

# **Planning Report**

## **SHD Application**

**Lands at the Townlands of  
Kilcock, Boycetown and Commons  
West (adjacent to the Brayton Park  
residential development),  
Kilcock,  
Co. Kildare**

## **On behalf of**

**Rycroft Homes Limited**

March 2020



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## 1 EXECUTIVE SUMMARY

Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin are instructed by our client, **Rycroft Homes Ltd., 1a Mpo Building, Blanchardstown Business Park, Snugborough Road, Dublin 15**, to lodge this SHD planning application to An Bord Pleanála under the Strategic Housing Development application process. This SHD application relates to a proposal for 345 residential units and all associated elements at lands **in the townlands of Kilcock, Boycetown, Commons West**, Kilcock, Co. Kildare. The subject site adjoins the Brayton Park residential development.

A summary of the main points of this report are set out below:

### 1.1 The Subject Site

- The subject site extends to c. 11.56 ha and is located to the west of Kilcock. The site currently consists of largely agricultural lands and associated agricultural buildings. The site is generally bound by undeveloped agricultural land to the north west, to the north east by the Dublin-Sligo railway line, open space at Bawnogues/Commons West to the south west, the Brayton Park residential development to the east and the M4 to the west.
- It is ideally located site in terms of **proximity to Kilcock Town and key towns and cities through frequent public transport** making this area an appropriate area to deliver residential development.
- Specifically, the site is located c. **1000 m (c 1.0km) from the Kilcock Railway Station** with frequent services on the Dublin – Sligo route. There are also frequent bus services from Kilcock to Dublin by bus.
- The location of the subject site makes it an **appropriate site for locating affordable housing**, which is becoming harder to provide within the existing boundaries of Greater Dublin City and other key towns/cities.

### 1.2 Development Rationale

- The subject site which is located at Kilcock is **ideally located to address national policy direction and the need for housing**. The town, and the site itself, is proximate to key towns (Kildare, Naas and Newbridge), Dublin city and employment areas.
- In terms of self-sufficiency Kilcock has a **wide range of local amenities** available to future residents such as educational facilities, recreational facilities and shopping/commercial facilities.
- **The subject site is proximate to Kilcock and frequent public transport** (i.e. Kilcock Railway Station) to key towns and cities. The focus of the proposed design and layout has been to enhance these connections. This includes the provision of an extensive network of pedestrian and cyclist paths through the subject site, facilitating pedestrian and cyclist movement through and to/from the site.
- The applicant in this case is in a position to deliver on this proposal over a 10 year period with the aim to provided much needed quality housing in a sustainable manner.
- They site can provide much needed **affordable housing in a sustainable location**.

### 1.3 Planning Context

- The subject site is a **underutilised, residentially zoned site located proximate to Kilcock** and to public transport services to key towns and cities. It is therefore opportunely located to deliver sustainable housing to cater for the current demand in accordance with the national policy mandate.
- The inherent **development potential of the site has been reinforced over the years by Kildare County Council's zoning for residential development and the inclusion within the Kilcock Local Area Plan 2015-2021.**
- The **residential units proposed are of exceptional quality**, with appropriate floor areas, private open space provisions, connections to public transport and car and bicycle parking facilities. Careful attention has been given to the protection of the existing levels of residential amenity afforded to the surrounding residential properties including the Brayton Park estate.

### 1.4 The Proposal

In summary, the application provides for a residential development, all ancillary elements and a creche consisting:

- 345 residential units (182 houses, 69 duplexes and 94 apartments) as follows:
  - 13 no. 1 bed units
  - 136 no. 2 bed units
  - 158 no. 3 bed units
  - 38 no. 4 bed units
- 650 surface Car Parking Spaces
- 280 Bicycle Parking Spaces
- Public Open Space
- A creche facility c. 466.76 sqm (2 storey), external play area and 34 no. car parking spaces and 30 no. bicycle parking spaces
- Vehicular Access
- Extensive pedestrian and cyclist pathways linking to adjoining areas
- 3 no. sub stations
- All Associated Site Development Works

Section 9 of this report sets out a detailed analysis of the extent of the SHD proposal submitted.

### 1.5 National Policy Mandate

This planning application has been prepared in the context of recent updates to national planning policy, which have directed the design approach from the outset. We specifically refer to the policy mandate set out in 'Project Ireland 2040: National Planning Framework', and the 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2018)'.

These documents are key national policies that seek the expedient delivery of quality urban residential development of an increased height and density at suitable locations.

Within the above documents, it has been identified that a significant and sustained increase in housing output and apartment style development is necessary to support government policy. National policy

further supports and reinforces the need the development of zoned residential lands in close proximity to quality transport routes.

Given the site's residential zoning; proximity to public transport; and accessibility to local services, the current proposal is considered to fully accord with national policy objectives. More specifically, the delivery of quality residential development on this zoned greenfield site, is wholly consistent with the policies and intentions of the National Planning Framework, Rebuilding Ireland and Regional Spatial and Economic Strategy.

## **1.6 Planning Authority Engagement**

This Planning Report sets out response pieces to:

- The Pre-Planning Section 247 meeting that took place between the applicant and Kildare County Council
- The Planning Authority Opinion lodged on the pre-planning application submitted to An Bord Pleanala.

A separate report and response piece to the ABP opinion issued is enclosed as part of the application.

## **1.7 Proposed Development Highlights**

- The scheme will provide 345 no. high quality residential units on lands zoned for residential purposes to the west of Kilcock.
- The subject site has the benefit of access to public transport facilities (the applicant can confirm that the lands are c.1000m – 12 minutes walking distance from the Kilcock Train Station and c.1000m – 12 minutes walking distance from public transport bus routes to the Dublin-Kilcock-Enfield-Mullingar and Dublin – Kilcock – Enfield/Summerhill routes).
- The development has been the subject of a landscape masterplan proposal agreed in principle with Kildare County Council as presented by Ronan Mac Diarmada Landscape Architects. The proposed development incorporates links at the boundaries of the subject site to adjoining lands (developed and undeveloped to date) this includes pedestrian access and maintenance vehicle access to the adjoining amenity lands to the south of the site at Bawnogues.
- The applicant and the design team have given careful attention to permeability within the site itself and the surrounding lands (which include the amenity areas to the south of the subject site, the existing Brayton Park estate and undeveloped zoned lands in the vicinity).
- The proposal also offers significant planning gain to the area by way of new pedestrian and cyclist connections. The proposed development provides for a land reservation to facilitate access to a future pedestrian/cyclist bridge over the railway line. The proposed bridge is an objective of the Kilcock Local Area Plan. It will be provided by others, subject to the securing of appropriate consent. The applicant fully supports the provision of this key connection to Kilcock. An Bord Pleanala are specifically referred to the enclosed Bridge Memo prepared by Brock McClure Planning and Development Consultants which set out details of the applicant's engagement with Irish Rail and Kildare County Council as well as ongoing commitment and support for the future bridge link.

## 2 INTRODUCTION

Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin are instructed by our client, **Rycroft Homes Ltd., 1a Mpo Building, Blanchardstown Business Park, Snugborough Road, Dublin 15**, to lodge this SHD planning application to An Bord Pleanála under the Strategic Housing Development application process.

The proposal relates to a proposal for 345 residential units, a creche and all associated elements at lands **in the townlands of Kilcock, Boycetown, Commons West**, Kilcock, Co. Kildare. The subject site adjoins the Brayton Park residential development.

It is now mandatory that this application, proposing in excess of 100 residential units, is considered under the provisions of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended and the Planning and Development Regulations 2001, as amended.

### 2.1 Applicant and Design Team

The scheme now before An Bord Pleanála has evolved following input from the following design team members:

- Rycroft Homes Limited – the applicant in this case
- Brock McClure Planning and Development Consultants
- C+W O'Brien Architects
- Pinnacle Consulting Engineers
- Kilgallen & Partners Consulting Engineers
- AWN Consulting Engineers
- Ronan Mac Diarmada & Associates Landscape Architects
- Moore Group Environmental Services
- Arbor Care – Consulting Arborist
- IAC Archaeology – Archaeology and Conservation Consultants
- Dunes Visuals Ltd – Architectural Visualization
- Eamon Galligan S.C – EIA Legal Opinion

### 2.2 Context for the lodgement of this Planning Application

This strategic housing development planning application request is lodged in accordance with Part 2 Section 4 (1) of the Planning & Development (Housing) and Residential Tenancies Act 2016, which sets out the following requirements:

*(1) Subject to subsection (4), during the specified period and notwithstanding anything to the contrary contained in any other provision of the Planning and Development Acts 2000 to 2016—*

*(a) an application for permission for a strategic housing development shall—*

- (i) be made to the Board under this section and not to a planning authority, other than an application for permission, the purpose of which is as set out in section 34(3A) of the Act of 2000,*
- (ii) be so made only where section 6(7)(b) applies or, in the case that a request is made under section 7(1), when the Board has complied with the request pursuant to section 7(2),*

*(iii) be so made only where the applicant for permission has fulfilled the requirements set out in section 8,*

*(iv) be in such form and contain such information as is prescribed, and*

*(v) be accompanied by the appropriate fee,*

*and*

*(b) a copy of the application, shall be sent by the applicant to the planning authority or authorities in whose area or areas the proposed strategic housing development would be situated.*

This planning application is lodged in compliance with the above requirements and particularly those set out in Section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016.

## 2.3 Hard and Digital Copies

In relation to this SHD planning application the applicant can confirm that:

- 2 hard copies and 3 digital copies of all material is now submitted for review by An Bord Pleanála.
- 6 hard copies and 1 digital copy of all material has been issued to the Planning Authority of Dun Laoghaire Rathdown County Council in advance of this submission.
- 1 digital copy has been issued to each of the 9 Prescribed Bodies identified by An Bord Pleanála in the formal opinion issued under ABP-302746-18.

## 2.4 Report Structure

This planning report is structured to address the following:

- **Section 3** Evolution of the Design Proposals.
- **Section 4** The subject site.
- **Section 5** sets out the Planning History associated with the site and immediate area. A statutory notice check is also set out.
- **Section 6** sets out details of the Section 247 pre-planning stage for the project.
- **Section 7** outlines the pre-planning stage of the project with An Bord Pleanála.
- **Section 8** describes in detail the extent of the proposal submitted.
- **Section 9** sets out the applicant's response to the Planning Authorities pre planning consultation report
- **Section 10** sets out the National Policy Context.
- **Section 11** sets out the overall key conclusions

### 3 EVOLUTION OF THE DESIGN PROPOSALS

For clarity, the applicant and the design team wish to set out the key points associated with the evolution of the design currently before the An Bord Pleanala. Separate details of the pre-planning consultation that took place with Kildare County Council and pre-planning consultation with An Bord Pleanala are detailed in Section 6 and 7 of this report.

From the outset, the applicant and the design team wish to highlight that the design of the proposal has evolved in response to the discussions that occurred at the pre-planning stage.

Initial queries, recommendations and concerns raised by the Planning Authority have been comprehensively reviewed and the revised treatment within the proposed development has addressed all points raised.

The proposal, as currently submitted delivers excellent connectivity within the subject site and the wider area which provides for ease of movement, legibility and a high - quality streetscape as well as the delivery of a quality sustainable residential community. The new environment created is pedestrian and cyclist friendly, easily navigated and fully permeable.

C+W O'Brien Architects have ensured that the proposed residential buildings and the proposed creche facilities address the proposed streets, have an active edge and have been designed with regard to best practice principles of urban design.

In summary, as a result of consultation with various Departments of Kildare County Council and by way of pre-planning consultation with An Bord Pleanala, the applicant and the design team have provided:

- A Tree Survey, Landscape Masterplan, Landscape Rationale, Schools Assessment report and Phasing Plan as requested by Kildare County Council
- An increase in the number of residential units proposed from 332 (at the pre planning consultation stage) to 345 (submitted herein). This is in response to An Bord Pleanala's requests that the applicant consider the densities on the subject site at the pre planning consultation meeting.
- A creche and all associated ancillary facilities as part of the proposed SHD planning application at the request of Kildare County Council and An Bord Pleanala
- Provision for future road, footpath and cycle path linkages from the subject site (at its boundaries) to adjoining existing uses and undeveloped zoned lands – including the educational zoned lands adjoining the subject site and the existing residential development at Brayton Park. This was at the request of Kildare County Council and An Bord Pleanala.
- 4 no. pedestrian access points at the southern boundary of the subject site into the existing Bawnogues Open Space amenity area (in the ownership of Kildare County Council). This is in response to a specific request by the Parks Department, Kildare County Council and An Bord Pleanala. This was the subject of discussions and agreement with the Parks Department following the An Bord Pleanala pre-planning consultation request meeting
- A vehicular gate and pedestrian gate at the southern boundary of the subject site into the adjoining amenity lands at Bawnogues for occasional use by Kildare County Council maintenance vehicles (only). The proposed development provides the gated access points only in this case, the Planning Authority is to determine and undertake any associated works within amenity lands at Bawnogues. This is provided in response to a specific request from the Parks Department. This request arose after the An Bord Pleanala pre-planning consultation request meeting.
- An area of land reserved to provide access to a future pedestrian/cyclist bridge over the Dublin – Sligo railway line. The bridge will be provided by other parties in the future – subject to appropriate consent. An Bord Pleanala are referred to the enclosed Bridge Memo prepared by Brock Mc Clure Planning and Development which sets out further details.
- Extensive well considered cycle and pedestrian pathways throughout the subject site.
- Two designated play areas within the open space area (along the sites boundary with the M4). This was specifically requested by the Parks Department, Kildare County Council.
- A set back of 91m from the M4 motorway as specified in the Kilcock Local Area Plan 2015-2021.

- Noise mitigation measures in the form of a landscaped buffer along the M4 motorway boundary and further acoustic enhancement/mitigation measures as set out in the enclosed Noise Assessment by AWN Consulting Engineers
- A vehicular and pedestrian link from the subject site to the Brayton Park Estate to link into the existing vehicular and path therein. This was requested by Kildare County Council and An Bord Pleanala.
- Part V provisions following further engagement with Kildare County Council to address the Housing Sections requirements relating to the Part V proposals. Note that these are presented herein without prejudice to future Part V engagement between the applicant and the Housing Section, Kildare County Council.

These key changes are set out in full detail in the enclosed material presented in the SHD planning application and specifically the documents entitled '*Design Response to An Bord Pleanala's Notice of Pre-Application Consultation Opinion*'.

## 4 THE SUBJECT SITE

The subject site extends to c. 11.56 ha and is located to the west of Kilcock. The site currently consists of largely agricultural lands and associated agricultural buildings. The site is generally bound by undeveloped agricultural land to the north west, to the north east by the Dublin-Sligo railway line, open space at Bawnogues/Commons West to the south west, the Brayton Park residential development to the east and the M4 to the west.

Vehicular access to the site is provided via the Brayton Park Estate Road.

An aerial view for the subject site is identified in Figures 2 below.



Figure 1 - Subject Site (shaded red)

### 4.1 Surrounding Area

The land use context in the vicinity of the site ranges from residential, educational, healthcare and amenity uses. In addition there are zoned greenfield lands adjoining the subject site.

The site is adjacent to existing residential development at Brayton Park estate. It is noted that there is an existing primary school (Scoil Ui Riada Gaelscoil) along Brayton Park Road as well as an existing creche facility. In addition, the Kilcock Primary Health care centre and an area of open space (with a walking track around it) is located immediately to the south of the subject site.

### 4.2 Access to Public Transport

The subject site is well located in terms of access to existing public transport.

**Train Services** – The Train Station at Kilcock is located c. 1000m (c.12 minutes walk) from the subject site. Kilcock is located along the Sligo/Longford rail line. This route links Sligo/Longford to Dublin Connolly. The enclosed Traffic Impact Assessment report prepared by Pinnacle Engineering Consultants identifies that there are “up to 9 services/day stopping at Kilcock”.

**Bus** - The subject site is located c. 1000m (c.12 minutes walking distance) from the closest bus stop. Service no. 115 and 115a provide services along the Dublin-Kilcock-Enfield-Mullingar and Dublin – Kilcock – Enfield/Summerhill routes.

Further details of the existing public transport services are set out in the enclosed Traffic Impact Assessment report prepared by Pinnacle Engineering Consultants.

## 5 PLANNING HISTORY

A brief synopsis of the planning history pertaining to the site subject and relevant planning history of adjoining sites is set out below.

### 5.1 Subject Site

There is no noted planning history on the subject site.

### 5.2 Surrounding Sites

**Kildare County Council Planning Register Reference 16/233 (An Bord Pleanála Reference PL09.246663)** – Permission refused at Boycetown, Kilcock, County Kildare for a 190 unit residential development on lands to the north west of the site for reasons pertaining to an inadequate water supply and capacity, prematurity pending completion of a masterplan for a municipal pumping station and associated foul sewer network, and impact on St. Patrick's Church (a Protected Structure).

**Development at Brayton Park - Kildare County Council Register Reference 02/2214 (An Bord Pleanála Ref. PL09.204113)** – Permission granted for development comprising of a new public access road (part distributor road) from the existing junction with the Clane Road R407, to the site access road. Outfall drains/services along the existing right of way from the site to Shaw Bridge, site development works and services, the erection of buildings as follows: 2 storey creche facility, 70 no. semi detached 2 storey houses, 54 no. town houses and 52 no. duplexes apartments.

**Boycetown Court – Kildare County Council Register Reference 08/690** – Permission granted at Boycetown Court, Boycetown, Kilcock, Co. Kildare for the construction of 39 detached dwellings comprising 37 no. two storey dwellings and 2 no. one and a half storey dwellings, foul water pumping station and all ancillary site works subject to 60 conditions. This application was extended by Kildare County Council Register Reference 14/240.

**Kildare County Council Register Reference 14/774** – Retention permission was granted at Boycetown Court, Boycetown, Kilcock, Co. Kildare for (a) retaining and completing a change of house type on sites no. 2 & 6 along with minor revisions to site boundaries on site nos. 1-7 that were previously granted planning permission under Reg. Ref. 08/690 and 14/240. (b) Permission for change of house types in site nos. 1,8 & 11 and minor revisions to boundaries on site nos. 8-13 that were previously granted planning permission under Reg. Ref. 08/690 and 14/240, and all ancillary works subject to 5 conditions.

**Kildare County Council Register Reference Reg. Ref. 15/270** – Permission granted at Boycetown Court, Boycetown, Kilcock, Co. Kildare. for change of house type on site nos. 16, 18, 20 and 21, minor revisions to site boundaries 14-21, removal of houses 28 and 30, all previously granted planning permission under Reg. Ref. 08/690 and 14/240, and all ancillary site works subject to 11 conditions.

### 5.3 Planning History Summary

Overall, the following key planning principles are established:

- The applicant in this case has clearly considered and addressed all of the reasons for refusal set out by An Bord Pleanála in respect of Planning Reg. Ref. 16/233 (An Bord Pleanála Ref. PL09.246663) at Boycetown, Kilcock, County Kildare above.

In summary, having regard to the proposed SHD Development:

- Pinnacle Consulting Engineers can confirm that they received a positive response to the initial Pre-Connection Enquiry (PCE), dated 25<sup>th</sup> June 2019 and a subsequent Statement of Design Acceptance, dated 12<sup>th</sup> July 2019, from Irish Water in respect of the proposed development.
- Pinnacle Consulting Engineers respectfully refer An Bord Pleanála to the fact that the Irish Water issue leading to a refusal on adjoining lands, is not in fact at all relevant to the proposed development on the subject site. The applicant in the case of An Bord Pleanála Ref. PL.246663 was applying to install a new pumping station on that site, which Irish Water were not in favour of, coupled with the fact that the outfall of the foul network proposed was crossing 3rd party lands. The proposed development by Rycroft Homes Limited (which is the subject of this SHD planning application) on the other hand is discharging via gravity, with no pumping elements required and connecting into infrastructure which is under the control of the Local Authority. Pinnacle Consulting Engineering and the applicant therefore can confirm to An Bord Pleanála that in the case of the subject site there are no such water and waste capacity constraints.
- In addition to the above, the proposed development by Rycroft Homes Limited is not located proximate to the Protected Structure (St. Patrick's Church).

### 5.4 Statutory Notice Check

Section 17 of the Planning Application Form sets out a requirement to consider the following vis a vis the subject site:

**Do any statutory notices (e.g. Fire Safety, Enforcement, Dangerous Buildings, Derelict Sites, Building Control etc.) apply to the site and/or any building thereon?**

We note that this is a greenfield site and the applicant can confirm that there are no notices of immediate relevance to the subject site.

#### **Fire Safety Certificate**

No records on site.

#### **Enforcement**

No records on site.

#### **Dangerous Buildings**

No records on site.

#### **Derelict Site**

No records on site.

### **Building Control**

No records on site.

## **6 SECTION 247 – KILDARE COUNTY COUNCIL PRE-PLANNING MEETING**

The evolution of the scheme and brief details on the level of engagement with the Planning Authority are summarised in brief below.

We can also confirm that formal Section 247 meeting minutes (Kildare County Council Minutes) and any formal correspondence between the design team and various departments are enclosed with this SHD planning application (under separate cover) for information purposes.

### **6.1 Positive Collaboration**

This strategic housing development submitted to An Bord Pleanala is the product of extensive positive engagement process with the Planning Authority.

This process commenced in May 2018 with the lodgement of the pre-planning submission. A meeting was held with the Planning Authority, which enabled a thorough discussion of all relevant issues raised by the Planners and the Council's technical departments.

All matters raised by the Planning Authority have, where possible, have been addressed throughout the documentation now submitted to An Bord Pleanala. It is important to note that where the applicant has deviated in terms of a difference of opinion or approach with the Planning Authority, there is a clear rationale in support of the scheme in terms of its strong footing in national policy and ministerial guidelines.

It is the applicant's and the design team's view that the engagement with the Planning Authority has ensured that the optimum design solution has been delivered. This has been a positive process and one which will benefit both the proposed development on the subject site in close proximity to Kilcock and the wider area.

### **6.2 Planning Authority Pre-Planning Meetings 1**

It is noted that 2 no. pre planning meetings took place with Kildare County Council representatives on the following dates:

- 27 February 2018
- 02 May 2018

#### **Pre Planning Meeting No.1 – 27 February 2018**

A formal pre-planning meeting took place on 27 February 2018 to discuss the proposal in principle. The minutes of the meeting (including the list of attendees) are enclosed as an Appendix to this report.

At that time the proposal related to the provision of 227 units at the subject site.

The key items discussed during the pre planning meeting included:

- The residential zoning of the majority of the subject site and the fact that the lands zoned for open space is to remain as open space as part of the proposed development.
- Part V proposals (indicative).
- The importance of the creation of linkages with adjoining lands was discussed.
- Proposed roads to tie in with existing.
- A tree survey and a Landscape Plan for the site was requested by the Planning Authority.
- A TIA was requested by the Planning Authority.
- A permeability study, Road Safety Audit and Auto tracking was requested.

- The importance of creating linkages with Kilcock was discussed. The provision of a footpath over the railway was discussed. The Planning Authority indicated that they may seek a contribution from the applicant (financial or land) to make this happen.
- In addition to the above the Planning Authority requested a Flood Risk Assessment, engagement with Irish Water, consideration of a Railway Line – Noise Buffer, Design Statement and Screening for Appropriate Assessment as part of any planning application on the subject site.

#### **Pre Planning Meeting No. 2 – 02 May 2018**

A further formal pre-planning meeting took place 02 May 2018 to discuss the proposal in principle. The minutes of the meeting (including the list of attendees) are enclosed as an Appendix to this report.

The proposal related to the provision of 319 units at the subject site.

For ease of reference, the key points raised have been grouped by theme below, with the design team responses as follows:

#### **Planning**

- Kildare County noted that 319 units tabled at the pre planning stage was considered an appropriate density.
- The variety of house types was welcomed by the Planning Authority.
- Permeability and linkages to adjoining sites should be shown.
- Cross section through adjoining rail link to be shown and boundary treatment where relevant.
- DMURS and Urban Design Manual to be adhered to in all design proposals.
- Creche provision is preferable unless a study of the locale shows there is an oversupply.

#### **Services – Flooding and Drainage**

- The Planning Authority noted that the applicant should consult the recent applications at Barnhill and Kill in order to review appropriate precedent for how to deal with any constraints that may exist.
- The Planning Authority required that the phased delivery of units might be appropriate.
- Continued dialogue with Irish Water prior to lodging with An Bord Pleanála.
- Similar discussions required regarding water supply.
- The water section advised to check if Brayton Park services are operating at or below capacity.
- Site specific Flood Risk Assessment is required.

#### **Part V**

- Once layout and mix is finalised it was suggested that contact be made with Housing Department.
- Units should be provided across the site, serving all the phases.

### **Roads and Traffic**

- The Planning Authority noted that all parking spaces should be 2.5x5m
- Cycle parking facilities and vehicular parking facilities should be provided with any creche facility. This should include staff provision.
- 10% visitor parking required across the scheme.
- Details of the footpath relocation within Kildare County Council to be issued to Simon Wallace and Peter Minnock, copying Jane O Reilly.
- KCC noted there may be a requirement for our scheme to shoulder some of the expense of the nearby junction accessing the adjoining development. It was agreed to review the Contribution Scheme to understand if the main junction is included in same.

In response to the key discussions that arose during the pre-planning meetings with Kildare County Council the Applicant and the Design Team undertook the following key actions:

- Ronan Mac Diarmada Landscape Architect was appointed to engage directly with Simon Wallace, Parks Department, Kildare County Council.
- The design team engaged with the Planning Authority in terms of potential tie in routes to adjoining lands (developed and undeveloped to date)
- An Arborist was appointed to undertake a Tree and hedgerow survey for the subject site.
- A site specific Flood Risk Assessment was prepared by Kilgallen & Partners.
- The applicant checked if adjoining scheme is taken in charge.
- The applicant and the Design Team devised a phasing programme for the overall development. A 10 year permission to be sought.
- Progressed a full planning application pack in line with previous advice to proceed to pre-planning consultation stage with An Bord Pleanala.
- As requested, further engagement with the Drainage, Roads, Parks and Housing Sections of Kildare County Council took place.

The applicant trusts the above commentary demonstrates that the Design Team has had full regard to the issues raised by the Planning Authority during the consultation stage.

In addition to the above separate engagement took place between the applicant's design team and the Departments within Kildare County Councils including the Parks Department and the Roads Department.

These took place on the following dates:

Meetings with representatives from the Water Department, Kildare County Council took place on the following dates 5 December 2018 and 21 March 2019. The details of the discussions that took place between Kildare County Council and Pinnacle Consulting Engineers are set out in the enclosed report prepared by Pinnacle Consulting Engineers.

Meetings took place with the Parks Department, Kildare County Council on XX May 2018. The items discussed included the existing hedgerows at the subject site and the possibility of future linkages to the lands to the south of the subject site at Bawnogues. In addition, a further meeting took place on 16 August 2019 between Ronan Mac Diarmada Landscape Architects and the Parks Department to discuss the proposed pedestrian connections and Kildare County Council maintenance vehicles connection to the adjoining Bawnogues amenity area.

## **7 STRATEGIC HOUSING DEVELOPMENT – PRE-PLANNING CONSULTATION MEETING**

On 10 October 2018, a formal Strategic Housing Development pre-planning request was lodged with An Bord Pleanála. Reg. Ref. ABP -302746-18 refers.

The development proposals at that time related to a proposal for 332 residential units, a crèche facility and all associated ancillary facilities was submitted to An Bord Pleanála.

A comprehensive pre-planning application was lodged with An Bord Pleanála setting out the basis on which the pre-planning request could be favorably considered.

The key changes between pre-application stage and planning application stage relate to the proposal can be summarized as follows:

- An uplift to unit numbers from 332 to 345 units.
- Revisions to car parking and cycle parking arrangements and proposals.
- The development has been the subject of a landscape masterplan proposal agreed in principle with Kildare County Council as presented by Ronan Mac Diarmada Landscape Architects.
- The applicant and the design team have carefully considered permeability within the site itself and the surrounding lands (which include the amenity areas to the south of the subject site, the existing Brayton Park estate and undeveloped zoned lands in the vicinity). The proposed development now incorporates links at the boundaries of the subject site to adjoining lands (developed and undeveloped to date) this includes pedestrian access and maintenance vehicle access to the adjoining amenity lands to the south of the site at Bawnogues.
- The proposal also offers significant planning gain to the area by way of new pedestrian and cyclist connections. The proposed development provides for a land reservation to facilitate access to a future pedestrian/cyclist bridge over the railway line. The proposed bridge is an objective of the Kilcock Local Area Plan. It will be provided by others, subject to the securing of appropriate consent. The applicant fully supports the provision of this key connection to Kilcock. An Bord Pleanála are specifically referred to the enclosed Bridge Memo prepared by Brock Mc Clure Planning and Development Consultants which set out details of the applicant's engagement with Irish Rail and Kildare County Council as well as ongoing commitment and support for the future bridge link.

### **7.1 Planning Authority Opinion**

As part of this pre-planning process, Kildare County Council issued a formal opinion on the proposal, which was dated 06 November 2018.

The application submitted herein has reviewed this opinion and documentation enclosed herewith addresses all matters raised. We note specifically Section 9 of this report which sets out a response piece to the Planning items outlined.

### **7.2 Pre-Planning Consultation Meeting – Tripartite Meeting**

A pre-planning consultation meeting was held to discuss the proposal on **20 November 2018**. It is noted that representatives from An Bord Pleanála, Kildare County Council and the Applicant attended this meeting.

The formal minutes from this meeting are enclosed with this SHD Planning Application under separate cover. We confirm that the applicant has reviewed these minutes and application documentation enclosed herewith is reflective the content.

### 7.3 An Bord Pleanála Opinion

Following consideration of the pre-planning application, a formal An Bord Pleanála Opinion dated 7 December 2018 was issued to the applicant for consideration.

A response to the An Bord Pleanála opinion (presented by Brock McClure Planning & Development Consultants with inputs from the Project Team) is enclosed herewith as a separate report for review purposes. This document should be read in conjunction with the Planning Report.

We note specifically that all matters raised have now been formally addressed and all prescribed bodies have been notified of the lodgment of this application as appropriate.

## 8 THE PROPOSAL

### 8.1 The proposed development provides for the following:

**Rycroft Homes Limited** intends to apply to An Bord Pleanála for a **10 year planning permission** for a Strategic Housing Development on lands at the townlands of Commons West, Boycetown and Kilcock, (all adjoining the existing Brayton Park Estate), Kilcock, Co. Kildare on a site of approximately 11.56 ha.

The site is generally bound by undeveloped agricultural land to the north west, to the north east by the Dublin-Sligo railway line, open space at Bawnogues/Commons West to the south west, the Brayton Park residential development to the east and the M4 to the west.

The proposed development will consist of:

345 no. residential units (69 no. Duplex Type Units, 182 no. Houses and 94 no. Apartments) ranging from 2 to 5 storeys, a standalone creche facility (approximately 466.76 sqm) with an overall height of 2 storeys, an associated external play area (approximately 277.67 sqm), associated ancillary surface car parking spaces and bicycle parking spaces, a link street, internal roads, pedestrian paths, cycle paths, public and private open spaces.

The proposed housing mix is comprised of 13 no. 1 bed units, 136 no. 2 bed units, 158 no. 3 bed units and 38 no. 4 bed units.

The proposed breakdown of residential units is as follows:

182 no. houses including:

- 42 no. 2 bed 2 storey houses (House Type A)
- 102 no. 3 bed 2 storey houses (House Type B1, B2, C1, C2, 02a, 02b, 04, 05)
- 7 no. 4 bed 2 storey houses (House Type E, 01 and 03)
- 31 no. 4 bed 3 storey houses (House Type D1)

69 no. duplexes and 94 no. apartments arranged in terraces and corner blocks ranging from 3-5 storeys including:

- 13 no. 2 bed duplexes (Type L)
- 56 no. 3 bed duplexes (Type M)
- 13 no. 1 bed apartments forming ground floor of duplex units (Type J)
- 56 no. 2 bed apartments forming ground floor of duplex units (Type K)
- 25 no. 2 bed apartments accommodated in part of corner Blocks A, B, C, D and E

Each residential unit has associated private open space, in the form of either gardens, terraces or balconies in addition to access to the proposed public open space (including 3 no. playground areas) with hard and soft landscaping treatment.

A total of 650 no. surface car parking spaces are provided for the residential development including visitor parking. 280 no. bicycle spaces are proposed for the proposed apartments and duplexes and bicycle spaces for the proposed houses are provided on curtilage. In addition, the crèche will be provided with 34 no. surface car parking spaces and 30 no. bicycle parking spaces.

The proposed development provides for 1 no. vehicular access and associated pedestrian and cycle paths via a new link street connecting from the Brayton Park Road and 1 no. vehicular access and associated pedestrian path providing a link into the existing Brayton Park Estate.

The proposed development makes provision for future linkages to adjoining lands; including undeveloped lands to the north-west, the adjoining undeveloped educational zoned lands to the north, as part of this application land is reserved for access to a potential future pedestrian/cycle bridge over the railway line to the north-east of the site ( to be delivered by others) . In addition, the proposed development provides for pedestrian and cycle paths connection to the north east of the site, as well as 4 no. pedestrian access points and 1 no. gated vehicular (for Kildare County Council maintenance use only) and pedestrian access point to the open space at Bawnogues/Commons West along the southern boundary of the site.

Bin storage is provided either on curtilage and or in communal storage. The associated site and infrastructural works include foul and surface water drainage, attenuation tanks, SuDs arrangements, hard and soft landscaping, permeable paving, all associated ancillary boundary treatments, boundary walls, fences and noise buffers, 3 no. substations (approximately 20 sqm each), public lighting, a link street, internal roads, cycle paths, pedestrian paths and all associated ancillary site development works.

This section should be read in conjunction with the enclosed Architectural drawings prepared by C + W O'Brien Architects as well as the HQA, Overall Development Summary and the Unit Breakdown sheet.

## **8.2 Residential Development**

Refer to the enclosed Development Summary, Architectural Design Statement, Drawings and Housing Quality Assessment (HQA) prepared by C+W O'Brien Architects for full particulars of the residential component of the proposed development. A total of 345 residential units (182 houses, 69 Duplexes and 94 apartments) are proposed. The proposed Residential Mix is as follows:

13 no. 1 beds (13%)

136 no. 2 beds (39.4%)

158 no. 3 beds (45.8%)

38 no. 4 beds (11%)

## **8.3 Dual Aspect**

C + W O'Brien Architects can confirm that all of the proposed 345 units proposed have the benefit of dual aspect.

When considering apartment units only, the dual aspect ratio is 100% of the proposed apartment units are dual aspect, again an exceptional level of quality dual aspect units in accordance with national planning policy standards.

## **8.4 Heights**

The proposed development ranges in height from 2 storey (dwelling and creche building) to 5 storey (apartment blocks).

As detailed in the supporting assessments presented as part of this SHD planning application, C+W O'Brien Architects can confirm that there are no material negative impacts (overlooking, overshadowing or overbearing) arising from the proposed development.

Appropriate separation distances are maintained both within the development and to adjoining existing development.

An Bord Pleanála are referred to the enclosed Material Contravention Statement prepared by Brock McClure Planning and Development.

## **8.5 Creche**

The proposed development includes the provision of a creche and all associated ancillary facilities at the entrance of the proposed development from Brayton Park road. This was a specific request by Kildare County Council at pre planning stage.

The delivery of a creche at this location is considered a significant planning gain for the wider Kilcock as well as the proposed residential development.

The delivery of an active use at this location will encourage vibrancy and will complement the existing school located along Brayton Park estate.

## **8.6 Density**

Residential Density proposed at this site is set out as 345 units on a site of c.11.56 ha site. This equates to c.43 units per ha Nett and is considered appropriate given the proximity of the site adjacent to the Kilcock and the public transport services therein – namely the Kilcock Train Station and Bus stops.

The rationale for density is set out further in the enclosed Statement of Consistency and the enclosed Architectural Design Statement prepared by C+W O'Brien Architects.

An Bord Pleanála are referred to the enclosed Material Contravention Statement prepared by Brock McClure Planning and Development.

## **8.7 Private Open Space Provision**

### **Apartments**

All residential apartment unit will be afforded with private open space in the form of a balcony or terrace. C+W O'Brien Architects can confirm that all balconies proposed have a minimum depth of 1.5m.

The Housing Quality Assessment prepared by C+W O'Brien Architects enclosed herewith confirms that all apartment units proposed meet the minimum requirements of the Apartment Guidelines 2018. A unit by unit summary of provision is identified within this assessment.

### **Houses**

C+W O'Brien Architects can confirm that all of the proposed houses are provided with private gardens. The Housing Quality Assessment prepared by C+W O'Brien Architects enclosed

herewith confirms that all houses proposed meet the minimum requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). A unit by unit summary of provision is identified within this assessment.

## 8.8 The Proposed Landscape Masterplan

The delivery of a quality open space proposal and an landscape masterplan for the site has been a key objective for this proposal and planning application. A landscape Masterplan and Landscape Rationale document prepared by Ronan Mac Diarmada Landscape Architect is enclosed as part of this SHD planning application.

The proposed landscaping has been the subject of pre planning discussions and engagement with Kildare County Council.

The current design delivers generous and central open space areas with a permeable landscape layout, which will be accessible to all users. The quality of the open space now proposed coupled with the quantum of open space delivered has ensured the delivery of a high quality landscape masterplan.

The applicant and Ronan Mac Diarmada Landscape Architects can confirm to An Bord Pleanala that matters raised by Kildare County Council and An Bord Pleanala at pre planning consultation stage of the SHD process have been taken into account in the finalised proposed presented herein to An Bord Pleanala.

The competent authority is directed to the enclosed Landscape Masterplan and Landscape Rationale prepared by Ronan MacDiarmada which has been summarised in brief below:

- The design concept surrounding the landscape plan has reviewed the use of clear and distinct zones which provides for passive and active open space uses.
- The Landscape concept is based on the principle of relationships between the proposed building and external open spaces to provide usable and safe amenity areas for all residents.

The open space concepts has been focused on the following elements:

- Delivery of quality, safe, usable open spaces areas throughout the development.
- Provision of pedestrian and cycle paths through the subject site to promote connectivity within the site itself as well as connections to adjoining existing land uses and future land uses.
- Delivery of informal natural play areas as requested by Parks Department, Kildare County Council
- Reservation of a portion of land within the development to provide access to the future pedestrian/cyclist bridge over the railway line (to be provided by others) and subject to the appropriate consents.
- Planting which supports enhanced biodiversity.
- Noise buffer planting with native trees and plants along the M4 boundary
- The design allows for active and passive spaces.
- The open space strategy has been focused on providing connected and functional spaces that provide excellent amenity for residents and knit successfully into the existing context.

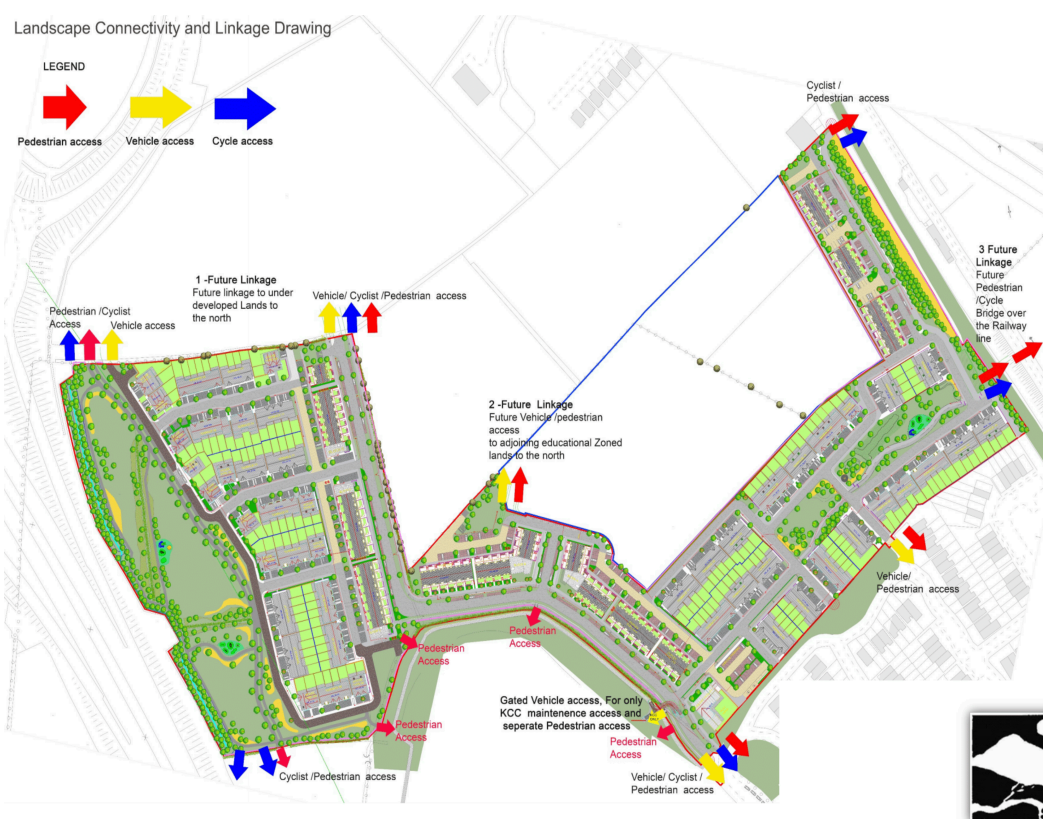
### The Quantum Delivered

- **A total of c. 115,597 sq m of public open space is proposed on the overall subject site. C+W O'Brien Architects can confirm that this equates to 27.45% of the subject site.**  
The breakdown for the open space provision is set out further within the Development Summary sheet prepared by C+W O'Brien Architects to accompany the planning application.

- This provision meets and exceeds the requirements of the relevant Development Plan and the Apartment Guidelines as set out in the material prepared by C+W O'Brien Architects and as identified in the Statement of Consistency enclosed herewith.

### **Access and Permeability**

- Access and Permeability across the site has been a key focus for the design team from the outset. The overriding objective has been to deliver a scheme that has clear paths for circulation for future residents but also one where the site is connected to local amenities, existing (and future) development and services.
- Full details of the proposed linkages are set out in the enclosed Landscape Rationale document prepared by Ronan Mac Diarmada Landscape Architect as well as the Transport Impact Assessment prepared by Pinnacle Consulting Engineers.
- In this regard, the site provides for the following pedestrian, cyclist and vehicular connections:



**Figure 3 - Permeability throughout the Scheme**

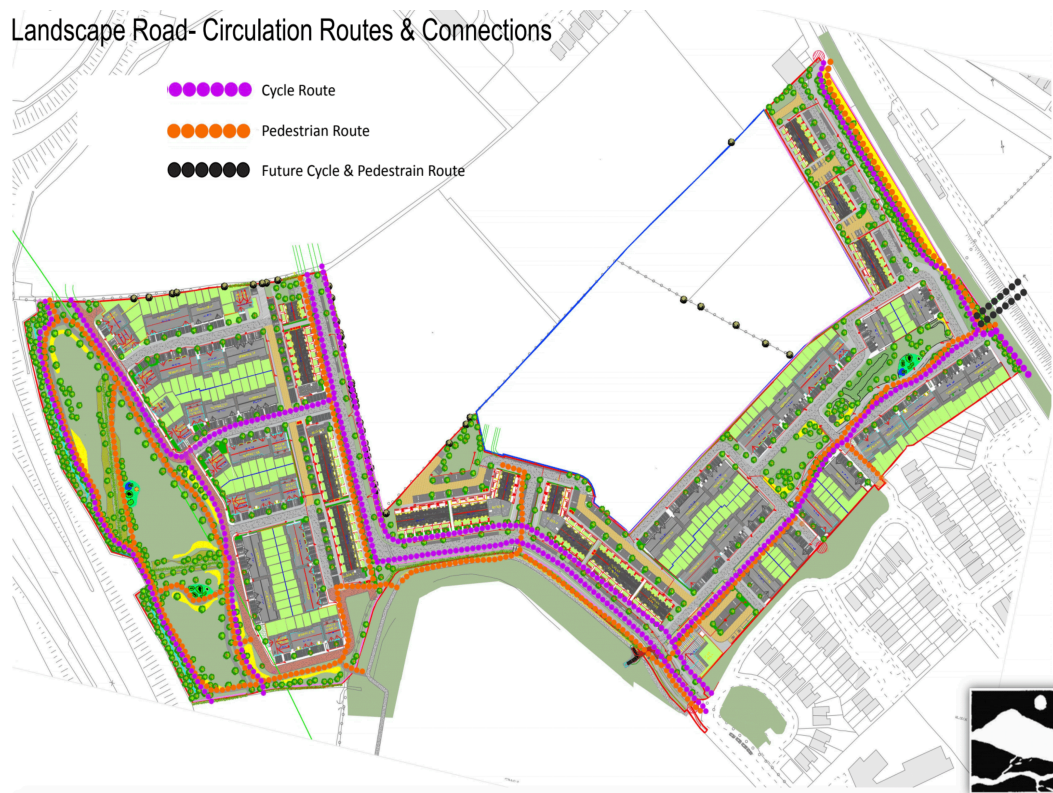


Figure 4 – Cycle and Pedestrian Routes

Overall, it is evident that a high-quality landscape masterplan has been delivered for the subject site. The scheme offers a series of interlinked active and passive open spaces and will create a real sense of place.

The proposal will deliver connectivity, permeability and activity to both the subject site and surrounding area.

## 8.9 Car Parking

The transport proposals for the proposed development have been designed by Pinnacle Consulting Engineers in conjunction with Kildare County Council.

### Provision

A total of 684 surface level car parking spaces are proposed. 650 no. car parking spaces for the residential component of the scheme and 34 no. car parking spaces for the creche. Pinnacle Consulting Engineers can confirm that these are presented in accordance with the Car Parking Standards set out in the Kildare County Development Plan 2017-2023.

This provision is assigned as follows:

- 245 no. car parking spaces for the proposed apartments/duplexes
- 41 no. visitor car parking spaces for the apartments/duplexes
- 182 no. car parking spaces for the proposed houses
- 34 no. car parking spaces associated with the proposed creche

Refer to the enclosed Traffic and Transport Impact Assessment prepared by Pinnacle Consulting Engineers. As set out in the enclosed report Pinnacle Consulting Engineers can confirm that:

*“in line with national policy, provision will be made for electric car charging. All in curtilage car parking spaces will be ducted to allow for future upgrading for electric car charging.*

*Up to 10% of on street car parking will be accessible for electric car charging with all spaces ducted for future upgradeability.”*

The proposed car parking provision is deemed appropriate for the subject site and represents an appropriate balance between the requirements of the Planning Authority, the provisions of the Development Plan, and National Policy.

#### **8.10 Cycle Parking**

A total of 314 no. cycle parking spaces are proposed:

- 280 cycle spaces are associated with the residential component (Duplexes and Apartments)
- 34 cycle parking spaces associated with the proposed creche facility

Refer to the enclosed Traffic and Transport Impact Assessment prepared by Pinnacle Consulting Engineers. Pinnacle Consulting Engineers can confirm that the bicycle parking proposals presented herein are in excess of the Standards set out in the Kildare County Development Plan 2017-2023.

#### **8.11 Part V Provision**

The proposal provides for 35 Part V residential units within the scheme, which meets with the 10% Part V Social and Affordable Housing Requirement.

Without prejudice to future discussions and agreement between the applicant and Kildare County Council, a total of 11 no. 1 beds, 12 no. 2 beds, 11 no. 3 beds and 1 no. 4 bed residential units are put forward to fulfil the applicants Part V provisions.

The enclosed brochure from C+W O'Brien Architects sets out further detail in relation to the Part V proposal as follows:

- Location of the Units
- Floor Plans
- Elevations
- Schedule of Accommodation

As set out as part of the indicative Part V proposals, indicative costings are presented herein by the applicant Rycroft Homes Limited as part of this planning application.

Please note that the content of the Part V proposal presented herein by the applicant is purely indicative and is intended to provide a reasonable estimate of the costs and values of the units based on construction costs and values prevailing at the time of the application. Please also note that the information set out herewith is purely for the purposes of facilitating the making of a valid planning application and will ultimately be subject to possible amendment and formal agreement with the Local Authority. The financial data contained herein is provided to the level of detail commensurate with this stage of the Part V process having regard to Circular Letter 10/2015 and should be read as being indicative as a result.

We note under the Amendment to the Act and its accompanying Regulations that the ultimate agreement with regard to Part V is dependent a) upon receipt of a final grant of

permission and b) upon a site value at the time the Permission is granted; neither of which can be available at this time.

The above is obviously subject to change depending upon the nature of any final grant of permission, including Conditions and the assessment by the Housing Authority of the ultimate proposal. Final costs will be based on site value at the time the Permission is granted.

Finally, we would wish to highlight that the above information is being provided on a wholly without prejudice basis in order to comply with the Planning & Development Regulations in force at this time. The final details of any agreement with the Local Authority regarding compliance with Part V, including agreements on costs will not be arrived at until after planning permission has been secured as is provided for under the Planning & Development Act 2000, as amended.

## 8.12 Additional Proposals

In addition to the description set out above, there is a comprehensive planning package now submitted setting out a description of proposals. In this regard, we refer An Bord Pleanála to the following inputs as appropriate:

Core Design Team:

- C+W O'Brien Architects - Full Set of Architectural Proposals, Indicative Part V Proposals and HQA's
- Brock McClure Consultants - Full Suite of Planning Reports and Associated Material
- Pinnacle Consulting Engineers - Full Set of Engineering/Service Proposals
- Ronan Mac Diarmada Landscape Architects - Full set of Landscape Proposals (Drawings and Rationale)
- Arborists Associates - Full Set of Arboricultural Proposals (Tree Survey and Arboricultural Impact Assessment)
- Moore Group Environmental Services - Details on Appropriate Assessment and Ecological Impact Assessment
- IAC Archaeology - Details on Archaeological Impact Assessment
- Photomontages – Dunes Visuals

## 8.13 Environmental Impact Assessment Screening Report

We confirm for the competent authority that an Environmental Impact Assessment Screening Report has been prepared and accompanies planning documentation enclosed herewith.

In addition, the applicant has enclosed a legal opinion from Mr. Eamon Galligan S.C dated 28.1.2019 which should be read in conjunction with the above referenced report.

The applicant respectfully refers An Bord Pleanála to the fact that the legal opinion in this case sets out the following;

*“For the development to require an EIA or screening for an EIAR, it must be located on a site within either a city or town or a “development area” that is adjoining a city or town, as so defined under the Local Government Act 2001.*

*A “built up area” defined as –*

*“built-up area” means a city or town (where “city” and “town” have the meanings assigned to them by the Local Government Act, 2001), or an adjoining **development area**;*”

However, the site of the proposed development comprises a green field site on the edge of the developed settlement of Kilcock. It is not located within a developed area as it is surrounded on three sides by undeveloped land. Therefore, even if Kilcock could be regarded as a town for the purposes of the definition of a “business district”, the site does not require an EIAR because it is not within a developed area. The site is clearly not within the town of Kilcock.

Furthermore, Kilcock is not designated as a “town” for the purposes of the Local Government Act 2001 (albeit that the definition of a “town” under that Act has been appealed) and would appear therefore that the site does not adjoin a city or town for the purposes of this call of EIA development.

The fact that the site may be within the development boundary for Kilcock does not affect the application of para 10(b)(iv), Part 2, Schedule 5 of the 2001 Regulations as it is the actual unbuilt context of the development site rather than its development plan designation or potential future development status that is relevant to the application to this category of EIA development.

I am therefore of the opinion that the proposed development does not fall within para 10 (b)(iv), Part 2, Schedule 5 of the 2001 Regulations:

*“(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of **other parts of a built-up area** and 20 hectares elsewhere. (In this paragraph, “business district” means a district **within a city or town** in which the predominant land use is retail or commercial use).*

*Accordingly, an EIA or screening for EIA is not required under the legislation.”*

It is evident from the above Legal Opinion that the proposal (345 dwellings and a crèche facility on a site of 11.56ha) is sub - threshold for the preparation of an EIAR.

## 9 STRATEGIC HOUSING DEVELOPMENT - PRE - PLANNING REQUEST

On 10 October 2018, a formal Strategic Housing Development pre-planning request was lodged with An Bord Pleanála. Reg. Ref. ABP- 302746-18 refers.

A comprehensive pre-planning application was lodged with An Bord Pleanála setting out the basis on which the pre-planning request could be favorably considered.

### 9.1 Planning Authority Opinion

As part of this pre-planning process, Kildare County Council issued a formal opinion on the proposal, dated 6 November 2018.

For the purpose of this report, the Kildare County Council’s planning opinion piece followed by the applicant response is outlined in brief below. The response items are largely informed by detailed included in the planning application material enclosed herewith.

The applicant notes the supportive wording set out in Section 11 of the Kildare County Council Planning opinion which states:

*“It is the Planning Authority’s opinion that the proposed development would be generally acceptable in principle and would generally accord with the policies and objectives of the Kildare County Development Plan 2017-2023 and Kilcock Local Area Plan 2015-2021 and with the proper planning and sustainable development of the area”.*

The opinion notes that there are some items that require further information from the applicant to allow a full assessment of the impact of the proposed development. These are set out in the table below and the applicant’s response is indicated in each case for the benefit of An Bord Pleanála.

Item	Planning Authority Discussion Point	Applicant Response
1.	The proposed development should be informed by the design guidance of Section 7.4.4.1 of the LAP (the Kilcock Local Area Plan 2015-2021)	We refer to the enclosed Response to the An Bord Pleanála Opinion which sets out C+W O'Brien's design response to Section 7.4.4.1 of the Kilcock Local Area Plan
2.	The delivery of the entire link road is required by Transportation which would open up future development lands. The LAP indicates a specific Roads Objective MTO25 which requires the provision of a link road from the Bawnogues Road to the M4/R128 Interchange. It is envisaged that this link road be 6.5m in width including 2 m wide footpath and cycle way.	We refer to the enclosed Traffic Impact Assessment report prepared by Pinnacle Consulting Engineers which sets out compliance with Roads Objective MTO25
3.	The delivery of the footbridge over the railway track should be considered as part of this scheme in order to address the design guidance of the LAP as indicated in Section 7.4.4.1	We refer to the enclosed Architectural drawings prepared by C+W O'Brien Architects, Planning Report and the separate Bridge Memo prepared by Brock McClure Planning and Development which sets out the applicants consideration, engagement and commitment to supporting the delivery of the pedestrian/cycle bridge over the railway.
4.	The indicative Layout for the Bawnogues and Enfield Road Expansion Lands of the LAP indicates a connection road (to the south of 60 Brayton Park). A connection is not proposed and should be considered with regard to the future development of the post primary school. At a minimum, the provision of a pedestrian/cycle connection between the existing open space and proposed open space C should be incorporated into the proposal which provide easier access to the future school proposed.	We refer to the enclosed Transport Impact Assessment report prepared by Pinnacle Consulting Engineers, the Proposed Site Layout Plan prepared by C+W O'Brien Architects and the enclosed Landscape Masterplan and Landscape Rationale
5.	<p>Due to the irregular configuration of the site, 3 distinct areas are evident.</p> <ul style="list-style-type: none"> <li>The South Western portion provides a large area of open space (within the buffer zone), however development does not adequately overlook this space. Development should form a continuous active frontage along this space and should inform the design of the development blocks within this section.</li> <li>The mid portion of development has a feature apartment block – The design of the proposed apartment block should be</li> </ul>	<p>An Bord Pleanála are referred to the enclosed Architecture Design Statement prepared by C+W O'Brien Architects and the enclosed Landscape Masterplan prepared by Ronan Mac Diarmada Landscape Architects.</p> <p>In addition the proposed development provides for a connection to Brayton Park and the provision of a portion of land reserved to provide access to a future pedestrian/cyclist bridge link (to be provided by others) over the railway. An Bord Pleanála are referred to the enclosed Bridge Memo prepared by Brock McClure Planning and Development.</p>

	<p>improved to create a more distinctive feature building.</p> <ul style="list-style-type: none"> <li>The North Eastern section of development presents an opportunity to connect to Brayton Park and also create a focal connection bridge to the area of land known as the 'island'.</li> </ul>	
6.	There are a number of blocks which present an awkward juxtaposition which require attention as indicated in Appendix C of this report.	We refer An Bord Pleanala to the enclosed proposed site layout plan by C+W O'Brien Architects and the Design Statement
7.	A redesign of development should be considered in the western section of the site to provide a continuous overlooked open space area to the west. There are also a number of open space areas which are not adequately overlooked as indicated in Appendix C of this report.	We refer An Bord Pleanala to the enclosed proposed site layout plan by C+W O'Brien Architects and the Design Statement
8.	Details of bin storage for terraces should be included.	We refer An Bord Pleanala to the enclosed drawings prepared by C+W O'Brien Architects for details of proposed bin storage.
9.	The Parks Section require additional detailing and alteration as indicated in Appendix B of this report which include the requirement for a detailed arborist report and tree survey, details of any land take from Bawnogues Amenity Land, details of play equipment.	<p>An Bord Pleanala are referred to the enclosed:</p> <ul style="list-style-type: none"> <li>Arborist Impact Assessment and Tree Survey prepared by ArborCase.</li> <li>The land ownership drawing prepared by C+W O'Brien Architects and the enclosed letter of consent from Kildare County Council.</li> <li>Proposed site layout plan/Masterplan prepared by C+W O'Brien Architects and the Landscape Masterplan prepared by Ronan Mac Diarmada Landscape Architects for details of pedestrian links to the Bawnogues amenity lands as well as the separate vehicular/pedestrian access for Kildare County Council maintenance use only.</li> <li>Landscape Rationale document prepared by Ronan Mac Diarmada Landscape Architects for details of the proposed play equipment.</li> </ul>
10.	Part V should be addressed prior to lodgement of an application to ABP to the satisfaction of Kildare County Council as indicated in the Housing Report	<p>Following further engagement with the Housing Section Kildare County Council, we refer to the enclosed Part V drawings and particulars prepared by C+W O'Brien Architects.</p> <p><i>The Part V arrangements are the subject of ongoing discussions and agreement between the applicant and the Housing Section, Kildare County Council.</i></p>

11.	<b>Issues pertaining to Surface Water and Flood Risk as indicated in Water Services report, Appendix B of this report, are required to be addressed.</b>	We refer to the enclosed Engineering Planning report prepared by Pinnacle Consulting Engineers and the Flood Risk Assessment prepared by
12.	<b>Additional reports and assessments (Noise Assessment, Road Safety Audit, Construction Management Plan, autotrack analysis) are required for the Transportation Department. A pedestrian crossing within the scheme and a future bus stop to the south of the R148 is also required. Details are contained in Appendix B of this report.</b>	<p>We refer An Bord Pleanala to the full list of enclosures presented as part of this SHD planning application – including:</p> <p>Noise Impact Assessment prepared by AWN Consulting Engineers</p> <p>A Road Safety Audit</p> <p>Autotrack drawings prepared by Pinnacle Consulting Engineers</p> <p>Construction Pollution Control prepared by Pinnacle Consulting Engineers</p> <p>In addition, we refer An Bord Pleanala to the enclosed Traffic and Transport Assessment report prepared by Pinnacle Consulting Engineers</p>
13.	<b>A visual impact assessment and additional contiguous elevations should be submitted to illustrate the impact of the proposed development within the wider area.</b>	We refer An Bord Pleanala to the enclosed Photomontages and CGI's prepared by Dunes Visuals and the context drawings prepared by C+W O'Brien Architects.

Table 1 - Response to Planning Authority Opinion

It is evident from the above that the applicant has positively addressed all concerns raised by the Planning Authority at pre-planning stage. Where there is a divergence in opinion the applicant has provided a supporting rationale for the various elements of the proposal under consideration.

## 10 NATIONAL POLICY CONTEXT

The following documents are reviewed and compliance of the proposal with same is identified:

- Project Ireland - National Planning Framework (2040) is the relevant national planning framework governing the subject site.
- Rebuilding Ireland - Action plan for housing and homelessness is also relevant to this site as outlines the need for large scale housing development within appropriate, urban locations in order to combat the lack of existing housing stock.
- Regional Spatial and Economic Strategy - This Strategy provides for a spatial, economic, metropolitan, climate change and investment strategy for the eastern and midlands region.

Each of these documents is now review below.

## 10.1 Project Ireland - National Planning Framework (2040)

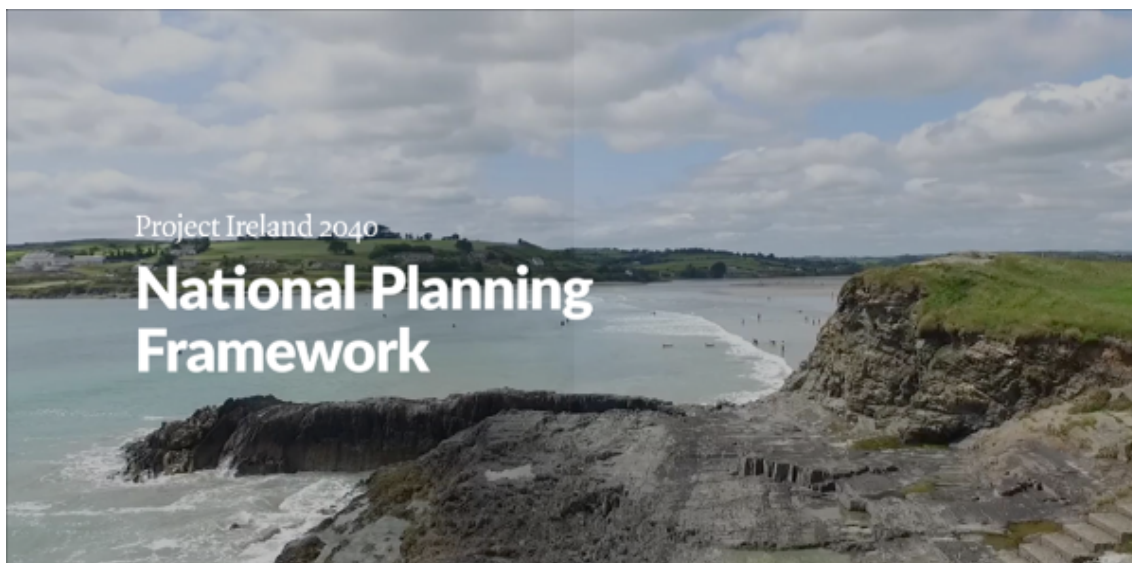


Figure 5: National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF sets out that the Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

It is identified that progressing the sustainable development of new greenfield sites for housing and particularly those close to public transport corridors is key to enabling growth.

The current proposal on lands in close proximity to Kilcock, Co. Kildare delivers on this requirement given its zoning and proximity to the Dublin-Sligo railway and bus services. The proposed residential development can make a significant contribution to the required increase in housing supply in Kilcock, Co. Kildare and nationally as envisaged by the National Planning Framework.

### **Compliance with Key National Policy Objectives**

The following policies are considered key in the context of this site:

#### **National Policy Objective 1b -**

*"Planning for a population in the Eastern and Midland Region of 490,000 - 540,000 additional people i.e. a population of around 2.85 million;"*

#### **National Policy Objective 2a -**

*"A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs."*

#### **National Policy Objective 4 -**

*"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."*

#### **National Policy Objective 6 -**

*"Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area."*

**National Policy Objective 11 -**

*“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*

**National Policy Objective 13 -**

*“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”*

**National Policy Objective 32 -**

*“To target the delivery of 550,000 additional households to 2040.”*

**National Policy Objective 33 -**

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

**National Policy Objective 34 -**

*“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.”*

**National Policy Objective 35 -**

*“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”*

It is our considered view that the current proposal complies with and exceeds the vision of the National Planning Framework on the following basis:

- The site is a key greenfield site and one that is wholly appropriate for a residential development of the scale proposed by this SHD planning application. This is particularly the case given proximity to public transport nodes (the Dublin – Sligo railway line and bus routes). The site is therefore well placed in terms of exceptional public transport accessibility.
- The site is a large currently unused greenfield site proximate to Kilcock. The current site is underutilised and the development now proposed will ensure a cohesive and efficient use of a greenfield site delivering a high quality residential development and associated facilities at a sustainable location.
- The proposal has the potential to deliver 345 residential units, which will be a significant addition to the local residential market and housing offer in area. The proposal provides a wide range of accommodation types for all cohorts of the population. The units also have the potential for adaptability if so required and will go a significant way in achieving the housing targets set out by the National Planning Framework.

Having considered the above, it is submitted that the proposal for 345 new residential units and a creche facility will deliver on key objectives contained within the National Planning Framework. The site is also zoned for residential development and is serviced with appropriate infrastructure to deliver on a sustainable residential development in close proximity to Kilcock town and public transport nodes.

## 10.2 Rebuilding Ireland: Action Plan for Housing and Homelessness



Figure 6: Rebuilding Ireland

The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:

- Pillar 1 - Address Homelessness
- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector
- Pillar 5 - Utilise Existing Housing

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 345 residential units on lands proximate to Kilcock town. The site has the benefit of accessibility to both rail facilities and bus public transport services and is considered a significant opportunity site for the delivery of residential units.

It is considered that the current proposal is a significant move forward within Kildare County Council in terms of the delivery of accommodation in that to date.

### 10.3 Regional Spatial and Economic Strategy



Figure 7: Regional & Economic Strategy

The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly* (RSES) has recently been published and adopted.

The site is identified as being located in the 'Dublin City and Suburbs' and is part of the Dublin Metropolitan Area as set out below:



Figure 8 - Dublin City and Suburbs

The Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area.

The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12-20 year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

#### **MASP Housing and Regeneration**

*“RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities.’”*

*“RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”*

Aside from the above core policy objectives, it is clear that the RSES supports continued population and economic growth in Dublin City and Key Metropolitan Towns. It is set out that there is an opportunity to promote and improve the provision of public transport and

active travel and the development of strategic amenities to provide for sustainable communities.

In terms of the MASP it is noted that Kilcock is identified within the MASP boundary area.

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density at c.43 units per ha and has had regard specifically to *standards as set out in the ‘Sustainable Urban Housing - Design Standards for New Apartments Guidelines for planning Authorities (2018)’ and the Sustainable Residential Development in Urban Areas (2009)* in ascertaining an appropriate residential density, height and car parking provision for the site.
- The scheme delivers a consolidated approach to development, delivers an appropriate site residential density proximate to key public transport provisions in Kilcock.
- The scheme utilises a key zoned greenfield site within the metropolitan area of Dublin. The delivery of residential development at this location is considered appropriate in line with the RSES.

#### 10.4 National Policy Summary

The National Planning Framework signals a shift in Government policy towards securing more compact and sustainable urban development, which requires at least half of new homes within Ireland’s cities to be provided within the existing urban envelope. A significant and sustained increase in housing output and apartment style development is therefore necessary to support government policy.

Given the sites residential zoning; proximity to public transport within Kilcock; and accessibility to local services, the current proposal is considered to comply with national policy objectives. More specifically, the delivery of residential development in a compact form on this prime, underutilised greenfield site, comprising well designed units is wholly consistent with the policies and intentions of the National Planning Framework, Rebuilding Ireland and Regional Spatial and Economic Strategy.

## 11 CONCLUSION

We invite the Board to consider the proposal now in front of them. We note the following key summary points:

- It is our considered view that the proposal now submitted delivers on the ambitions of relevant National Guidelines (e.g. National Planning Framework, Rebuilding Ireland and RSES) and we ask that An Bord Pleanala have regard to this in their consideration of the proposal. Further analysis of the proposal against the relevant guidelines is provided in the enclosed Statement of Consistency prepared by Brock McClure Planning and Development Consultants.
- Kildare County Council is supportive of the proposed development and the applicant has undertaken extensive engagement with the Planning Authority in advance of submitting this application to An Bord Pleanala.
- For all the reasons set out in all documentation it has been demonstrated that the application is robust and in compliance with all relevant strategic and statutory guidance.
- As stated, the proposal is in accordance with the relevant statutory documents and there is an appropriate planning context for this proposal.
- The development can deliver much needed residential accommodation on resident zoned lands in close proximity to Kilcock town. The proposed uses are acceptable in principle at this site and under this zoning.
- The proposed residential, creche facilities, associated elements including open space are acceptable in principle at the subject site under the zoning on site.
- The subject site benefits from close proximity to key public transport routes (noting that Kilcock Train Station and Bus stops are c.1000m from the subject site) as well as a wide range of amenities and facilities within the town centre of Kilcock.
- We can confirm that the applicant and the project team have addressed insofar as possible all pre-planning feedback from Kildare County Council and the matters set out in the An Bord Pleanala opinion.

We ask that An Bord Pleanala consider these points in their assessment of this proposal and grant permission for the development.

