Childcare Facilities Guidelines for Planning Authorities (2001) and is designed to cater for all types of care.

Dedicated, private play areas, along with dedicated parking (cars & bicycles) for staff and drop off spaces for parents are also provided for.

**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>	Car parking shall be provided in accordance with Table 11.2 and associated guidance notes.
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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
Crèches	1 per employee & dedicated set down area and 1 per 4 children plus dedicated set down area

Extract from Table 11.2 “Car Parking” of Development Plan

<b>DM OBJ 93</b>	<p>New residential development should take account of the following regarding car parking:</p> <ul style="list-style-type: none"> <li>▪ Vehicular parking for detached and semi-detached housing should be within the curtilage of the house;</li> <li>▪ 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;</li> <li>▪ 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;</li> <li>▪ Consideration needs to be given to parking for visitors and people with disabilities; and</li> <li>▪ Provision of EV Charging points.</li> </ul>
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### **Statement of Consistency:**

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 for 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 proposed car parking as part of the overall 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.

### **Electric Vehicle Parking**

In relation to the provision of EV parking, (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 10% of the spaces.

### **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>	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.
<b>DM OBJ 97</b>	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
<b>DM OBJ 99</b>	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



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
Creche	25% of pupil registration numbers/minimum of 10 spaces. Consider separate teacher/employee parking

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

### **Statement of Consistency:**

#### **Bicycle parking**

Bicycle parking is provided 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.

#### **Written Statement for Duleek**

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

Section 5.0 Land Use Strategy states that “*the development strategy for Duleek will focus on supporting the continued development of the town as a local service centre*”, and that “*Residential growth in the town will be reflective of the designation of Duleek as a self-sustaining town in the settlement hierarchy. There are a number of centrally located parcels of land in proximity to the town centre and Business Park that would create a link between the established residential areas and the urban core of the town whilst also ensuring any development takes place within the existing built up envelope*”.



## **Section 5.1 Settlement and Housing**

*Residential development in Duleek consists of a concentration of small developments on the approach roads to the town. Between these developments and the town centre are individual houses on large plots of land in addition to large parcels of undeveloped greenfield lands.*

*At the time of writing there were approximately 85 extant units in the town remaining to be built, with two residential developments under construction in the town.*

*Future residential development in the town will take a more sequential approach to development with priority given to lands closer to the town centre and Business Park in addition to under-utilised infill and brownfield lands.*

*Any development should include an appropriate mix of housing that meets the needs of the entire community.*

### **Statement of Consistency:**

The proposed development is to occur on a site within walking distance of the town centre (c. 500m) and is zoned objective A2 New Residential. The proposed development will consolidate development in the environs leading to compact urban development in this designated Self-Sustaining Town.

## **Section 5.5 Movement**

*Continuous and enhanced permeability within the town centre and between the town centre and adjoining residential areas is a key priority of the plan. Adequate footpaths, public lighting and the provision of new cycle lanes remain to the forefront of village enhancement works.*

### **Statement of Consistency:**

The proposed development proposes the provision of a roadside footpath and cycle path along Longford Road / The Steeples Road as well as pedestrian and cyclist connections to the adjoining lanes to the north and east of the site, thus opening up the site to permeability and connectivity. The proposed site layout plan incorporates the necessary pedestrian and cyclist path, as well as a public lighting layout thus ensuring these paths are well lit and safe.

## **Section 5.9 Urban Design and Public Realm**

*The Plan advocates a high quality, well designed, well landscaped development that is capable of providing an appropriately scaled environment, in keeping with the historic character, amenity, environment, heritage and landscape of the town.*

*All new development in Duleek must facilitate the provision or improvement of key infrastructure or community facilities. High quality design, the use of appropriate materials and a quality layout are considered essential in*



order to ensure that new development contributes positively to Duleek and helps to create an attractive and sustainable settlement.

**Statement of Consistency:**

The proposed development has been designed to create a high quality residential development, that is centred on a large, landscaped open space. Trees and hedgerows are retained in so far as is possible. The proposed design and building heights are in keeping with the established character of the area. A childcare facility of 415 sq.m is proposed which is of sufficient size to cater for the proposed development and the wider community.

The following CDP policies and objectives are specific to Duleek and relevant to the proposed development:

<b>DUL POL 1</b>	To support the sustainable growth of Duleek in a manner that allows the town to fulfil its function as a local service centre, by promoting the consolidation of business and retail services in the town centre, employment growth in Duleek Business Park, and improving connectivity between residential areas and the town centre.
<b>DUL OBJ 1</b>	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 Duleek as set out in Table 2.12 of the Core Strategy is not exceeded.
<b>DUL OBJ 2</b>	To support and encourage residential development on under-utilised land and/or vacant lands including 'infill' and 'brownfield' sites, subject to a high standard of design and layout being achieved.
<b>DUL OBJ 9</b>	To undertake the following improvements in Duleek:  i) To upgrade the junction of the R150 and Longford Roads.  ii) To provide/upgrade or extend as appropriate footpaths along Larrix Street extending from Larrix Court to Church Lane and the R150, and along The Steeples from Longford Road to Navan Road (R150) and towards The Hawthorns.  iii) To provide for a footpath on the R150 between the junctions with Church Lane and The Steeples.  iv) To prepare a traffic management and improvement strategy to address traffic difficulties arising within the area known as 'Lanes District'.

**Statement of Consistency:**

The proposed development of 141 no. dwellings on a strategic site within Duleek is of a scale that is appropriate for the designation of the town as a Self-Sustaining Town and of a quantum of housing that is in keeping with the targeted growth for Duleek for the lifetime of the Plan and its Core Strategy i.e. 336 no. units.



The proposed development allows the site to be opened up thus improving connectivity and permeability and encouraging ease of access to the town, employment opportunities and promoting sustainable modes of transport.

The development proposal also includes the provision of a roadside footpath and cycle path along Longford Road / The Steeples Road.



## 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. The proposed development is consistent with national policy and with the policies and objectives of the current Meath County Development Plan 2021-2027. 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

We are therefore, of the opinion that the proposed development will provide an appropriate form of high quality residential development for the subject lands which have been zoned for new residential development for many years, providing for an efficient use of lands in close proximity to the town centre of Duleek.

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.

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