

SHD Planning
Application to
An Bord
Pleanála

Material
Contravention
Statement

Dunshaughlin West /
Phase II Strategic
Housing Development

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

For Castlethorn
Construction
Unlimited Company

OCTOBER 2020

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1 INTRODUCTION

This document has been prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2 D02 X361, to address aspects of the proposed development that may be considered by An Bord Pleanála to materially contravene the Development Plan.

Under the Planning and Development (Housing) and Residential Tenancies Act 2016, where a proposed development is considered to materially contravene the objectives of the relevant Development Plan or Local Area Plan (other than in relation to the zoning of the land), an SHD application must include a statement indicating why permission should, nonetheless, be granted, having regard to matters referred to in section 37(2) (b) of the Act of 2000. The statutory notice accompanying this application includes an appropriate form of words that confirms this.

In considering whether there would be a departure from a fundamental provision of the statutory development plan, the relevant objective(s) must be identified and a determination made by the competent authority as to whether the proposed development, alone or cumulatively, would seriously prejudice the objective of the plan. An Bord Pleanála has a discretion to grant permission for development that materially contravenes the development plan, other than in relation to land use zoning, subject to specific considerations. These considerations are identified in Section 2 below.

This statement, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants, seeks to address the possibility that the proposed development could be deemed by Meath County Council or An Bord Pleanála to represent a material contravention of the Meath County Plan 2013 – 2019 or the Dunshaughlin Local Area Plan 2009 – 2015 (as extended) specifically relating to: -

- Core Strategy & Housing Allocation.
- Land Use Zoning.

We acknowledge that it lies with An Bord Pleanála to determine whether the proposed development materially contravenes the Development Plan / Local Area Plan.

2 DISCRETION OF AN BORD PLEANÁLA TO GRANT PERMISSION FOR DEVELOPMENT THAT MATERIALLY CONTRAVENES THE DEVELOPMENT PLAN

In accordance with Section 9(6) of the Planning and Development (Housing) and Residential Tenancies Act 2016 the Board may grant permission for a proposed strategic housing development that materially contravenes the development plan (and/or a local area plan), other than in relation to zoning. Section 9(6)(a) states: -

“Subject to paragraph (b), the Board may decide to grant a permission for a proposed strategic housing development in respect of an application under section 4 even where the proposed development, or a part of it, contravenes materially the development plan or local area plan relating to the area concerned.”

Section 9(6)(c) of the 2016 Act, states that the Board may only grant permission for a development that materially contravenes a development plan (other than in relation to the zoning of the land) where it considers that, if section 37(2)(b) of the Planning & Development Act 2000, as amended, were to apply, it would grant permission for the proposed development.

Section 37(2)(b) of the Act of 2000 (as amended) states that where a proposed development materially contravenes the development plan, the Board may grant permission only where it considers that: -

“(i) the proposed development is of strategic or national importance,

(ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned,

or

(iii) permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government,

or

(iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.”

It follows from the foregoing that it must be established that the proposed development is of “strategic” or “national importance” and that one of the other criteria under (ii), (iii) or (iv) are met. By definition, “strategic housing development” is of “strategic...importance” and this is reflected in the decision-making of the Board in relation to SHD applications. The application of the other criteria will be addressed for the below.

3 PROPOSED DEVELOPMENT

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

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

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

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

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

4 LAND USE ZONING

Under the Development Plan subject lands are subject to a phasing objective - 'Residential Phase II (Post 2019)' under the current Development Plan and primarily zoned as objective A2 – New Residential with a portion of the lands proposed as Open Space being zoned Objective F1. Given the date of lodgement a decision on this Application will be made in 2020, therefore, if permitted the development on the subject lands will occur in 2020 (i.e. post 2019).

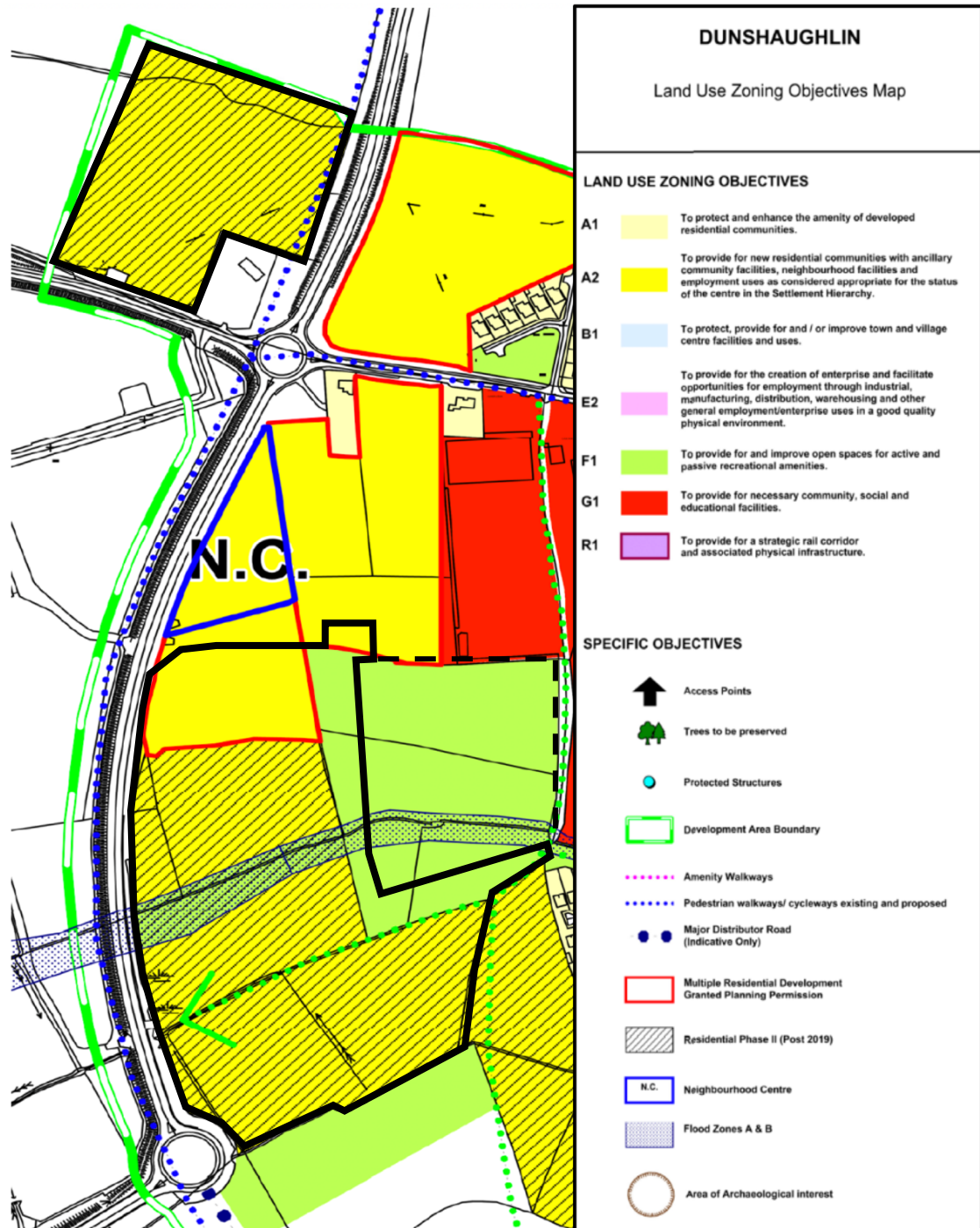


Figure 1: Extract from the zoning map for Dunshaughlin in the Meth County Development Plan 2013 – 2019 with site outlined indicatively in solid black line. The lands zoned F1 – Open Space which are outside the application site but also under the control of the Applicants are indicated in a dashed black line (Overlay by SLA).

The zoning objective for A2 reads as follows: -

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

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

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

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

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

The Development Plan indicates that the main objective for A2 lands is development or redevelopment which is residential in character with ancillary uses and for F1 lands provide for and improve open spaces.

The Development Plan lists a range of ‘permissible uses’ and uses that are ‘open for consideration’ (see below). Under section 2.9.6 of the Development Plan, any proposed use not listed will be assessed under the overall policies and objectives of the plan.

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

In the context of the A2 – New Residential zoning, the proposed development consists of a residential scheme. Additional physical and social infrastructure / facilities are proposed to be provided in the form of (*inter alia*) public open spaces and a childcare facility. These are considered permissible uses.

The application site also includes lands zoned F1 – Open Space. Pedestrian / cycle infrastructure and water services connecting between Character Area 3 and 4 cross the open spaces lands where appropriate. Permitted uses under Objective F1 – Open Space include “Cycleways/Greenways/Trail Development” and “Water Services/Public Services”, therefore, both the pedestrian / cycle infrastructure and water services are considered permissible on these lands.

The development also included a vehicular link between Character Area 3 & 4 through the lands zoned F1 – Open Space. While not strictly permitted on lands zoned F1 – Open Space the subject road link has a very limited effect on the use of the lands zoned for public open space. We refer to Section 5.2 below where this is addressed in further detail.

The proposed development complements and consolidates the established development of Dunshaughlin in sequential and integrated manner.

5 POTENTIAL MATERIAL CONTRAVENTION ISSUES

5.1 Core Strategy – Meath County Development Plan 2013 – 2019 & Dunshaughlin Local Area Plan 2009 – 2015

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

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

Table 2.4 Housing Allocation & Zoned Land Requirements

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

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

Table 2.5 Allocated and Committed Units

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

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

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

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

Objective SS OBJ 1 sets out: -

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

Objective SS OBJ 11 sets out: -

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

The proposed development of 415no. units at the Dunshaughlin SHD site may in tandem with similar development at other undeveloped land banks exceed the housing allocation for this settlement as envisaged by the LAP and Development Plan core strategy. This is not however considered to be contrary to strategic planning policy at local, regional and national levels, relevant to the regeneration and development at the application site. We considered that the proposed land use and density is compliant with planning and land use policy and ministerial guidance for this location.

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

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

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

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

See Section 6 below for further justification in relation to the cores strategy / housing allocation based on new national & regional planning policy.

5.2 Land Use Zoning – Meath County Development Plan 2013 – 2019 & Dunshaughlin Local Area Plan 2015

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

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

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

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

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

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

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

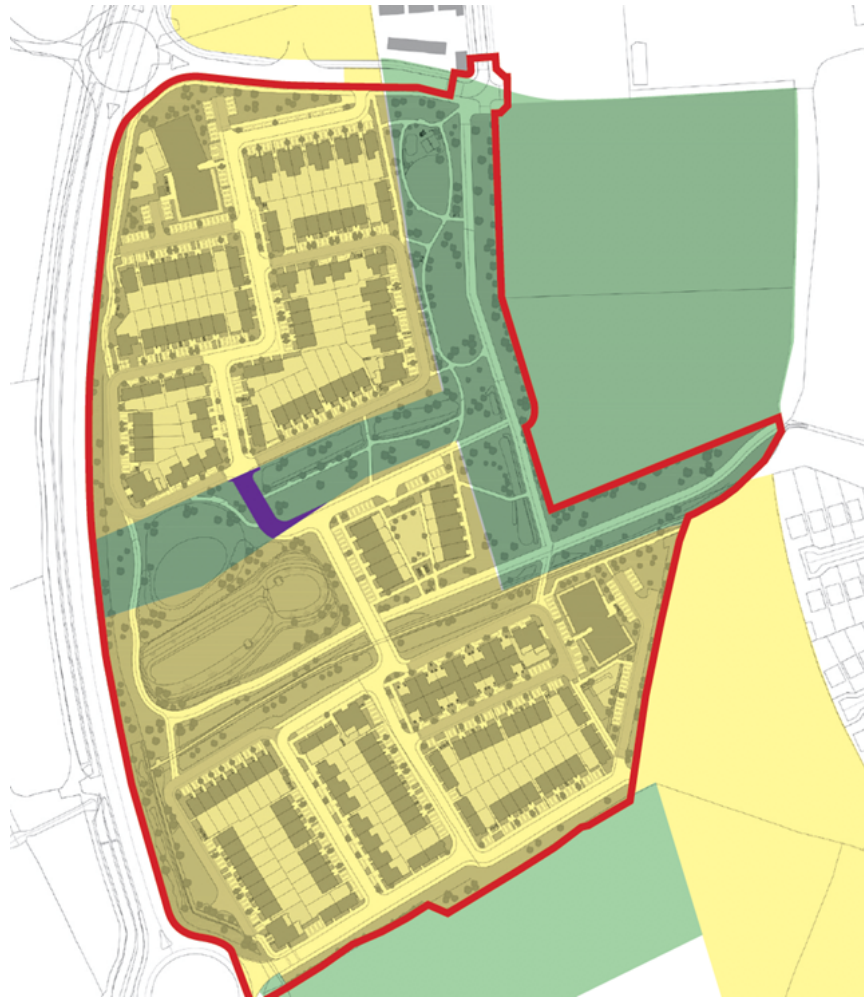


Figure 2: Extract from the Design Statement, prepared by O'Mahony Pike Architects showing the road connection between Character Area 3 and Character Area 4 through lands zoned F1 – Open Space.

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

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

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

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

6 JUSTIFICATION FOR MATERIAL CONTRAVENTION

As noted in Section 2 above, Section 37(2)(b) of the Planning Act, 2000, states that where a proposed development materially contravenes the Development Plan, the Board may grant permission where it considers that: -

“(i) the proposed development is of strategic or national importance,

(ii) there are conflicting objectives in the development plan, or the objectives are not clearly stated, insofar as the proposed development is concerned,

or

(iii) permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government,

or

(iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.”

We set out below our interpretation of how the Section 37(2)(b) considerations relate to the proposed development, from a planning perspective: -

6.1 (i) The Proposed Development is of Strategic or National Importance

The proposed development was deemed on foot of a pre-application request and subsequent tri-partite meeting with An Bord Pleanála and Meath County Council, to meet the legislative definition of strategic housing development. It can therefore be deemed of strategic importance with respect to the timely delivery of urban housing and implementation of the current Government’s Action Plan for Housing and Homelessness – Rebuilding Ireland.

The significant shortfall in housing output to address current and projected demand is a national problem, with lack of housing in Metropolitan Dublin, the Greater Dublin Area and elsewhere having social and economic ramifications for sustainable national growth. We would therefore submit that the proposed development is of strategic and national importance.

The proposed development is considered to be in accordance with Objective 3a of the National Planning Framework. Objective 3a states the following: -

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

The proposed development represents the achievement of more sustainable higher density residential development, in line with existing and emerging transportation facilities within the vicinity of the application site.

Furthermore NPO 33 states: -

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

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

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

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

- The proposed development will respond to demand and need for residential development within close proximity to Dunshaughlin town centre and to existing residential areas.

- The lands are considered spatially sequential and positioned adjacent to the existing built-up footprint of Dunshaughlin and contiguous to existing developed lands, facilities and amenities.
- Dunshaughlin is strategically located to cater for significant new growth and the proposed development will contribute to supporting a compact urban form providing strong linkages and an extension of the built up area of Dunshaughlin on lands which are zoned for new residential development.
- The proposal is for a residential development which exhibits a high standard of architectural and landscape design, and which will provide for a high-quality and sustainable environment for future residents on a suitable site which has long since been zoned for such development.
- The proposed development supports the integration of land use and transport due to the highly accessible location of the subject lands. In line with its Settlement Strategy status the proposed development supports Dunshaughlin in continuing to develop in a self-sufficient manner to facilitate additional population growth.
- The proposed development will respond to demand and need for residential development within close proximity to Dunshaughlin town centre and to existing residential areas. The development will include a broad mix of units types to support the creation of new community.
- The development is premised on creating a pedestrian / cycle friendly environment. Dedicated pedestrian and cycle connections within the development to the adjoining Phase 1 development and Drumree Road are provided. Further pedestrian and cycle connections east along the Skane River are also provided to be extended to and through the adjoining community college lands to link with Dunshaughlin Town Park and on towards Main Street.
- The proposed development will assist in the consolidation of population growth in Dunshaughlin and in County Meath as a whole. As demonstrated above, the proposed development will benefit from proximate public transport facilities, and strong pedestrian and cycle linkages internally and externally to Dunshaughlin town centre.
- Dunshaughlin is well served by public transport and the Planning Authority have acknowledged that further growth will support the viability of further public transport provision in the medium to longer term with the preferred route for the rail line and planned Dunshaughlin train station located to the west of the town and conveniently accessible to the subject lands.
- Dunshaughlin is well served by public transport with Bus Éireann services running regularly direct to Dublin City. M3 Parkway Railway Station (PACE) which has direct commuter rail services to Dublin City Centre is located approximately 10 kilometres from Dunshaughlin and provides a 'park and ride' facility (1,200no. free car parking spaces). The M3 motorway is immediately accessible to the subject site and provides a direct link to Dublin City to the south and Navan to the north.
- The subject site benefits from its immediate accessibility to high quality road infrastructure as well as foul drainage and water supply infrastructure already in-situ under Phase 1 works.
- We refer the Board to the independent Socio-Economic Report, prepared by Future Analytics Consulting (FAC) Ltd. Which provides a comprehensive socio-economic assessment for Dunshaughlin which looks at population, work force, travel patterns and residential development pipeline and output.
- The Report demonstrates that there is a significant amount of employment within Dunshaughlin and within a 15min drive based on data from the CSO's Place of Work, School or College - Census of Anonymised Records (POWSCAR). The provision of additional housing will ensure that the demand created by this workforce is met and ensures jobs can be retained and unsustainable patterns of commuting are reduced.

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

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

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

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

Arising from the above, and while noting that the statutory requirement is for the development to be of either strategic *or* national importance, it is our professional opinion that the project in question should be considered to be of both strategic and national importance.

6.2 (ii) Permission for the Proposed Development should be Granted having regard to Regional Spatial and Economic Strategy for the Area, Guidelines Under Section 28, Policy Directives Under Section 29, the Statutory Obligations of any Local Authority in the Area, and any Relevant Policy of the Government, the Minister or any Minister of the Government

The County Development Plan was adopted before the publication of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Eastern & Midlands (RSES) which seek to implement at a regional level the strategic national policy objectives of the NPF. As such, justification for the proposed development is supplied by the need to achieve the regional policy objectives that seek to implement the NPF strategy.

- **National Planning Framework – Ireland 2040**

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

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

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

Region Based Objectives

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

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

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

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

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

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

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

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

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

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

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

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

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

“Tier 1: Serviced Zoned Land

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

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

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

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

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

- **Implementation Roadmap for the NPF**

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

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

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

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

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

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

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

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

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

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

- **National Development Plan 2018 – 2027**

The National Development Plan 2018 – 2027 (NDP) sets out the main investment projects, programmes and priorities envisaged over the next decade in order to drive the implementation of the NPF.

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

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

The NDP states that in 2016 as part of the preparation of the Greater Dublin Area Transport Strategy, a cost benefit analysis of an extension of the Dunboyne / M3 Parkway line to Dunshaughlin and Navan was conducted by the National Transport Authority (NTA).

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

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

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

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

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

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

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

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

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

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

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

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

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

- **Employment**

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

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

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

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

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

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

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

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

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

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

Overall Analysis of Socio-Economic Profile

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

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

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

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

- **Housing Delivery**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SUMMARY

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

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

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

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

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

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

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

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

6.3 (iv) Permission for the Proposed Development should be Granted having regard to the Pattern of Development, and Permissions Granted, in the Area Since the Making of the Development Plan.

It is submitted that the publication of the NPF, RSES and various supporting Ministerial Guidance provide justification for more sustainable development in terms of density at this site since previous permissions were granted for lower density development.

The proposed development will intensively develop a remaining vacant site in the LAP lands, predominantly for residential use with a childcare facility and potentially a small scale retail use that are located proximate to and entirely ancillary to the existing uses in the town centre. The proposed development would capitalise on the considerable infrastructural investment that has taken place both within Dunshaughlin as a whole and within the immediate western environs of the town, much of which has been facilitated and indeed carried out by the Applicant.

The subject site is unique in Dunshaughlin in terms of its location immediately adjoining completed distributor roads infrastructure i.e. Dunshaughlin Link Road which provides direct access to the M3 Motorway.

Much of the supporting physical infrastructure required for these Phase 2 lands has, and is, being delivered as part of the Phase 1 permission (MCC Reg. Ref. DA/803421 refers). This includes foul trunk main, surface water outfall and large wetland attenuation area. Phase 1 will also see the construction of a new roundabout junction on Dunshaughlin Link Road.

Therefore, the granting of permission can be justified by reference to the pattern of development, and permissions granted, in the area since the making of the development plan.

7 CONCLUSION

We respectfully submit that, should the Board consider the proposed development is a material contravention of specific Development Plan and/or Local Area Plan objectives, that there is reasonable justification to grant permission, having regard to the relevant criteria under Section 37(2)(b) of the Planning and Development act 2000, as amended.

We consider that the Board have also been provided with comprehensive evidence to support the making of such a decision to materially contravene either objectives of the Meath County Development Plan 2016 – 2022, or the objectives of the Dunshaughlin Local Area Plan 2009 – 2015 (as extended), or both in the event the Board considers that necessary.

Stephen Little & Associates are committed to progressing and achieving sustainable development goals.

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