

Statement of Response to ABP's SHD Pre-Application Opinion

In respect of

**Proposed Strategic Housing Development at
Southgate, Dublin Road, Drogheda, Co. Meath**

Prepared for

Rockmill Ltd

Prepared by

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1.0 INTRODUCTION

- 1.1 This Statement of Response report seeks to address individually the issues / items raised within the Opinion of An Bord Pleanála, issued on the 17th of January 2020 (ABP-305869-19), following the tripartite preapplication consultation in respect of the proposed strategic housing development at Southgate, Dublin Road, Drogheda, County Meath.
- 1.2 The opinion states that An Bord Pleanála “*is of the opinion that the documents submitted with the request to enter into consultations **constitute a reasonable basis for strategic housing development***”. (Emphasis added)
- 1.3 The Opinion further states that, pursuant to Article 285(5)(b) of the Planning & Development (Strategic Housing Development) Regulation 2017, the prospective applicant is notified that seventeen no. items of specific information should be submitted with any application for permission. Section 2 below sets out each of these items and summarises how they have been addressed in the final application submitted for approval.
- 1.4 This Statement will refer to other documentation which forms part of the final SHD application pack and will direct the reader to the relevant information within the application documentation, which demonstrates that the issues raised during the course of pre-application consultation have been fully and satisfactorily dealt with prior to the submission of this final Strategic Housing Development Application.

2.0 ABP REQUEST FOR SUBMISSION OF SPECIFIC INFORMATION

- 2.1 The Board’s Opinion set out requirements for further specific information to be provided by the applicant which are summarised below, with a response to each point provided which should be read in conjunction with the associated documentation accompanying this application.

- 1. Rationale for the proposed entirely residential development on C1 zoned lands to address the housing need in the area, residential density, housing mix and adjacent land uses in the context of local and national policy objectives for the development of Drogheda and the overall development of the C1 zoned lands at this location.**

Response:

- 2.2 In response to item 1 of the Board’s Opinion, we refer the Board to the Statement of Consistency and Planning Report (Section 8 refers) prepared by John Spain Associates which provides a rationale for the proposed residential development on C1 zoned lands.
- 2.3 The Statement of Consistency and Planning Report demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context.
- 2.4 In summary, the subject site is zoned C1 under the Meath County Development Plan 2013-2019. C1 lands are subject to an objective “*to provide for and facilitate mixed residential and business uses*”. Residential use is permitted in principle under the C1 zoning objective.

- 2.5 The County Development Plan provides additional background and guidance associated with the C1 zoning objective (page 34 of the Development Plan refers). This guidance states inter alia that C1 zones have been identified to encourage mixed use development and for this reason it will be a requirement to include at least 30% of a given site area for commercial (non-retail) development.
- 2.6 Section 8 of the Planning Report and statement of consistency has been prepared to demonstrate how the overall development of the applicants landholding / site at Southgate will meet the objectives and guidance associated with the C1 zoning objective, while also allowing a Strategic Housing Development (delivering much needed housing for the town of Drogheda, which is designated for growth) to proceed, and ensuring that an appropriate use mix is provided in the masterplan area to meet the C1 zoning objective requirements.
- 2.7 Section 8 of the Statement of Consistency details how the objective of providing for 30% non-retail commercial use at this location has already been met on the basis of existing commercial childcare facility development to the north of the SHD site, and within the existing adjacent Southgate Centre. This has been calculated on the basis of the entire site of the commercial childcare facility falling under commercial use, and the breaking down of the Southgate Centre site pro rata based on the ratio of floorspace within the development. Please refer to the Statement of Consistency for further details.
- 2.8 Section 8 of the Statement of Consistency also demonstrates compliance with the general guidance provided for C1 zoned sites under the Draft Meath County Development Plan 2021-2027, as updated by the recently published material alterations to the plan.
- 2.9 As set out therein, the percentage of residential development (based on site area) would not exceed 50% in accordance with the general guidance within the draft plan as altered by the material amendments.
- 2.10 The proposed residential development is located within a defined regional centre, in close proximity to high quality employment development and public transport. It is considered that the proposed development is in accordance with the approved zoning and policy context for the subject site, will contribute to supporting compact growth and the consolidation of Drogheda's built form, and is of a scale that is sustainable and is suitably located within the existing built up area of the town of Drogheda. The proposal will precipitate significant enhancements in terms of the permeability, accessibility, and amenity of the wider area.

- 2. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The report should also demonstrate that the development provides the optimal architectural solution and sustainable development for the site and in this regard, the proposed development shall be accompanied by an architectural report and accompanying drawings which outlines the design rationale for the proposed height and design strategy having regard to inter alia, national and local planning policy, the site's context and local attributes.**

Response:

- 2.11 In response to Item No. 2 of the Board's Opinion, we refer to the response document prepared by KMD Architects, which details the materials and finishes proposed within the development. As noted within the KMD document, the proposed apartment buildings are treated with a carefully selected range of finishes, which respond to the setting and context of the new buildings.
- 2.12 Ground floor levels are finished in limestone cladding, with brick selected for the upper floors. Both of these materials are high quality and are highly durable. The choice and setting out of materials help to articulate and break down the building facades, providing for a sense of visual interest and a human scale to the development. Vertical circulation elements with glazed exteriors provide further interest and a sense of vertical emphasis, while as detailed within the KMD document, the balconies also receive careful treatment in terms of their layout and materiality.
- 2.13 The finishes selected are considered successful in ensuring a high level of quality and sustainability, while also imbuing the scheme with a character and sense of place.
- 2.14 In accordance with the second part of the foregoing point, the application is also accompanied by an in-depth architectural design statement, which justifies the design of the scheme with reference to relevant policy and the site's context and attributes. Further policy justification can also be found within the Statement of Consistency and Planning Report prepared by John Spain Associates. In terms of the treatment of the landscape areas, full details are set out in the Design Rationale – Landscape Architecture and associated drawings prepared by Dermot Foley Landscape Architects.

- 3. A site layout plan that clearly indicates pedestrian connectivity from the subject site to and through the site to the Southgate Shopping Centre, indicating pedestrian routes including through the adjacent lands outside the development site boundary.**

Response:

- 2.15 In response to Item No. 3 of the Board's Opinion, the KMD Architects response document includes a section relating to connectivity with the Southgate Shopping Centre, including a layout plan. The Traffic and Transport Assessment report prepared by DBFL consulting engineers provides further rationale in this regard, and the DBFL pack also includes a local layout linkages plan (Drawing no. 190081-2003).

- 2.16 During the course of the tripartite meeting with the Board and the Planning Authority, a portion of the discussion focused on the potential for a direct link from the south-eastern boundary of the SHD site, across the adjoining car park and into the Southgate Shopping Centre via the car park entrance. Following the tripartite meeting, this option has been investigated in detail by the design team, with potential routes assessed in terms of design and safety.
- 2.17 In response to this, and the Quality Audit completed for the development, a pedestrian crossing of the new pedestrian / cycle route is proposed to allow access to the adjoining car parking in the Southgate Centre. This is provided along the desire line from the proposed development to the shopping centre ground floor access from the adjoining car park. This is in addition to the other available direct routes from either corner of the site, proceeding to the Centre via the public footpath.
- 2.18 To avoid pedestrians crossing at other points along the new pedestrian / cycle route, the treatment of the remainder of the boundary with the adjoining car park has been carefully considered by the design team. The resulting proposal is the provision of a landscaped berm treatment topped with beech hedging along this boundary. This treatment will allow for a sense of visual openness and connection with the Southgate Centre, while also ensuring that unsafe pedestrian desire lines are not left open across the adjoining car park.
- 2.19 This design solution ensures strong connections and permeability between the Strategic Housing Development and the existing Southgate Centre, while also avoiding the creation of unsafe routes through a car park which would be of negligible benefit in terms of accessing the Shopping Centre.

4. A housing quality assessment with regard to relevant national and local planning policy on residential development.

Response:

- 2.20 In response to Item No. 4 of the Board's Opinion, a detailed housing quality assessment (HQA) has been prepared by KMD Architects and is submitted herewith. The HQA addresses the relevant policy provisions and standards, with an emphasis on the Specific Planning Policy Requirements (SPPRs) of the 2018 Apartment Guidelines. As these standards within the 2018 Guidelines were brought forward under section 28 of the Planning and Development Act 2000 ('the 2000 Act'), they are read in place of any conflicting policies within the County Development Plan.
- 2.21 The KMD HQA document details in quantitative terms how the proposed development accords with the relevant standards. The Statement of Consistency and Planning Report, at section 6, also summarises the findings of the HQA and provides a quantitative and qualitative assessment of the scheme in the context of the relevant standards. This includes a systematic appraisal of the scheme in the context of the relevant SPPRs of the 2018 Apartment Guidelines.
- 2.22 It is concluded that the proposed development accords with the relevant standards and policies for apartment development of this nature and at this location.

5. A life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018). The report should have regard to the long-term management and maintenance of the proposed development.

Response:

- 2.23 A Building Lifecycle Report has been prepared by KMD Architects in association with the project design team and is submitted as part of this final planning application to the Board. The report has been prepared in accordance with section 6.13 of the Sustainable Urban Housing: Design Standards for New Apartments (2018) (this is the paragraph of the Guidelines dealing with building lifecycle, rather than section 6.3 as referenced in the Opinion). This paragraph of the Guidelines states the following:

“Accordingly, planning applications for apartment development shall include a building lifecycle report which in turn includes an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of residents.”

- 2.24 In accordance with the requirements of the 2018 Guidelines and the Board’s Opinion, the accompanying Building Lifecycle Report sets out details of the long term running and maintenance of the proposed development, maintenance and management costs, and sets out in detail the measures which have been introduced to manage and reduce costs for future residents.

6. Rationale for proposed public open space provision with regard to national and local planning policy on residential development.

Response:

- 2.25 In response to Item No. 6 we refer the Board to the Landscape Design Statement prepared by Dermot Foley Landscape Architects and the Architectural Design Statement prepared by KMD Architects. Public open space is provided at a rate of 16% of the application site area within the applicant’s ownership (i.e. excluding public realm upgrades), which accords with the requirements of Section 11.2.2.3 of the Meath County Development Plan 2013-2019, which requires that *“public open space shall be provided for in residential development at a minimum rate of 15% of total site area”* (page 226 of the Written Statement refers). This also exceeds the highest standard of 15% under the 2009 Guidelines for Sustainable Residential Development in Urban Areas, although under these Guidelines the site would likely be considered an infill site where a standard of 10% would apply – which the proposed development would meet and exceed by a considerable margin.
- 2.26 A drawing delineating the breakdown of public and communal open space is included at Page 38 of the Architectural Design Statement prepared by KMD. Further rationale for the quantum and design of open space within the development is provided within the Landscape Design Statement prepared by Dermot Foley Landscape Architects.

- 7. Comprehensive landscaping proposals to include details of hard and soft landscaping, play equipment (if provided), boundary treatments, delineation of public and communal open space provision, pedestrian and cycle facilities, public lighting, Arboricultural Impact Assessment, tree protection measures, car and cycle parking areas and refuse storage areas.**

Response:

- 2.27 We refer to the Landscape Design Rationale Statement and associated drawings prepared by Dermot Foley Landscape Architects which provides details of hard and soft landscaping, play equipment, boundary treatment, pedestrian and cycle facilities and refuse storage areas. This is supported by the Architectural Design Statement prepared by KMD which provides further detail on the landscape strategy and open space, including a drawing delineating the breakdown of public and communal open space is included at Page 38 of the Architectural Design Statement prepared by KMD.
- 2.28 The application is also supported by detailed arboricultural inputs including tree impact assessment and tree protection measures, and public lighting inputs including a detailed site lighting plan. Details of refuse stores are provided within the architectural drawing pack, and the operational waste management plan prepared by BECL.

- 8. Topographical survey of the site and detailed cross sections to indicate existing and proposed ground levels across the site, proposed FFL's, road levels, open space levels, drainage infrastructure, landscaping, etc. relative to each other and relative to adjacent lands and structures including public roads.**

Response:

- 2.29 The application pack includes a topographical survey drawing (refer to the KMD drawing pack and KMD statement of response). The KMD drawing pack also includes a series of site sections which indicate existing and proposed levels across the site, including the level of proposed buildings, adjoining lands and structures, and proposed areas of open space. The DBFL drawing pack includes details of existing and proposed services and drainage infrastructure in accordance with this item of the Board's Opinion.

- 9. Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development. The analysis should also consider potential overshadowing impacts on adjoining residential areas.**

Response:

- 2.30 The application is submitted by a Daylight and Sunlight Analysis prepared by Avison Young This demonstrates compliance with BRE Standards, with an acceptable level of residential amenity for future occupiers of the proposed development. In summary, the report demonstrates the following:
- 100% of the habitable rooms assessed in all blocks will meet the minimum recommended ADF targets of 1% for bedrooms and 2% for a living / kitchen / dining room.

- 98% of rooms meet the recommended level of NSL to 80% or more of their room areas.
- 76% of rooms will meet the minimum recommended criteria for winter sunlight and 49% for total sunlight. Where rooms fall below the APSH target criteria, they either serve less sensitive bedrooms, sensitive bedrooms; are influenced by their east/west orientation; and the presence of overhanging balconies, both of which restrict the available sunlight hours to windows as acknowledged by the BRE Guidelines in Paragraphs 3.1.6 and 3.2.9.
- 100% of the proposed public and communal amenity areas within the site comply with the recommended BRE guidance on light access.
- All but one of the neighbouring windows assessed fully meet the BRE guidelines for daylight / sunlight. The one window demonstrating an exceedance will experience a minor alteration in VSC, but all rooms will comply with the recommended NSL criteria, which suggests that the impact will be minor.
- The VSC and APSH façade assessments undertaken of detached dwellings to the north indicate that high levels of sunlight and daylight amenity in excess of the BRE guidance will be retained.
- All neighbouring amenity areas will retain light access in compliance with the BRE.
- Some shadows will be cast by the development, however the report concludes that the impact will largely be negligible and the level of overshadowing is acceptable.

2.31 Taking account of the detailed analysis undertaken, it is submitted that the development achieves a very high standard of access to light for the proposed residential units, without precipitating any significant impact on neighbouring properties. We refer to the Daylight and Sunlight Analysis Report prepared by Avison Young for further details.

10. Rationale for proposed parking provision with regard to development plan parking standards and to the 'Sustainable Urban Housing Design Standards for New Apartments - Guidelines for Planning Authorities' (2018), to consider the existing and proposed car parking provision in the context of the available car parking at the Southgate Centre and the existing and projected demand for same with regard to current and proposed land uses at the Centre, also details of car parking management.

Response:

2.32 In response to Item No. 10 of the Board's Opinion, a Parking Strategy prepared by DBFL provides a detailed rationale for the proposed parking provision with regard to the development plan parking standards and to the '*Sustainable Urban Housing Design Standards for New Apartments - Guidelines for Planning Authorities*' (2018). As part of this, the Parking Strategy considers the existing and proposed car parking provision in the context of the available car parking at the Southgate Centre and the existing and projected demand for same with regard to current, proposed and potential future land uses at the Centre. The Parking Strategy also provides details of car parking management and initiatives for sustainable travel.

2.33 It is recognised that the proposed 181 no. car parking spaces would not be consistent with the Development Plan requirements, however the proposed parking provision is considered justified in the context of the 2018 Apartment Guidelines and based on the

parking analysis of the adjoining Southgate Centre, which is a mixed use development with a significant commercial retail area and includes office space and residential units.

- 2.34 In summary, the Parking Strategy demonstrates the proposed car parking ratio of 0.9 spaces per unit (181 car parking spaces) is considered justified having regard to the pattern of the adjoining Southgate Shopping Centre, where the existing apartments have a typical parking demand of 0.7 car parking spaces per unit. This also reflects the commuting patterns for the Southgate complex as identified in the 2016 Census SAPMAP. These existing apartments benefit from the same public transport accessibility levels and general demographics, and therefore provide a reasonable representation of the likely parking demand within the proposed development. Furthermore, visitors to the proposed development will also be able to avail of the surplus car parking spaces available within the Southgate Shopping Centre.
- 2.35 The Parking Strategy also includes initiatives for reducing the dependency on private cars and encouraging residents to make use of the sustainable transport options available. This includes increased cycle parking (300 no. cycle parking spaces), encouraging residents to use public transport with awareness and promotion, and an active and enforced parking management strategy.
- 2.36 The proposed parking provision is consistent with and considered to be justified in the context of the Apartment Guidelines 2018. In this regard, the subject site is considered an 'Intermediate Urban Location' given the location of the proposed development in a mixed use neighbourhood centre setting, adjacent to employment uses, and based on the density of the development which is well in excess of 45 units per hectare. On this basis, it is considered that the proposed development is appropriate to accommodate reduced parking requirements. Therefore, a total of 181 car parking spaces are provided (a ratio of c. 0.9 spaces per unit). It should be noted that this represents a reduction in car parking provision when compared to the scheme as submitted for pre-application consultation. The reduction has regard to the comments of the Board in relation to car parking, and above mentioned detailed analysis undertaken by DBFL Consulting Engineers in the context of the existing car parking provision in the adjacent Southgate Centre.
- 2.37 Having regard to the above, it is considered that the proposed car parking is justified and would not materially contravene the local policy having regard to the existing parking availability within the Southgate Shopping Centre, and in the context of the Apartment Guidelines. However, without prejudice to the foregoing, a justification is set out in the Material Contravention Statement prepared by John Spain Associates in the event that the Board consider that a material contravention does arise.

11. Landscape and Visual Impact Assessment with photomontages, to include, inter alia, consideration of visual impacts on the Dublin Road, the Colpe Road and surrounding residential areas.

Response:

- 2.38 A Landscape and Visual Impact Assessment report has been prepared by Dermot Foley Landscape Architects and is submitted along with the final application. This report has been prepared based on photomontages / verified views prepared by Digital Dimensions using the appropriate methodology. The views and the accompanying report address the visual impact of the scheme on views from the Dublin Road, Colpe Road, and surrounding residential areas as required by the foregoing item of the Board's Opinion.

- 2.39 Based on an assessment of the impact of the scheme on these viewpoints, the report concludes:

“The completed development provides for a positive response to the existing predominantly brownfield site. It provides for a detailed, permeable and site-specific response to the provision of high-quality public open spaces. The open space network provides for an attractive and diverse range of amenity and recreational opportunities. Equally the open space network enhances the strong urban design framework for the site. As a whole the proposed development will make a significant and positive contribution to the townscape of the wider area and the future context of the surrounding lands. Likewise, the proposed network of open spaces will make a significant and positive contribution to the emerging landscape character, biodiversity, amenity and recreational opportunities of the area.”

12. Traffic and Transport Impact Analysis, to be prepared in consultation with Louth County Council.

Response:

- 2.40 In response to Item No. 12, we refer the Board to the Traffic and Transport Assessment (TTA) prepared by DBFL Consulting which includes an impact assessment for Drogheda Town. This was completed in response to the pre-planning consultation response received from Louth County Council (LCC) which noted that additional traffic would be routed along the R132 towards Drogheda and, in particular, to the Bull Ring junctions which would result in significant demands on the capacity of the junction.
- 2.41 Although it is anticipated that the level of impact experienced at junctions located beyond the scope of the traffic network model would be immaterial as a result of the development, an impact assessment was nevertheless carried out for the Bull Ring junctions in order to determine the impact that the development would have on these junctions and alleviate concerns raised by LCC.
- 2.42 The results of the assessment demonstrate that there are negligible impacts at the Bull Ring junctions as a result of the proposed development with impacts below 2% at both junctions in both the AM and PM peak hour periods. Therefore, it was not considered necessary to conduct further assessment at these junctions. DBFL Consulting Engineers consulted with LCC, and issued the Traffic and Transport Assessment to LCC prior to submission of the application.

13. Road Safety Audit and Quality Audit.

Response:

- 2.43 A Stage 1 Quality Audit prepared by Bruton Consulting Engineers Ltd is submitted with the application. The Quality Audit has been carried out in accordance with the Design Manual for Urban Roads and Streets.

14. Archaeological Impact Assessment to be prepared in consultation with the National Monuments Service.

Response:

- 2.44 In response to this item of information requested within the Board's Opinion, a final Archaeological Impact Assessment has been prepared by Archer Heritage, and is submitted along with this final application. Archer Heritage consulted with the National Monuments Service prior to the finalisation of the report, with a copy of the draft report issued to the National Monuments Service on the 6th March 2020.

15. Rationale for proposed childcare provision (or omission of same) with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments - Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme. The applicant is advised to consult with the relevant Childcare Committee in relation to this matter prior to the submission of any application.

Response:

- 2.45 In response to Item No. 15 of the Board's Opinion, we refer to the Social and Community Infrastructure Audit prepared by John Spain Associates which provides a rationale why it is considered of the provision of a separate childcare facility is not required as part of the development, due to the subject site's location directly adjacent to a significant existing childcare facility and within an area which benefits from access to a range of existing facilities.
- 5.22 In terms of assessing the need for whether the provision of a childcare facility is justified within the proposed development, the Guidelines for Planning Authorities on Childcare Facilities (2001) recommend that 20 childcare spaces be provided for new housing developments of 75 units or more. It is generally accepted that one bed units can be discounted from the overall figure. This accords with Paragraph 4.3 of the Apartment Guidelines 2018 which states that "*Notwithstanding the Department's Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile for the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms*".
- 2.46 Based upon the above, there are 148 units within the proposed development that are 2 and 3 bedroom units and to which this is applicable. Based on the requirement for 20 spaces per 75 units, this would therefore require the provision of a childcare facility with capacity for 39 children ($148 / 75 \times 20 = 39.46$).
- 2.47 The Grange Early Years and Preschool Centre, located immediately adjoining the site (which was developed by the applicant), provides services for children of 0-1 up to 5 years of age and has a staffing level of 16 employees (as per the Meath County Childcare Committee website). The childcare facility has a capacity of 98 spaces at

present, however the applicant has confirmed that a portion of the existing floorspace within the childcare facility is not currently being utilised. We refer to the submitted letter provided by the applicant for further information, and outlines on that basis, an additional capacity of c. 156 sq.m (1,678 sq.ft) has been identified, which could accommodate c. 50 childcare spaces.

- 2.48 A number of additional proximate childcare facilities have also been identified in the surrounding area, further details of which are set out within the Social and Community Infrastructure report accompanying this application.
- 2.49 On the basis of the significant number of childcare facilities in the area, the direct adjacency of the site to an existing significant childcare facility, and the nature of the proposed development and its likely target demographic, it is respectfully submitted that the provision of an additional childcare facility within the proposed development should not be required.
- 2.50 Having regard to the foregoing and the contents of the Social and Community Infrastructure report, it is considered that an additional childcare facility / creche will not be required to serve the current development proposal.

16. AA Screening Report

Response:

- 2.51 An AA Screening Report has been prepared by Enviroguide Consulting and accompanies the final application. The AA Screening Report concludes:

“The Proposed Strategic Housing Development at Southgate, Drogheda Co Meath has been assessed and taking into account:

- *the nature, size and location of the proposed works and possible impacts arising from the construction works*
- *the qualifying interests and conservation objectives of the European sites located within the 15km Zone of Impact*
- *the potential for in-combination effects arising from other plans and projects.*

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

- *Clogher Head SAC;*
- *River Nanny Estuary and Shore SPA; and*
- *River Boyne and River Blackwater SPA*
- *Boyne Coast and Estuary cSAC,*
- *River Boyne & River Blackwater cSAC; and*
- *Boyne Estuary SPA*

These complete precise and definitive findings based on the best available scientific evidence, remove all reasonable scientific doubt that the proposed Development will have any likely significant impacts on the European Sites detailed above. In addition, no measures intended to avoid or reduce the potential harmful effects of the project on a European Site have been taken into account in this Appropriate Assessment Screening Report and its conclusions.

Accordingly, a Stage 2 Appropriate Assessment is not required to be carried out in relation to the Proposed Development.”

17. Water infrastructure proposals to meet the requirements outlined in the submission on file of Irish Water dated 12th December 2019.

Response:

- 2.52 We refer to Section 6 of the Infrastructure Design Report prepared by DBFL Consulting Engineers which provides a full response to Item No. 17 of the Board’s Opinion.
- 2.53 In relation to water, this confirms the applicant will enter into a connection agreement with Irish Water prior to commencement on site and this agreement will include details of potential infrastructure upgrades (to be determined as part of the connection agreement progress and undertaken by Irish Water) with the costs of the same borne by the applicant. For clarity these works do not form part of the proposed development but would be delivered by Irish Water with the applicant bearing the costs for same.
- 2.54 In relation to wastewater, this confirms that foul flows from the subject site will connect to the existing foul drainage within the Grange Rath estate. The existing foul drainage infrastructure is in the ownership of the applicant and therefore permission is not required from a third party to connect to the infrastructure. A letter confirming this from the owner is provided as an appendix to the DBFL Infrastructure Design Report.
- 2.55 A copy of the Irish Water Confirmation of Feasibility and Statement of Design Acceptance for the proposed development are submitted with the application.

3.0 RESPONSE TO POINTS RAISED BY THE PLANNING AUTHORITY

- 3.1 The report of the Planning Authority on the pre-application documentation submission was issued to the Board in accordance with Section 6(4)(b) of the Act, as amended.
- 3.2 We note that the Planning Authority confirms the site complies with the requirements of the C1 zoning objective, and that the Planning Authority considers the proposed density is appropriate for the subject site due to its location along a public transport corridor adjoining a bus stop and adjacent to neighbourhood facilities at Southgate.
- 3.3 The following are the relevant extracts from the CE’s Report which specifically request that the following matters are addressed as part of any future application.

- ***In the case of apartment blocks, particular attention must be paid to the location of communal open space for the residents. This open space should not be unduly overshadowed by the blocks and be laid out in such a fashion to provide for ease of maintenance. Secluded sunny areas and shade should be provided by a careful choice of planting. Communal open space is identified in between both apartment blocks.***

The 2018 Apartment Guidelines sets out minimum standards for communal open space. The development includes communal areas along the southern section of the site. It is considered that a detailed layout should be included with any future application which shows clear distinction between public open space and communal open space.

- 3.4 This has been addressed under items no. 7 and 9 above. The scheme incorporates communal areas (comprising a total of 0.29 ha) providing for a high standard of amenity for future residents, including a play area located to the west of Blocks 1 and 2, at podium level above the car park below. The proposed communal open space significantly exceeds the Apartment Guidelines requirement of 1,333 sq.m for the development (53 x 5 + 132 x 7 + 16 x 9). In total, c. 2,210 sq.m of communal open space is provided.
- 3.5 A drawing delineating the breakdown of public and communal open space is included at Page 37 of the Architectural Design Statement prepared by KMD. As set out in the HQA and Statement of Consistency with the application
- 3.6 Furthermore, the Daylight and Sunlight Analysis confirms the open space will not be unduly overshadowed by the blocks as confirmed in the sunlight and daylight assessment report prepared by Avison Young, which sets out that all of the communal and public open space will achieve compliance with the BRE guidance for sunlight access.
- **Section 11.2.2.6 of the Meath County Development Plan 2013-2019 relates to boundary treatments. The development does not include any housing and a site boundary layout has been submitted that shows the locations of different boundary treatment on the site boundaries. It is considered that any future application should include details of all site boundaries and boundaries within the site including ground floor patio detail. Plans, elevations and sections of each boundary should be provided.**
- 3.7 This has been addressed under item no. 2 above, and we also refer to the Boundary Sections Drawing prepared by KMD Architects (Drawing no. A19-101) and the Boundary Plan prepared by Dermot Foley Landscape Architects (Drawing no. Sh. 11-DR-202).

Other Internal Reports

- 3.8 The CE's Report provides a summary of the comments received from other departments within the Planning Authority. These comments have been considered in detail and informed the design process, as summarised below.
- **Public Lighting Section – “the lighting design is ‘unacceptable and not to the required standard, it is also stated that the Landscape Plan is premature without a satisfactory lighting design as they must complement each other’**
- Public Lighting recommends that the ‘revised lighting design be required for all public spaces within the confines of the development. The public lighting shall be designed and installed as per “Meath County Councils; Public Lighting Technical Specification & Requirements” document’.***
- 3.9 A revised lighting scheme is submitted with the application. This has been designed in accordance with the Meath County Councils; Public Lighting Technical Specification & Requirements” document’
- **Meath County Council Water Services Section – note that the development as proposed at the pre-application stage broadly met the requirements of the MCC Water Services Section, and required a number of matters be**

addressed in relation to Surface Water Treatment & Disposal prior to submission of an SHD application:

3.10 We refer to Section 6 of the Infrastructure Design Report prepared by DBFL Consulting Engineers which provides a full response to the pre-planning consultation comments raised by the MCC Water Services Section.

- **Environmental Section - The applicant would be required to provide the following documents: a site specific construction and demolition waste management plan and a construction environmental management plan**

3.11 In response to the comments raised, a Construction and Demolition Waste Management Plan, an Operational Waste Management and a Construction and Environmental Management Plan are submitted with the application.

4.0 CONCLUSION

4.1 In conclusion, it is respectfully submitted that all the issues raised by An Bord Pleanála have been comprehensively and successfully addressed prior to the submission of this final application to the Board.

4.2 The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

4.3 The changes and clarifications incorporated into the final scheme are considered to result in improvements to the overall proposed development and ensure that a high-quality scheme is presented to the Board for approval.

4.4 In addition, the issues raised by the Planning Authority in their pre-application report have also been addressed in the final application, as summarised above.

4.5 It is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional, and local planning policies and guidelines and therefore should be granted planning permission in this regard.