

## **STATEMENT OF CONSISTENCY**

**Development in the townlands of  
Kilcock, Boycetown and Commons West  
Kilcock,  
Co. Kildare  
(adjacent to the existing residential  
development at Brayton Park)**

**On behalf of  
Rycroft Homes Ltd.**

March 2020



Planning & Development  
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## Table of Contents

<b>1</b>	<b><i>Introduction</i></b>	<b>3</b>
<b>2</b>	<b><i>Overview</i></b>	<b>4</b>
	This section sets out the basis and structure of this report:	4
2.1	Ministerial Guidelines	4
2.2	Statutory Planning Policy Documents	4
<b>3</b>	<b><i>Strategic Planning Policy Documents</i></b>	<b>5</b>
3.1	Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual (2009) Guidelines	5
3.2	Delivering Homes Sustaining Communities (2007)	11
3.3	Guidelines for Planning Authorities on Childcare Facilities (2001)	15
3.4	The Planning System and Flood Risk Management (2009)	16
3.5	Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)	17
3.6	Design Standards for New Apartments – Guidelines for Planning Authorities (2018)	18
3.7	Design Manual for Urban Roads and Streets (2013)	22
<b>4</b>	<b><i>Statutory Policy Documents</i></b>	<b>23</b>
4.1	Kildare County Development Plan 2017-2023	23
4.1.1	Key Policies and Objectives	24
	Meath County Development Plan 2017-2023	26
4.1.2	Development Management Standards	27
4.2	Kilcock Local Area Plan 2015-2021	32
4.2.1	Zoning	32
4.2.2	Local Strategy	34
<b>5</b>	<b><i>Appropriate Assessment</i></b>	<b>46</b>
<b>6</b>	<b><i>Conclusion</i></b>	<b>47</b>

## 1 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Statement of Consistency on behalf of **Rycroft Homes Ltd., 1a Mpo Building, Blanchardstown Business Park, Snugborough Road, Dublin 15**, for a proposed residential development and all associated elements **in the townlands of Kilcock, Boycetown and Commons West, Kilcock, Co. Kildare**. The subject site is adjacent to the existing residential development at Brayton Park, Kilcock.

This Statement of Consistency is prepared to accompany an Strategic Housing Development (SHD) planning application, which is lodged with An Bord Pleanála in compliance with Part 2 Section 4 (1) and Section 5 (1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

This Statement of Consistency is intended to identify compliance with relevant strategic planning policy documentation and is prepared to address the requirement of the Strategic Housing Development Guidance document issued by An Bord Pleanála. We note that a Planning Report, which includes further details in respect of the site location and development description, also accompanies this SHD application to An Bord Pleanála. In addition, this report should be read as part of a wider suite of reports and we refer An Bord Pleanála to the Cover Letter enclosed with this application, which sets out a full schedule of all documents enclosed with this application.

The intention of this document is to outline consistency with guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with the key policies, objectives and development management standards set out in the local statutory planning policy documents, namely, the Kildare County Development Plan 2017-2023 as well as the Kilcock Local Area Plan 2015-2021.

## **2 Overview**

This section sets out the basis and structure of this report:

### **2.1 Ministerial Guidelines**

The following Ministerial guidelines are considered relevant to the this SHD proposal:

- 1. Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual – Best Practice Guidelines**
- 2. Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities**
- 3. Guidelines for Planning Authorities on Childcare Facilities (2001)**
- 4. The Planning System and Flood Risk Management (2009)**
- 5. Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)**
- 6. Quality Housing for Sustainable Communities (2007)**
- 7. Sustainable Urban Housing - Design Standards for New Apartments (2018)**
- 8. Urban Development and Building Height Guidelines (2018)**

The subject site and proposal are examined in compliance with each of the documents in Section 3 of this Statement.

### **2.2 Statutory Planning Policy Documents**

In addition to the above, the relevant statutory policy for consideration in the case of this SHD application is as follows:

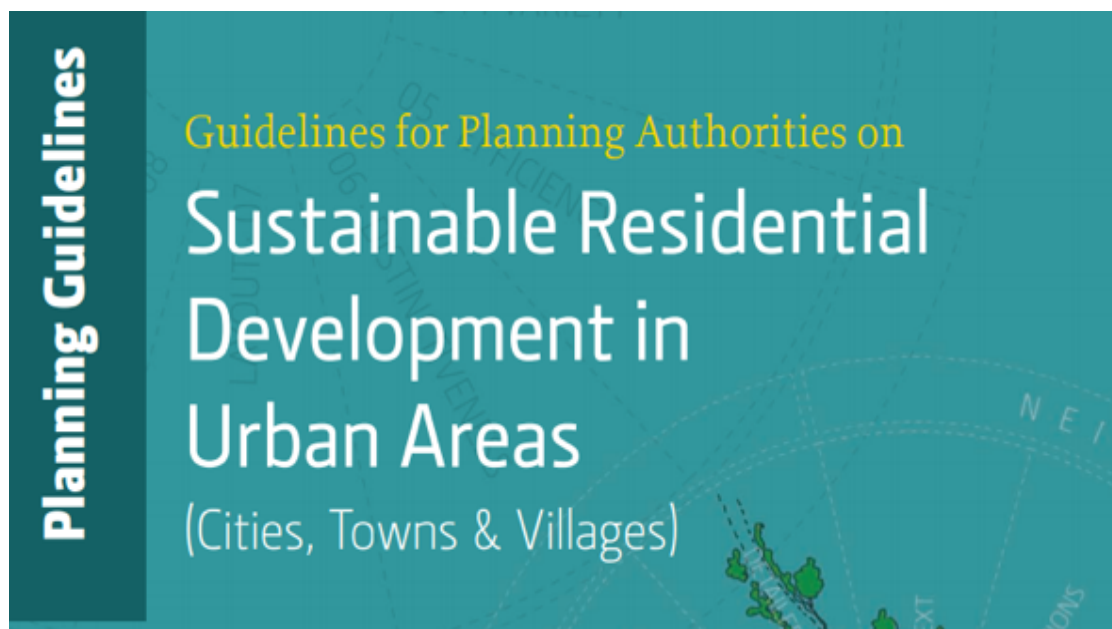
- Kildare County Development Plan 2017-2023
- Kilcock Local Area Plan 2015-2021

The subject site and proposal are examined in compliance with each of the documents in Section 4 of this Statement.

### 3 Strategic Planning Policy Documents

Each of the relevant strategic policy documents is now considered below in the context of the subject site.

#### 3.1 Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual (2009) Guidelines



The role of these guidelines is to ensure the sustainable delivery of new development throughout the country. The Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. High quality design is recommended in the development management process. The Guidelines are accompanied by an Urban Design Manual, which demonstrates how key principles can be applied in the design and layout of new residential development.

Chapter 5 of the Guidelines focuses on Cities and Larger Towns. It is our view that Kilcock falls under the category larger towns in the Guidelines given that population of Kilcock town is over 5,000 (noting that the population of Kilcock is c. 6,093) which appropriately defines larger towns.

We examine the contents of the Guidelines below as they relate to Larger Towns.

#### Design

The key elements of design in the context of larger towns are as follows:

- Acceptable Building Heights;
- Avoidance of Overlooking/Overshadowing;
- Provision of adequate public and private open space;
- Internal Space in Apartments;
- Suitable parking provision;
- Provision of ancillary facilities including childcare.

The proposed development has been designed in the context of the above and we note the following in this regard:

- Appropriate building heights of 2 - 5 storeys are proposed.
- There are no cases of overlooking within minimum separation distances maintained. We refer An Bord Pleanála to the opinion responses prepared by Brock McClure Planning & Development Consultants and C+W O'Brien Architects for further detail on this matter.
- Overshadowing is not considered an issue given the heights of 2-3 storeys and detached, semi detached and terraced nature of the housing proposed. The apartments blocks proposed are up to 5 storeys and are designed and located in such a manner as to avoid overshadowing.
- Quality and spacious housing units are proposed throughout the development.
- Appropriate on street parking is delivered. All parking is proximate to residential units as well as the creche facility. Car parking is overlooked.
- Public open space is located to optimise access for the development and where practical utilise existing mature trees and hedgerows. The Open Space proposals on lands zoned for Open Space along the M4 boundary comply with the zoning objectives of the Kilcock Local Area Plan 2015-2021.
- A coherent and permeable network of open spaces is proposed.
- Pedestrian and cyclist access and permeability is key across the site. The applicant and the design team have given specific consideration to this and as a result the proposals incorporate an extensive pedestrian and cycle linkage network to ensure accessibility and deliver connectivity with:
  - surrounding residential developments (including the adjoining Brayton Park),
  - the services within Kilcock town and the existing train station (the applicant's proposal provides for a land reservation area to facilitate future access to a cycle and pedestrian bridge over the railway line (to be delivered by others))
  - the nearby existing school, creche and Primary Health Care Centre,
  - the adjoining amenity open space area at Bawnogues (to the south of the site),
  - adjoining undeveloped lands which include lands zoned for educational and residential uses
  - the extensive facilities within Kilcock town and the train station.

#### Childcare

The Guidelines also reference the provision of childcare facilities for larger towns and notes that the thresholds for provision of childcare facilities should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of the area and also in consultation with local childcare committees and Planning Authorities.

The applicant in this case has engaged with the Planning Authority on the matter of the provision of a childcare facility and it has been agreed to deliver a facility within the scheme. The childcare facility will cater for the demand arising from the proposed development. The proposed location of the creche proximate to the main entrance to the proposed development, the existing school and Primary Health Centre is considered a positive synergy of complementary land uses at this location.

For consistency, this report outlines the consistency of the proposal with the requirement for a childcare facility at Section 3.3 below.

C+W O'Brien Architects have designed the proposed creche to provide facilities for 91 no. children and 17 no. staff members. The creche has been incorporated into the scheme in compliance with the requirements of the Guidelines.

#### Density

The proposed development aims to deliver an appropriate density and form of residential development on this site in close proximity to Kilcock on appropriately zoned residential lands. In addition, it is noted that a portion of the subject site has been designated for open space (along the M4 boundary) and will be accessible to all future residents and the wider community.

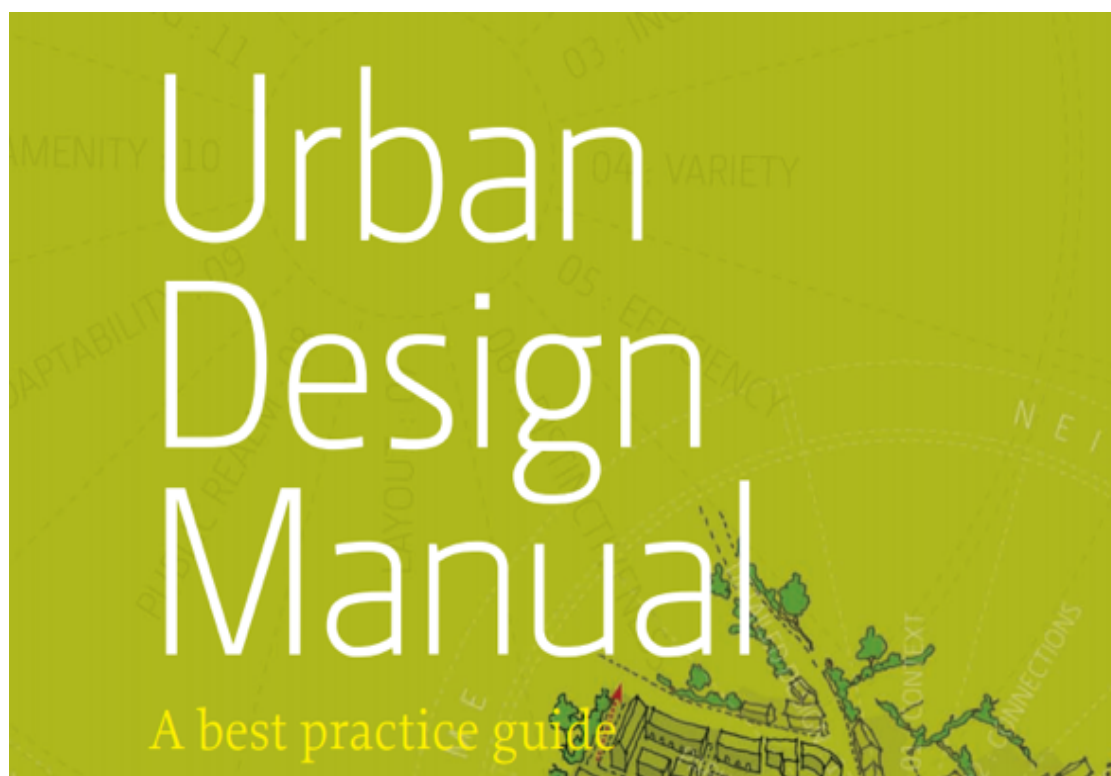
A density of 43 units per ha is proposed at the subject site. It is submitted that this is an appropriate approach to development at this location given the surrounding site context and its proximity to public transport services. The site context is considered outer suburban/greenfield in nature and the guideline for such sites is 35-50 units per ha. The proposed development provides densities within this range.

In addition, the proposed development provides a design solution and layout that promotes the provision of sustainable residential development, including a layout that:

- Prioritise walking, cycling as well as and facilitating and future proofing linkages to public transport (including a reservation for access to a future cycle/pedestrian bridge across the railway line to the north of the subject site – to be provided by others), and minimise car use.
- Promotes ease of access for all users.
- Promotes the efficient use of land.
- Reduces traffic speeds in housing developments.

It is considered that the proposed development is located on suitably zoned land for residential purposes. The density requirement set out by the current County Development Plan have been taken into consideration when designing the scheme. The provision of a series of new linkages (including pedestrian and cycle paths) throughout the site significantly improve permeability to surrounding areas and integrates the proposed development into the broader landscape of Kilcock. The site layout maximises permeability through appropriate apartment block sizes, dwelling heights, connectivity and limited use of cul-de-sacs.

Urban Design Manual



In addition to the above, we draw the attention of An Bord Pleanála to the compliance of the proposed development with the ‘sister’ document for the guidelines, namely, the ‘Urban Design Manual’.

This SHD planning application is accompanied by an Architectural Design Statement, prepared by C+W O’Brien Architects, which demonstrates how the proposed development has regard to and has been developed in accordance with best practice in respect to urban design.

The enclosed Design Statement should be read in conjunction with this Statement of Consistency and the Planning Report and as well as the plans and particulars accompanying this planning application.

For the purposes of this Statement of Consistency, compliance with the key requirements of the Urban Design Manual 12 no. criteria are noted below:

CRITERIA	PROPOSAL RESPONSE
<b>1.0 CONTEXT</b> <b>How does the development respond to its surroundings?</b>	<p>The proposed layout of the subject site has had regard to the context of the wider area is seen as reflecting the established existing developments but in a contemporary way. This allows the development to fit into an established area but also allows the development to express its own identity. The density of the development is appropriate to its context and respects the existing adjacent developments.</p> <p>The existing typography and site features inform the architecture and landscaping of the scheme. The architecture also reflects the form of the adjacent developments, however, it is presented in a more contemporary manner, which still allows it to reinforce the character and identity of the neighbourhood.</p>
<b>2.0 CONNECTIONS</b>	<p>A wide range of connections are proposed within the subject site. In addition the applicant has provided for linkages to adjoining lands. The proposed connections</p>



<p><b>How well is the new neighbourhood/site connected?</b></p>	<p>include the proposed link road, the land reserved to facilitate the future pedestrian/cycle bridge over the railway line to be provided by others – this will link the subject site to Kilcock in the future. The proposed design has ensured that the provision of the footbridge could be delivered once agreement between Kildare County Council and Irish Rail has occurred.</p> <p>These following proposed connections will ensure the new development is fully accessible and connected to the wider area. Extensive new cycle/ pedestrian connections is proposed with adjoining lands, including the amenity area to the south of the site, along the railway line to the north of the site and the undeveloped adjoining lands connected by a new link street which delivers on the LAP objective.</p>
<p><b>3.0 INCLUSIVITY</b></p> <p><b>How easily can people use and access the development?</b></p>	<p>A broad range of unit types and sizes are proposed. There is a range of smaller “starter” 1, 2 and 3 bed apartments, along with three and four bed houses of various configurations. This will ensure that the housing stock will cater for many varied households.</p> <p>The layout provides for universal access, with open spaces of varying sizes and locations. Open spaces are well defined and are located as to be passively overlooked by houses where possible.</p>
<p><b>4.0 VARIETY</b></p> <p><b>How does the development promote a good mix of activities?</b></p>	<p>The mix of housing type and tenure will complement the adjacent existing housing developments in the area. The variety of the housing stock will add to the home choice within the immediate area and also within the site itself, allowing for family upgrading whilst maintaining their established roots. The provision of a childcare facility will contribute to the mix of uses and activity within the purposed development. The extensive landscaped areas and pedestrian cycle routes will provide a range of activities which promote health and wellbeing for all age groups.</p> <p>Both Part V and private tenure will be in the same building type and will be indistinguishable from each other.</p>
<p><b>5.0 EFFICIENCY</b></p> <p><b>How does the development make appropriate use of resources including land?</b></p>	<p>The nett density of the site is 43.23units per ha or 17.49 units per acre. The proposed design and layout strives to maximise the use of the site whilst providing an appropriate scale, massing and mix on the subject site.</p> <p>Buildings and spaces are arranged to take full advantage of good solar orientation. The proposed landscaped areas (including the buffer area along the M4) will include natural play areas.</p>
<p><b>6.0 DISTINCTIVENESS</b></p> <p><b>How do the proposals create a sense of place?</b></p>	<p>Whilst the scheme takes its format from the existing surrounding estates, it will be a distinct and separate entity by the use of the external finishes and house styling. A sense of place is developed within pockets of the scheme, which clusters housing and differing activities around the open space areas.</p>
<p><b>7.0 LAYOUT</b></p> <p><b>How does the proposal create people-friendly streets and spaces?</b></p>	<p>The layout provides active frontages and passive overlooking throughout the site. Where a gable of a house is exposed, a variation of the particular house type is used, with window opening and room uses ensuring overlooking at these locations.</p> <p>Houses are arranged around the open spaces for passive overlooking to ensure activity and safety for the users. Road lengths are kept to a minimum to minimize road speeds and a series of shared surfaces reinforce that concept.</p>
<p><b>8.0 PUBLIC REALM</b></p> <p><b>How safe, secure and enjoyable are the public areas?</b></p>	<p>Public and private spaces are arranged to create a legible layout for both the residents and visitors. Public areas are positioned to benefit from passive surveillance from the residents and passers-by. Semi-private spaces in front of the houses help to define the edge of the public realm and allows the parking provision</p>

	required to be provided and additionally provide a buffer zone. This will encourage the individual residents to take ownership and maintain these areas.
<b>9.0 ADAPTABILITY</b> <b>How will the buildings cope with change?</b>	Owing to the good range of house types, it is considered that these can easily be adapted by the end user in various ways. The purposed dwellings change over time with the evolving needs of the residents (subject to securing the appropriate consent).
<b>10.0 PRIVACY AND AMENITY</b> <b>How do the buildings provide a high quality amenity?</b>	<p>All dwellings have access to usable private outdoor space including play areas. All houses have access to private rear gardens, which could also be used for discreet bin storage.</p> <p>Windows are sized and located so as to avoid views from other units and from the street. The landscaped parking zone in front of each house also provides a level of privacy. The proposal ensures that the amenity standards of adjoining residence (i.e. Brayton Park) is secure.</p> <p>Orientation of proposed Apartment buildings has been designed in such a manner as to ensure daylight/ sunlight levels and minimises overlooking.</p> <p>Each unit has been designed to create positive aspects.</p>
<b>11.0 PARKING</b> <b>How will parking be secure and attractive?</b>	<p>Each unit has its parking provision provided to the front of the house, within their buffer zone. This ensures that the user is as close to the dwelling entrance as possible and offers a degree of security.</p> <p>Parking areas will be landscaped to avoid long stretches of visible parking. Parking for all unit types is compliant with the Development Plan standards.</p>
<b>12.0 DETAILED DESIGN</b> <b>How well thought through is the building and landscape design?</b>	<p>The proposed materials are a mix of different shades of brickwork and smooth render, with varying shades and colours. This allows for variety in the scheme and provides visual interest for the residents and visitors, as well as serving as reference points throughout the site. Good quality and durable materials will facilitate easy and regular maintenance.</p> <p>Overall the purposed scheme provides:</p> <ul style="list-style-type: none"> <li>• High quality landscaping proposals and</li> <li>• pallets of materials</li> <li>• Mix of unit types</li> <li>• Range of boundary treatments</li> <li>• Connections to adjoining lands (including amenity area)</li> </ul>

*Table 5 - Compliance with Urban Design Manual*

The above table clearly outlines how the development proposal can successfully deliver on the key provisions of the Urban Design Manual.

We submit to the Bord that the current proposal is supportive of the objectives of the Sustainable Residential Development in Urban Areas (2009) and the associated Urban Design Manual.

### 3.2 Delivering Homes Sustaining Communities (2007)



The Departments policy on housing provides the overarching policy framework for an integrated approach to housing and planning and notes that demographic factors will continue to underpin strong demand for housing. This in turn presents challenges for the physical planning of new housing and associated services. The quality of the housing environment is central to creating a sustainable community.

The Delivering Homes Sustaining Communities policy statement is accompanied by Best Practice Guidelines entitled 'Quality Housing for Sustainable Communities' and this document is examined below in the context of the proposed residential development at Kilcock.

## Quality Homes for Sustainable Communities (2007)



The purpose of these Guidelines is to promote high standards in design and construction and in the provision of residential development and services in new housing schemes.

It is our considered opinion that the proposal for the site at Kilcock has delivered on the key principles of this document by delivering the following:

- Diversity in the unit type and housing mix proposed (the applicant has proposed a mix of houses, duplexes and apartments to provide 1, 2, 3 and 4 bed units)
- An appropriate residential density of 43.23 units per ha (net) is proposed, which is delivered in line with clear guidance from the Planning Authority during pre-planning engagement.
- Each of the proposed house will have access to a minimum of 55 sq m area of useable private outdoor space in the rear with hard landscaped shared open spaces to the front of the houses.
- Pedestrian and Cycle Access is prioritised within the proposed development. A series of routes are provided by way of the proposed development.
- All public open spaces are safe and benefit from passive surveillance. A clear and coherent network of open spaces is proposed throughout the scheme.
- There are a number of play areas delivered within the proposed development. These have been discussed and agreed with the Parks Department of Kildare County Council. In addition, as specifically encouraged by Kildare County Council natural play spaces are provided throughout the network of open spaces. The proposed play areas ensure security and benefit from passive surveillance.

A Housing Quality Assessment has been prepared by C+W O'Brien Architects and submitted with this SHD planning application. We refer the Bord to consideration of this assessment for full details on the extent of proposals.

The following table sets out a summary of compliance with the key standards of Quality Homes for Sustainable Communities (2007) as outlined on page 49 of the Guidelines.

Houses				
Unit Type	Overall Floor Area Requirements	Proposal (Approximate)	Percentage of Dwellings	Percentage of Over All
Type A (Mid Terrace House) 2 bed/4 person/2 storey	85 sq. m	90.4 sq m	27.10%	12.17%
<b>Type A Total</b>			<b>27.10%</b>	<b>12.17%</b>
Type B1 (End of Terrace House) 3 bed/5 person/2 storey	100 sq m	110.5 sq m	17.42%	7.83%
Type B2 (End of Terrace House -ext. kit) 3 bed/5 person/2 storey	100 sq m	122.50 sq m	3.87%	1.74%
<b>Type B Total</b>			<b>21.29%</b>	<b>9.57%</b>
Type C1 (Mid Terrace) 3 bed/ 5 person/2 storey	100 sq m	109.40 sq m	14.19%	6.38%
Type C2 (Mid Terrace -ext. kit) 3 bed/5 person/2 storey	100 sq m	124.60 sq m	14.84%	6.67%
<b>Type C Total</b>			<b>29.03%</b>	<b>13.04%</b>
Type D1 (End of Terrace) 4 bed/7 persons/3 storey	110 sq m	155.9 sq m	20%	8.99%
<b>Type D Total</b>			<b>20%</b>	<b>8.99%</b>
Type E (End Terrace House) 4 bed/6 person/2 storey	110 sq m	150.80. sq m	2.58%	1.16%
<b>Type E Total</b>			<b>20%</b>	<b>8.99%</b>
House 01 (Semi-Detached) 4 bed/6 person/2 storey	110 sq m	150.8 sq m	7.41%	0.58%

House 02a (Semi Detached Corner House) 3 bed/5 person/2 storey	100 sq m	125.60 sq m	25.93%	2.03%
House 02b (Semi Detached Corner House) 3 bed/6 person/2 storey	100 sq m	139.00 sq m	25.93%	2.03%
House 03 (Detached) 4 bed/6 person/2 storey	110 sq m	142.4 sq m	3.7%	0.29%
House 04 (Semi-Detached) 3 bed/5 person/2 storey	100 sq m	122.5 sq m	29.63%	2.32%
House 05 (Semi-Detached) 3 bed/5 person/2 storey	100 sq m	110.5 sq m	7.41%	0.58%

Table 6 – Breakdown of Housing Unit Types

Apartments & Duplexes				
Unit Type	Overall Floor Area Requirements	Proposal (Approximate)	Percentage of Dwellings	Percentage of Over All
Duplex Type L (First and Second Floors) 2 bed/3person	85.00 sq m	96.80 sq m	18.84%	3.77%
Duplex Type M (First and Second Floors) 3 bed/5 person	100 sq m	110.00 sq m	81.16%	16.23%
Apartment Type A 2 bed/4 person	73 sq m	91.76 sq m	1.06%	0.29%
Apartment Type B 2 bed/4 person	73 sq m	91.76 sq m	1.06%	0.29%
Apartment Type C 2 bed/3 person	63 sq m	69.34 – 74.38 sq m	1.06%	0.29%

Apartment Type D 2 bed/3 person	63 sq m	69.34 – 74.38 sq m	1.06%	0.29%
Apartment Type E 2 bed/3 person	63 sq m	69.34 – 74.38 sq m	1.06%	0.29%
Apartment Type J (Ground Floor of Duplex Units) 1 bed/2 person	45 sq m	58 sq m	18.84%	3.77%
Apartment Type K (Ground Floor of Duplex Units) 2 bed/3 person	63 sq m	70.5 sq m	81.16%	16.23%

Table 7 - Breakdown of Duplex Units Types

The Planning Authority will note that the proposal is in full compliance with the typical size requirements outlined in the Guidelines.

We submit to the Board that the current proposal is compliant with the objectives of the Delivering Homes Sustaining Communities (2007) and the associated Best Practice Guide 'Quality Housing for Sustainable Communities'.

### 3.3 Guidelines for Planning Authorities on Childcare Facilities (2001)

The Childcare Guidelines provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, as well as developers and childcare providers in formulating development proposals.

The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of planning applications which include childcare facilities.

The Guidelines identify a number of appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments;
- The vicinity and concentrations of work places, such as industrial estates, business parks and any other locations where there are significant numbers working;
- In the vicinity of schools;
- Neighbourhood, District and Town Centres;
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes and dedicated cycle ways.

The recommendation for new housing developments is the provision of **1 facility for each 75 dwellings**. This will generally provide for 20 childcare spaces based on a requirement of 35 of such dwellings requiring childcare spaces. The guidelines state that 50% of units can be assumed to require childcare.

We can confirm that the current proposal provides for a 2-storey crèche of c. 466.76 sq m, which the applicant has designed to cater for 91 children. The facility has an associated external play areas of c.277.67 sqm. Section 3.6 below sets out how the development complies with the Apartment Guidelines (2018).



We submit to the Board that the current proposal is therefore in compliance with the key objectives of the Guidelines for Planning Authorities on Childcare Facilities (2001) as amended by the Apartment Guidelines (2018).

### 3.4 The Planning System and Flood Risk Management (2009)



The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended).

The purpose of the Guidelines is that Planning Authorities must implement the Guidelines in ensuring that where relevant, flood risk is a key consideration in the assessment of planning applications.

The applicant notes that there is an objective on the subject site to prepare a site - specific flood risk assessment (as per the Kilcock Local Area Plan 2015-2021). In compliance with this objective, the applicant has prepared a Flood Risk Assessment prepared by Kilgallen & Partners to accompany this Strategic Housing Development application to An Bord Pleanala.

We refer An Bord Pleanala to the enclosed document entitled 'Site Specific Flood Risk Assessment' prepared by Kilgallen & Partners Consulting Engineers for further details on flood risk associated with the subject site, the key conclusion is set out for the benefit of An Bord Pleanala:

*"The proposed development was subject to SSFRA in accordance with OPW Flood Risk Management Guidelines. This SSFRA did not find any indicators of the proposed development being at risk from fluvial, pluvial or groundwater flooding; also, the SSFRA did not find any indicators that the proposed development will give rise to flood risk elsewhere".*

It is in considering the above and the enclosed Flood Risk Assessment, that we submit to the Board that the current proposal is in compliance with the key objectives of The Planning System and Flood Risk Management (2009) guidelines.



3.5 **Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)**

## **Appropriate Assessment of Plans and Projects in Ireland**

### **Guidance for Planning Authorities**

Under Article 6 (3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations (1997)” any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed in the Planning and Development Acts (2000) as amended.

The applicant can confirm that on review of the NPWS website, it is noted that the subject site is not located proximate or adjacent to a Natura 2000 site.

We refer An Bord Pleanála to the enclosed Appropriate Assessment Screening Statement Report prepared by the Moore Group Environmental Consultants enclosed with this SHD planning application.

The Appropriate Assessment Screening Statement Report concludes the following:

*‘Having considered the above, significant effects on any European sites as a result of the proposed Project have been ruled out and, therefore, potential significant effects on European sites have been excluded at a preliminary screening stage.*

*It has been objectively concluded by Moore Group Environmental Services that:*

- 1. The proposed Project is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.*
- 2. The proposed Project is unlikely to indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.*
- 3. The proposed Project, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment in view of their conservation objectives.*
- 4. It is possible to conclude that there would be no significant effects, no potentially significant effects and no uncertain effects if the proposed Project were to proceed.*

**It can be excluded**, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site.

*It is the view of Moore Group Environmental Services that it is not necessary to undertake any further stage of the Appropriate Assessment process.'*

It is in considering the above, that we submit to the Bord that the current proposal is in compliance with the key objectives of the Bird Birds and Habitats Directive.

### 3.6 Design Standards for New Apartments – Guidelines for Planning Authorities (2018)



Sustainable Urban Housing: Design Standards for New Apartments 2018 Guidelines are also intended to promote sustainable housing, by ensuring that the design and layout of **new apartments** provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

This guidance document was prepared with the intention of *'ensuring that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures'*.

It is also intended to strike an effective regulatory balance in setting out planning guidance to achieve both high quality apartment development and a significantly increased overall level of apartment output.

An Bord Pleanála is required to have regard to these guidelines and apply any specific planning policy requirements of same.

The current proposal provides only for 345 dwellings, comprising 94 no. apartment units and 69 no. duplexes.

We can confirm the following in terms of compliance with the adopted guidelines:

- **All proposed floor areas meet Guideline requirements.**

Applicant's response:

We note in addition that the all apartment units, meet the additional 10% floor area requirement.

- **The Guidelines state that a minimum of 50% of apartments in a given scheme must be dual aspect.**

Applicant's response:

C + W O'Brien Architects and the applicant can confirm that 100% of proposed apartments are dual aspect.

- **Floor to ceiling heights comply with minimum 2.4m requirements, except in relation to ground floor apartments where the ceiling height of 2.7m is delivered as a minimum.**

Applicant's response:

The applicant and C+W O'Brien Architects can confirm that the proposed floor to ceiling height of the proposed apartments are 2.4m. and 2.7m.

- **Internal storage areas.**

Applicant's response:

The proposed internal storage areas will meet the requirement minimums, which range from 3-6 sq m. C+W O'Brien Architects can confirm that no individual storage room exceeds 3.5 sq m.

- **Private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. These spaces are a minimum depth of at least 1.5m and will comply with minimum requirements of 4-9 sq m as a minimum.**

Applicant's response:

C+W O'Brien Architects can confirm that the proposed private amenity spaces are a minimum depth of at least 1.5m and will comply with minimum requirements of 4-9 sq m as a minimum.

- **Passive surveillance, open spaces, play areas and surface parking will maximise security within an apartment scheme.**

Applicant's response:

The layout provides active frontages and passive overlooking throughout the site. Where a gable of a house is exposed, a variation of the particular house type is used, with window opening and room uses ensuring overlooking at these locations. Houses are arranged around the open spaces for passive overlooking to ensure activity and safety for the users.

House units that abut open spaces or roads have been treated to afford a degree of passive surveillance onto these respective spaces. This is achieved through providing windows at Ground and First floor level, as well as some cases, relocating the front door to the units to the side elevation.

### **Childcare Facilities**

The Apartment Guidelines require the provision of one childcare facility for every 75 dwelling units, subject to the proposed development mix and existing local childcare facilities.

It is also stated that "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.”*

*In addition to this it clarifies that “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.”*

**Applicant’s response:**

The applicant in this case has provided for creche facilities and all associated ancillary elements as per the Proposed Site Layout Plan prepared by C+W O Brien Architects.

- **Refuse facilities shall be generally designed to 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. A number of general design considerations are provided in the Guidelines.**

**Applicant’s response:**

The refuse facilities have been designed in accordance with the Guidelines and are identified on the enclosed drawings prepared by C+W O Brien Architects.

**Car Parking**

The Apartment Guidelines generally encourage reduced standards of car parking. The document defines accessible locations as falling into 3 categories:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

**Applicant’s response:**

We are of the view that the proposal complies with the Guidelines in terms of parking provision. The number of car parking spaces proposed are, in our view, an appropriate provision for this location. An Bord Pleanala are referred to the Traffic Impact Assessment prepared by Pinnacle Consulting Engineers and submitted as part of this SHD planning application to An Bord Pleanala.

It is considered that the proposed level of car parking is appropriate in this case and represents an appropriate balance between the requirements of the Planning Authority, the provisions of the Development and National Policy.

**Floor area, private open space and storage requirement are set out in the Guidelines****Applicant's response:**

The full breakdown of these units is provided in the accompanying schedule prepared by C+W O'Brien Architects.

<b>Apartments/Duplexes</b>		
<b>Standard</b>	<b>DOE Requirement</b>	<b>Proposal (approximately)</b>
<b>1 bed</b>		
Overall Floor Area	45 sq m	58 sq m
Private Open Space	5 sq m	20.7 sq m
Storage	3 sq m	3 sq m
<b>2 bed</b>		
Overall Floor Area	63 sq m (3 persons) 73 sq m (4 persons)	69.34 – 99.34sq m 91.76 sqm
Private Open Space	6 sq m (3 persons) 7 sq m (4 persons)	6 sq m—6.4 sqm 7 sqm
Storage	5 sq m (3 persons) 6 sq m (4 persons)	5 – 5.1 sq m 7 sqm
<b>3 bed</b>		
Overall Floor Area	90 sq m	99.8 sq
Private Open Space	9 sq m	9.1 sq m
Storage	9 sq m	9.5 sq m

*Table 9 - Compliance with Apartment Guidelines*

In terms of compliance with other key requirements we note the following with regard to the apartments and duplexes proposed:

- All apartments and duplexes are dual aspects.
- Floor to ceiling heights comply with the minimums.
- Appropriate car and cycle parking is delivered for the units.
- There is appropriate refuse storage.

We confirm for the Board that the duplexes and apartment units proposed in this case are compliant with the content of the above Guidelines.

### **3.7 Design Manual for Urban Roads and Streets (2013)**

The Design Manual for Urban Roads and Streets (DMURS), 2013, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. DMURS places a focus on pedestrians, cyclists and public transport users and sets out guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland.

Consideration of DMURS and its contents has been a key objective for the proposed development.

The Traffic Report prepared by Pinnacle provides further detail in respect of compliance with DMURS. A Statement of Compliance with DMURS prepared by Pinnacle Engineering as a standalone document is enclosed as part of the this SHD planning application and it clearly sets out the merits of the scheme in this regard. In summary, we note the following key points set out in the DMURS Statement of Compliance:

- A hierarchy of roads has been provided.
- Pedestrian and cyclist interconnectivity are emphasised throughout this development.
- Permeability is encouraged through appropriate block sizes.

Pinnacle Consulting Engineers can confirm to the Bord that the current proposal is in compliance of the objectives of the Design Manual for Urban Roads and Streets (2013).

## 4 Statutory Policy Documents

The Statutory Policy Document for consideration is the Kildare County Development Plan 2017-2023. Section 3.1 below reviews this document in detail.

We note that the subject site is located within the boundary for the Kilcock Local Area Plan 2015-2021, and we have reviewed the contents of the Plan to ensure that the proposal complies with the key principles of same. Section 3.2 below reviews this document in brief.

### 4.1 Kildare County Development Plan 2017-2023

Under the Kildare County Development Plan 2017-2023, the subject site is identified as part of the Kilcock Area.

#### Core Strategy

Kildare has been cited as one of the fastest growing counties in Ireland. As such, Chapter 2 of the County Development Plan ‘Core Strategy’ highlights the goals the country aims to fulfil over the life span of the Plan as to manage appropriately development and growth. The Act requires Development Plans to provide:

*‘a Core Strategy to include a settlement hierarchy; evidence based population and housing targets for all towns, villages and the open countryside; to demonstrate how future development supports public transport and services;’*

In order to attain such, we note of relevance the following strategies:

- Supporting the achievement of more sustainable towns and villages through residential and employment opportunities together with supporting social and community facilities;
- Direct appropriate levels of growth into the designated growth centres and **moderate sustainable growth towns**.

The County also intends to:

*‘Provide quality homes, in mixed tenure neighbourhoods, catering for a wide range of family types. There is also a clear need to ensure that social and community facilities, including recreation and amenity facilities, are provided in tandem with residential development. The provision of infrastructure such as schools, retail and childcare facilities is necessary to complement and support increasing populations throughout the county.’*

#### Applicant’s Response:

The applicant notes that Kilcock is identified as a Moderate Sustainable Growth Town. In this regard, it is submitted that Kilcock, can fulfil the housing requirements set out in the Core Strategy.

The applicant considers that design of the proposed development will provide:

- a range of quality homes and associated facilities (including a creche) as well as Open Space areas which will create a sustainable neighbourhood at this location,
- a mixture of tenures (noting that the Project Architect C+W O’Brien Architects that the mix will be illegible in terms of external design),
- private and public open spaces of a high standard,
- excellent means of movements for vehicles
- extensive pedestrian and cyclist pathways to adjoining lands to secure linkages to existing areas/facilities/services (including transport services at Kilcock Station) and future linkages to undeveloped zoned education and residential lands as well as land reservation to provide access to a future bridge link over the railway line (to be provided by others which will provide increased cycle/pedestrian access to the Kilcock town and the train station).

- Improved access via pedestrian links and vehicular links (for Kildare County Council maintenance vehicles on an occasional basis) to the existing amenity area at Bawnogues to the south of the site.
- The proposed residential units will be provided in tandem with the proposed open space amenities, pedestrian and cycle linkages and creche facilities to support the needs of the new population at this location and promote the creation of a new integrated community on the subject lands.

The zoning, policies and objectives and key development standards of relevance to the site are now all outlined below.

#### 4.1.1 Key Policies and Objectives

The following policies and objectives of the Kildare County Development Plan 2017-2023 are considered relevant in this case:

##### General Housing:

*“HSO 5 - Build and support the delivery of new housing appropriate to the needs of the county in terms of the demand for social housing, the needs of older people, homeless people, students, people with disabilities and the Traveller community (HSO 5).”*

*“HSO 8 - Ensure that an appropriate mix of housing types and sizes is provided in each residential development.”*

##### Applicant Response:

In accordance with the Housing Objectives set out above, the applicant can confirm that there are a total of 19 different housing types proposed within this scheme of 345 residential units.

An appropriate mix of 1, 2, 3 and 4 bed accommodation is provided in the form of houses, duplexes and apartments. These residences will that caters for social housing, the needs of the older population, young couples and families, this will promote the creation of a vibrant local residential community at the subject site.

##### Sustainable Communities:

*“HC1 - Support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.”*

*“HCO 3 - Ensure that all new urban development is of a high design quality and supports the achievement of successful urban spaces and sustainable communities.”*

##### Applicant Response:

The applicant has ensured that the proposed development is in compliance with government guidance. This is clearly set out in Section 2 of this report. The proposed represents a high quality architectural response to the subject site and its environs.

It has been designed to comply with various standards and government policy. The applicant has ensured via the proposed design of the residential units, the associated public and private amenity spaces, the creche facilities, the extensive linkages within the site as well as the wider area (which has a focus on pedestrian and cyclist linkages) will provide an attractive place to live and work thereby creating a sustainable long term community at this location.

##### Housing Urban Design:

*“HD1 - Ensure that all new residential development within the county is of high quality design*



*and complies with Government guidance on the design of sustainable residential development and urban streets.”*

*“HDO1 - Ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the companion Urban Design Manual- A Best Practice Guide, DEHLG (2009).”*

*“HDO 2 - Ensure that residential development provides an integrated and balanced approach to movement, place making and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DEHLG (2013).”*

*“HDO 3 - Encourage appropriate design and densities for new residential development while recognising the need to protect existing residential communities and the established character of the area. Where appropriate, local area plans may incorporate additional guidance in the form of design briefs for important, sensitive or larger development sites.”*

#### **Applicant Response:**

The compliance of the proposal with government guidance is clearly set out in Section 2 of this report. The subject site has been the subject of significant consideration and design input where the key objective of the applicant’s team has been the delivery of a high quality residential development, associated supporting amenities and facilities that respects the existing character of the area, promotes increased linkages with adjoining lands, Kilcock town, existing transportation services in order to create a new residential community that integrated successfully with adjoining residential communities, existing services, amenities and the established character of Kilcock and environs. The proposal delivers a sustainable approach to development with appropriate densities and a layout that has been informed by government guidance documents.

#### **Mix of Dwelling Types:**

*“MDO 1 - Require that new residential developments provide for a wide variety of housing types, sizes and tenures.”*

#### **Applicant Response:**

There are a total of 19 different housing types proposed within this scheme of 345 residential units. An appropriate mix of 1, 2, 3 and 4 bed accommodation is proposed that caters for social housing, the needs of the older population, young couples and families.

The proposed development provides residential accommodation in the form of houses, duplexes and apartments in compliance with MDo 1.

The applicant can confirm that the tenure of the proposed residential units will not be legible/distinguishable in design terms.

#### **Design and Layout:**

*“DL 1 - Promote a high quality of design and layout in new residential developments and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.”*

#### **Applicant Response:**

In response the applicant can confirm that C+W O’Brien Architects have designed a high quality residential development. An Architectural Design Statement is enclosed as part of the SHD

planning application, which outlines the basis on which the proposed development has been designed and delivered.

In addition, the proposed Landscaping, open space provision and connectivity of the subject site has been carefully considered as set out in the enclosed Landscape drawings and Landscape Rationale document prepared by Ronan Mac Diarmada & Associates Landscape Architects and enclosed with this SHD planning application.

C+W O'Brien Architects can confirm that the proposed materials are a mix of smooth render and brick in varying shades and colours. This allows for variety in the proposed development and provides visual interest for the residents and visitors, as well as serving as reference points throughout the site thereby improving legibility and ease of circulation. Good quality and durable materials will be provided that limit maintenance requirements.

Therefore the provisions of DL1 are complied with.

#### **Private Open Space:**

**“OS 1** - Ensure that all dwelling units have access to high quality, functional private open space that is carefully integrated into the design of new residential developments.”

#### **Applicant Response:**

In compliance with OS1, C+W O'Brien Architects can confirm that all residential units are provided with large private open space areas in the form of rear back gardens for the proposed houses and balcony/terrace areas for the proposed apartments and duplex units.

#### **Public Open Space:**

**“PS 1** - Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that enhances the visual character, identity and amenity of the area.”

#### **Applicant Response:**

Ronan Mac Diarmada and Associates Landscape Architects have prepared a Landscape Masterplan and a Landscape Rationale document which the applicant has enclosed as part of the SHD planning application.

The Landscape Masterplan drawing and the enclosed Landscape Rationale document sets out details of the proposed public open spaces, the visual character and amenity spaces proposed as part of the proposed development. The Landscape Masterplan and the extensive proposed connections (vehicular, pedestrian and cycle) to the adjoining lands including:

- linkages to the adjoining Brayton Park estate
- the Bawnogues Amenity area
- the undeveloped zoned educational and residential zoned lands
- Lands reserved to provide access to a future pedestrian and cycle bridge over the railway line (noted this is an objective of the Kilcock Local Area Plan 2015-2022 and will be provided by others with the support of the applicant).

The requirements of PS1 are therefore complied with.

#### **Meath County Development Plan 2017-2023**

It is important to highlight that while the subject lands are located in County Kildare, Kilcock Town is positioned directly on the boarder of County Meath. As such, the Meath County Development Plan 2017-2023 sets out the following objective for Kilcock Town:

*“This Development Plan seeks the development of Kilcock environs on a balanced and sustainable basis whereby residential development is matched by the delivery of key physical and social infrastructure and a strong economic base in town.*

The Plan also lists the following policies in relation to Kilcock Environs;

***SP1 To encourage the sustainable development of Kilcock Environs in a comprehensive manner which will integrate with the existing built up area of Kilcock town.***

***SP2 To seek the development of Kilcock Environs on a balanced and sustainable basis whereby residential development is matched by the delivery of key physical and social infrastructure and a strong economic base in the town.***

#### **Applicant’s Response**

The proposed development will provide a sustainable integrated community which will integrate into the existing built up area of Kilcock and its Environs. The applicant will ensure that the proposed residential units will be provided in tandem with the proposed open space amenities, pedestrian and cycle linkages and creche facilities to support the needs of the new population at this location and promote the creation of a new integrated community on the subject lands. This has been factored into the Phasing proposals presented with C+W O Brien Architects drawing no. 110 entitled Phasing Plan.

The new community will integrate into the existing community and utilise the full range of existing services and amenities within Kilcock town including Kilcock’s retail and service industry thereby promoting the economic activity in Kilcock town.

Based on the above, the proposed development complies with SP1 and SP2.

#### **4.1.2 Development Management Standards**

The key development management standards from Chapter 17 of the Kildare County Development Plan 2017-2023 are examined below in the context of the proposed development.

##### **1. Heights**

We note the following requirements of the Plan in this regard:

*“In general heights should respect the local streetscape and the appropriate maximum or minimum height of any building will be determined by:*

- *Prevailing Heights in the area*
- *Proximity of Existing Housing*
- *The scale of the Proposal”*

#### **Applicant’s Response:**

The proposal development provides for heights of 2-5 storeys. It is submitted that this is appropriate and in line with Development Plan provisions.

C+W O Brien Architects can confirm that there are appropriate separation distances maintained within the proposed development, which ensures that the heights proposed, do not have a negative impact on residential amenity within the scheme.

It is in consideration of the above, that we submit the proposed heights to be appropriate at this location.

The applicant refers An Bord Pleanála to the enclosed Material Contravention Statement prepared by Brock Mc Clure Planning and Development Consultants.

### **3. Overlooking**

In general, the Development Plan requires separation distances of 22m.

#### **Applicant's Response:**

C+W O'Brien Architect can confirm that the proposed development delivers on this requirement across the proposal as a minimum.

### **4. Design Statements**

The Plan sets out that proposals of more than 10 units, should have a design statement included with any planning application that may progress.

#### **Applicant's Response:**

In response to this requirement, C+W O'Brien Architects have prepared the enclosed Design Statement to accompany this SHD planning application to An Bord Pleanála. The Board are directed to the enclosed document for their consideration in assessing this planning application.

### **5. Density**

Table 4.2. of the Development Plan sets out the guidance for residential density appropriate to new development sites.

#### **Applicant's Response:**

The applicant notes that a general residential density of 30-50 units per ha is envisaged for outer suburban/greenfield sites within the Development Plan.

With regard to the subject site, the current proposal delivers on an appropriate residential density of 29.84 units per ha (gross) and 43.23 units per ha (net). The basis of the density calculation is identified within the enclosed Architectural Design Statement prepared by C+W O'Brien Architects.

Given the publication of new National Planning Policy documentation since the time of writing of the Kildare Development Plan 2017-2023 (namely the National Planning Framework (2018) and the RSES (2019) the densities proposed herein by the applicant are considered to be a reasonable response and approach for a currently underutilised greenfield zoned site outside of Kilcock.

In terms of density, a balance has been struck within the subject site given the urban rural nature of the site and detailed pre planning discussions relating to residential density with the Kildare County Council (the Planning Authority) have taken place on this matter.

### **Residential Density:**

*"LD 1 - Promote residential densities appropriate to its location and surrounding context."*

#### **Applicant's Response:**

The proposal development delivers on an appropriate residential density of 29.84 units per ha (gross) and 43.23 units per hectare (net). Table 4.2 of the Development Plan confirms that 'Edge of centre sites within Small Town/Village' sites should have a site density of 20-35 units per ha. Policy LD1 also notes that it is the policy of the Council **'Promote residential densities appropriate to its location and surrounding context.'**

Having considered the above, we would be of the view that 43 units per ha is appropriate to the site given the urban/rural nature of the site and given that a high quality proposal is delivered.

As set out above, given the publication of new National Planning Policy documentation since the time of writing of the Kildare Development Plan 2017-2023 (namely the National Planning

Framework (2018) and the RSES (2019) the densities proposed herein by the applicant are considered a reasonable response and approach for a currently underutilised greenfield zoned site outside of Kilcock.

The applicant refers An Bord Pleanála to the enclosed Material Contravention Statement prepared by Brock Mc Clure Planning and Development Consultants.

## **6. Housing Mix**

It is an objective of the Council to ensure an appropriate mix of house types and sizes. The Development Plan requires a Housing Mix Statement to be submitted with applications for 50 units or more in large growth towns. This statement should set out how the housing mix has been determined.

### **Applicant's Response:**

C+W O'Brien Architects have included an "Overall Development Summary" and a HQA as part of the SHD planning application material.

C+W O'Brien Architects can confirm the following provision of Housing Mix relating to the proposed development:

13 x 1 beds (3.8%)

136 x 2 beds (39.4%)

158 x 3 beds (45.8%)

38 x 4 beds (11%)

The above proposal delivers variety in terms of housing offer. The applicant is responding to the demand for 3 bed homes, with provision made also for smaller housing units to address requirements for smaller homes within the area.

In combination C+W O'Brien Architects can confirm that there are 19 different house, duplex and apartment types in a 2 storey and 5 storey format, providing 1, 2, 3 and 4 bed options.

## **7. Layout**

As stated in Section 17.4.4 of the Development Plan, *"the layout of new residential development should be designed to achieve the following:*

- *A strong sense of identity and a sense of place.*
- *Permeable layouts, with multiple connections to adjoining sites / estates for pedestrians and cyclists.*
- *Priority in the order of pedestrian > cyclist > public transport > car.*
- *A good sense of enclosure.*
- *Active frontage and supervised spaces.*
- *High quality materials and planting."*

It is further stated that:

*“New developments should take full account of the characteristics of the natural and built environment of the site, the views and vistas to and from the site, and the surrounding areas. Particular attention shall be given to boundaries with adjoining developments to ensure that natural boundaries are incorporated as an integral part of the design and that gaps between boundaries are avoided. Gated developments will not be permitted as they reduce social inclusion and integration within the existing community and generally fail to address the existing streetscape.*

**Applicant’s Response:**

The proposed development has been designed to respond to the particular characteristics of the subject site and promote/utilise the natural landscape features therein.

The proposed layout provides an interconnected development ensuring priority for pedestrian/cyclists to create a permeable development. The proposed pedestrian and cyclist routes are clearly legible and animated with active frontages/supervised spaces and front doors directly serving the street. There is a mix of house types that provide a balance of accommodation in a variety of formats. High quality materials are proposed throughout the development.

**8. Floor Areas**

Table 17.4 of the Development Plan sets out the minimum floor area and storages requirements for dwelling houses.

**Applicant’s Response**

The Board are referred to section 2.4 above that displays compliance with Table 17.4 of the Development Plan sets out the minimum floor area and storages requirements for dwellings.

**9. Public Open Space**

We note that the Development Plan generally requires public open space at a rate of 15% of the total site area, on greenfield sites.

**Applicant’s Response**

C+W O Brien Architects can confirm that a total of 27.45% of the overall site shall be delivered as public open space. This is in excess of the Development Plan standards. This is set out in the enclosed Overall Development Summary prepared and enclosed by C+W O Brien Architects.

This accounts for a provision for approximately 31,737 sq m of open space. The open space provision is provided within the lands zoned as F (Open Space) and the residential zoned lands (Zoned C New Residential).

The public open space lands are spread throughout the site and will be easily accessible by all residents.

The open spaces include formal play areas (3 no.) as discussed and agreed with Kildare County Council as well as natural play areas as specified by the Kildare County Council.

**10. Private Open Space**

We submit that the proposal is in accordance with Table 17.5 of the Development Plan, which sets out the minimum private open space requirements for dwelling houses.

**Applicant's Response:**

We refer the Board to the HQA provided by C+W O'Brien and accompanying this SHD planning application for private open space allocation for houses.

Apartments/Duplexes – Private Open Space		
Unit Type	Minimum Open Space Required	Proposal
1 bed	5 sq m	20.7 sq m
2 bed	7 sq m	6.4 - 22.6 sq m
3 bed	9 sqm	9.1 sq m

Table 11 – Private Open Space Standards

**11. Car Parking Provision**

Section 17.7.6 of the Development Plan sets out the relevant standards for car parking. It is noted that the following car parking standards apply to the subject site:

- 2 spaces per unit – houses
- Apartments – 1.5 spaces per unit +1 visitor space per 4 apartments
- Creche – 0.5 per staff member plus 1 per 4 children

**Applicant's Response**

650 no. car parking spaces are proposed for the residential component of the proposed development. In addition, 34 no. spaces are provided for the creche facility (including 2 no. disabled car parking spaces).

An Bord Pleanála are referred to the enclosed Traffic Impact Assessment report prepared by Pinnacle Consulting Engineers for further details in relation to car parking which accompanies this planning application to An Bord Pleanála.

It is considered that the proposed level of car parking is appropriate in this case and represents an appropriate balance between the requirements of the Planning Authority, the provisions of the Development and National Policy.

**12. Bicycle Parking**

The Development Plan does not require bicycle parking provision for housing units as it is assumed that house units with rear gardens can cater for storage of bicycles. It is noted, that for apartment units, 1 space per unit and 1 visitor space per 2 units.

**Applicant's Response**

The proposed development comprises of houses, apartments and duplexes. The applicant considers that bicycle parking will be facilitated in the rear gardens of the proposed houses.

The applicant has provided for 280 no. secure, covered, stacked bicycle parking throughout the development to accommodate bicycle parking for the proposed apartments and duplexes. This is in excess of the Development Plan Standards for bicycle parking.

An Bord Pleanála are referred to the enclosed Traffic Impact Assessment report prepared by Pinnacle Consulting Engineers for further details in relation to bicycle parking which accompanies this planning application to An Bord Pleanála.

## 4.2 Kilcock Local Area Plan 2015-2021

Kilcock has seen a significant increase in population over the last decade, specifically speaking, the town's population doubled during the nine-year period between 2002-2011. The most recent census in 2016 found the population of Kilcock to be 6,093, with 35-44 years as the dominant age group of the area.

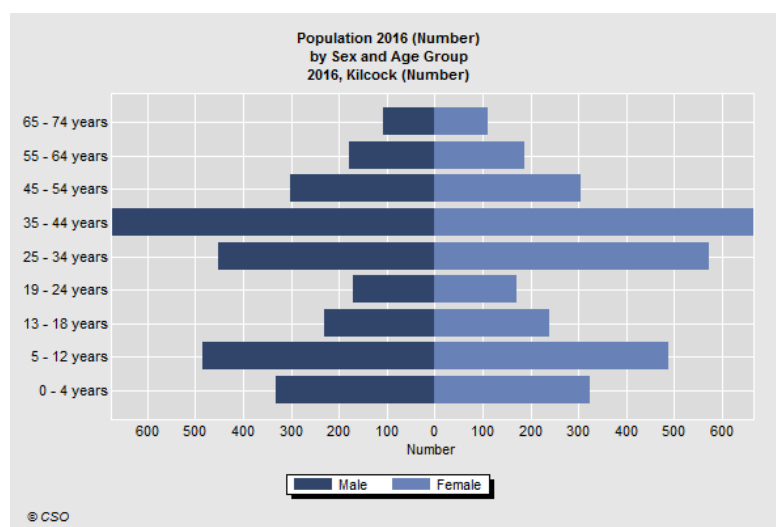


Figure 10 – Population Kilcock 2016

### 4.2.1 Zoning

The subject site is zoned as follows in the Kilcock Local Area Plan 2015-2021 :

- 'New Residential' under C lands (brown) and
- Open Space (F3 Green) as per the current.

In addition, it is noted from the zoning map that:

- There is an indicative roads objective running through the site.
- A buffer zone is identified within the F3 Open Space zoned lands (this is denoted by the yellow line on the map extract below).
- An indicative bridge (pedestrian/cyclist) over the railway line is identified on the zoning map
- A cycle path objective is shown along the subject sites boundary with the railway line.



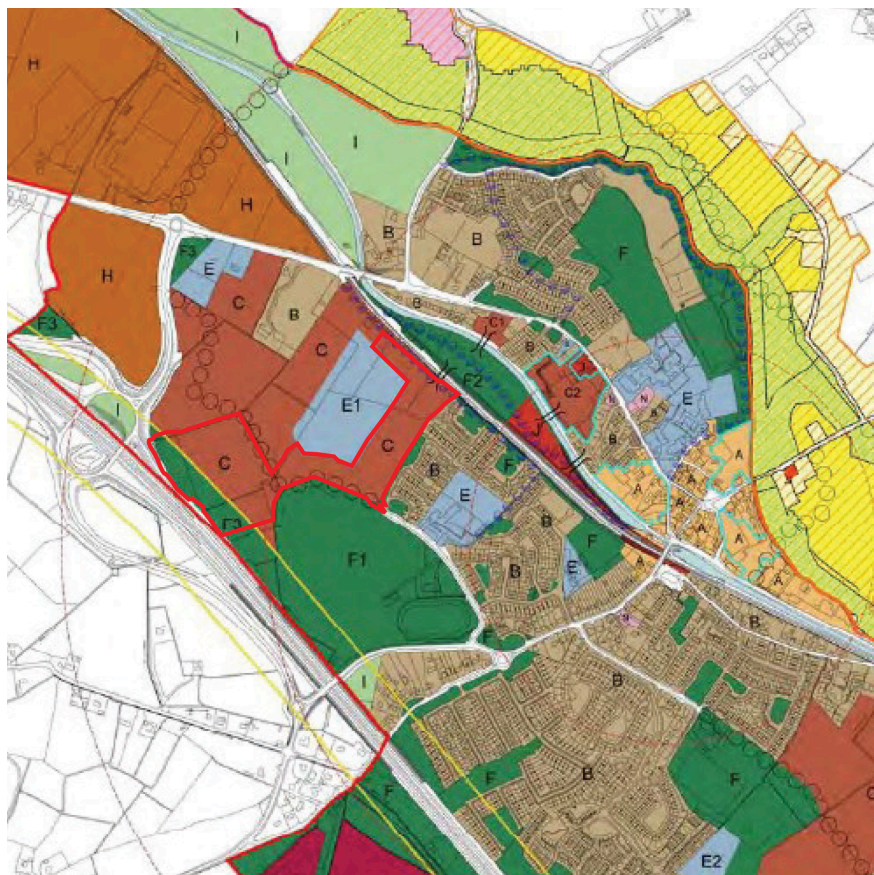


Figure 11 – Kilcock LAP Zoning Map Extract – subject site generally denoted in red

The site zoning provides for **new residential and associated uses**. The zoning objective of this site is ‘To provide for new residential development in the Bawnogues area of the town. This zoning provides for new residential development and other services incidental to residential development. This zoning shall facilitate the future expansion of Kilcock in co-operation with Kildare County Council.

#### Applicant’s Response:

The proposed development to provided 345 residential units, creche facilities and all associated elements is in accordance with the zoning on the subject site. The applicant has ensured that the proposed design and layout has responded to the 2 no. zonings on the subject site.

The lands identified as F3 “Open Space” and the set-back buffer zone of 91 m have been incorporated into the proposed layout by C+W O’Brien Architects.

The open space area, i.e the F3 lands will serve as part of the overall landscaped area of open space including 2 no. play areas, extensive planting, a noise buffer and a series of cycle and pedestrian paths.

The applicant notes that the Kilcock Local Area Plan identifies ‘Dwelling’, ‘Park/ Playground’ and ‘Creche/ playschool’ as the land uses that are permitted in principal for zoning objective C. The proposed development delivers these uses in compliance with the zoning objective on the subject site (the majority of which is zoned “C”).

Together with the provision of open space and the delivery of a link street though the subject site, the provision of a cycle/pedestrian path along the boundary with the railway line as well as the provision of a land reservation area (located to the east of the site) to facilitate access to the future

cycle/pedestrian bridge (to be provided by others) over the railway line the development proposal is therefore fully in accordance with zoning objective as well as other site specific objectives within the Local Area Plan.

#### 4.2.2 Local Strategy

A review of the Kilcock Local Area Plan 2015-2021 confirms that one of the key strategies of the plan is to ensure Kilcock becomes a town of well-connected sustainable neighbourhoods and socially inclusive communities with a priority to;

- Provide quality homes
- Create sustainable neighbourhoods

##### Providing Quality Homes:

In relation to providing quality homes, the plans states;

*“Consistent with creating a compact town and Kilcock’s role within the region, the continued, **sustainable management of land zoned for housing** is a central element of this priority. This will be done in a way that reduces urban sprawl and provides for a quality compact town of mixed tenure neighbourhoods, catering for a wide range of family types and individuals.*

*The provision of quality housing within Kilcock, that is suitable for all citizens throughout their lives and adaptable to peoples changing circumstances is fundamental to creating a compact town with sustainable neighbourhoods. Requiring residential schemes to have good local facilities and ensuring large schemes are phased so that support infrastructure is provided in tandem with residential development will assist in achieving this key strategy.”*

##### Applicant’s Response:

The proposed development on the subject site will deliver on the requirement of the Local Area Plan to provide quality housing. The applicant can confirm that a range of quality residential accommodation and all associated elements will be delivered in a phased manner on the subject site in tandem with supporting infrastructure.

The majority of the subject site is zoned for residential purposes (with the exception of the portion of land adjoining the M4 motorway which is zoned as open space). The proposal also provides for creche facilities and provides pedestrian linkages to the Bawnogues amenity area (to the south of the site).

Additional facilities are provided for in the form of extensive pedestrian and cycle path facilities throughout the subject site providing linkages with adjoining lands. Full details of the proposed linkages are set out in the enclosed Landscape Rationale document prepared by Ronan Mac Diarmada & Associates Landscape Architects submitted as part of this SHD planning application.

##### Creating Sustainable Neighbourhoods:

In relation to creating sustainable neighbourhoods the plan states;

*“The creation of good, sustainable neighbourhoods which support thriving communities and **provide for a wide range of household types, age groups and tenures** with community facilities close by is a priority of this plan. In order to achieve this, criteria and standards for good neighbourhoods are a central part of this strategy. These principles are intended to ensure, for example, that **infrastructure such as schools, shops and childcare facilities** are provided in a phased and coordinated manner. The*

importance of shops within walking distance of residential developments is reaffirmed in this key strategy.

*This priority will ensure that the council will work with various stakeholders who fund and provide community services and facilities, including but not limited to the Department of Health and Children, the Department of Education and Science, the HSE, registered charities, not-for-profit companies and foundations, religious orders, sports and community groups and organisations, to ensure social and community infrastructure is provided in a timely manner.*

**Applicant's Response:**

The proposed development will assist the planning authority in achieving its desire to create sustainable neighbourhoods on the subject lands outside of Kilcock.

The proposed development provides for:

- a range of quality homes and associated facilities (including a creche) as well as Open Space areas which will create a sustainable neighbourhood at this location,
- a mixture of tenures (noting that the Project Architect C+W O'Brien Architects that the mix will be illegible in terms of external design),
- private and public open spaces of a high standard,
- excellent means of movements includes vehicles, with a primary focus on pedestrian and cycle linkages
- extensive linkages to adjoining lands including the amenity area to the south of the site at Bawnogues (as discussed and agreed with Kildare County Council).

This proposed represents a high quality architectural response to the subject site and its environs. The applicant has ensured via the proposed design of the residential units, the associated public and private amenity spaces, the creche facilities, the extensive linkages within the site as well as the wider area (which has a focus on pedestrian and cyclist linkages) will provide an attractive place to live and work thereby creating a sustainable long term community at this location.

**Strategic Approach:**

The Local Area Plan vision for urban form and structure of Kilcock is based on a number of key issues which are worth noting;

- The creation of sustainable neighbourhoods, proximate to public transport services and a range of community infrastructure.
- The development of a green infrastructure strategy for recreation, amenity, biodiversity and climate change reasons.

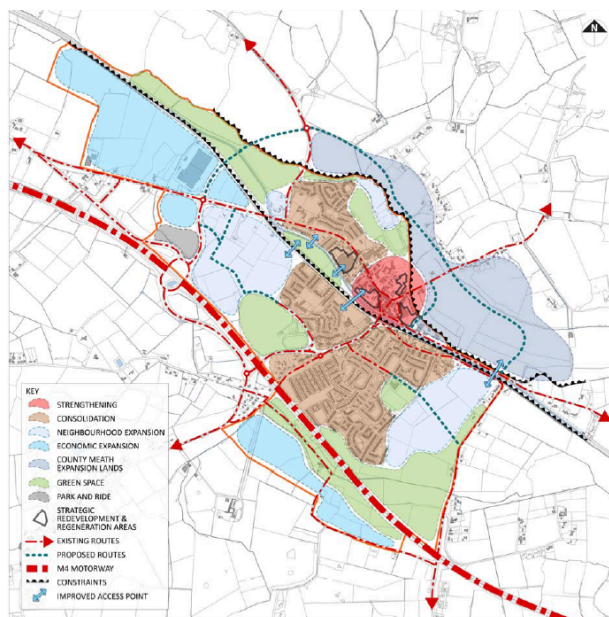


Figure 12 – Kilcock Key Plan



Figure 13 – Kilcock Vision Plan

### Expansion Areas:

It is an objective of Kildare County Council;

**SKO1 – To provide for sustainable neighborhood expansion areas.**

The subject site has been identified in the plan as an ‘Neighbourhood Expansion Area’. In order to ensure neighbourhood expansion areas achieve sustainability at a number of different levels, the plan outlines the following principals that should incorporated;



### 1. Achieving Social Diversity

- a. Critical Mass – The neighbourhood expansion areas together with surrounding communities in Kilcock, will establish a critical mass of population to sustain local amenities and public transport
- b. Diverse Dwelling Types and Tenure Mix – The neighbourhood expansion areas will include a wide range of dwelling types and, with a mixture of unit sizes, houses types and tenure to suit people with different income and at different stages of their lives.
- c. Indistinguishable Social Housing – Social and affordable housing will be provided, pepper-potted throughout, the external design of which will be indistinguishable from market housing.
- d. Mix of Uses -The local population will support the mix of uses within the neighbourhood expansion lands such as a proposed secondary and primary school, community facilities and live/work units. Increased pedestrian and cyclist links via bridges over the railway and Royal canal will increase access to the town core retail area.

#### **Applicant's response:**

The proposed development on the subject site delivers on these key objectives. The proposed development will deliver 345 units which will provide a critical mass of population within the subject site on lands which are appropriately zoned lands for residential development and open space which will support existing amenities and public transportation within Kilcock.

C+W O'Brien Architects can confirm that the proposed development delivers 19 different unit types, social housing which will be indistinguishable in terms of external design and a mix of uses including residential and creche facilities. In addition, the proposal provides for a wide network of pedestrian and cyclist linkages within the subject site as well as at the boundaries of the subject site. An Bord Pleanála are referred to the enclosed Architectural drawing, the Architectural Design Statement prepared by C+W O'Brien Architects and the Landscape Masterplan prepared by Ronan Mac Diarmada Landscape Architects.

### 2. Environmental Sustainability

- a. Sustainable Urban Drainage System – A Sustainable Urban Drainage system (SUDs) will be put in place to manage rain water run-off. Rain water harvesting technologies will be incorporated into block and building design to allow for rainwater use within homes
- b. Enhance Local Ecology – The network of SUDs will also promote local biodiversity by allowing new wildlife habitats to establish. The SUDs will also create an ecological network linking the Royal Canal habitats and surrounding areas.

#### **Applicant's response:**

The proposed development on the subject site delivers on these key objectives. An Bord Pleanála are referred to the enclosed report prepared by Pinnacle Consulting Engineers which sets out the proposed SuDs measures.

### 3. Local Identity

- a. Distinctive Local Character – The design of the neighbourhood expansion areas will draw on the local vernacular, including urban morphology, architecture and landscape design. The use of local materials and an innovative approach towards their applications will help to establish the new residential areas as part of Kilcock with a distinctive identity.

**Applicant's response:**

The proposed development on the subject site delivers on these key objectives. An Bord Pleanála are referred to the enclosed Architectural Design Statement prepared by C+W O'Brien Architects and the enclosed Landscape Masterplan prepared by Ronan Mac Diarmada Landscape Architects.

**4. Liveability**

- a. Accessibility – To reduce the reliance on cars and encourage a walkable environment, the neighbourhood expansion areas will be linked through a proposed interconnected network of streets, pedestrian and cyclist bridges to the town centre, train station and community infrastructure.
- b. Well Connected Open Space Network – To promote healthy lifestyles, neighbourhood expansion areas will offer easy access to public open spaces, recreation and amenity areas including the Royal Canal with its extensive pedestrian and cyclist routes as part of the canalway project.
- c. Legible Design – A legible structure of streets and perimeter blocks will link the neighbourhood expansion areas to adjacent developments and amenities based on the perimeter block principal of overlooked street and public spaces

**Applicant's response:**

The proposed development on the subject site delivers on these key objectives. In line with the above the proposed development provides a wide range of connections including a focus on pedestrian and cycle paths within the subject site as well as connections with adjoining areas. The proposal provides an area of land reserved to provide access to a pedestrian/cycle bridge (to be provided by others) across the rail line to the train station/town centre.

The proposed development provides by 27% of the overall site area as open space. This is proposed by way of a series of well connected open spaces which has been discussed and agreed with Kildare County Council.

The proposed development includes the provision for future linkages with adjoining sites at the perimeter of the subject site, linkages with the existing Brayton Park estate and extensive pedestrian linkages (as well as a vehicular access gate for use for maintenance access for Kildare County Council use only) to the adjoining amenities to the south of the subject site at Bawnogues.

**Housing Targets****Table 8: Kilcock Housing Unit Target 2015 - 2021**

Timeframe	Unit Target	Calculation Details
2006 - 2017	850	= 3% of the overall county unit target for 2006-2017 (being 27,982 units) <sup>4</sup>
2013 - 2017	714	= 850 units (2006-2017 target) - 136 units (total units built from 2006-2015)
2017 - 2021	376	= 3% of the annual county target for 2016-2022 (being 3,122 units) = 94 x 4
2015 - 2021	1,635	= Additional 50% over-provision <sup>5</sup> (714 + 376 + 545 = 1,635)
2015 - 2021	1,061	= 1,635 units (2015-2021 target) – 574 units (with valid Planning Permissions <sup>6</sup> )
2015 - 2021	67 units overzoned	= Potential Deliverable Units on remaining uncommitted lands 1128 (uncommitted unit total) – 1,061 (2021 unit target)

**Figure 15 – Kilcock Housing Target 2015-2021**

**Table 10: Unit Potential Undeveloped Residentially Zoned Land**

Location	Zoning	Site Size	Committed Units	Density	Unit Potential
Site ref 1	New Residential	23ha	N/A	30 per ha	690 units
Site ref 2	Existing Residential	2.8ha	39 units granted	N/A	39 units
Site ref 3	Existing Residential	4.1ha	181 units granted	N/A	181 units
Site ref 4	Existing Residential	0.2ha	4 units granted	N/A	4 units
Site ref 5	Existing Residential	1.7ha	N/A	25 per ha	42 units
Site ref 6	New Residential	2.2ha	N/A	30 per ha	66 units
Site ref 7	Town Centre	0.92ha	N/A	30 per ha	27 units
Site ref 8	New Residential	0.5ha	N/A	25 per ha	13 units
Site ref 9	Existing Residential	0.2ha	N/A	25 per ha	5 units
Site ref 10	Existing Residential	0.66ha	N/A	25 per ha	17 units
Site ref 11	Existing Residential	0.44ha	N/A	25 per ha	11 units
Site ref 12	New Residential	9.3ha	291 units granted	N/A	291 units
Site ref 13	New Residential	9.5ha	N/A	25 per ha	237 units
Site ref 14	New Residential	0.78ha	N/A	25 per ha	20 units
Site ref 15	Town Centre	1.0ha	59 units granted	N/A	59 units

*Figure 16 – Site Potential*

The subject site (site ref 1) is located in an area of 23ha with a designated in a Local Area Plan with a unit potential of 690 units and a density of 30 per ha.

***Applicant's response:***

This application is seeking delivery of 345 units on a site area of c.11.56ha.

The proposed development will deliver part of the overall residential quantum of the residential unit target for the overall lands referenced as "Site Ref. 1" in the Kilcock Local Area Plan.

An Bord Pleanála are referred to the enclosed Material Contravention Statement.

### Flood Risk Objective:

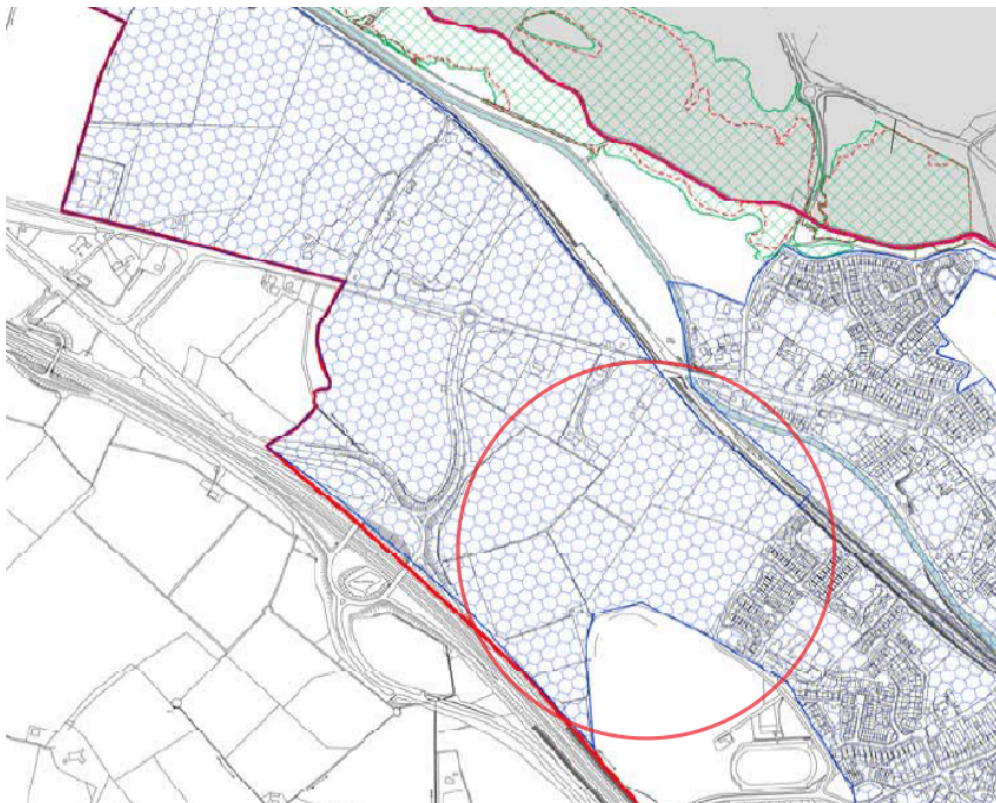


Figure 17 - Map 8 from Kilcock Local Area Plan

As identified in figure 7 above, the entirety of the site is governed by an Objective identified in blue, which requires the development proposals be subject to site specific Flood Risk Assessment appropriate to the type and scale of the development being proposed:

**SI 40 – To require all applicants, where appropriate, to carry out a Flood Risk Assessment in accordance with the Departmental Guidelines on Flood Risk Management in locations identified in Map 8.**

#### **Applicant's response:**

In response to Objective SI 40, the applicant has enclosed a Site-Specific Flood Risk Assessment prepared by Kilgallen & Partners Consulting Engineers with this SHD planning application.

An Bord Pleanála are referred to the enclosed report for further details relating to Flood Risk associated with the site.

#### **The Bawnogues Expansion Area:**

It is noted that the Kilcock Local Area Plan includes a Section entitled 7.4.4 entitled Expansion Areas, this includes an area referenced as “The Bawnogues”. The subject site is included as part of the Bawnogues Expansion Area.

According to the Kilcock LAP 2015-2021 the following design guidance should be incorporated into any proposals for the future development of these lands.

The following key policies and objectives are applicable:



### The Bawnogues

The Bawnogues residential expansion area is located to the south west of the town centre. The railway and Royal Canal form the boundary to the north while the M4 forms the boundary to the south. Brayton Park and the Bawnogues open space are located to the east and the M4 interchange bound the lands to the west. The following design guidance should be incorporated into any proposals for the future development of these lands. Fig 28 provides an indicative layout for the future development based on the Urban Design Framework in section 7.4.1 and the following design guidance.

1. To develop a new urban neighbourhood based on sustainable principles outlined in section 7.4.4.1.
2. To create a high quality physical environment through the development of a coherent spatial structure comprising the following elements:
  - Perimeter block structure.
  - Central Boulevard linking Courtown Road with the M4 interchange and to the Enfield Road along with an interconnected network of neighbourhood streets as outlined in Chapter 15 Urban Design, Kildare County Development Plan 2011-2017 and in line with the design principles contained in the Design Manual of Urban Roads and Streets.
  - The provision of a pedestrian and cyclist bridge linking the Bawnogues with the proposed recreational open space on the 'Island', the Royal Canal and the train station.
  - Building frontage along the Royal Canal.
  - Building frontages addressing the open space in the Bawnogues
  - The incorporation of SUDs into the layout which is integrated into landscape proposals for the development.
3. To provide new linkages to ensure increased connectivity with the town centre and train station.
4. To open up the Royal Canal as part of this spatial structure and provide linkages over the canal to the 'Island' creating a network of linked public green spaces.
5. To facilitate the provision of a socially cohesive community through the provision of a wide range of housing types and tenures including the provision of live/work units.
6. To identify a 12 acre site for a post primary school which will be:
  - Integrated and linked to the surrounding neighbourhoods and wider community by an interconnected network of streets and green linkages.
  - The boundaries of the school are to be 'wrapped' with residential development.

### Applicant's response

The proposed development for 345 no. residential units, a creche and all associated ancillary elements is located on part of the lands identified as the Bawnogues expansion area.

C+ W O Brien Architects can confirm that the proposed development is designed in accordance with the requirements of Section 7.4.4.1 of the Local Area Plan – this is addressed in the enclosed response to the An Bord Pleanála Opinion report prepared by Brock Mc Clure Planning and Development Consultants in conjunction with team members.

In accordance with the policies/objectives of the Bawnogues area:

- The proposed internal link street and all internal streets within the proposed scheme have been designed in line with the principles of DMURS and the specific requests of Kildare County Council – refer to the enclosed DMURS
- The applicant can confirm that land is reserved for access to a potential future pedestrian/cycle bridge (to be delivered by others) over the railway line. An Bord Pleanála are referred to the enclosed "Bridge Memo" prepared by Brock Mc Clure Planning and Development Consultants on behalf of the applicant for further details.

- C+W O'Brien Architects have designed the proposed development with building frontage addressing the open space to the south of the site (the open space at Bawnogues)
- Pinnacle Consulting Engineers and Ronan Mac Diarmada Landscape Architects have engaged in relation to the proposed SuDs measures set out as part of this SHD planning application
- The proposed development includes an extensive network linkages including a link street, internal roads, pedestrian and cycle paths as well as the proposed land reservation for access to a future pedestrian/cycle bridge over the railway line – all of these elements will ensure that the subject site is well connected to Kilcock and the existing train station
- In addition, the proposed development provides for a wide range of linkages with adjoining lands – including the Brayton Park estate, the adjoining lands zoned for residential as well as educational use. The applicant and C+W O'Brien Architects have ensured that the educational zoned lands are wrapped with residential development as specified above.
- The proposed development will foster the creation of a socially cohesive community by way of the proposed housing mix and tenure

**Objective no. MTO 2** To maximise the use of public transport infrastructure, walking and cycling and minimise car dependence.

**Objective no. MTO 3** To promote pedestrian and cycling movements for local trips.

**Objective no. MTO 4** To avoid severance within local catchments.

#### Applicant's response

The proposed development will promote walking and cycling by the provision of an extensive network of internal pedestrian and cycle pathways.

An Bord Pleanála are referred to the enclosed Landscape Rationale document prepared by Ronan Mac Diarmada Landscape Architect which identifies the proposed pedestrian and cycle networks within the subject site.

In addition, the applicant can confirm that an area of land is reserved for access to a potential future pedestrian/cycle bridge (to be provided by others) over the railway line in order to connect to Kilcock and the train station. The subject site is within walking distance of the train station at Kilcock and the existing bus services, future residents will have easy access to the existing public transportation infrastructure.

**Objective no. MTO 7** To develop a local cycle network for Kilcock connecting key destinations to the wider catchment and national cycle network.

**Objective no. MTO 8** To provide additional cycle and pedestrian bridges across the Royal Canal and railway line to form part of strategic cycling and walking routes.

**Objective no. MTO 9** To investigate sources of funding for the provision of the public infrastructure objectives of this plan including the provision of pedestrian and cyclist bridges over the Royal Canal and railway line through the Capital Works Programme assisted by the Section 48 Development Contribution Scheme and other funding streams.

#### Applicant's response

The proposed development provided a new network of cycle and pedestrian routes within the subject site which link to adjoining lands at the perimeter of the site. This complies with MTO7.

It is noted that MTo8 refers to the provision of a cycle and pedestrian bridge across the railway line. The applicant has provided a land reservation area for future access to the bridge (to be provided by others). An Bord Pleanála is referred to the enclosed “Bridge Memo” prepared by Brock McClure Planning and Development with inputs from the applicant. This sets out the applicant’s commitment to assisting with the provision of the future pedestrian and cyclist bridge which will be provided by others and subject to securing of appropriate consent.

In addition to the above the applicant notes the particular wording of MTo 9 which identifies that the Planning Authority intends to investigate sources of funding for the provision of the pedestrian and cyclist bridge over the railway line. In this regard the applicant has ensured that land is reserved within the subject site to facilitate a future link to the bridge over the railway line which will be provided by others in the future (potentially by Kildare County Council by way of a Part 8 Application. Noting that this will be subject to future discussions between the Planning Authority and Irish Rail). The applicant welcomes this and is willing to assist with the delivery of the bridge as set out in the enclosed “Bridge Memo” prepared by Brock McClure Planning and Development and the documents attached to the Memo.

**Objective no. MTo 11** To develop new cycle links to a high standard for utility cycling including:

- The royal canal route
- **The Bawnogues to the train station using ‘the island’ as a route along the railway linking to the royal canal cycle track route.**
- To enhance the outer orbital walking and cycling route from Courtown Demesne to Connaught street and the courtown road.
- Develop a pedestrian and cyclist bridges connecting the Ryebriar area to the schools in Bawnogues crossing the Royal Canal and Railway.
- The Ryebriar area to the Town Centre along the rye water river.
- Branganstown to the train station and to the outer orbital route.

#### **Applicant’s response**

The proposed development will promote walking and cycling by the provision of an extensive network of internal pedestrian and cycle pathways.

An Bord Pleanála are referred to the enclosed Landscape Rationale document prepared by Ronan Mac Diarmada Landscape Architect which identifies the proposed pedestrian and cycle networks within the subject site.

In addition to the above this SHD planning application provides includes a portion of land reserved within the subject site to facilitate a future link to the bridge over the railway line which will be provided by others in the future (potentially by Kildare County Council by way of a Part 8 Application).

**Objective no. MTo 12** To create and support a network of pedestrian infrastructure to promote and facilitate walking and provide improved levels of priority and lighting for pedestrians and cyclists along key desire lines.

#### **Applicant’s response**

The proposed development will promote walking and cycling by the provision of an extensive network of internal pedestrian and cycle pathways. In addition, the subject site is within walking distance of the Kilcock train station and bus services. An Bord Pleanála are referred to the enclosed Landscape Rationale document prepared by Ronan Mac Diarmada Landscape Architect which identifies the proposed pedestrian and cycle networks within the subject site.

In accordance with MT12 this SHD planning application has been issued to the National Transport Authority (NTA). The NTA was one of the statutory bodies that An Bord Pleanála requested that the full SHD planning application be issued to. The applicant has complied with this requirement.

**Objective no. MTO 25** To facilitate the future construction of the following roads and in the interim protect their routes from development:

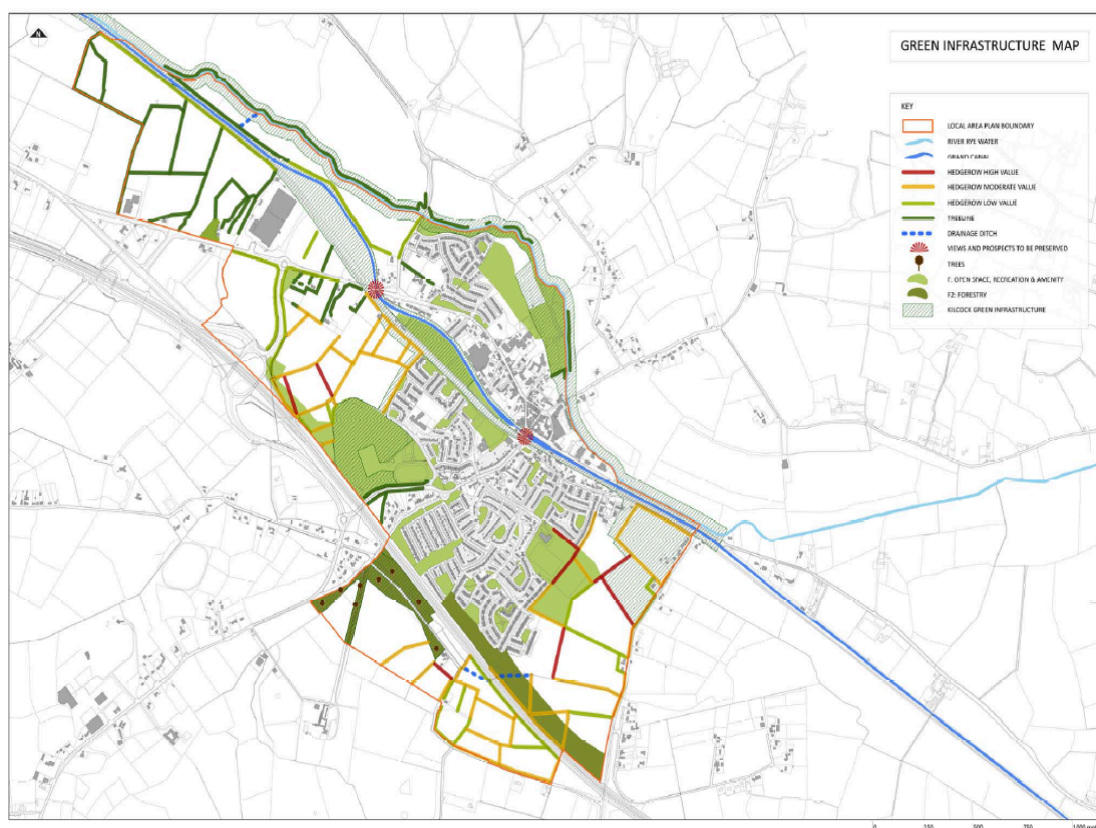
- **From the Bawnogues to the M4 interchange. (our emphasis)**
- From Mollyware street (royal meadow) to the Branganstown road.
- from the Enfield Road to the County Boundary.

#### Applicant's response

An Bord Pleanála are referred to the enclosed Traffic Impact Assessment report and associated drawings prepared by Pinnacle Consulting Engineers and the Landscape Rationale document prepared by Ronan MacDiarmada Landscape Architect which sets out the roads proposals for the proposed development and the associated street hierarchy. The proposals have been the subject of extensive discussions with the Planning Authority.

The proposed development complies with Objectives MTO25 set out above.

#### Green infrastructure



Map 9: Green Infrastructure Map

#### Applicant's response

An Bord Pleanála are referred to the enclosed Landscape Masterplan and the associated Landscape Rationale document prepared by Ronan Mac Diarmada Landscape Architect which sets out the details of the proposed open spaces and the associated planting proposals for the subject site. Where feasible the applicant, the design team (including the Arborist, Landscape Architect and Project Architect) have sought to maintain existing hedgerows. It is considered that the proposed

landscape measures within the subject site will enhance the green infrastructure within the subject site as well as providing linkages with the Bawnogues amenity area and facilitating future pedestrian/cycle linkages (to be provided by others) over the railway.

### **Open Space**

**Objective no. GK 07 – to develop a town park at the Bawnogues for the entire community of Kilcock. The development of the town park will be led by the Bawnogues Master Plan, which seeks to preserve the existing boundaries, in order to maximise the amenity use for the town of Kilcock, while taking account of any surviving features of social and natural heritage which includes former equine use. It should be noted that the road objective to link Brayton park access road with the R158 should not impact on the amenity land use of the Bawnogues lands.**

### **Applicant's response**

An Bord Pleanála are referred to the fact that the open space at Bawnogues is located generally to the south of the subject site. The open space amenity area is outside of the subject site boundary.

The applicant has proposed a number of pedestrian access points and separate gated pedestrian and vehicular access (for use by Kildare County Council maintenance vehicles only) into the Bawnogues open space amenity lands. The access points were the subject of discussion between Ronan Mac Diarmada Landscape Architects and the Parks Department, Kildare County Council. There are no works proposed within the Bawnogues amenity area as part of this planning application.

## 5 Appropriate Assessment

We note the conclusion of An Bord Pleanála in respect of their determination on an adjoining site (Ref. PLog.246663) that:

*Having regard to the nature of the proposed development sought together with the source-pathway-receptor model, I would not consider that an NIS or Appropriate Assessment is necessary in this case in light of the conservation objectives identified for the sites located within 15 kilometres of the appeal site. I consider it reasonable to conclude that on the basis of the information available that the proposed development individually or in combination with other plans or projects would not adversely affect the integrity of the European site No. 001398 in view of the site's conservation objectives.*

Having regard to the above the applicant has enclosed a Report for the Purposes of Appropriate Assessment Screening Report prepared by the Moore Group Environmental Services which concludes that:

*It has been objectively concluded by Moore Group Environmental Services that:*

1. *The proposed Project is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.*
2. *The proposed Project is unlikely to indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.*
3. *The proposed Project, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment in view of their conservation objectives.*
4. *It is possible to conclude that there would be no significant effects, no potentially significant effects and no uncertain effects if the proposed Project were to proceed.*

**It can be excluded**, on the basis of objective information, that the proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site.

It is the view of Moore Group Environmental Services that it is not necessary to undertake any further stage of the Appropriate Assessment process.

## **6 Conclusion**

This Statement of Consistency is prepared to accompany a pre-planning application request, which is lodged with An Bord Pleanála in compliance with Section 5 (1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

This Statement of Consistency has identified the compliance of the scheme with relevant strategic planning policy documentation and we trust that the Bord will now accept that the key objectives of each of the documents cited in this report have been met.

We direct the attention of the Bord to other material submitted herewith for further detail on the context of the site within Kilcock and a clear and concise development description.