



STATEMENT OF CONSISTENCY

On behalf of

Consdorf Investments ICAV

For

Proposed Strategic Housing Development Consisting of 130 no. Dwellings

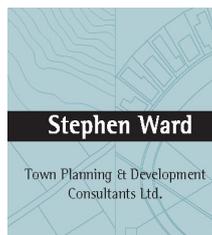
On Lands Zoned for Residential Uses

At

Ballinderry Road, Mullingar, Co. Westmeath

By

Stephen Ward Town Planning and Development Consultants Limited



March 2022

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EXECUTIVE SUMMARY

This Statement of Consistency accompanies a planning application under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016 for a Strategic Housing Development (SHD) consisting of 130 no. dwellings, associated open space areas and all associated site development works. **The application is made by Stephen Ward Town Planning and Development Consultants Limited on behalf the applicant, Steinfort Investment Fund (a wholly owned sub-fund of Consdorf Investments ICAV), the applicant. In the interests of brevity, the applicant is referred to as 'Consdorf Investments ICAV' in this and other accompanying reports submitted in support of the application.**

In summary, the key elements of the development will consist of the construction of 130 no. dwellings in semi-detached, terraced, duplex and apartment format. Buildings range in height from 2 to 2.5 storeys (including some that incorporate attic floor living space) in the following mix - 23 no. 2 bedroom; 74 no. 3 bedroom and 33 no. 4 bedroom. The overall quantum of public open space provided to serve the development extends to c. 0.655 sq.m.

The proposed development also provides for the construction of a section c.187m of a new landscaped link street, incorporating cycle tracks and footpaths either side, in accordance with the Development Framework for the Mullingar South Framework Plan as contained within the Mullingar Local Area Plan 2014-2021 (as extended). In addition to serving the development itself, the proposed link street provides a potential future connection to residentially zoned lands to the west of the application site. Two new no. pedestrian / cyclist connections are also proposed along the northern site boundary providing pedestrian / cycle access only to the adjoining Chestnut Drive / Grove residential development.

Vehicular access to the development is provided via a new single access point off the Ballinderry Road (L1132) along the eastern site boundary onto the proposed new link street. The development also provides for the construction of a section of footpath (c. 70 metres) in a northerly direction on the western side of the Ballinderry Road from the application site entrance to connect to the existing footpath to the north.

The planning application also includes the demolition of an existing habitable dwelling and ancillary outbuildings and all associated site development works including the provision of a pumping station and rising main to serve the development and associated infrastructure and service provision, landscaping, boundary treatments, roads, footpaths public lighting, the provision of 3 no. ESB substation, downing of ESB powerline, Electrical Vehicle charging points and ducting. The site development works also provide for regrading/infilling of land levels within the site and the provision of retaining walls/structures.

The breakdown and mix of dwellings proposed is

Table 1 below sets out the key characteristics of the proposed SHD.

Table 1 - Principle Characteristics of the Development			
Gross Site Area	4.015 hectares (of which 0.045 consists of a section of the public road on which it is proposed to construct a footpath)		
Gross Residential Area	3.97 hectares		
Public Open Space	0.665 hectares		
Building Height	2-2.5 storeys		
Residential Density	32.4 dph (Gross Site Area) 33 dph (32.7dph Gross Residential Areas)		
Total No. Units	130		
Houses	94		72 %
Apartment /Duplex Units	36		28%
Apartment/Duplex Mix	2 bed	23	64%
	3 bed	13	36%
Residential GFA	14,602 sq.m		
Cycle Parking	79 no. spaces		
Car Parking	215 no. spaces		
Plot Ratio	0.49		
Site Coverage	19.5%		

This Statement of Consistency contains three sections. Section One provides an introduction to the proposed development and the site within the context of national and regional planning policy framework. The proposed development and consistency with the following local planning policy documents is contained in Section Two-

- (a) Westmeath County Development Plan 2021-2027
- (b) Mullingar Local Area Plan 2014-2020 (as Extended)

Consistency with the Guidelines issued by the Minister under Section 28 of the Act of 2000 and other relevant Guidelines listed below are detailed at Section 3 of this Statement-

- Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009) with the associated 'Best Practice Urban Design Manual' (2008);
- Sustainable Urban Housing: Design Standards for New Apartments (Revised Version 2020)
- Urban Development and Building Heights, Guidelines for Planning Authorities (December, 2018);
- The Design Manual for Urban Roads and Streets (2013);
- Appropriate Assessment of Plans and Projects- Guidance for Planning Authorities (2009),
- The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009).

Other planning policy documents and policy documents relative to planning and development are also referenced, such as 'Rebuilding Ireland - Action Plan for Housing and Homelessness' (2016) and 'Housing for All

– a New Housing Plan for Ireland (2021). In addition Circular NRUP 02/2021 – Residential Densities in Towns and Villages (DHLGH 2021) is referenced.

SECTION 1.0 – INTRODUCTION TO SITE AND PROJECT

The proposed development site is located on a predominantly Greenfield site on residentially zoned lands to the south-west of Mullingar Town. A portion of the site, approximately 0.2 hectares, consists of a detached dwelling, associated outbuildings and attendant garden area. It is proposed to demolish this dwelling and outbuildings as part of the proposed development. The site is bounded to the east by Ballinderry Road and a limited number of single dwellings fronting that road; by an established housing area to the north; by residentially zoned lands to the west (beyond which is existing an existing housing area accessed from Lynn Road); and to the south by existing farm outbuildings, ‘one-off’ dwellings that front the Ballinderry Road and by farmland.

1.1 PLANNING POLICY FRAMEWORK AND CONTEXT

1.1.1 National Planning Framework (NPF) – Project Ireland 2040

The NPF recognises there are significant contrasts across the Eastern and Midlands Region, with distinctive areas and associated strengths and challenges but acknowledges that all main towns are strategically placed in a national context (pg. 32).



Figure 1 - Extract from National Planning Framework

The NPF states, *“the Midlands is strategically important”*. Bordering both the Northern and Western, and Southern Regions *“its central location in Ireland can be leveraged to enable significant strategic investment to a greater extent than at present, supported by a sustainable pattern of population growth, with a focus on strategic national employment and infrastructure development, quality of life and a strengthening of the urban cores of the county towns and other principal settlements”* (para. 3.2:32).

Location of Future Residential Development - It is a National Policy Objective (NPO 33) to, *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location”* (pg. 93).

Whilst population projections are not provided beyond a County Level in the NPF, the Framework nevertheless states, *“There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth”* (pg. 60).

The NPF also highlights at Appendix 2 that Mullingar has a high ratio of jobs to resident workers in Mullingar, reflecting its role as an employment centre and the extent of its area of influence in the region.

The NPF projects a population growth of 30 per cent or more for those settlements not identified under NPO 2a and 2b (i.e. the five cities and their suburbs in addition to Athlone, Sligo, Letterkenny, and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross border networks) above 2016 population levels (NPO 9). Mullingar has a population of 20,928 people according to the 2016 Census. This equates to a population increase of 6,278 raising the projected population of Mullingar to 27,206.

While projections are not provided below the County level, the NPF states *“It is not expected that all towns, large or small, will each target the same level of growth to 2040 and targets set in accordance with the Framework and the Regional Spatial Economic Strategies will be reviewed based on performance, by 2027. But all towns can and must grow over this period and some will be identified as having capacity for higher than average levels of growth”* (pg. 62).

Section 4.4 of the NPF states that planning to accommodate strategic employment growth at regional, metropolitan and local levels should include consideration of-

- *Current employment location, density of workers, land-take and resource/infrastructure dependency including town centres, business parks, industrial estates and significant single enterprises.*
- *Locations for expansion of existing enterprises.*
- *Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port, etc.) or dependent on skills availability (pg. 64).*

There are several large existing employment areas in Mullingar. These include Mullingar Business and Technology Park (27 hectares) at Ardmore located to the north west of the site; Marlinstown Office Park located to north of the site and Lough Sheever Corporate Park located at Robinstown in the northern environs of the Town.

Figure 2 – Shows Location of Proposed Development Site Relative to Major Employment Areas in the Town Including Health Care Infrastructure and Services



In addition to industry and business related employment areas, the town is also well served by a cluster of key health infrastructure and services. These include the Midland Regional Hospital a 200 bed acute hospital serving the Longford- Westmeath area in the northern environs of the town; St. Mary's specialising in geriatric and rehab services also located in the Town's northern environs; St. Loman's Hospital to the east specialising in psychiatric services and care. It is an objective of the Draft Westmeath County Development Plan 2021-2027 (CPO 5.20) to support the development and expansion of the hospital. In addition to the public hospital, St. Francis Private Hospital and associated Ballinderry Clinic just west of the proposed development site, offers a range of medical and surgical services, including a sixteen unit consulting clinic providing out-patient services.

Mullingar has a robust and varied employment base that includes key services, specifically in the area of medical, health and related services.

It is clearly a settlement that is capable of growth in line with the NPF objectives.

1.1.2 Regional Spatial and Economic Strategy (RSES) – Eastern and Midlands Regional Assembly

In a regional planning context, Mullingar is designated a “Key Town” and lies within the “Gateway Region”. It is the only designated “Key Town” in County Westmeath. The characteristics of Key Towns as described by the RSES are, “large towns which are economically active towns that provide employment for their surrounding areas. They have high-quality transport links and the capacity to act as regional drivers to complete the Regional Growth Centres” (Section 4.3: 44). One of the key elements of the regional growth strategy for the Region is to, “Embed a network of Key Towns through the Region to deliver sustainable regional development” (Section 2.3: 26). It is a Regional Policy Objective (RPO 4.27) that “Key Towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers”.

Figure 3 – Extract from Figure 4.2 Settlement Strategy RSES for



● Key Town (Mullingar)

Along with the four other “Gateway Region Key Towns” of Longford, Tullamore, Portlaoise and Graiguecullen the RSES envisage higher levels of growth for Mullingar. According to Section 4.6, this is because

“These towns provide important connections with adjoining regions and have the capacity and future growth potential to accommodate above average growth in tandem with the requisite investment in employment creation, services, amenities and sustainable transport”. (Section 4.6:78)

With regard to residential development and expansion, the RSES fully supports the need to ensure an adequate supply of housing in the town, consistent with its role as a “Key Town”. In this regard it is stated at Section 4.6,

“The provision of housing plays a fundamental role in the overall economic, social and environmental success of the settlement” (pg. 86). The RSES emphasise the need to ensure an effective housing supply of land for housing. It is also a further requirement that housing is constructed to the highest quality and standard and responds to the housing needs of different households. These objective will help to sustain and enhance the settlement, contributing to the creation of a high quality place (Section 4.6:86).

In terms of housing density, the RSES explicitly call for higher densities in Key Towns such as Mullingar. In the context of settlement typologies and the formulation of appropriate policy responses it is expressly stated at Section 4.3,

“In this regard higher densities in core strategies should be applied to higher order settlements such as Dublin City, Regional Growth Centres and Key Towns”. (emphasis added)

In tandem with the allocation of lands for residential use and the provision of housing, the RSES also seeks to capitalise on Mullingar’s accessibility with planned infrastructure upgrades which include the N4 from Mullingar to Longford and there is further potential to provide for an enhanced rail service on the Sligo rail line. Furthermore, the RSES supports the preparation of a Local Transport Plan for Mullingar.

The RSES supports the appraisal and or the delivery of the upgrades the N4 from Mullingar to Longford and the potential to enhance the rail service on the Sligo rail line. This serves to demonstrate the further investment and improved connectivity to Mullingar as a Key Town in the Region.

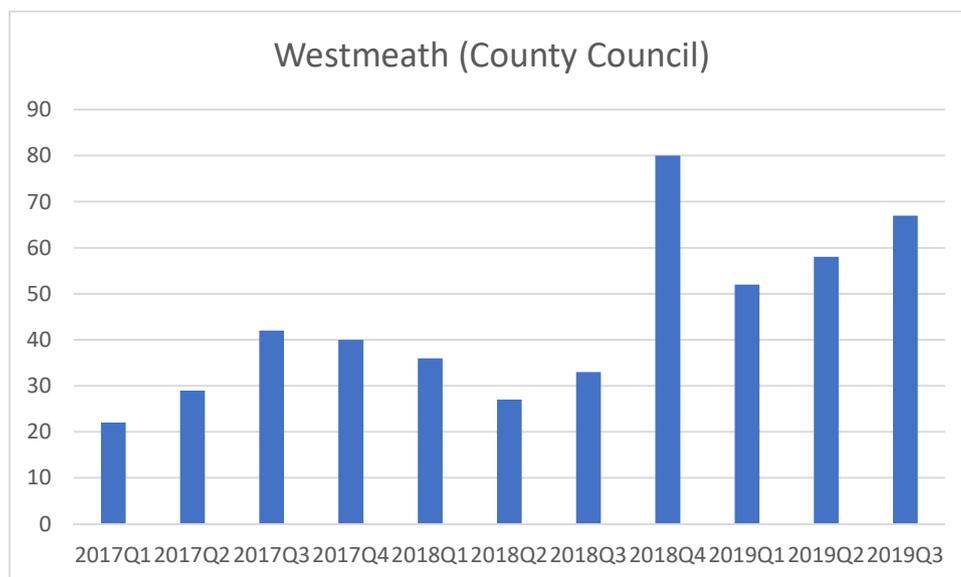
The RSES highlights that significant Government spending in recent years has seen the Mullingar Main Drainage Scheme upgraded at a cost of €39m. Water supply to the town is currently sourced from Lough Owel but in the long-term will be provided by the South Westmeath Scheme which will provide an interconnector between Athlone and Mullingar or through connection to a feeder.

1.1.3 Rebuilding Ireland - Action Plan for Housing and Homelessness

Rebuilding Ireland was launched in 2016 with the aim of doubling the annual level of housing output to 25,000 homes per annum over the period 2017-2021. The achievement of the Plan’s core objectives falls under five pillars. The proposed development falls under ‘Pillar Three- Build More Homes’ with the key objective to

“Increase the output of private housing to meet demand of affordable prices”. Unfortunately, CSO figures are not available at settlement level but figures for Westmeath County Council Area show new completions since the Action Plan was launched in 2017 and the Q1, Q2 & Q3 of 2019 amount to 486 units.

Figure 4 - Completed Dwellings in County Westmeath 2017-2019 (CSO)



1.1.4 Housing for All – A New Housing Plan for Ireland (2021)

The under supply of housing at all levels has and continues to be well documented and one of the key objectives of the recently published national housing plan, *Housing for All*, seeks to increase the supply of new housing. Over 300,000 new homes are required to address housing need and demand. This equates to 33,000 homes annum. The proposed development, providing housing on zoned and serviced lands in a Key Town is fully consistent with the objectives to provide more housing at appropriate locations.

1.2 NEED FOR THE PROPOSED DEVELOPMENT

As a Key Town in the Region, significant growth will be directed to Mullingar over the course of the next twenty years. It is a Regional Objective to support Mullingar as a major economic centre.

The proposed development site occupies residentially zoned and serviceable lands in the southern environs of the town contiguous to the built-up area, with footpaths and public lighting in place close to the proposed site entrance off Ballinderry Road in a northerly direction towards the town centre. Mullingar Business and Technology Park is located approximately 1.5km to the north-west. St. Francis Private Hospital and ‘health village’ is located just west of the site.

Development of and planning permission for multi-unit residential development in the last five years has primarily occurred to the north of the Canal and the railway line. The development of the subject lands for residential uses will assist in redressing this imbalance and will support new employment and educational

infrastructure in this part of the Town Holy Family Primary School on Ardmore Road and IDA Ardmore Business and Technology Park.

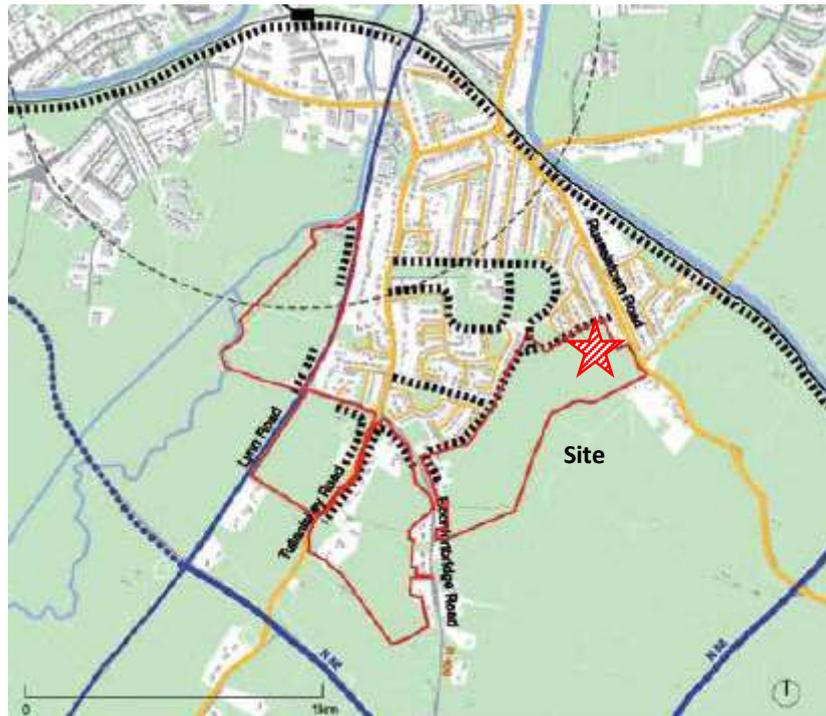
It will also assist in opening up the large block of residentially zoned lands in this part of the town but in addition will crucially provide an opportunity to redress the dendritic and introverted pattern of development that has occurred in this area through the provision of new linkages to established residential areas i.e. Chesnut Grove as well as zoned lands to the north and west. Ease of movement and connectivity were fundamental in the design and layout. Opening up natural desire lines and providing direct and safe routes within the development itself and to surrounding lands were a key consideration. The scheme has been designed in strict compliance with DMURs principles and standards giving priority to pedestrians/cyclists over the car both in terms of safety and permeability. The Mullingar Local Area Plan (LAP)(2014-2020) incorporating the Mullingar South Framework Plan (MSFP) laments the pattern of development that has occurred in the Mullingar South area within which the site is located.

The LAP states, *“The existing settlements in Mullingar South have occurred in a wedge between Lynn Road in the west and the Royal Canal in the east. Along the Main Roads some individual housing exists while housing estates have been developed effectively as enclaves with poor connections to surrounding developments and areas”*. Section 8.20 of the LAP goes on to state - *“Cul de sacs and enclave, access routes dominate the suburban areas”*. (Paragraph 8.20:143) Consequently in order to address this one of the key development objectives for the Ballinderry area as set out at Section 8.22.2 of the LAP is – *“To provide new linkages to the existing residential development”* (Paragraph 8.22.2:144).

The proposed development fully delivers on this objective by providing new and valuable green links to adjoining lands to the north and by opening up residentially zoned lands to the west through the provision of new pedestrian/cyclist and vehicular linkages. Two new pedestrian/cyclist connections are proposed to the north of the site providing access to the established housing area encompassing Chesnut Drive and Chestnut Grove. The proposed new link street, which extends to the western boundary of the site, incorporates footpaths and cycle tracks either side providing a future sustainable connection to zoned lands to the west consistent with LAP objectives. As part of the development, it is also proposed to construct a new section of footpath along the western edge of Ballinderry Road ensuring a direct and continuous footpath is available from the site to the town centre.

Figure 5 below extracted from Figure 8.8 of the LAP depicts the dendritic pattern of development that has evolved in the area and how this has severely restricted access and movement opportunities. The proposed development will open these development areas and provide an opportunity to improve permeability within this part of the existing built-up area.

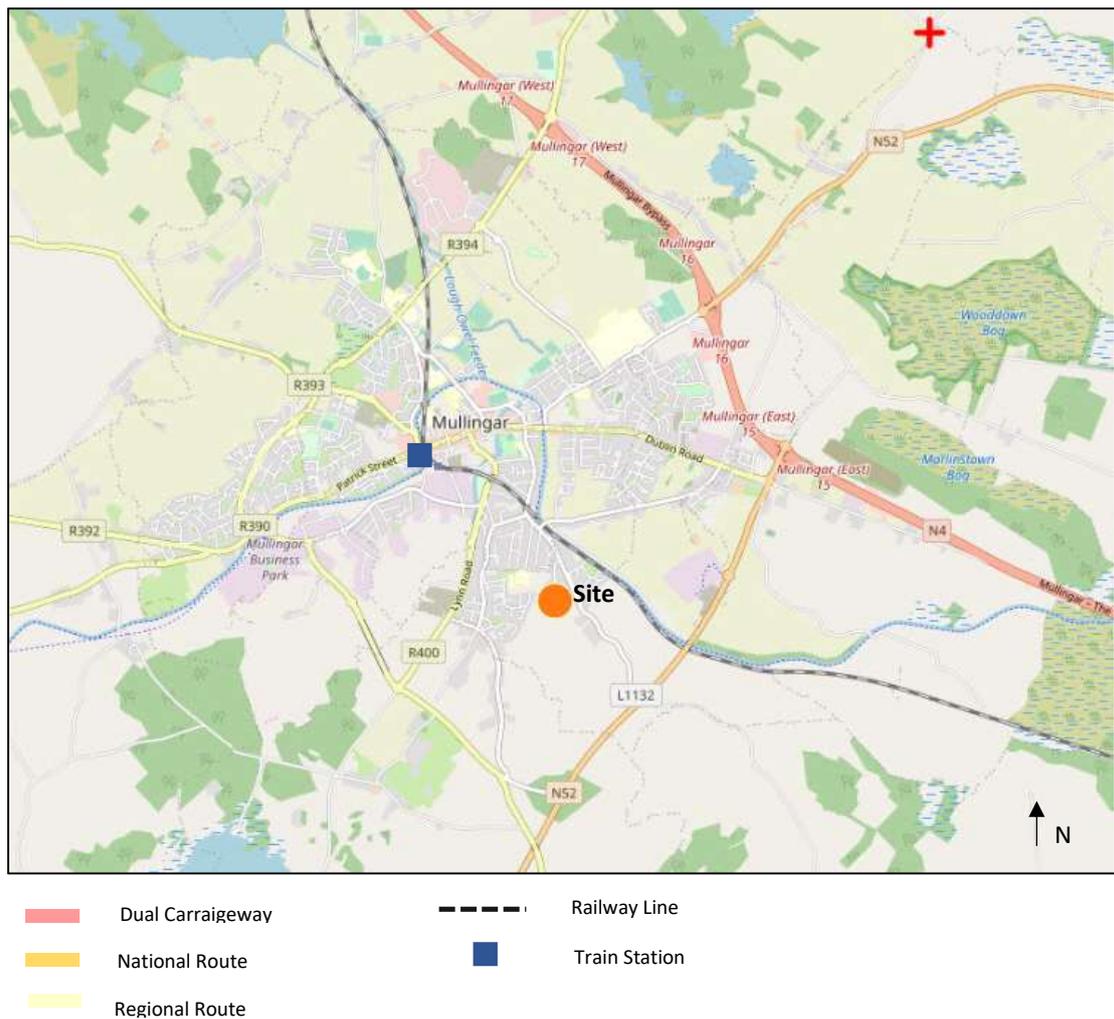
Figure 5- Extract from Figure 8.8 Access and Movement Analysis – Mullingar LAP 2014-2020



1.3 SITE LOCATION, CONTEXT AND DESCRIPTION

The proposed development site is located in the southern environs of the ‘growth’ town of Mullingar. The site is located c. 1.5 km to the south east of the Town Centre just west of Ballinderry Road (L1132). Ballinderry Road is a local road that runs along a broadly north-south axis and intersects with the N52 c. 1 km to the south of the site. The N52 connects with the Regional Road (R394) which bypasses the Town to the west. It also connects with the N4 which functions as a ring road to the east and north.

Figure 6 – Site Context



The proposed development site is an “outer suburban/greenfield site”, located at the edge of, but adjoining the built-up area of Mullingar and within its defined settlement boundaries. The site is bounded to the north and along part of its southern boundary by lower density residential development and to the west by zoned lands (for residential development). ‘Chesnut Drive’ housing development lies immediately north of the site, with additional established housing areas including ‘Oakcrest’, ‘Chestnut Grove’ and ‘Millmount’ located further north and north-west in the direct of the town centre. These housing areas comprise predominantly detached and semi-detached dwellings. Just west of Chesnut Drive is St. Francis’ Private Hospital and grounds. The Hospital grounds extend to approximately 7.9 hectares and are currently accessed from Lynn Road to the west.

Part of the site’s eastern boundary is formed by a row of detached dwellings with frontage onto Ballinderry Road, with additional single dwellings also located further the south. ‘Newtown Lawns’ estate is located opposite the site on the eastern side of Ballinderry Road. Again, housing typically consists of a mix of detached and semi-detached dwellings. Lands immediately west of the site are zoned (for residential development) and adjoin an established housing areas encompassing ‘Lynn Heights’, ‘Belvedere Hills’ and ‘Hill View’. These developments are accessed from Lynn Road to the west which runs almost parallel to Ballinderry Road.

The site is in proximate and accessible to a range of employment areas. These include Mullingar Business Park located c. 1km to the north-west the site, Forest Park located c. 2 km to the west and the IDA Ardmore Business and Technology Park located c 1.5km to the east. According to the Westmeath Development Plan there are over 1,410 “active businesses” within 5km of Mullingar employing over 5,050 people. In addition to commercial/industrial employment areas, St. Francis Private Hospital is located less than c.200 m west of the site’s northern boundary. The hospital has capacity for 77 beds and provides a range of diagnostic and surgical services for both adults and children, including an out-patient clinics. The town centre, another employment area in itself is also less than 1.5m from the site. Employment opportunities in proximity to the site are broad and varied and are accessible by sustainable means.

Figure 7 – Proposed Development and Proximity to Employment Areas



- ★ Site
- St. Francis Hospital
- Employment Areas

Site Description - Irregular in configuration, the overall site extends to 4.015 of which 0.045 hectares incorporates a section of ¹the public road has a stated area of 3.97 hectares of which c. approximately 0.2 hectares consists of a vacant detached dwelling and associated garden area, with the balance c. 3.77 hectares comprising greenfield lands. It is proposed to demolish the existing dwelling and associated outbuildings as part of the development.

Site Levels and Topography - The site is undulating in character overall. Largely level to the south (approximately 99.791m), ground levels rise in a northerly direction to c. 104 m before falling away again towards the northern boundary to c. 100m. There is also a ridge that runs from the north-east corner to approximately mid-point along the western boundary where existing levels range from c. 98-99m. A full scale Topographical Site Survey Drawing by Coughlan Associates (Drawing Ref. No. 03) accompanies this application under separate cover. For ease of reference an extract from this drawing with site contours highlighted is provided overleaf.

Figure 8 – Extract from Topographical Survey Drawing (Drawing No. 3 Coughlan Associates)



(Not-to-Scale)

¹ Letter of Consent from WMCC to include the public road in application site area is provided under separate cover.

Site Boundaries & Vegetation – A tree survey has been undertaken on the proposed development site. The Survey was undertaken by Consulting Arborists, The Tree File Limited, in February 2019. It includes an analysis of all existing vegetation within the site, including site boundaries. The location of trees is highlighted on the Topographical survey extract above.

The northern site boundary separating the site from the established Chestnut Grove estate is defined by hedgerow, trees and an area of thicket. The trees comprise a mix of species that includes Monterey Cypress, Ash, Sycamore and Leylandii. None of the vegetation at this location (Hedge 9 and Hedge 6) are identified as having any arboricultural value. Tracts of hedgerow and trees (Hedge 2, 3, 4 and 5) also define part of the eastern site boundary where it abuts the rear garden areas of detached dwellings fronting Ballinderry Road. These are described by the Survey as being of “*poor quality*”. There is a further group of trees along the eastern boundary where it turns at a 90 degree angle along the boundary to the existing dwelling that forms part of the application site. Without exception all of these trees are identified as being of “*Category U*” value by the Survey. This means they are either “*dead, dying or dangerous*”. A further limited tract of hedgerow (Hedge 1) delineates the site from Ballinderry Road further south. The southern and western site boundaries are largely undefined save for a short section of the south-western boundary which according to the Survey comprises tree and hedgerow of no arboricultural value.

A tract of hedgerow interspersed with trees traverses a section of the northern part of the site in along a broadly north-south axis. As is the case with boundary vegetation, these are not considered to have a high arboricultural value.

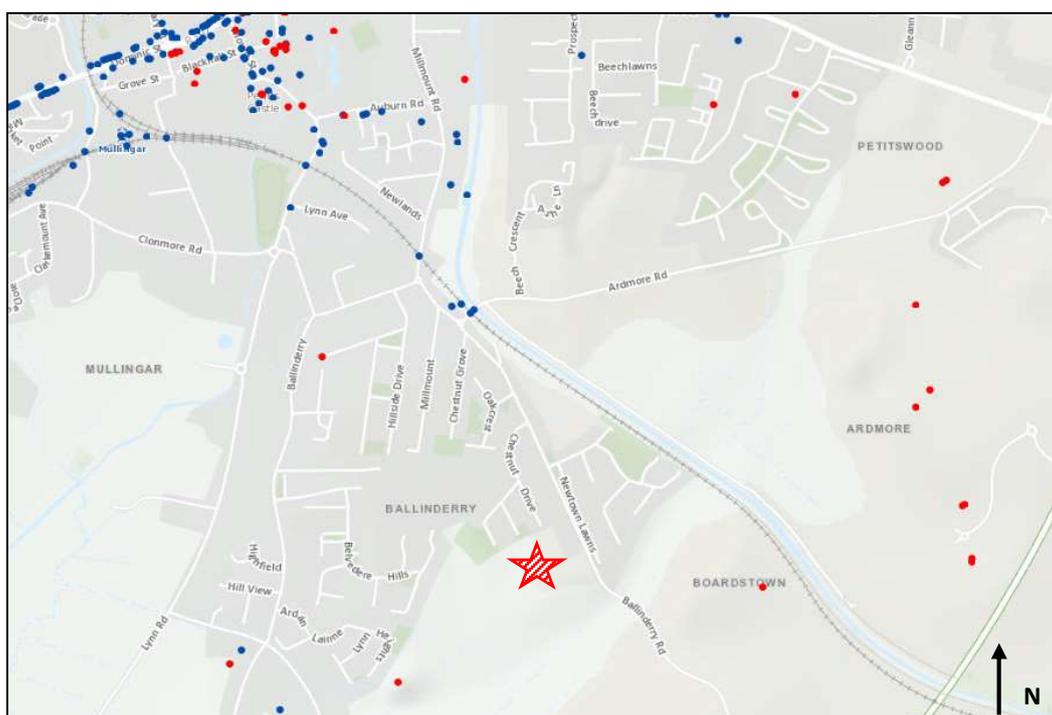
The overall summary of the Tree Survey is, “*The vegetation associated with this site is broadly of poor quality*”.

Archaeological and Built Heritage – By reference to relevant sources including Map 11 of the Mullingar Local Area Plan 2014-2020 and the National Monuments Service on-line archaeological survey database (www.archaeology.ie), the subject site does not contain any recorded monuments and no part of the site is located within an area of archaeological potential or interest. Similarly the site does not contain any Protected Structures or Structures included in the National Inventory of Architectural Heritage (NIAH).

Notwithstanding this, the site has been subject to licenced archaeological testing (Licence Ref. No. 19R0208) under taken by Archer Heritage. The testing consisted of geo-physical survey in the first instance carried out in September 2019 followed by a programme of test trenching in October 2019.

No archaeological features or objects were uncovered in any of the areas subject to test trenching. The Assessment concludes there is “moderate” potential for latent archaeological remains and recommends archaeological monitoring of groundworks in the event of permission being granted. The applicant has no objection to undertaking monitoring of groundworks in the event such is deemed necessary or appropriate by An Bord Pleanála or the Department of Culture, Heritage and the Gaeltacht.

Figure 9 - Extract from National Monuments Viewer



-  Site
-  Recorded Monument
-  NIAH Site

Natura 2000 and Nature Conservation – The proposed development has been subject to Appropriate Assessment Screening by eminent and experienced Ecologist Mr. Roger Goodwillie CIEEM.

There are eight Natura 2000 sites within a 15 km radius of the application site. The subject site itself is not located within or contiguous to any of these sites.

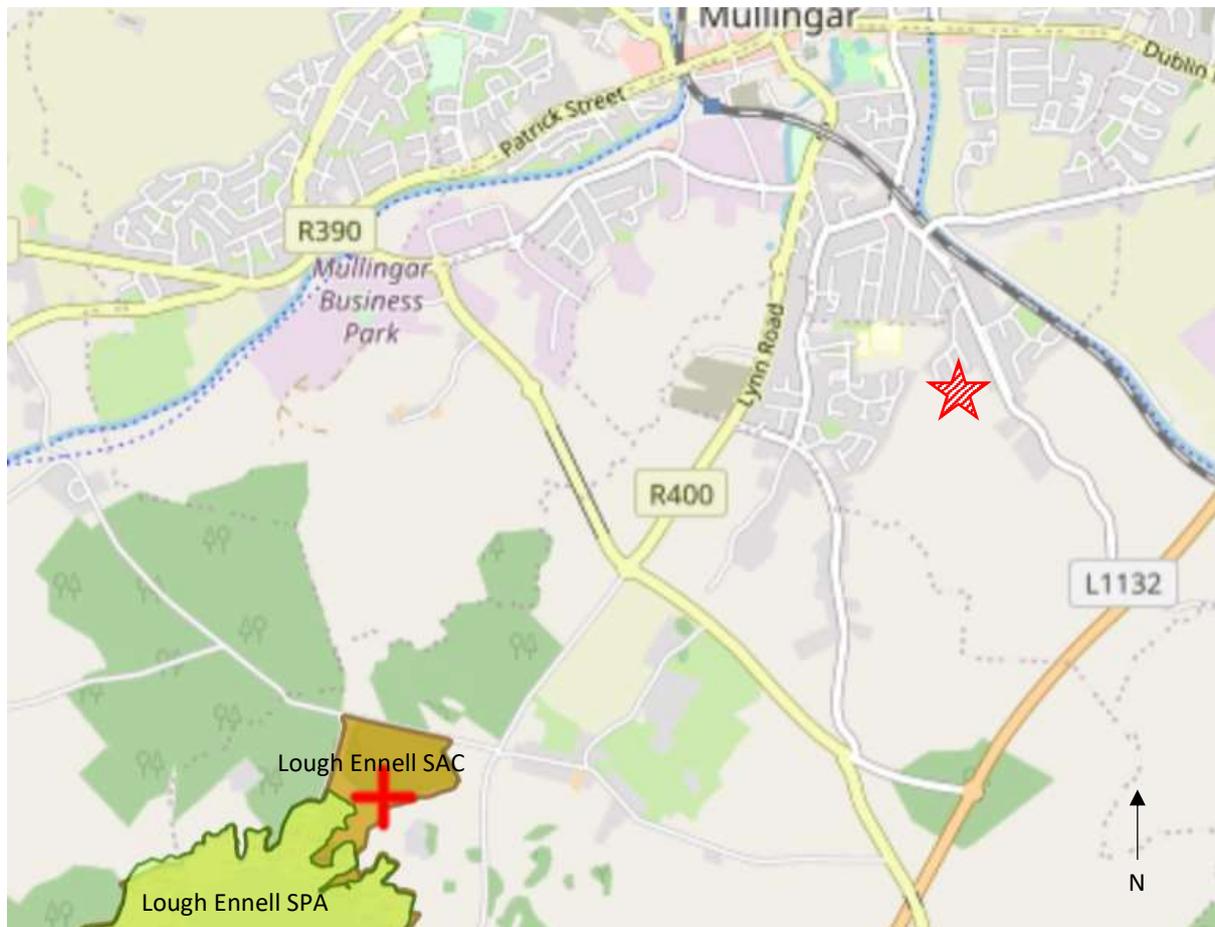
Natura 2000 Sites within 15 Km of Application Site		
Name of Site	Site Code	km
Lough Ennell SAC	0685	2.7
Lough Ennell SPA	4044	3.0
Woodtown Bog SAC	2205	4.5
Lough Owel SAC	0688	5.4
Lough Owel SPA	4047	5.4
Scragh Bog SAC	0692	7.8
Lough Iron SPA	4046	12.1
River Boyne & River Blackwater	2299	12.4

The nearest such site is Lough Ennell Special Area of Conservation (SAC) (Site Code 0685) and Lough Ennell Special Protection Area (SPA)(Site Code 4044) located c. 2.7 km and c. 3 km south-west of the proposed development site respectively. Whilst there are other Natura 2000 sites within a 15km radius of the site, Furthermore, based on best available scientific evidence the conclusions reached are that the development by itself or in combination with other plans or projects would not adversely affect the integrity of European Sites

in view of the sites' Conservation Objective. This conclusion is based on a complete assessment of all aspects of the proposed project and there is no reasonable scientific doubt as to the absence of adverse effects and a Stage 2 Appropriate Assessment (and submission of an NIS) is not therefore required.

The Screening Assessment concludes there will be no potential for significant impact on the integrity of the Natura 2000 network or its conservation objectives arising from the proposed development and as such at this stage further stages of appropriate assessment are not required.

Figure 10 - Extract from National Parks and Wildlife (NPWS) Designations Viewer



Site Constraints – Constraints are confined to the south-eastern corner where a 38 KV power line crosses the site in a diagonal direction for a length of approximately c.60 m. No construction can take place within 10 m of an overhead cable. The presence of the power line means that the area in the vicinity must remain free from development so that it is accessible at all times for service/maintenance purpose and so that a safe ground to line clearance can be maintained, leaving c. 4,600 sq.m of the site which cannot be developed for residential uses. As a result of this power line the actual developable area of the site is reduced to 3.51 hectares.

Figure 11 – Position of 38 KV Power Line in SE Corner of Site



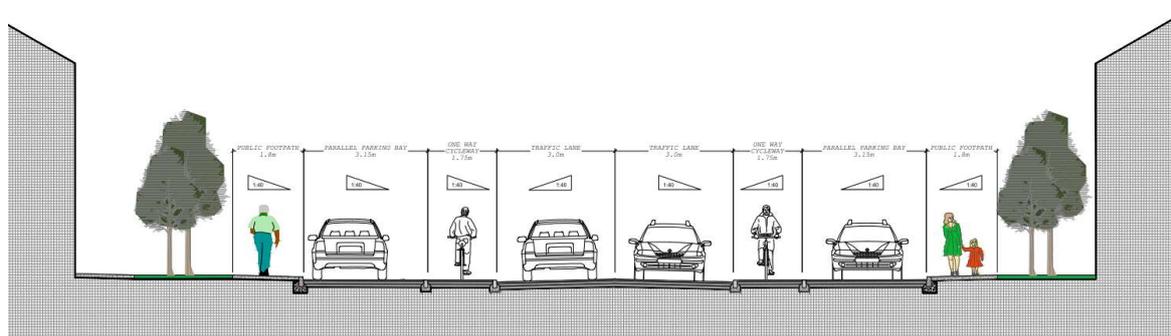
 Approximate Site Boundaries

1.4 THE PROPOSED DEVELOPMENT

In summary, the proposal consists of a residential development comprising 130 no. dwellings in a mix of terraced, semi-detached, apartment/duplex units. Whilst the majority of the proposed development site is greenfield in nature, a portion of the site in the north-eastern corner (c. 0.2 hectares) consists of an existing dwelling and associated outbuildings and garden area. It is proposed to demolish this dwelling and associated outbuildings as part of the development.

In addition to proposed dwellings, the development also consists of a new vehicular entrance off Ballinderry Road and the construction of new link street. This new link street which extends as far as the western site boundary will not only serve the proposed development itself but will also open up a large tract of residentially zoned lands to the west of the site for development. The link street is designed such that it can easily tie into future road/pedestrian and cyclist infrastructure serving these lands. Consistent with LAP objectives, the link street takes the form a “tree lined avenue” with footpaths, off grade cycle tracks and flanked by active building frontage either side. It has a carriageway width of 6m, 1.8m wide footpaths with 1.75m wide cycle tracks either side.

Figure 12 – Proposed Link Street Typical Section



(Not-to-Scale Extract from SDS Drawing Ref. No. C131)

As would be expected, the LAP stipulates that road design and layout in residential schemes shall have regard to DMURS with the specific aim being to “*end the practice of designing streets as traffic corridors*”. The new link road has been designed in accordance with DMURS standards and principles. A Statement of Consistency with DMURS by Alan Lipscombe Traffic and Transport Consultants accompanies this planning application under separate cover.

The approach of the development is also consistent with Policy P-SR10 of the LAP which seeks, inter alia, to ensure the development of sustainable residential development through the promotion of layouts that prioritise non-car based movement. In this regard the design and layout of the road is also fully consistent with Section 9.9.19 of the Mullingar LAP 2014-2020.

Plate 1 – Visual of Proposed Link Road incorporating Cycle Paths and Footpaths



In addition to vehicular access, the proposed development also provides for pedestrian /cyclist connectivity at two separate locations to the established housing area abutting the site to the north, with an additional pedestrian connection proposed along the western site boundary providing a direct and safe link to these future development lands. The proposed pedestrian links to adjoining lands are designed to benefit from maximum passive surveillance with front doors of dwellings and high occupancy rooms facing towards them.

As noted at Section 1.4 of this Statement, it is also proposed to extend the existing footpath along public lands on the western edge of Ballinderry Road by 73.5 m approximately ensuring safe and continuous footpaths are available from the site to the town centre. A letter of consent from Westmeath County Council to include these lands within the application site area is provided under separate cover.

The development also provides for associated open space areas, landscaping, boundary treatment including the construction of limited sections of retaining walls, car parking and all associated site development works, including some site regrading works and the construction of a pumping station and rising main.

Proposed Dwellings – A total of 130 no. dwellings are proposed of which 94 are houses, with the balance of dwellings i.e. 36 comprising a mix of apartments and duplex units. Houses account for 72 per cent of proposed dwellings with the apartment /duplex units accounting for 28 per cent. The proposed houses range in height

from 2 – 2.5 storeys. Apartment /duplex dwellings are accommodated in 5 no. 2.5 storey buildings across the site. Without exception all apartment /duplex units are either dual or triple aspect units.

Proposed House Types (Not-to-Scale Extracts from Coughlan & Associates Architects Scheme Drawings)



House Type A –End Terrace /Semi-Detached

No. of Storeys	2.5
GFA	148.8 sq.m
No. of Bedrooms	4
Garden Size Range	72 sq.m – 101 sq.m
No. Proposed	12



House Type A1 - End Terrace /Semi-Detached

No. of Storeys	2.5
GFA	148.8 sq.m
No. of Bedrooms	4
Garden Size Range	60 sq.m – 97.1 sq.m
No. Proposed	1



House Type B - End Terrace /Semi-Detached

No. of Storeys	2
GFA	108 sq.m
No. of Bedrooms	3
Garden Size Range	82 sq.m – 125.4 sq.m
No. Proposed	27



House Type B1 – Mid-Terrace

No. of Storeys	2
GFA	108 sq.m
No. of Bedrooms	3
Garden Size Range	82 sq.m – 125.4 sq.m
No. Proposed	19



House Type C – End Terrace /Semi-Detached

No. of Storeys	2.5
GFA	148.8 sq.m
No. of Bedrooms	4
Garden Size Range	82 sq.m – 125.4 sq.m
No. Proposed	12

Apartment/Duplex Dwellings – Proposed apartment /duplex units are accommodated in five separate blocks across the site ranging in height from 2 to 2.5 storeys. Proposed building heights take account of the site’s suburban context and have regard to the prevailing and predominant building height in the area.

The height of individual blocks varies from 2 storeys to 2.5 storeys some incorporating attic living space. In general these higher density blocks, encompass a ground floor apartment with either apartment or duplex units above. A total of ten different apartment/duplex types are proposed. These include Apartment Type D & D1 a ground floor 2 bedroom dwelling (78.9 sq.m) with external terrace; Apartment Type E and E1 (66.5 sq.m) is a first floor 2 bedroom triple aspect apartment and first floor terrace. The development contains 3 no. Apartment Type D; 2 no. Apartment D1; 3 no Apartment E and 2 and 2 no. Apartment Type E1. These units bookend each of the higher density buildings within the site. Apartment F and F1 consists of 3 bedroom ground floor apartment (80.2 sq.m in area) with external terrace, with a 2 bedroom duplex unit Type G and G1 located above. Unit G and G1 extend to 100.1 sq.m in area. A total of 1 no. unit Type F and 8 no. unit Type F1 are proposed with 1 no. Type G and 8 no. Type G units provided above. Unit Type H consists of a 2 bedroom ground floor triple aspect apartment (75.5sq.m in area) with an external terraced area and a 3 bedroom duplex above (Type J). Unit Type J contains 3 bedrooms has a stated gross floor area of 102.6 sq.m in area with a first floor balcony provided off the main living area. A total of 4 no. Type H and 4 J no. Type Units are proposed.

The overall mix of dwellings proposed is provided in the Table 2 overleaf.

Table 2 – Overall Dwelling Mix and Typology				
Dwelling Type	2 Bed	3 Bed	4 Bed	Total
A Semi-D/End Terrace			12	12
A1 Semi-D/End Terrace			1	1
B Semi-D/ End Terrace		27		27
B1 Mid-Terrace		19		19
B2 Mid-Terrace		15		15
C Semi-D/End Terrace			12	12
C1 Mid-Terrace			8	8
D Ground Floor Apartment	3			3
D1 Ground Floor Apartment	2			2
E First Floor Apartment	3			3
E1 First Floor Apartment	2			2
F Ground Floor Apartment		1		1
F1 Ground Floor Apartment		8		9
G Upper Floor Duplex	1			1
G1 Upper Floor Duplex	8			8
H Ground Floor Apartment	4			4
J – Upper Floor Duplex		4		4
Total	23	74	33	130
%	18%	57%	25%	100 %

Although 3 bedroom units account for the majority of dwellings proposed (i.e. 74 no. dwellings overall), the mix of 3 no. bedroom units comprises both apartments/duplex units and houses, with apartments accounting for 17 per cent of the overall 3 bedroom provision. The mix of units currently proposed is broadly similar to that presented to Westmeath County at the Section 247 meeting held on October 21st 2020. With regard to the mix of housing proposed, the S247 Minutes state, *“The mix of units proposed is welcomed and supported”*. The mix of units

Need and Justification for Apartment /Duplex Dwellings as Part of the Proposed Housing Mix - As outlined above at Section 1.1.1 of this statement, the NPF aims to secure more compact and sustainable urban development, with the RSES calling for higher densities in Key Towns such as Mullingar. The Guidelines aim to ensure that apartment living is attractive and desirable housing option to encourage greater diversity of apartments in Ireland’s cities and towns and other appropriate locations. This is seen as key in providing for the long-term move towards smaller average household size, ageing and more diverse population.

According to the Guidelines, *“Demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type. The 2016 Census also indicates that, if the number of 1-2 person dwellings compared to the number of 1-2 person households, there is a deficit of approximately 150% i.e. there are approximately two and half times as many 1-2 person households as there are 1-2 person homes”* (para. 2.6).

According to the Guidelines, in general terms, apartments are most appropriately located within urban areas with the scale and extend of apartment development increasing in relation to proximity to public transport and employment centres. While, the Guidelines recognise that the identification of the types of location in cities and towns that may be subject to local determination by the Planning Authority, the Guidelines provide a broad description of proximity and accessibility considerations that can be applied with regard to apartment location. The subject site in Mullingar can be considered as follows (para. 2.4, pg.6)-

“Peripheral and/or less accessible urban locations

Such locations are generally suitable for limited, very small scale, higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net) including:

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

The Guidelines recognise that while apartments may be required below the 45 dwellings per hectare net density threshold, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density. Accordingly, apartments may be considered as part of a mix of housing types in a given development at any urban location, including suburbs, towns and villages”.

The proposed development is fully in keeping with the locational criteria outlined by the Guidelines. Of the 130 no. dwellings proposed there are 36 no. apartment /duplex dwellings. Apartments therefore account for 28 per cent of the total dwelling mix. The inclusion of apartments ensures a variety of dwelling types and sizes within the development. It also represents a departure from the traditional dwelling typology in the area which is dominated by detached and semi-detached dwellings.

Developing more apartment dwellings is now a key tenet of national residential policy in pursuit attaining more compact and sustainable development patterns and also in response to the growing demographic of one-two person households.

Public Open Space – A total of 6,655 sq.m (0.6655 ha) of public open space is provided across the site. This equates to over 16 per cent of the residential site area (3.970 hectares) and is in excess of the minimum requirement of 15 per cent prescribed by the Development Plan. Open space is distributed across five different locations across the site.

Areas range in size, configuration, character and function with the smallest being 705 sq.m in area and the largest measuring 1,870 sq.m. Each area has its own distinct character and function.

Figure 13– Proposed Landscape Layout



(Please refer to Doyle O'Troithigh Landscape Layout Drawing for fully Scaled Version).

Table 3 – Summary of Public Open Space Provision			
Area	Name	Measurement	Characteristics and Function
A	Central Open Space	1,630 sq.m	Multi-functional space incorporating formal play and exercise zone as well as grassed areas and seating
B	Oval Pocket Park	705 sq.m	West facing pocket park incorporating circuitous footpaths, seating areas, native planting and raised lawn space
C	Nature Trail Park	1,220 sq.m	South facing area located at northern site boundary incorporating natural play area for children. Existing trees and hedgerows will be retained and supplemented and pedestrian / cycle linkages to adjoining Chestnut Drive development proposed.
D	Western Green	1,230 sq.m	Green area incorporating network of circuitous paths with rest stops in the form of seating to encourage relaxation and social interaction. Formal play and exercise area are also provided.
E	Ballinderry Pocket Park	1,870 sq.m	Kickabout and seating areas incorporating circuitous pathway links from the site entrance to the south-western part of the site.
Total Public Open Space Provision		6,655 sqm or 16.76 per cent of the overall site area	

The proposed layout seeks to ensure that all public open space areas benefit from maximum overlooking and passive surveillance. This is achieved by way of the positioning and orientation of dwellings, carefully considered landscaping and by following desire lines across the site in order to encourage high levels activity and footfall both within the open space areas themselves and in direct proximity to them.

In the case of Area C, as it is proposed to retain and supplement existing natural boundary features to the north for natural heritage and place-making purposes as such this space benefits from direct overlooking on three sides including a row of 7 no. dwellings to the south and then by at least 4 / 5 no. dwellings to the east and south.

The positioning of a grouped car parking area to serve nearby dwellings (occupying Plot No.'s 105 – 108) in conjunction with the primary function of this public open space area which is to provide attractive and functional pedestrian / cyclist connections to the established residential area to the north means the area will benefit from high levels of activity and footfall.

Given the development constraints affecting the south-eastern corner of the site, including the necessity for it to accommodate essential drainage infrastructure, ensuring that "Ballinderry Pocket Park" - Area E forms an integral part of the new residential area has been a design priority.

It is directly overlooked on its western side by the front door of the dwelling occupying Plot No. 24. Whilst the rear garden area is screened from the public open space by 1.8 m high block plastered wall, the proposed boundary to the front and side of this corner dwelling comprises more 'transparent' screening in the form of a low (c. 800mm) boundary fence, ensuring uninterrupted surveillance is possible. The distance from the front door of this dwelling to the edge of the public open space area is less than 5m. Along its northern edge front doors of 3 no. dwellings directly face the space. The set back of these dwellings from the footpath that runs to the north is less than 3 m and is just 5m from the edge of the public open space area itself. Windows serving the principal living area of a fourth dwelling (occupying Plot No. 12) also directly overlook the area. The distance between these windows and the public open space is c. 4m. Low level boundary treatment to the side (south) and front (east) of this dwellings ensure unobscured passive surveillance is possible.

The area also provides a more direct pedestrian/cyclist connection to the southern part of the site from the main entrance to the development off Ballinderry Road.

Figure 14 – Ballinderry Pocket Park



In total the quantum of open space provided is 0.665 sq.m (0.665 hectares). This equates to over 16 per cent of the gross residential site area. In quantitative terms the level of public open space provided is fully consistent with CPO 16.21 of the County Development Plan.

As required under Policy P-POS3 of the Mullingar LAP the applicant has engaged a Landscape Architect and a detailed landscape plan will be submitted with the planning application.

Car Parking – A total of 215 no. surface car parking spaces are provided across the site. Proposed car parking is provided in-curtilage, on-street and in a grouped format, depending on location and dwelling type. Where houses incorporate driveways 2 no in-curtilage spaces are generally provided. Whilst in the case of apartment/duplex dwellings, for example, car parking is grouped to the front of residential buildings. In accordance with DMURS principles, a limited amount of on-street parking is provided. The on-street parking areas are arranged in series of bays running parallel to the main carriageway in addition to grouped car parking areas on local residential streets.

DMURS endorses on-street parking for developments of up to 35 – 40 dwellings per hectare (net). In this regard it is stated at Section 4.4.9, “*On-street parking alone can generally cater for densities up to 35-40 dwellings per ha (net)*” (Paragraph 4.4.9:117).

Based on a gross residential site area of 3.97 hectares (i.e. excluding the public road) the development achieves a density of 33 dwellings per hectare. Having regard to the proposed density, it is submitted the level of on-street parking provided falls well within these parameters.

Compliance with Part V - As required, the applicant has commenced the process of engagement with the Housing Section of Westmeath County Council to establish its requirements in respect of social and affordable housing. Correspondence from Westmeath County Council dated 9th March 2021 accompanies this planning application under separate cover confirming that pre-application has taken place.

At this point in time, it is the preferred option of the applicant to transfer the ownership of a percentage of the overall permitted dwellings to the Local Authority. As the lands were acquired by the applicant between 1st September 2015 and 31st July 2021 then it is proposed that 10 per cent of the overall dwelling provision be transferred to the Local Authority, in accordance with amendments to Part V of the Planning and Development Act 2000 (as amended) under Section 46 of the Affordable Housing Act 2021.

Coughlan Architect’s drawing No. 12 (enclosed under separate cover) indicates the units it is proposed to transfer at this stage. Also enclosed is a breakdown of indicative construction and development costs, including profit on those costs based on current open market value rates, as required. By letter dated 9th March 2022 the Housing Section of Westmeath County Council has confirmed in principle the Part V proposal. This correspondence is enclosed under separate cover.

SECTION 2.0 - THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH LOCAL PLANNING POLICY

2.1 STATUTORY DEVELOPMENT PLANS AFFECTING THE SITE

The statutory Development Plan affecting the application site is Westmeath County Development Plan (WMCDP) 2021 -2027 within which sits the Mullingar Local Area Plan (LAP) 2014-2020 (As Extended).

The following sections of this Statement demonstrate how the proposed development is consistent with the policies of the above Plans. For ease of reference, polices from each Plan are referenced as follows:

- Westmeath County Development Plan 2021 - 2027 (WMCDP, 2021)
- Mullingar Local Area Plan 2014-2020 (MLAP 2014)

2.2 WESTMEATH COUNTY DEVELOPMENT PLAN 2021-2027

2.2.1 Core Strategy

Strategic Aims - Chapter 2 of the nascent County Development Plan sets out population targets and broad housing requirements for the over the lifetime of the Plan. The aims of the Core Strategy as expressed through the following policy objectives –

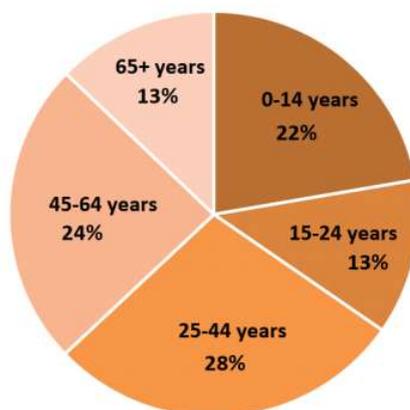
- “To guide the future development in Westmeath in line with national and regional objectives set out in the NPF and the RSES and other national guidelines and policies.*
- To promote and facilitate the development of the County in accordance with the provisions of the Core Strategy, including directing development in line with the settlement hierarchy and promoting development at an appropriate scale that is reflective of the terms of the Core Strategy Table and zoning maps.*
- To apply the Settlement Hierarchy to determine the scale, rate and location of proposed developments and apply appropriate development management measures to ensure compliance with the Settlement Hierarchy including the population targets for the County.*
- To promote the delivery of at least 30% of all new homes that are targeted in settlements within their existing built-up footprints,*
- To support the achievement of more self-sustaining town and villages through residential an employment opportunities together with supporting social and community facilities,*
- To monitor and maintain a record of residential development permitted in settlements designated under the Settlement Hierarchy in order to ensure compliance with the population allocations defined by the Core Strategy and to adjust the approach to permitting development proposals in instances where Core Strategy objectives are not being met.” (Paragraph 2.5:pp 27-28)*

Population Trends and Targets – The 2016 Census recorded a population increase of 2,606 persons (3 per cent) in Westmeath from 86,164 in 2011 to 88,770 in 2016, slightly lower than the national rate of 4 per cent over the same period.

Population Distribution - Mullingar along with Athlone, however, experienced “steady” population growth over that period with their populations increasing by 4.1 per cent and 4.5 per cent. The Plan notes the combined population of Athlone and Mullingar now accounts for 47.6 per cent of the County’s population and that the County is becoming more “urban in nature” with population growth for rural and urban areas from 2011-2016 being 8.1 per cent and 14.2 per cent respectively, compared to 6.2 per cent and 11.2 per cent over the last intercensal period.

Population Structure – In terms of population structure, the 2016 Census identifies that those aged between 25-44 years account for 28 per cent of the County’s population, with those in the 45-64 age cohort accounting for 24 per cent. 0-14 year olds make up 22 per cent of the population with 15-24 year olds and those aged 65 + accounting for 13 per cent respectively.

Figure 15– Age Profile of Westmeath’s Population Based CSO 2016 Data



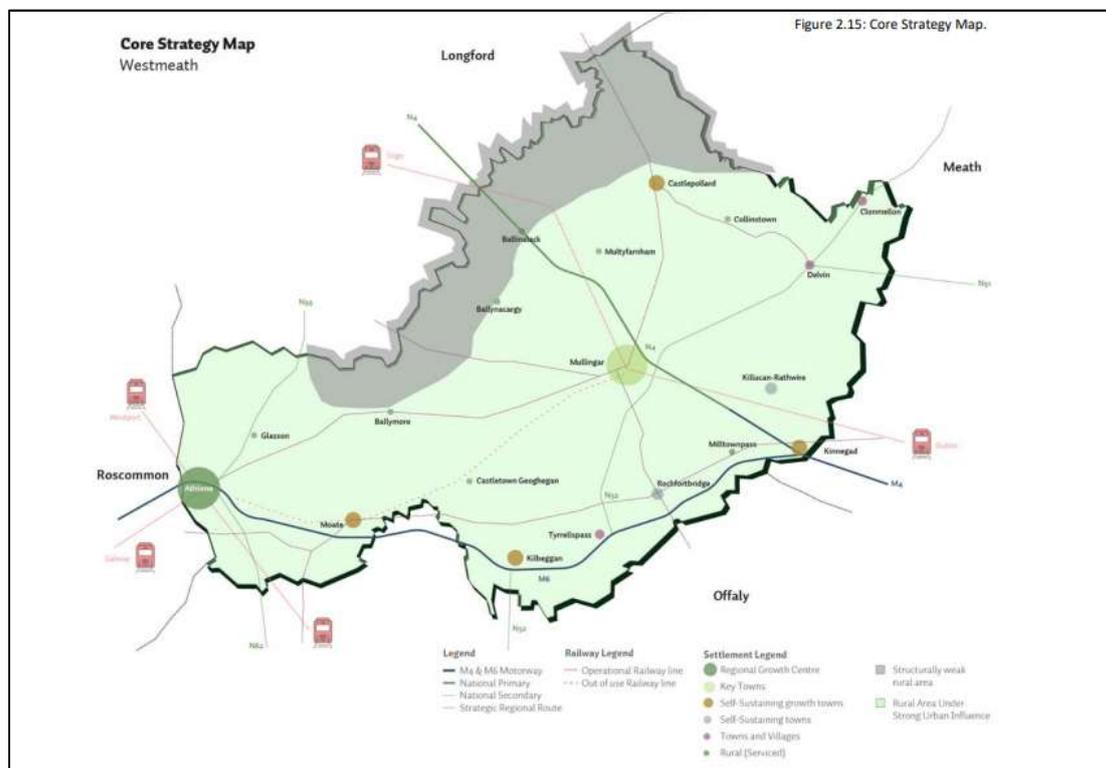
(Source Figure 2.3 – Westmeath County Development Plan 2021-2027)

A further refinement and analysis of these findings is set out at Paragraph 2.6.2 of the Plan. Of note is the following –

- The average age is 36.3 years.
- 22.3 per cent of the population is aged under 14.
- The number of children of pre-school age i.e. 0-4 is 6,464 equating to 7.3 per cent.
- The number of children of primary school going age i.e. 5-12 is 10,765 the equivalent of 12.1 per cent.
- The number of children of secondary school going age i.e. 13-18 is 7,493 or 8.4 per cent.

Settlement Hierarchy – According to Table 2.4 of the Plan and consistent with regional planning policy, Mullingar is identified as a “Key Town”. Key Towns are defined as, “Large economically active service and / or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres”.

Figure 16 – Core Strategy Map



Extract from Figure 2.15 WCDP 2021-2027

With regard to Mullingar, the Plan notes, “The town occupies a strategic location along the N4, with excellent inter-urban links to the capital and international airport by motorway and rail. It has an existing base of both indigenous and international companies at the forefront of their field, in sectors such as engineering and consumer goods and services. In 2016, Mullingar had a ratio of jobs to resident workers of 1,079, one of the highest overall ratios in the region. In 2016, the town had 7,998 workers and 8,633 jobs”. (Paragraph 2.10: 41)

Core Strategy policy objectives specific to Mullingar are expressed through CPO 2.5 and CPO 2.6 as follows –

CPO 2.5 – “Support the continued growth and sustainable development of Mullingar to act as a growth driver of the region and to fulfil its role as a Key Town in accordance with principles and policies of the RSES”.

CPO 2.6 – “Prepare a Local Area Plan (LAP) for Mullingar to align with the RSES and this Core Strategy”. **Mullingar is a focus for growth and expansion under the Core Strategy and as such is expected to accommodate and absorb the majority of development in the County, including residential development. In this regard the development of the subject lands fully aligns with CPO 2.5.**

More recent national and regional planning policy, specifically, the National Planning Framework and the Regional Spatial and Economic Strategy place much greater emphasis on compact development and making the most efficient use of land through land use densification.

It is also noted that in addition to the LAP, it also proposed to prepare an Area Based Transport Plan that promotes Mullingar as a sustainable transport hub of national and regional importance.

It is clear from these objectives that Mullingar is expected to experience significant levels of growth and development over the Plan period in terms of employment, infrastructure and housing.

Population Projections and Estimates for Mullingar up to 2031 – Table 2.6 of the Plan sets out population targets for each settlement tier to 2026, 2027 and 2031. In Mullingar’s case the population is projected to increase from 20,928 in 2016 to 23,325 in 2021 increasing to 26,003 in 2027. **This equates to a 24 per cent growth rate over the period of the recently adopted Development Plan.** By 2031 the Town’s population is forecasted to grow by an additional 14 per cent to 27,849 persons. **The projected growth in population over the next ten years will inevitably generate the need and demand for additional housing. The proposed development will make a valuable contribution to the housing supply chain at an accessible and sustainable location within the Town boundary.**

Figure 17– Population Forecast for the County

Table 2.6: Proportional Intervention (Pi) Scenario C.

	Settlement Tiers	Settlement	Census	Interpolated forecast of population				Growth Rate 2016-2027	Growth Rate 2021-2027	Pi2031
			C2016	Pi2021	Pi2026	Pi2027				
I	Regional Growth Centre	Athlone	21,349	24,233	27,116	27,693	30%* **	14%***	30,000	
		Athlone (Roscommon*)	4,737	4,847	5,423	5,539			6,657	
		Athlone (Westmeath)	16,612	19,386	21,693	22,154			23,343	
II	Key Town	Mullingar	20,928	23,235	25,542	26,003	24%	12%	27,849	
III	Self-Sustaining Growth Towns	Moate	2,763	3,018	3,274	3,325	20%	10%	3,529	
		Kinnegad	2,745	2,999	3,252	3,303			3,506	
		Kilbeggan	1,288	1,407	1,526	1,550			1,645	
		Castlepollard	1,163	1,270	1,378	1,399			1,485	

Source – Table 2.6 Westmeath County Development Plan 2021-2027

2.2.2 Housing

The strategy for meeting the housing needs of the County's population is set out at Chapter 3 of the Plan and also at Appendix 1. Appendix 1 contains the County Housing Strategy, including a Housing Need and Demand Assessment, as required under the NPF.

The new County Plan estimates that an additional 4,983 residential units will be required in Westmeath over the lifetime of the Plan. Consistent with national planning policy, the development priority is that these additional units will be provided through the densification and consolidation of existing urban areas.

As a 'Key Town' and consistent with current national policy on the location of new housing, Mullingar will absorb a significant proportion of the new residential units that will be required over the next six year period.

Whilst the precise quantum and allocation of lands for housing is not specified in County Plan (Table 2.9 – Core Strategy Table), it is submitted the subject site meets all sequential test principles being zoned, serviced, contiguous to the existing built-up area, as well as being proximate and safely accessible by foot to employment, services and amenities. It is also subject to the provisions on an adopted LAP.

In this regard it is noted that Core Strategy Policy Objective 2.17 fully supports - "the delivery of existing zoned and serviced lands to facilitate population growth and achieve sustainable compact growth targets of 30 % of all new housing to be built within the footprint of targeted settlements in the County".

The development also fully aligns with other Core Strategy Policy Objectives as follows –

CPO 2.13 *"Ensure that the future spatial development of Westmeath is in accordance with the National Planning Framework 2040 (NPF) including the population targets set out under the implementation Roadmap, and the Regional, Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031".*

CPO 2.14 *"Implement all land use planning policy and objectives in a manner which takes account of and is consistent with the Core Strategy in order to accelerate a transition to a greener, low carbon and climate resilient County with a focus on reduced travel demand through the promotion of sustainable travel patterns".*

CPO 2.15 *"In the assessment of development proposals, to take account of transport corridors, environmental carrying capacity, availability and /or capacity to provide waste water and water supply services, potential to conflict with Water Framework Directive objectives, potential for impact on the integrity of European sites and Annex Habitats and species, features of bio-diversity value including ecological networks, impact on landscape and visual characteristics, education and other socio economic objectives".*

CPO 2.16 *"Promote the integration of land use and transportation policies and to prioritise provision for cycling and walking travel modes and the strengthening of public transport."*

CPO 2.19 *"Incorporate in the content of the County Development Plan, measures in accordance with section 10(n) of the Planning and Development Acts (2000) as amended for the promotion of sustainable settlement patterns and transportation strategies in urban and rural areas including the promotion of measures to –*

- i. Reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in renewable resources,*
- ii. Reduce anthropogenic greenhouse gas emission, and*
- iii. Address the necessity of adaptation to climate change, in particular, having regard to location, layout and design of new development”.*

The proposed development complies with the core strategy household allocations included in the settlement plan of the 2021 County Plan by providing much needed residential accommodation on appropriately zoned lands in the only ‘Key Town’ in the County.

The subject lands abut the existing built-up area and provide an opportunity to open up and provide sustainable connections to residentially zoned lands to the west, potential future connections to existing development to the east of Lynn Road, as well as improving the permeability and accessibility of existing residential areas in the area through the provision of new pedestrian, cyclist and vehicular access to these lands.

New pedestrian connections are proposed to the ‘Chestnut Grove’ development’ to the north. The proposed pedestrian connections follow desire lines across a proposed area of open space along the northern site boundary abutting an existing area of open space within ‘Chestnut Grove”.

DMURS principles have been fundamental and integral to the design layout and it is submitted the development provides a catalyst for integration and permeability in the wider development area, as specifically called for by the current Mullingar LAP.

It is also proposed to extend a section of the existing footpath along the western edge of Ballinderry Road. This will ensure a direct, safe and continuous link from the site to the town centre and day-to-day services and amenities.

Having regard to the above, it is submitted the development of 130 no. dwellings at the site fully aligns with Core Strategy policy.

Consistent with national planning policy objectives, the project Architects have sought to deliver a tighter, more urbanised layout, by comparison to the established pattern of development in the area and in this regard the development represents a departure from the established housing typology in the immediate area which is dominated by detached and semi-detached dwellings. There are no detached or semi-detached blocks proposed. Without exception all proposed dwellings either form part of either terraced or apartment blocks.

The proposal seeks to meet the changing housing requirements of the local population by providing an alternative housing format for people of different incomes, abilities and at different stages of life. The site sits at the eastern edge of the Mullingar South Framework Plan area between established residential areas and lands that are zoned for residential uses.

Public Realm and Placemaking – The Plan seeks to ensure that new additions to the public realm respond to local context, character and civic identity by assessing new development against the following objectives –

CPO 7.1 – “Provide for a high-quality public realm and public spaces by promoting quality urban design that accommodates and create patterns of use having regard to the physical, cultural and social identities of individual settlements.”

CPO 7.2 – “Apply the following key attributes when considering public realm, public space enhancements and public seating;

Accessible – *connected and linked permeable spaces to ensure ease of movement.*

Functional – *safe, adaptable and social environments to attract and foster activity.*

Attractive – *Visually pleasing spaces, with high quality design, materials and installations (lighting, furniture and signage based on a singular common design them,*

Distinctive – *Reference to local context and building on the character and identity of place*

Prior to embarking on the detailed design and layout of the development, the site was subject to a series of baseline environmental studies including site survey, archaeological assessment, ecological assessment and arboricultural assessment.

With the exception of the arboricultural study, which identified that a limited section of hedgerow/trees to the northern and eastern boundary that are worthy of retention, none of these studies identified any natural or man-made features of interest within the application site boundaries. The site has no distinguishing traits and is relatively featureless overall. The most significant characteristics are its undulating character and the 38 v high voltage line that traverses the south-eastern corner. (Copies of all these reports and of the site survey drawing are provided under separate cover).

The project architects Coughlan & Associates also undertook a SWOT analysis and this is provided in the enclosed Architectural Design Statement provided under separate cover.

The analysis of the site in this way has resulted in a development that is responsive to, and integrates with the surrounding landscape and streetscape of the area and that maximises sustainable connections with existing and future residential areas. As illustrated in the enclosed Architectural Design Statement, a number of alternative layouts were explored and examined by the Design Team before the current layout was fixed.

Delivering a public realm that creates a sense of welcome, safety and security whilst also being fully accessible and user-friendly at all times was a priority for the multi-disciplinary Design Team which included inputs from an RIAI accredited architectural firm, a firm of chartered landscape architects and a traffic engineer, with experience in designing DMURS compliant schemes.

Consistent with CPO 7.1, without exception the position and orientation of buildings along all new street edges and public open spaces contain frequent openings creating active frontages, articulation and a high degree of overlooking and enclosure. The length of the proposed new link street is approximately 200 m and it is flanked by buildings on both sides. Buildings front the full extent of its length on the northern side with the building line on its southern edge broken only by the northern boundary to Public Open Space Area A. Front elevations of dwellings are set back from the public footpath no more than 3m from the public footpath and no more than 6m from the edge of the cycle track. To ensure continuity of the street wall, it is proposed to plant a line of tall trees along the northern edge of POS Area A, with further tree planting proposed within grassed areas that line the street.

A detailed landscape plan has been prepared for the site by Doyle O'Troithigh Chartered Landscape Architects, with specific emphasis on the public realm including public open spaces and the principal link street through the site, which consists of a tree lined boulevard with footpaths and cycle tracks either side. Appropriate and varied planting throughout public realm areas makes a significant contribution to the overall character and appearance of the development providing structure and legibility whilst also enhancing its integration with the surrounding area.

Plate 2– Visualisation of Principal Centrally Located Public Open Space Area Serving the Development



Accessibility - In terms of accessibility, it is submitted the design and layout provides a well-connected network of paths and roads within the site that will connect with existing and future networks whilst also enhancing the permeability of the existing built-up area, ensuring access for all in the community and prioritising sustainable

modes of transport rather than the private car. Consistent with the LAP objectives the proposed development seeks to increase the general level of permeability in the area through the provision of two no. new pedestrian /cyclist connections to the adjoining Chestnut Drive development.

Functional – The movement network within the site is designed in accordance with DMURS principles and standards. Continuous footpaths, including tactile paving and dropped kerbing are provided through the scheme. In addition, all footpaths and pedestrian crossings are a minimum of 2.0 m wide and all crossing points will have buff coloured tactile paving and either dropped kerbing or raised tables.

Proposed new sustainable connections to Chestnut Drive will comprise 1.8m width bit mac footpaths with public lighting. Both connections will be directly overlooked by dwellings from within the development itself and also by dwellings in Chestnut Drive i.e. Dwelling No. 49 and No. 73 Chesnut Drive.

Attractive – All public realm areas will be constructed from high quality and durable finishes and materials and will be heavily but judiciously landscaped incorporating a series of strategically located seated areas throughout for the benefit of the mobility impaired, the elderly and to encourage socialisation.

Figure 3– Visualisation of Landscaping and Seating Area along Link Street

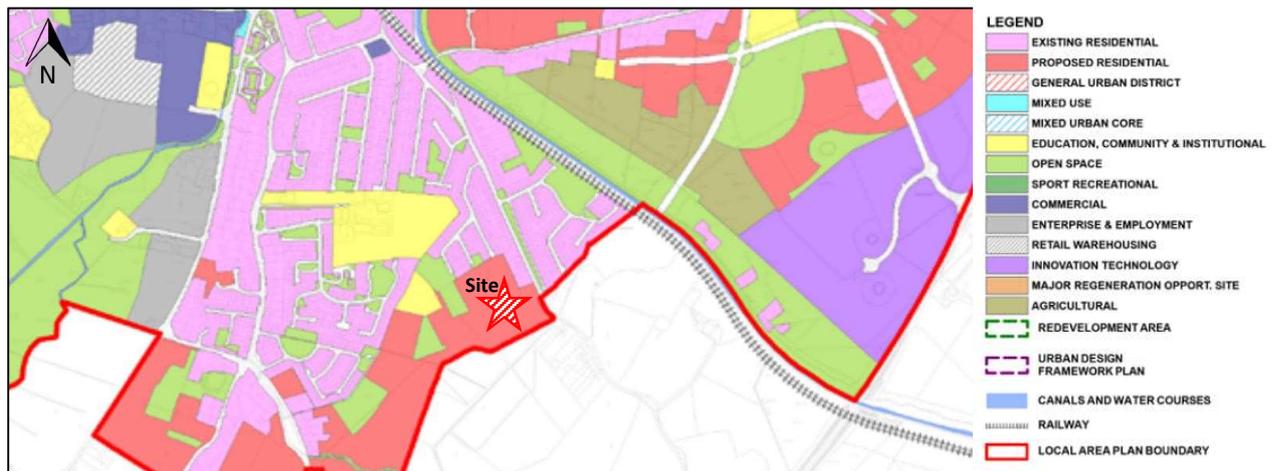


Distinctive – *It is submitted the development is appropriate to its location in terms of positioning, building forms, massing, proportions and scale and through the use of a limited palette of materials and colour that complement the existing area. The layout, design and density create a coherent structure of streets, public spaces and buildings that respect the site context and create a strong sense of identity at this location.*

2.3 MULLINGAR LOCAL AREA PLAN 2014-2020

Land Use Zoning - Under the Mullingar Local Area Plan (MLAP) 2014-2020, the application site in its entirety is zoned *'Proposed Residential'*, with the stated development objective being, *"To provide for residential development, associated services and to protect and improve residential amenity."*

Figure 19 - Extract from Mullingar LAP 2014-2020 (Site location is indicative)



Having regard to the residential nature of the development, the principle of the development is entirely acceptable and fully consistent with the zoning objectives for the site.

Chapter 2 of the MLAP contains the policies and objectives of the Council in relation to the provision of housing and aims to secure the provision of sustainable new residential communities. Development Management standards in respect of residential development are also incorporated within the MLAP.

Housing Policy – The development objectives for housing as they relate to the application site are expressed through Policy H1 of the MLAP.

Policy H1: To facilitate residential development in Mullingar in line with its designation as a Linked Gateway Town, as prescribed in the Regional Planning Guidelines and the County Development Plan, and to ensure that this development reflects the character and setting of the existing built form, in terms of structure, pattern, scale, design and materials with adequate provision of open space, and which also protects the amenities of existing dwellings.

Policy H7: To ensure the provision of a suitable range of house types and sizes to facilitate the demographic profile of the town.

The proposed development incorporates a range of dwellings sizes and typologies that includes 2 bedroom, 3 bedroom and 4 bedroom comprising terraced and semi-detached houses and apartment/duplex units. The mix proposed seeks to balance local housing requirements as set out in the MLAP with current national housing requirements which calls for the densification of urban areas and higher buildings, whilst respecting the character and amenity of existing dwelling in the area. Apartment buildings are deliberately sited in the

central part of the site and at the site's eastern and western edges away from existing dwellings to reduce any perceived loss of amenity or privacy to those dwellings.

A minimum separation distance of 22 m is maintained between all proposed and existing dwellings.

Whilst back-to-back separation distances between proposed dwellings and existing dwellings fronting Ballinderry Road range between 35m-38m.

The application site is also located within the Mullingar South Framework Plan (MSFP). The Mullingar South FP Area is located to the south of Mullingar and covers an area of approximately 83.3ha. The area extends from the River Brosna at the western end to Russellstown Road at the eastern end. For the purposes of the Framework Plan the area has been subdivided into four parcels. The proposed site is located in parcel one;

“The eastern portion comprises approximately 21.4ha and is contained entirely within the townland of Ballinderry. It extends from Russellstown Road to the Rochfortbridge Road. To the east of Russellstown Road and to the north and north-west of the area it is bounded by housing development. To the south-east there is mainly open countryside” (Pg.140).

- To promote public transport links to the town centre.
- To achieve a high quality of residential environment and amenity.
- To create new and distinctive places with identity, focus and attraction.

The entire South Mullingar Framework Plan area is identified as having the potential to accommodate 800 residential units.

The Framework Plan recognises that existing developments in Mullingar South have occurred in a wedge between Lynn Road in the west and the Royal Canal in the east. According to the plan, housing estates have developed as enclaves and there is limited access to the public roads from surrounding neighbourhoods. The vision for the area is *“To provide for long term urban expansion to the South of Mullingar and to create a sustainable, distinctive place where the community can benefit from a mix of uses and activities and enjoy a high quality urban and landscape environment”*.

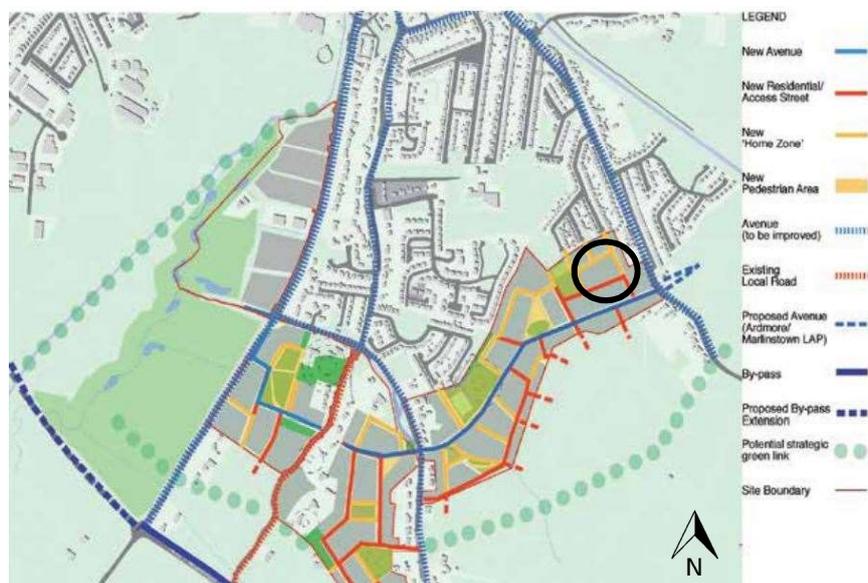
The application site lands are located in the area identified as “Ballinderry”. The development objectives for this area are –

- To allow for the expansion of Mullingar South and the residential neighbourhood.
- To structure the place on three character areas reflecting use landscape, movement and urban form.
- To create a focus for Ballinderry and surrounding areas by providing for a range of education, social and community uses and local services.
- To provide new linkages to existing residential development.
- To continue the necklace of open spaces connected by tree-lined avenues.

Figure 20 - Land Use and Function Map for Mullingar South Framework Plan (Site location is indicative)



Figure 21 - Route Structure and Development Framework for Mullingar South Framework Plan (Site location is indicative)



The proposed development is the first significant development to come forward in this area. Located at the eastern edge of the Framework Plan area, the development will open up these lands for development acting as a development catalyst and at 33 dwellings per hectare will contribute towards the critical mass that will be needed to create and support a viable and sustainable neighbourhood.

The proposed development will also help structure the area through, landscape, movement and urban form and critically will open up new safe and sustainable connections to the existing built-up area and the proposed development lands to the west of Lynn Road as the LAP specifies.

In summary, the FP states the lands should provide for a range of housing types, sizes and tenures and highlights that critical mass is necessary to develop a viable community in the area. It is intended to create a place where all ages and generations can live together. All new residential development shall have regard to the DoEHLG publications, Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual, A Best Practice Guide (2009) and the Design Manual for Urban Roads and Streets 2013. A detailed assessment of how the proposed development complies with these guidelines is provided at Section 3.0 of this Statement.

The FP proposes a density of 30 units per hectare be applied within the Framework Plan area. According to the Framework Plan, development will occur on a phased bases (p.117) and *“Given the scale of development provided for and the nature of the areas peripheral location, the full implementation of the Framework Plan will extend beyond the life of the LAP and up to 2026”* (p.149).

2. 4 PROPOSED DEVELOPMENT AND CONSISTENCY WITH DEVELOPMENT MANAGEMENT STANDARDS

The following sections of this Statement demonstrate how the proposed development meets relevant development management standards in accordance with the following policy guidance and standards –

- i. Mullingar Local Area Plan 2014-2020 (as extended)
- ii. Westmeath County Development Plan 2021 – 2027
- iii. Design Standards for Apartments Guidelines for Planning Authorities (revised version XXX)
- iv. National Cycle Manual (2011)

Density

Under National Policy Objective (NPO) 33, the National Planning Framework seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. Achieving appropriate density at appropriate locations is key to achieving more sustainable development patterns.

The LAP states the Planning Authority will have regard to principles outlined in the 2009 Sustainable Residential Density Guidelines.

With regards to density, the Guidance provided within the ‘Sustainable Residential Guidelines in Urban Areas’ is 35-50 dwellings per hectare for ‘Outer Suburban/ Greenfield Sites’. Policy CPO 16.24 of the County Plan, mirrors current national policy on density seeking to promote residential density within the “key towns” of Mullingar and Athlone where sites are within walking distance of the town centre and are adequately served social infrastructure.

Further clarity, however, in respect of density is provided in a circular issued by the Department of Housing, Local Government and Heritage dated 21st April 2021. Circular NRUP 02/2021 states that whilst net densities of 35-50 dwellings are encouraged in larger towns, net densities of 30-35 dwellings per hectare may be acceptable in certain large town contexts. In this regard the Circular states,

“These ‘outer suburban’ provisions apply to cities and larger towns and the Sustainable Residential Density Guidelines define larger towns as having a population in excess of 5,000 people. Large towns therefore range from 5,000 people up to the accepted city scale of 50,000 people. Given the very broad extent of this range and variety of urban situations in Ireland, it is necessary for An Bord Pleanála and Planning Authorities to exercise discretion in the application and assessment of residential density at the periphery of large towns, particularly at the edges of towns in a rural context.

Accordingly, the full range of outer suburban density, from a baseline figure of 30 dwellings per hectare (net) may be considered, with densities below that figure permissible subject to Section 5.12 of the Sustainable Residential Development Guidelines.

In a nutshell, the Circular clarifies that discretion may be applied in the assessment of residential density at the periphery of larger towns such as Mullingar, with net residential densities below 35 dwellings per hectare permissible in certain cases.

The application site area, including that part of the site consisting of a section of the Ballinderry Road (0.045 hectares) has a stated area of 4.015 hectares.

Excluding the proposed footpath link (on the Ballinderry Road), then the gross residential area of the site is 3.97 hectares. With an overall dwelling provision of 130 this results in a gross density of 33 dwellings per hectare, falling well within the recommended density targets promoted at national and local planning policy level as set out above.

Public Open Space – Both the LAP and Policy CPO 16.21 of the County Plan require public open space to be provided at a rate of 15 per cent of the gross site area.

The application site has a gross residential site area of 3.97 hectares, generating a requirement to provide 0.58 hectares of public open space.

A total of 6,655 sq.m (0.6655 ha) of public open space is provided across the site. This equates to over 16 per cent of the residential site area (3.970 hectares) and is in excess of the minimum requirement of 15 per cent as prescribed by the Development Plan. Open space is distributed across five different locations. Areas range in size, configuration, character and function with the smallest being 705 sq.m in area and the largest measuring 1,870 sq.m.

Figure 22 – Proposed Landscape Layout



Table 4 – Summary of Public Open Space Provision			
Area	Name	Measurement	Characteristics and Function
A	Central Open Space	1,630 sq.m	Multi-functional space incorporating formal play and exercise zone as well as grassed areas and seating
B	Oval Pocket Park	705 sq.m	West facing pocket park incorporating circuitous footpaths, seating areas, native planting and raised lawn space
C	Nature Trail Park	1,220 sq.m	South facing area located at northern site boundary incorporating natural play area for children. Existing trees and hedgerows will be retained and supplemented and pedestrian / cycle linkages to adjoining Chestnut Drive development proposed.
D	Western Green	1,230 sq.m	Green area incorporating network of circuitous paths with rest stops in the form of seating to encourage relaxation and social interaction. Formal play and exercise area are also provided.
E	Ballinderry Pocket Park	1,870 sq.m	Kickabout and seating areas incorporating circuitous pathway links from the site entrance to the south-western part of the site.
Total Public Open Space Provision		6,655 sqm or 16.76 per cent of the overall site area	

The proposed layout seeks to ensure that all public open space areas benefit from maximum overlooking and passive surveillance. This is achieved by way of the positioning and orientation of dwellings, carefully considered landscaping and by following desire lines across the site in order to encourage high levels activity and footfall both within the open space areas themselves and in direct proximity to them.

In the case of Area C, as it is proposed to retain and supplement existing natural boundary features to the north for natural heritage and place-making purposes as such this space benefits from direct overlooking on three sides including a row of 7 no. dwellings to the south and then by at least 4 / 5 no. dwellings to the east and south.

The positioning of a grouped car parking area to serve nearby dwellings (occupying Plot No.'s 105 – 108) in conjunction with the primary function of this public open space area which is to provide attractive and functional pedestrian / cyclist connections to the established residential area to the north means the area will benefit from high levels of activity and footfall.

Having regard to Policy CPO 16.3 of the County Plan which seeks enable positive integration between proposed and established housing area. The siting of a public open space area at this location provides an opportunity to improve the functionality, surveillance and area of an existing public open space area. It also provides an opportunity to improve permeability in the area through the provision of with two pedestrian /cyclist connections following natural desire lines across an attractive, landscaped area that benefits from a high degree of overlooking. In this regard, this element of the development is very much in keeping with Policy CPO 16.25 of the County Plan which calls for new developments to be fully permeable for walking and cycling.

The south-eastern portion of the site cannot be developed for housing due the presence of a 38 KV powerline traversing this part of the site. It also accommodates key site infrastructure including a pumping station and an underground attenuation tank. Having regard to these constraints this part of the site has been designed to incorporate a heavily landscaped 'kick-about' area, with a pedestrian pathway crossing the area connecting the eastern and western part of the site to encourage footfall and activity. Given the development constraints affecting the south-eastern corner of the site, including the necessity for it to accommodate essential drainage infrastructure, ensuring that "Ballinderry Pocket Park" - Area E forms an integral part of the new residential area has been a design priority.

It is directly overlooked on its western side by the front door of the dwelling occupying Plot No. 24. Whilst the rear garden area is screened from the public open space by 1.8 m high block plastered wall, the proposed boundary to the front and side of this corner dwelling comprises more 'transparent' screening in the form of an low (c. 800mm) boundary fence, ensuring uninterrupted surveillance is possible. The distance from the front door of this dwelling to the edge of the public open space area is less than 5m. Along its northern edge front doors of 3 no. dwellings directly face the space. The set back of these dwellings from the footpath that runs to the north is less than 3 m and is just 5m from the edge of the public open space area itself. Windows serving the principal living area of a fourth dwelling (occupying Plot No. 12) also directly overlook the area. The distance

between these windows and the public open space is c. 4m. Low level boundary treatment to the side (south) and front (east) of this dwellings ensure unobscured passive surveillance is possible.

The area also provides a more direct pedestrian/cyclist connection to the southern part of the site from the main entrance to the development off Ballinderry Road.

In total the quantum of open space provided is 0.665 sq.m (0.665 hectares). This equates to over 16 per cent of the gross residential site area. In quantitative terms the level of public open space provided is fully consistent with CPO 16.21 of the County Development Plan.

As required under Policy P-POS3 of the Mullingar LAP the applicant has engaged a Landscape Architect and a detailed landscape plan will be submitted with the planning application.

Detailed landscape proposals by Doyle O'Troithigh Landscape Architects, along with a Landscape Strategy Report and planting plan are provided under separate cover.

Private Open Space for Houses – The minimum private open space requirement for 1- 2 bedroom dwellings is 48 sq.m increasing to 60-75 sq.m for houses comprising three bedrooms or more.

Proposed houses are either 3 or 4 bedrooms so the minimum requirement in accordance with Policy CPO 16.20 of the County Plan is rear garden sizes should be in the range of 60-75 sq.m.

In all cases the minimum rear garden areas are achieved and exceeded.

The smallest garden size extends to 61 sq.m, with the largest (Dwelling No. 103) with the largest extending to 152.3 sq.m (Dwelling No. 46). The proposed development is fully consistent with Policy CPO 16.20 in this regard.

A detailed schedule of all rear garden sizes on a house by house basis is provided under separate cover in the Quality Housing Assessment by Coughlan Architects.

Proposed Apartments /Duplex Units and Consistency with Sustainable Urban Housing: Design Standards for New Apartments (Revised Edition 2020) - In accordance with Policy CPO 16.19, all proposed apartment /duplex units meet requisite standards in terms of minimum floor areas, private and communal amenity space and aspect. Please refer to enclosed Housing Quality Audit by Coughlan Architects which provides a detailed unit by unit assessment against relevant standards.

Car Parking- Having regard to Table 16.2 of the WMCP 2021 the proposed development, comprising 130 no. dwellings would generate a requirement to provide 173 no. car parking spaces. This is based on a requirement of one parking space per dwelling, plus one “visitor” space for every three no. dwelling units.

There is provision for 215 no. car parking across the site.

To avoid car parking dominating the area and to add interest and variety, parking is provided in-curtilage, on-street and in grouped parking areas

All houses are generally provided with at least 1 no. in curtilage car parking space, with some driveways capable of accommodating 2 no. spaces. Overall there are 126 in-curtilage spaces available with the balance i.e. 89 spaces taking the form of either on-street or grouped communal areas to serve primarily apartment/duplex blocks and a limited number of terraced houses. Grouped car parking areas are located either to the front or rear of dwellings.

Again to minimise visual impacts, grouped car parking areas comprise no more than 11-12 spaces maximum. All grouped car parking areas are well overlooked by adjoining dwellings and are sited as close as possible to front doors of dwellings.

EV Charging Capabilities – As required under Policy CPO 16.36 of the 2021 County Development Plan ducting facilities across the site are provided to accommodate future EV charging points. Separately there are 8 EV charging points provided at 8 locations within grouped car parking areas across the site. Please refer to enclosed drawing by Morley Walsh (Drawing Ref. No. 3189 [60] 02) for the location of these charge points and how future EV charging stations have been provided for.

Cycle Parking - In keeping with the spirit and objectives of ‘*Smarter Travel, the National Cycle Policy Framework*’ and consistent with Development Plan policies and objectives as set out above, specifically the objective to improve the permeability of the area, the proposed development seeks to promote and encourage cycling as a principal of means of travel to/from the site not only through the provision of dedicated cycle lanes but also by ensuring safe and secure cycle parking is available on site.

The minimum standards for cycle parking are set out in Table 9.1 of the Mullingar Local Area Plan and Table 16.3 of the 2021 Westmeath County Development Plan. The LAP provides that 2 private secure bicycle spaces per 100sq.m of floor area be provided, noting that the design of storage facilities should not require bicycle access via living area.

The five apartment / duplex buildings have an overall gross floor area of 3,061.3 sq.m generating a requirement for 61 no. spaces, with a further 18 no. spaces provided for visitors i.e. 1 per 2 no. dwellings resulting in an overall requirement of 79.

Table 16.3 and Policy CPO16.37 of the County Development recommends that cycle parking is provided at a rate of 1 space per bedspace, in addition to 1 visitor space per dwelling but stipulates that as a minimum requirement at least 2 spaces per dwelling should be provided. Applying a rate of 2 spaces per dwelling and 1 visitor space per 2 units then the requirement would be 90.

Separately, the Apartment Guidelines (revised version 2020) require 1 no. cycle space per bedroom is provided, with visitor parking provided at a rate of 1 no. per 2 dwellings. Applying this calculation method then with 36 no. apartment/duplex units proposed encompassing a total of 85 no. bedrooms the proposed development would generate a requirement of 103 no. spaces overall i.e. 85 no. to serve individual dwelling with a further 18 no. visitor spaces proposed.

The development seeks to provide an appropriate level of bicycle parking taking into account the varying standards across national and local planning policy level.

A total of 79 covered spaces are provided to serve the apartment/duplex element of the scheme. These covered areas are located close to the main entrances to apartment / duplex buildings. The level of bicycle parking proposed is calculated based on the requirements of the Mullingar LAP and the National Cycle Manual i.e. 2 spaces per 100 sq.m. They are easily extended in the event the Board considers the provision should be 103 cycle parking spaces and the applicant would accept a condition in that regard.

Bin/Refuse Storage – Policy CPO 16.22 of the County Plan stipulates all dwellings must have access to adequate bin storage areas including provision for segregation of waste in accessible, convenient locations.

Semi- Detached and end-of –terrace dwellings have adequate space to the rear and to the side to allow for the storage of waste receptacles and the movement of receptacles to the front of houses for collection /emptying.

Terraced dwellings are provided with a screened waste storage area in the front driveways of dwellings. These designated storage areas are capable of accommodating 3 no typical 240 litre bins.

All dwellings front the principal estate road which can accommodate waste collection vehicles

All five apartment/duplex buildings incorporate an external bin storage area at an accessible location.

Each apartment /duplex building contains a dedicated external bin storage areas large enough to facilitate the 3 no. bin system to allow for the segregation of waste. The waste storage areas are designed to comply with the requirements of Section 4.8 the Sustainable Urban Housing: Design Standards for New Apartments (Revised 2020).

In both call waste storage areas are located within publically lit areas and within 6 m of main access roads where refuse vehicles can easily pass.

The internal access road serving the development has been designed to accommodate ease of access and movement for typical waste collection vehicles across the site, including reverse manoeuvring.

The design and layout of the development provides an opportunity for a high level of recycling, reuse and recovery of all types of household waste by future occupants in compliance with relevant legal requirements, waste policies and best practice management guidelines.

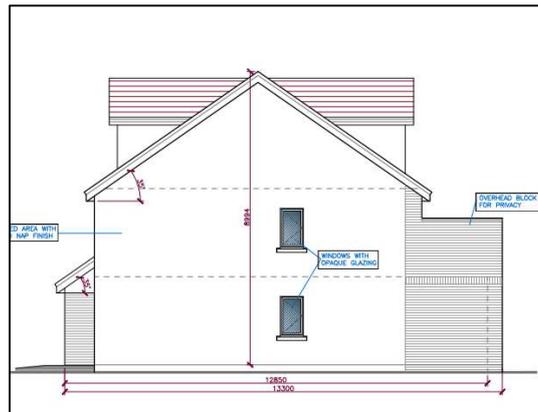
Privacy and Enclosure – The LAP recommends that all houses achieve a minimum rear garden depth of 11m.
In all cases all houses meet this requirement with no rear garden area less than 11m deep.

Overlooking – Both the LAP and County Development Plan (CPO 16.14) stipulate that a 22m separation distance should be achieved between opposing first floor windows of dwellings

The proposed development is fully compliant in this regard, in all cases a back-to-back separation distance of at least 22 m is achieved between proposed dwellings.

This separation distance increases to 35m – 38m where proposed dwellings abut the rear garden areas of existing dwellings on Ballinderry Road.

Figure 25 – Side Elevation to Block 5 showing 1.8 m Block Finished Privacy Wall and Windows Fitted with Obscure Glass (Extract from Coughlan Architects Drawing)



Daylight Sunlight Analysis – In accordance with Policy CPO 16.15 of the County Plan the development has been subject to a comprehensive daylight /sunlight analysis to assess any potential impacts on adjoining properties. The Assessment was undertaken by Digital Dimensions in accordance the recommendations of ‘*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice – Second Edition, (B.R.E.)*’.

The findings of the Assessment conclude the proposed development will not result in any material loss of sunlight or daylight to either the rear garden areas or internal living areas of dwellings adjoining the application site. Please refer to the Assessment enclosed under separate cover for full technical details.

In this regard the proposed development fully adheres to Policy CPO 16.15 of the County Development Plan.

Detailed Design Statement – Consistent with Policy CPO 16.3 of the County Development Plan, a detailed Architectural Design Statement by Coughlan Architects is provided under separate cover. Please refer to enclosed Architectural Design Statement.

2. 5 Proposed Development and Consistency with Policy on Infrastructure and Services

Stormwater Management & Flood Risk

The Westmeath County Council Development Plan contains several objectives supporting the provision of SuDS for new developments and the drainage system proposed fully espouses these objectives. These objectives include the following –

CPO 10.116 – Support in conjunction with Irish Water the improvement of storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in urban environments.

CPO 10.117 – Implement policies contained in the Greater Dublin Strategic Drainage Study (GSDSDS) in relation to SuDS and climate change or any revision thereof.

CPO 10.118 – Ensure new development is adequately serviced with surface water drainage infrastructure which meets the requirements of the Water Framework Directive, associated River Basin Management Plans and CRAM Management Plans.

CPO 10.119 – Require that planning applications are accompanied by a comprehensive SuDS assessment that addresses run-off quality and its impact on the existing habitat and water quality.

CPO 10.120 - Ensure that in public and private developments in urban areas, both within developments and within the public realm, seek to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks.

In order to reduce the potential impact of flood risk in the catchment area as well as on-site, the approach to the management of surface water has been revised since pre-application stage so that water is conveyed to the drainage system in part via an appropriate range of SUDS measures, in conjunction with an attenuation tank.

The proposed development has regard to all of the above policies and technical details in respect of the management of flood risk and surface water management and full details are provided in the enclosed drawings by SDS Engineers and accompanying Infrastructure Report provided under separate cover.

By reference to relevant OPW sources, the site is not located within an area identified as being at risk from flooding and there are no recorded flood incidents on the site or within the immediate area.

The site has been subject to a Stage 1 – Site Specific Flood Risk Assessment (SFRA) in accordance with Section 28 Guidelines, The Planning System and Flood Risk Management Guidelines (2009). The Assessment considers all types of flood risk associated with the site and concludes the proposed development will not result in flood risk to the site or surrounding area or downstream to the site.

Ground investigation works undertaken on the site indicate that infiltration rates would not support a surface water network that is entirely nature based. Ground investigation information providing evidence of infiltration rates and water table levels in the enclosed report by SDS Engineers provided under separate cover.

Notwithstanding this, in order to ensure a robust flood risk management scheme in the catchment area as well as on-site, the approach to the management of surface water has been revised so that water is conveyed to the drainage system in part via an appropriate range of SUDS measures.

Rather than reliance on an underground attenuation tank alone, the proposed attenuation tank has been reduced in size and it is now proposed to incorporate permeable paving in driveways and communal parking areas. It is also proposed to incorporate a networks of dry swales across the site. SDS Engineers Drawing C100 identifies the location of the SUDS features in conjunction with Infrastructure Design Services Report.

In this regard the proposed development is fully consistent with the objectives of the Westmeath County Council Development Plan 2021-2027, specifically CPO 10.118, CPO 10.119, CPO 10.120 (Flood Source and Climate) and CPO 16.61 (Development Management Standards Policy Objectives – Climate).

Further to this, through the incorporation of SuDS the proposed development seeks to support the management of water quality in the receiving ground and surface waters. The proposed surface water management system incorporates a range of SuDs systems that will ensure adequate treatment of run-off prior to discharging to the surface water network. In this regard the proposed to the following Development Plan objectives which seek to protect the quality of receiving ground and surface waters.

CPO 10.88 - Ensure that in assessing applications for developments, that consideration is had to the impact on the quality of surface waters having regard to targets and measures set out in the River Basin Management Plan for Ireland 2018-2021.

CPO 10.89 - Ensure that development would not have an unacceptable impact on water quality and quantity including surface water, ground water, designated source protection areas, river corridors and associated wetlands.

CPO 10.92 – new development proposals shall ensure that full consideration is given to the level of investment that will be required in the provision of water services, particularly in environmentally sensitive areas to ensure that the provision of water services does not negatively impact on habitat quality, species diversity or other environmental considerations.

Foul Water Management

Policy CPO 16.23 of the Plan requires the applicant to consult with Irish Water regarding arrangements pertaining to waste water connections agreements. ***All foul water will discharge to the public system and Irish Water has confirmed there is sufficient capacity in the system to accommodate the proposed development without the requirement for any upgrades.*** Confirmation of feasibility from Irish Water dated 3rd September 2021 is provided at Appendix D of the Services Design Report. Irish Water has also issued a Confirmation of Design Acceptance in respect of the foul water management proposals dated 14th March 2022. A copy of the Confirmation of Design Acceptance is provided at Appendix E of the Services Design Report.

Water Supply

The proposed development will connect to a public watermain on Ballinderry Road.

2.6 PROPOSED DEVELOPMENT & CONSISTENCY WITH POLICY ON LANDSCAPE & NATURAL & BUILT HERITAGE MATTERS

Natura 2000 Sites – Section 12 of the Development Plan sets out the Council’s policy in respect of landscape and natural heritage matters. Policy in respect of Natura 2000 sites is expressed through policies CPO 12.4 – CPO 12.12. Collectively these policies seek to protect and conserve Special Areas of Conservation, candidate Special Areas of Conservation, Special Protection Areas and candidate Special Protection Areas designated under the EU Birds and Habitats Directives. Specifically, Policy CPO 12.6 states that any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted.

The application site is not located within or abutting any Natura 2000 site. It is located within the built-up footprint, zoned for residential uses and will connect to all public mains infrastructure.

The site has been subject to Appropriate Assessment Screening by Mr. Roger Goodwillie. Mr. Goodwillie is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

The Assessment identifies 8 Natura 2000 sites located within a 15 km radius of the application site but finds the only sites where potential effects could arise are those sites located within the same catchment, of which there are two. These are Lough Ennell SAC (Site Code 0685) and Lough Ennell SPA (Site Code 4044).

However, the Assessment concludes that there is no direct pathway between the application site and these sites and as such no potential for significant effects to occur. The Assessment also concludes that none of the designated habitats in the SAC occurs on the site and there is no regular use by any bird species listed for the SPA. As such, the proposed development does not trigger the requirement for NIS.

Archaeology – Policy CPO 14.5 of the Development Plan seeks to ensure the protection of the archaeological heritage of the County. The subject site does not contain any recorded monuments and no part of the site is located within an area of archaeological potential or interest. Similarly the site does not contain any Protected Structures or Structures included in the National Inventory of Architectural Heritage (NIAH).

Notwithstanding this, the site has been subject to licenced archaeological testing (Licence Ref. No. 19R0208) under taken by Archer Heritage. The testing consisted of geo-physical survey in the first instance carried out in September 2019 followed by a programme of test trenching in October 2019.

No archaeological features or objects were uncovered in any of the areas subject to test trenching. The Assessment concludes there is “moderate” potential for latent archaeological remains and recommends archaeological monitoring of groundworks in the event of permission being granted. The applicant has no objection to undertaking monitoring of groundworks in the event such is deemed necessary or appropriate by the Planning Authority or i the Department of Culture, Heritage and the Gaeltacht.

3.0 THE PROPOSED DEVELOPMENT AND CONSISTENCY WITH SECTION 28 MINISTERIAL GUIDANCE

3.1 INTRODUCTION

The Department of Housing, Planning, Community and Local Government has published several guidelines relating to the government's vision for housing and the promotion of sustainable urban housing, including:

- Delivering Homes Sustaining Communities – Statement on Housing Policy' (2007) and associated 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007),
- Sustainable Residential Development in Urban Areas' with an associated 'Best Practice Urban Design Manual' (2009),
- Sustainable Urban Housing: Design Standards for New Apartments (Revised 2020)
- Urban Development and Building Heights, Guidelines for Planning Authorities - Consultation Draft (August, 2018)
- The Design Manual for Urban Roads and Streets (2013)
- Appropriate Assessment of Plans and Projects – Guidance for Planning Authorities (2009)
- Childcare Facilities, Guidelines for Planning Authorities (2001)

This Section of this statement will outline the proposals compliance with these documents.

3.2 PROPOSED DEVELOPMENT AND CONSISTENCY SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS (2009)

The 2009 Sustainable Residential Development Guidelines and accompanying Urban Design Manual contain a set of guidelines and design parameters aimed at creating high quality, sustainable and lasting new residential areas. Some of the key objectives of these Guidelines can be summarised as follows:-

- Prioritise walking, cycling and public transport and minimise dependence on the private car.
- Deliver a high quality of life in terms of amenity, safety and convenience.
- Promote social integration
- Promote efficient use of land and energy.
- Provide a mix of land uses to minimise transport demand.

Sustainability Checklist - Section 4 of the Guidelines contains recommendations and guidelines for the creation of sustainable residential areas. A sustainability checklist is set out at the end of Section 4. The following section will demonstrate how the proposed development complies with the items on this checklist.

Are the lands proposed for development in accordance with the sequencing priorities set out in the Development Plan or Local Area Plan?

The proposed development site in its entirety is zoned for residential uses by the Mullingar LAP and is prioritised for development under the provisions of the newly adopted Core Strategy as contained within the Westmeath County Development Plan 2021, being located within a designated Growth Town.

Are the lands proposed for development in accordance with the sequencing priorities set out in the Development Plan or Local Area Plan?

Neither the LAP nor the nascent County Development contain a geographical sequencing or phasing map for residential development for Mullingar. However, it is proposed development complies with the core strategy household allocations included in the settlement plan of the 2021 County Plan by providing much needed residential accommodation on appropriately zoned lands in the only 'Key Town' in the County.

The subject lands abut the existing built-up area and provide an opportunity to open up and provide sustainable connections to residentially zoned lands to the west, potential future connections to existing development to the east of Lynn Road, as well as improving the permeability and accessibility of existing residential areas in the area through the provision of new pedestrian, cyclist and vehicular access to these lands.

Is there an appropriate range of community and support facilities available to serve the site?

The site is within walking distance of Mullingar Town and major employment areas. A direct and continuous footpath link will be available from the site to the Town Centre. Alternative routes are available through the Chestnut Drive/ Grove housing development.

Is there adequate public transport to serve the development?

Although the site is not served by a public transport network at this point in time, this will improve as critical mass increases through the provision of housing and other services. The National Transport Authority and Westmeath County Council are proposing to introduce two new cross town routes. One of these routes terminates at Ballinderry Road adjacent to the site. (Please refer to enclosed TTA under separate cover.)

The site is within safe walking distance of Mullingar Town via a continuous footpath link and in proximity to major employment areas.

Will the development prioritise sustainable transport modes?

The layout of the development has been designed in accordance with DMURS principles.

Will the development ensure more efficient use of energy?

The development occupies zoned and serviced lands and achieves a gross density of 33 dwellings per hectare. The layout of the site has been designed to ensure the maximum number of dwellings benefit from daylight/sunlight penetration. All apartment/duplex units have a dual or triple aspect. The design of all dwellings meets Building Regulation Standards and will achieve an average "A" BER rating.

Will the development include the right quality and quantity of open space?

With 0.665 ha of public open space provided across the site the development exceeds the 15 per cent requirement of the Development Plan.

Will the development include measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood?

Development is designed in accordance with principles of defensible spaces with all dwellings facing towards and overlooking the public realm and public open space areas.

Will the development present an attractive and well maintained appearance?

The proposed development is designed by RIAI accredited firm of architects and will be constructed from high quality materials. The application is also be accompanied by a detailed Landscape Plan preped by a qualified and experienced firm of Landscape Architects.

Will the development promote social integration?

Proposal consists of a mix of dwelling types and sizes and attractive public open space areas where people can gather to relax, exercise and socialise together. The proposal is also in compliance with Part V of the Planning and Development Act 2000 as amended.

Will development protect and where possible enhance the built and natural heritage?

The site is not located within an area identified as having archaeological potential or significance and contains no known archaeological features or monuments. Furthermore, there are no Protected Structures or structures listed on the National Inventory of Architectural Heritage (NIAH) located within or in the vicinity of the site. AA Screening of development concludes the site contains typical species and communities for old pastureland and is most unlikely to contain rare species. The fauna likewise has no features of interest. There are no Protected Trees or other environmental designations affecting the site.

Is there provision for Sustainable Urban Drainage System?

Proposal is designed in accordance with SUDS principles.

3.3 PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE URBAN DESIGN MANUAL – BEST PRACTICE GUIDE (2009)

The companion document to the Sustainable Residential Development in Urban Areas Guidelines, the Urban Design Manual, identifies 12 essential criteria against which all new residential development against a range and scale of locations will be assessed. These criteria include *Context, Connections, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Privacy and Amenity, Parking and Detailed Design*. The Architects Design Statement by VDA Architects under separate cover provides a detailed description of the design evaluation and evaluates the proposal with regard to the 12 core principles. A summary of the proposal's compliance with the Urban Design Manual is provided below-

Scale	Policy Issue	Objectives	Proposed Development
Neighbourhood Area 	Context	To promote places that are locally distinctive having regard to their setting and context.	Development utilises appropriately zoned and serviced lands abutting the existing built-up area of Mullingar. Layout provides for connectivity to existing and proposed development lands. Buildings are no more than 2.5 storeys in height and the residential nature of the development is wholly in keeping with the surrounding pattern of development.
	Connectivity	To promote places that allow for ease of movement, permeability and integration.	The development provides for pedestrian/cyclist connectivity to established residential areas to the north and also provides for future links by sustainable modes of transport to future development lands to the west including cyclist and pedestrian links. Safe pedestrian access is available to Mullingar Town Centre via a direct and continuous footpath link including footpath extension on the eastern side of the Ballinderry Road.
	Inclusivity	To promote places that are accessible	Layout is highly permeable and legible and has been designed in accordance with

		to all in terms of social integration, provide physical access to all and respond to local needs.	DMURS principles. Open space areas, and internal access roads and connections to abutting lands are all overlooked. The development includes a mix of dwellings including ground floor apartments for single level living.
	Variety	To promote places that contain a mixture of viable uses and are able to respond to local needs.	The proposal consists of a mix of dwellings, including 4-bed, 3-bed and 2-bed dwellings. These are in form of apartment/duplex dwellings as well as more traditional terraced and semi-detached dwellings.
Site 	Efficiency	To promote places that make efficient use of land and are designed to respond to the challenge of climate change.	Site occupies fully serviceable and appropriately zoned lands that are prioritised for development. Development achieves a density of 33 dwellings per hectare (gross) ensuring efficient and sustainable use of land. All dwellings will incorporate renewable energy technologies to be determined at detailed design stage. Please refer to enclosed Energy Statement by Morley Walsh
	Distinctiveness	To promote places that build upon existing site assets, have a clear identity, are legible and easy to navigate.	Layout has been designed to minimise cut and fill and some natural boundaries are being retained. Proposed dwellings comprise a range of house/apartment/duplex units but with a unified design theme in terms of materials and finishes.
	Layout	To promote places with layouts, streets	The site layout is legible and easy to follow. The main public space area is provided centrally within the site to ensure

		<p>and spaces that are people friendly.</p>	<p>accessibility and maximum passive surveillance.</p> <p>Dwellings face onto the public open space to create an accessible and safe environment. Car parking spaces are kept to the front of dwellings and within view</p>
	<p>Public realm</p>	<p>To promote public spaces that have vitality, are safe and secure, attractive and accessible to all.</p>	<p>The public realm, including public open space areas and Ballinderry Road, is defined by active frontages, across the site with front doors of dwellings and windows to high occupancy rooms facing these spaces. The principal spine route through the site consists of a landscaped avenue with 2m wide footpaths, cycle paths either side and limited sections of parallel parking along its length thereby ensuring a high degree of activity. All footpaths and pedestrian crossings are a minimum of 1.8 m wide and all crossing points comprise tactile paving and dropped kerbs or raised table to ensure safe ease of movement for all users. Front boundaries to dwellings comprise timber fencing to a maximum height of 900mm to ensure 'eyes on the street' at all times.</p>
<p>Buildings</p> 	<p>Adaptability</p>	<p>To promote places that are designed to be adaptable through time.</p>	<p>The development consists of dwellings ranging in size from 2 to 4 bedrooms in a variety of formats, including single level dwellings, ensuring that families, single person households, mobility impaired persons and those simply wishing to downsize are catered for. All house types proposed have a downstairs toilet/utility room and exceed minimum floor area</p>

			requirements thereby providing an opportunity for future adaptation and reconfiguration if required. In many cases rear garden areas also exceed minimum providing additional scope to extend.
Privacy and Amenity	To promote the design of buildings that provide good standards of privacy and amenity.		All dwellings are provided with private amenity areas in accordance with relevant minimum standards.
Parking	To promote the integration of car parking in the urban environment in a way that is well located, secure and attractive.		Car parking is provided in accordance with the standards of the Westmeath County Council Development Plan 2021-2027. On-street, in curtilage and grouped car parking zones are provided. Grouped car parking zones are interspersed with appropriate planting to soften their appearance.
Detailed Design	The design of the building should make a positive contribution to the locality.		In terms of design, scheme dwellings are designed to adhere to current standards and guidelines whilst respecting and responding to their immediate context i.e. surrounding pattern of development and outer suburban location of the site. Dwellings are designed by an RIAI accredited firm of architects, with the development sub-divided into character areas. It will be constructed from high quality and durable buildings materials. Externally, elevational treatments display uniformity in materials but vary in detailed design to create interest and assist legibility. Chartered landscape architect firm, Doyle O'Troithigh, have prepared a detailed landscape and planting plan for the site in

			close collaboration with the scheme architects.
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3.4 PROPOSED DEVELOPMENT AND CONSISTENCY WITH SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS (REVISED 2020)

The Guidelines identify three types of locations in cities and towns that may be suitable for apartment development with regard to the proximity and accessibility considerations. It is submitted that the application site is at a Peripheral and/or Less Accessible Urban Locations.

According to the Guidelines, *“Demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type. **The 2016 Census also indicates that, if the number of 1-2 person dwellings is compared to the number of 1-2 person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2 person households as there are 1-2 person homes.**”* (para.2.6)

The Guidelines acknowledge *“While the availability of a range of employment is one of the reasons that skilled migrants are more likely to seek to locate in urban areas, this is also dependent on the availability of a choice of suitable accommodation.”* (para.2.12)

“This means that as well as being an overriding social issue, urban housing supply, especially the provision of apartments in our key cities, is a critical strategic competitiveness issue that statutory Development Plans must address.” (para.2.13).

APARTMENT DESIGN STANDARDS		
Policy	Standard / Requirement	Assessment against the proposed development
<i>Apartment Mix</i> (SPPR1)	Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms.	No studio apartments or one bedroom units are proposed.
<i>Apartment Mix</i> (Para. 3.5-3.7)	The Guidelines make provision for a two bedroom apartment to accommodate 3 persons to allow for social housing and to provide necessary variation in dwelling size. It is recommended that no more than 10% of the total number of units in any private residential development comprise this category.	<p>A total of 5 no. two bedroom three person apartments are proposed as part of the development. This represents 13 % of the total number of apartments proposed. These are Apartment Types E and E1. In all cases Apartment Types E and E1 exceed the minimum floor area requirements by 3 sq.m. In addition, minimum private amenity and communal amenity standards are also exceeded. In the case of the former private amenity space for all dwellings is exceeded by 2.6 sq.m. Whilst in the case of the latter the requirement is that 6 sq.m of communal space is provided per dwelling the level actually provided ranges between 13. – 17.7 sq.m per dwelling.</p> <p>Having regard to the generous internal floor and external amenity areas proposed, it is submitted that these dwellings will provide a high quality living environment and level of amenity for occupants.</p>
Policy	Standard / Requirement	Assessment against the proposed development

<p>Exceed minimum floor area <i>(Para 3.8)</i></p>	<p>The majority of all apartments in a proposed scheme of 10 or more must exceed the min. floor area standard by a minimum of 10%. It is acceptable to redistribute part of the min 10% additional floorspace requirement throughout the scheme, i.e. to all proposed units.</p>	<p>The total gross floor area for the proposed apartments amounts to 3,191m² . Of the 36 apartment/duplex dwellings proposed 22 no. exceed minimum floor area standards. This equates to 61 per cent of the units proposed. Please refer to enclosed Quality Housing Assessment by Coughlan Architects.</p>
<p>Dual Aspect <i>(SPP4)</i></p>	<p>In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme</p>	<p>All apartments are dual aspect with some benefitting from triple aspect. Please refer to enclosed Quality Housing Assessment by Coughlan Architects.</p>
<p>Floor to Ceiling Height <i>(SPP5)</i></p>	<p>Min floor to ceiling height must accord with Building Regulations requirement of 2.4m, except in relation to ground floor apartments, where it should be greater. It is a specific planning policy requirement that ground level apartment floor to ceiling heights shall be a minimum of 2.7m.</p>	<p>The proposed floor to ceiling heights accord with Building Regulation standards.</p>
<p>Lift and Stair Cores <i>(SPP6)</i></p>	<p>Up to 12 apartments per floor per individual stair/lift core may be provided in apartment schemes.</p>	<p>There are a maximum of 2 apartments per floor.</p>
<p>Internal Storage</p>	<p>No individual storage room within an apartment should exceed 3.5 square metres.</p>	<p>This is complied with. Please refer to enclosed Quality Housing Assessment by Coughlan Architects.</p>

<i>(Para. 3.31)</i>		
Policy	Standard / Requirement	Assessment against the proposed development
Private Amenity Space <i>(Para's 3.35 – 3.39)</i>	Private amenity space shall be provided in the form of gardens or patios/terraces for all apartments and balconies at upper levels. A minimum depth of 1.5 metres is required for balconies. Minimum areas for private amenity space for apartments are set out at Appendix 1.	All apartments have private amenity areas in the form of ground floor patios or balconies on upper floors. The depth of balconies exceeds the 1.5 metre minimum depth.
Security Considerations <i>(Para's 3.40 - 3.42)</i>	Blocks & buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, & overlooked by adjoining dwellings.	The design of the proposed apartments complies with all security considerations. Entrances are clearly defined and overlooked.
Refuse Storage <i>(Para. 4.8)</i>	Refuse facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated	Kitchen areas within apartments provide adequate space to store refuse temporarily. Communal refuse storage areas are located in proximity to main entrances as illustrated on enclosed Architects drawings.

	materials prior to deposition in communal waste storage.	
Policy	Standard / Requirement	Assessment against the proposed development
<i>Communal Amenity Space</i> <i>(Para's 4.10 - 4.12)</i>	Space should be accessible, secure & usable. There should be a distinction from private amenity space. Minimum areas for communal amenity space for apartments are set out at Appendix 1.	Communal open space is highlighted on architect drawing no. These areas consist mostly of landscaped areas.
<i>Children's Play</i> <i>(Para's 4.13-4.14)</i>	The recreational needs of children must be considered as part of communal amenity space within apartment schemes. Children's play needs around the apartment building should be catered for.	Equipped play areas are located at different locations across the site i.e. in Public Open Space Areas A – Central Open Space and C- Nature Trail.
<i>Car Parking</i> <i>(Para's 4.18 – 4.20)</i>	The default policy is for car parking to be minimised and substantially reduced in central & accessible urban locations.	Car parking is provided at the recommended rate of 1 space per apartment with visitor parking provided at 1 space for every 3-4 apartments.
<i>Bicycle parking and storage</i>	Directly accessible from public road. Of permanent construction & secure design,	External bicycle parking is provided to serve all apartment / duplex buildings. It is directly accessible to main access doors and situated close to public roads.

<p><i>(Para's 4.15 – 4.17)</i></p>	<p>preferably within the building footprint or where not possible, adjoining the structure.</p> <p>A minimum of 1 cycle storage space per bedroom shall be applied including studio units. Visitor provision of 1 space per 2 apartments (flexibility allowed).</p>	
<p><i>Content of Planning Applications</i> <i>(Para's 6.1-6.3)</i></p>	<p>A schedule must be submitted that details the number and type of apartments and associated individual unit floor areas, private amenity space and internal (and any external) storage space.</p>	<p>Please refer to schedule provided within Quality Housing Assessment by Coughlan Architects.</p>
	<p>Identify the proposed apartments that are at least 10% greater than the minimum floor area standard in schemes with 100 or more apartments.</p>	<p>Please refer to schedule provided within Quality Housing Assessment by Coughlan Architects.</p>

3.5 PROPOSED DEVELOPMENT AND CONSISTENCY WITH URBAN DEVELOPMENT AND BUILDING HEIGHT GUIDELINES FOR PLANNING AUTHORITIES (2018)

The Building Height Guidelines were published in response to national planning policy to secure compact sustainable forms of development in the National Planning Framework and the long term capital investment framework under the 10-year National Development Plan. The Guidelines signal a move away from the traditional building approach that has for the most part discouraged higher residential buildings in favour of growing our towns and cities and towns upwards rather than just outwards.

The Guidelines contain national planning policy that -

- Expands on the requirements of the National Planning Framework; and
- Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations.

The Strategic Planning Policy Requirements (SPPRs) contained in the Guidelines take precedence over any conflicting policies including Development Plans. The Guidelines require that buildings heights of at least three to four storeys must be supported in principle (paragraph 1.9). It is recognised that the suburban edges of towns and cities now typically include town-houses (2-3 storeys), duplexes (2-3 storeys) and apartments (4 storeys upwards) achieving medium densities in the range of 35-50 dwellings per hectare. The Guidelines highlight several advantages to this form of residential development-

- Such developments address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends while at the same time providing for the larger 3, 4 or more bedroom homes.
- They provide a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer time without necessitating relocation.
- These forms of developments benefit from using traditional construction methods, which can enhance viability.
- This form of development can facilitate the development of an attractive street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood, passive surveillance and community.

The proposed development achieves a density of 33 dwellings per hectare. Increased height is used to create strong urban edges, provide enclosure and define new public open spaces successfully without negatively impacting on existing low density development to the north and west.

3.6 PROPOSED DEVELOPMENT AND CONSISTENCY WITH DESIGN MANUAL FOR URBAN ROADS AND STREETS (DMURS)(2013)

The principal tenet of the 2013 *Design Manual for Urban Roads and Streets* is to put well-designed streets at the heart of sustainable communities. The Guidelines aim to promote real alternatives to car journeys and encourage lower vehicle speeds in urban areas with a view to making streets safer and more attractive to pedestrians and cyclists.

Access to the development and internal access roads serving proposed dwellings have been designed in accordance with DMURS standards and principles.

Key design features include the following -

- ***Consistent with Table Road widths range from 6m wide for the principal access road through the site, narrowing to 5m on local access roads.***
- ***Cycle tracks are provided either side of the proposed link street***
- ***Horizontal layout of internal street network is designed to self-enforce low speeds by limiting the length of straight sections to 80m or shorter as far as possible. For links exceeding 80m in length chicanes and speed tables are proposed. A 30 km/h speed limit is proposed.***
- ***Maximum junction radii of 6 m are proposed.***
- ***Continuous 1.8 m wide footpaths are provided within the site with tactile paving and dropped kerbs or raised provided at all crossing points.***
- ***Car parking throughout the site is mixed and includes some parallel parking areas at appropriate locations.***

Please refer to enclosed Statement of Compliance with DMURS by A. Lipscombe Traffic and Transport Consultants Limited provided under separate cover.

3.7 PROPOSED DEVELOPMENT AND CONSISTENCY WITH CHILDCARE FACILITIES – GUIDELINES FOR PLANNING AUTHORITIES (2001)

Section 2.4 of the *2001 Childcare Facilities- Guidelines for Planning Authorities* recommend that in new housing areas at least one childcare facility for each 75 dwellings would be appropriate. In this regard the Guidelines states;

“For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate”.

This objective has been carried through at county and local level. Within both Plans, it is stated that childcare facilities should comply with the provisions of ‘*Childcare Facilities: Guidelines for Planning Authorities*’. It is stated in the Plans that childcare facilities are appropriate in these locations;

- (i) In communities/larger new housing estates.
- (ii) The vicinity of concentrations of work places, such as industrial estates, business parks and any other locations where there are significant numbers working.
- (iii) In the vicinity of schools.
- (iv) Neighbourhood and town centres.
- (v) Adjacent to public transport corridors, park-and-ride facilities, pedestrian routes and dedicated cycle ways.

The Guidelines state that in *“new housing areas a standard of one childcare facility providing for a minimum of 20 childcare places per approximately 75 dwellings shall be provided unless otherwise recommended by the County Childcare Committee”.*

Since the Guidelines came into effect in 2001, some twenty years ago, it is now widely acknowledged that in order for purpose-built childcare facilities to operate viably and successfully there needs to be a defined need and critical mass to support them. All too often it has been the case that purpose-built facilities provided in accordance with the Guidelines have not been taken up by childcare providers either because the development itself does not generate sufficient demand or there is already adequate provision in the area.

By reference to Circular Letter PL 3-2016 issued by the Department of Environment, Community and Local Government dated 31st of March 2016, it is noted the Department is considering revising the 2001 Childcare Guidelines. This is acknowledged in the recently published Sustainable Urban Housing: Design Guidelines for New Apartments which state;

*Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of **one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units**, the threshold for provision of any such facilities in apartment schemes 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 of 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.”

The proposed strategic housing development in this case will consist of 130 units. Of the 130 dwellings proposed there are 23 no. 2 bedroom dwellings, with the balance consisting of 3 and 4 bedroom houses.

Having regard to the dwelling mix proposed the majority of the development is likely to accommodate families and as a result is likely to generate additional childcare demand.

According to the 2016 Census single person households now account for 24 per cent of all households. Applying this ratio to the proposed development, it is assumed that of the 130 dwellings proposed at least 99 will be occupied by 2 or more persons. Based on the assumption that 99 no. dwellings will be occupied by families and assuming average family contains 1.38 children (CSO, 2016) (i.e. persons aged between 18 and under) of which 30 per cent are children between 0-4 years old then the proposed development will yield a potential population of 137 no. children of which approximately 41 would be of pre-school going age i.e. aged between 0-4.

The Quarterly National Household Survey (Q3 2016) on childcare identifies that the percentage of pre-school children that are minded by a parent is 62 per cent with only 19 per cent of pre-school children availing of non-parental childcare that includes services such as crèches/montessori/playgroup or after school facilities.

Applying this ratio to the proposed development then the proposed development would generate in the region of approximately 8 no. childcare spaces.

It is submitted the proposed development by itself would not generate sufficient childcare demand to generate the construction of a new crèche and that the additional demand could be accommodated by existing facilities in the area. Furthermore there are 3 no. existing registered childcare facilities located within 800 m of the site.

Moreover, as part of ²pre-application consultation undertaken with Westmeath County Council Childcare Committee, it was confirmed that a facility catering for any less than 25 no. children would simply not be a viable prospect for registered childcare providers for cost, operational and viability reasons.

² 15th June 2021 – Telephone Call between Ms. B. Clarke of S. Ward Consultants and Ms. M. Martin of Westmeath County Council Childcare Committee.

Existing Childcare Facilities – There are existing childcare facilities located near the site, with the closest approximately 570m from the site. The location of these facilities relative to the site are identified on the Figure below. The nearest of such facilities is Mullingar Academy of Childcare and Education, which is located approximately 570m from the proposed site. Additional facilities include Belvedere Hills Nursey & Montessori, Mullingar Montessori and the Den, Women’s Community Projects Pre-School and Grovelands Childcare Mullingar.

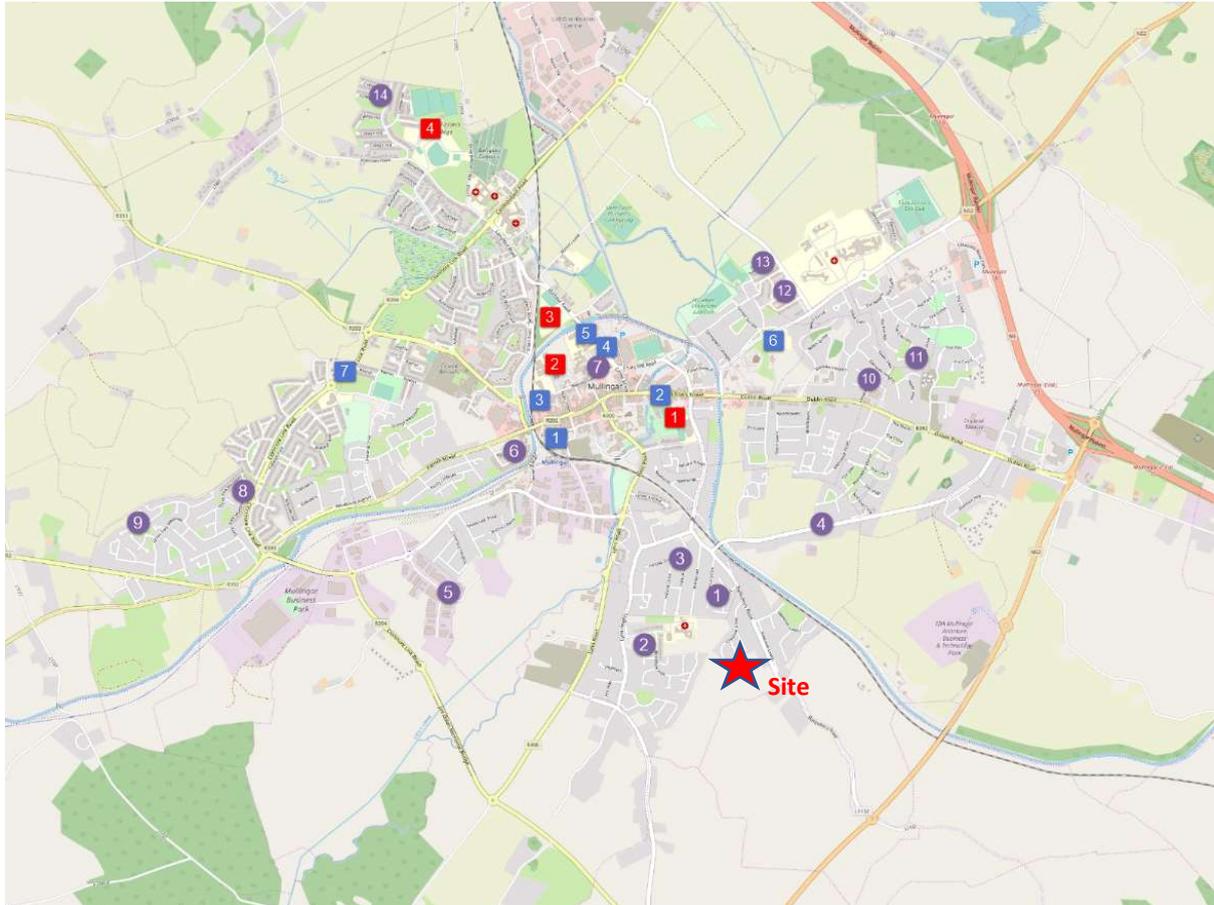


Figure 1 - Existing Childcare Provision

- 1- Grovelands Childcare Mullingar
- 2- Mullingar Academy of Childcare and Education
- 3- Belvedere Hills Nursey & Montessori School
- 4- Mullingar Montessori and the Den
- 5- Women’s Community Projects Pre-School

3.8 PROPOSED DEVELOPMENT AND CONSISTENCY WITH GUIDELINES FOR PLANNING AUTHORITIES - APPROPRIATE ASSESSMENT OF PLANS AND PROJECTS IN IRELAND (2009-2010)

With the introduction of the Birds Directive in 1979 and the Habitats Directive in 1992 came the obligation to establish the Natura 2000 network of sites of highest bio-diversity importance for rare and threatened habitats and species across the EU. In Ireland, the Natura 2000 network of European sites comprises Special Areas of Conservation (SACs, including candidate SACs), and Special Protection Areas (SPAs, including proposed SPAs). The obligation to undertake appropriate assessment derives from Article 6(3) and 6(4) of the Habitats Directive, and both involve a number of steps and tests that need to be applied in sequential order.

An appropriate assessment screening report was undertaken by Roger Goodwillie CIEEM for the development proposed. This assessment was undertaken following the procedure outlined by the Guidelines for Appropriate Assessment.

Mr Goodwillie also undertook an ecological assessment of the site. The site only contains typical species and communities for its habitat and history. There are no rare or protected species on site.

The Assessment concludes that-

“In screening for an appropriate assessment of this project for the local Natura 2000 sites, in particular the two at Lough Ennell, this analysis finds that there will be no perceptible change in the state of the sites and no impairment of their integrity nor influence on the attainment of their conservation objectives.

No listed species or habitat will be affected adversely and since this is so, there is no possibility of a wider cumulative impact.

I am satisfied the development by itself or in combination with other plans or projects would not adversely affect the integrity of European Sites in view of the sites’ Conservation Objectives. This conclusion is based on the best available scientific evidence and on a complete assessment of all aspects of the proposed project. There is no reasonable scientific doubt as to the absence of adverse effects and a Stage 2 Appropriate Assessment (and submission of an NIS) is not therefore required”.

A copy of Mr. Goodwillie’s Assessment is provided under separate cover.

3.9 PROPOSED DEVELOPMENT AND CONSISTENCY WITH THE PLANNING SYSTEM AND FLOOD RISK GUIDELINES (2009)

The Planning System and Flood Risk Management Guidelines recommend a precautionary approach when considering flood risk management in the planning system. The site is not located within an area identified as being at risk from flooding and there is no record of any flooding having occurred on the site.

Notwithstanding this, a site specific Flood Risk Assessment has been undertaken by SDS Engineers and is contained within the Services 'Design Report and Flood Risk Assessment' enclosed under separate cover.

The SFRA concludes no potential flood risks arise as a result of the proposed development.

Please refer to enclosed Report by SDS Engineers for more details.