

Planning Report & Statement of Consistency

**Lands at
Glencarrig House,
Simmonstown,
Celbridge,
Co. Kildare,
W23Y9PY**

**On behalf of
Garyaron Homes Ltd**

August 2022



Planning & Development Consultants

63 York Road,

Dun Laoghaire

Co. Dublin

www.brockmcclure.ie

Table of Contents

1	EXECUTIVE SUMMARY	4
2	INTRODUCTION	6
	CONTEXT FOR THE LODGEMENT OF THIS SUBMISSION	8
	HARD AND DIGITAL COPIES.....	8
3	SITE LOCATION AND CONTEXT	9
4	PLANNING HISTORY	11
4.1	SUBJECT SITE	11
4.2	SURROUNDING SITES	11
4.3	CONCLUSION	11
4.4	STATUTORY NOTICE CHECK.....	12
5	SECTION 247 PRE-PLANNING MEETING WITH LOCAL AUTHORITY	13
5.1	PRE-PLANNING PROPOSAL 1.....	13
5.2	PRE-PLANNING PROPOSAL 2.....	14
5.3	PRE-PLANNING PROPOSAL 3.....	17
5.4	PRE-PLANNING CONCLUSION	18
5.5	LRD MEETING	18
6	DESCRIPTION OF PROPOSED DEVELOPMENT	19
6.1	SUMMARY OF PROPOSED DEVELOPMENT	19
6.2	DETAILED DESCRIPTION	20
6.2.1	<i>Demolition</i>	<i>20</i>
6.2.2	<i>Communal Open Space.....</i>	<i>20</i>
6.2.3	<i>Residential Element</i>	<i>22</i>
6.2.4	<i>Dual Aspect.....</i>	<i>23</i>
6.2.5	<i>Residential Density.....</i>	<i>23</i>
6.2.6	<i>Communal Facilities.....</i>	<i>23</i>
6.2.7	<i>Childcare Provision.....</i>	<i>24</i>
6.2.8	<i>Car and Bicycle Parking.....</i>	<i>24</i>
6.2.9	<i>Part V Provision.....</i>	<i>24</i>
6.2.10	<i>Daylight/ Sunlight</i>	<i>24</i>
6.2.11	<i>Flood Risk Assessment</i>	<i>25</i>
6.2.12	<i>Construction.....</i>	<i>25</i>
6.2.13	<i>Traffic and Transport</i>	<i>25</i>
6.2.14	<i>Visual Impact</i>	<i>26</i>
7	RELATIONSHIP TO SURROUNDING DEVELOPMENT	27
8	STATEMENT OF CONSISTENCY - STRATEGIC PLANNING CONTEXT	28
8.1	STRATEGIC PLANNING POLICY DOCUMENTS	28
8.2	NATIONAL PLANNING FRAMEWORK – PROJECT IRELAND 2040	28
8.3	REBUILDING IRELAND: ACTION PLAN FOR HOUSING AND HOMELESSNESS	31
8.4	HOUSING FOR ALL – A NEW HOUSING PLAN FOR IRELAND	32
8.5	REGIONAL SPATIAL & ECONOMIC STRATEGY FOR THE EASTERN AND MIDLAND REGION 2019-2031	33
8.6	SMARTER TRAVEL - A NEW TRANSPORT POLICY FOR IRELAND 2009-2020.....	35
8.7	TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2016-2035.....	36
9	SECTION 28 MINISTERIAL GUIDELINES.....	38
9.1	SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS (2009) / URBAN DESIGN MANUAL (2009) GUIDELINES.....	38
9.2	DELIVERING HOMES SUSTAINING COMMUNITIES (2007)	43
9.3	GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES (2001).....	44
9.4	THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT (2009).....	45
9.5	GUIDANCE ON APPROPRIATE ASSESSMENT FOR PLANNING AUTHORITIES (2009)	46

9.6	SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS 2020 (AS AMENDED).....	47
9.7	DESIGN MANUAL FOR URBAN ROADS AND STREETS 2019.....	53
9.8	URBAN DEVELOPMENT AND BUILDING HEIGHT GUIDELINES (2018).....	54
10	STATUTORY PLANNING CONTEXT	60
10.1	KILDARE COUNTY DEVELOPMENT PLAN 2017-2023.....	60
10.1.1	<i>Housing Policies and Objectives</i>	61
10.1.2	<i>Sustainable Communities Policies and Objectives</i>	61
10.1.3	<i>Residential Urban Design Policies and Objectives</i>	62
10.1.4	<i>Location and Density Policies and Objectives</i>	62
10.1.5	<i>Mix of Dwelling Types Policies and Objectives</i>	64
10.1.6	<i>Design and Layout Types Policies and Objectives</i>	65
10.1.7	<i>Private and Semiprivate Open Space Policies and Objectives</i>	65
10.1.8	<i>Public Open Space Policies and Objectives</i>	66
10.1.9	<i>Residential Development Standards</i>	66
10.2	CELBRIDGE LOCAL AREA PLAN 2017- 2023	71
10.2.1	<i>Zoning</i>	71
10.2.2	<i>Spatial Planning Context</i>	72
10.2.3	<i>Strategic Vision</i>	72
10.2.4	<i>Housing</i>	72
11	CONCLUSION	75

1 Executive Summary

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report on behalf of **Garyaron Homes Ltd. Unit H2, Merrywell Business Park, Lr Ballymount Road Dublin, D12 XRX3** for a proposed residential development at **Glencarrig, Hazelhatch, Celbridge, Co. Kildare, W23Y9PY**. For clarity, the site is located within the administrative boundary of Kildare County Council.

This report is intended to identify consistency with the relevant national planning policy guidelines under section 28 of the Planning and Development Act (as amended), and with local statutory planning policy in the form of the Kildare County Development Plan 2017-2023

The Subject site is located in an area zoned ‘B: Existing Residential/ Infill’ by the Celbridge Local Area Plan 2017-2023, with an objective to ‘*protect and enhance the amenity of established residential communities and provide sustainable intensification*’.

Section 13.4 of the Celbridge Local Area Plan 2017-2023 presents a land use zoning matrix that outlines land uses permitted under each zoning objective set out within the plan. Zoning objective B permits new dwellings, playgrounds/parks and nursing homes in principle. The proposed development falls under the category of dwellings and therefore is considered generally acceptable subject to compliance with objectives set out in other chapters of the Local Area Plan.

Residential development is considered the most appropriate use for this site given its location south of the existing Celbridge town centre and close to public transport links. The proposed site is surrounded to the north and west by existing residential development and to the south by an area earmarked for residential development, the Simmonstown Key Development Area.

The proximity of the site to amenities, services, and high frequency public transport in the form of bus means it is therefore opportunistically located to provide for higher residential density and additional height in compliance with the national policy mandate. This was also an objective for this location raised at the initial pre planning consultation between the design team and Kildare County Council Planners and the Section 247 Consultation that has taken place.

The development will consist of the Demolition of the existing dwelling and construction of 137 no. residential units comprising 115 new apartment units and 22 new houses. The specifications of the proposed dwellings are outlined in section 6.1 of this report. The apartment units will be provided in 3. no. 5 storey blocks across the site, appropriately located to protect the residential amenity of surrounding existing properties and maximise the development potential of the subject site, allowing for large areas of open space to be provided. A new creche facility will be provided as part of the development.

All associated site development works, services provision, vehicular and pedestrian access, 135 no. car parking spaces (44 of these will be for the houses on site, 87 will be for the apartment units and 4 for the creche) and 204 no. bicycle parking spaces (124 no. in a secure lockup for residents and 80 for visitors), bin stores, plant/stores, ESB substation and switch room, private and communal open space, public realm improvements, landscaping and boundary treatment works are included as part of the development.

The development includes supporting residential amenity services which are wholly appropriate for this scheme. Public realm upgrades proposed as part of this development will transform currently underutilized pockets of land within and surrounding the development site to create a quality mixed use environment.

We note that there is no recent planning history for the subject site. Recent relevant permissions on surrounding sites are outlined within this report.

The proposal reflects the feedback received at the pre planning consultation meetings carried out between the project design team and Kildare County Councils planning department.

The proposal is in accordance with the relevant statutory documents and there is appropriate planning context for this proposal. Furthermore, the proposed heights and density for this scheme is well founded in the context of national planning policy.

The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities, connections to public transport and car and bicycle parking facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties in the design of this scheme.

2 Introduction

This report is intended to specify the rationale behind the subject proposal; to identify compliance with relevant statutory documentation; and to provide a detailed description of the proposal for the benefit of Kildare County Council.

We wish to highlight from the outset, that our client is committed to working with the Planning Authority and to deliver on a proposal that is appropriate to the site and the surrounding context in Celbridge. The Planning Authority is aware of the applicant's commitment to delivering a high-quality residential development as evidenced in the pre planning meetings.

We note at this point that the site is conveniently located to the South of Celbridge, near high quality public transport. The site is located approximately 900 metres from a bus stop to the North, which is serviced by routes 67x, 120, 120A and 120B providing connections to Dublin city centre. The routes listed offer UCD, Connolly station and Merrion Square as destinations. Hazelhatch and Celbridge train station is approximately 1km to the south of the site and offers rail services to Kildare/ Waterford, Galway, and Dublin.

We ask the Planning Authority to consider these points in their review of proposals and we trust that they will view this proposal as a positive move towards the delivery of much needed residential development at an opportunistically located site.

Design Team -

Our client, Garyaron Homes Ltd has appointed an experienced design team to prepare a residential planning application comprising the following:

- Brock McClure Planning and Development Consultants
- John Fleming – Architects
- Kavanagh Burke - Consulting Engineers
- Ronan Mac Diarmada – Landscape Architect
- NRB – Traffic and Transport
- Malachy Walsh – Ecology
- MANDE- M&E
- 3D Design Bureau – Sunlight & Daylight, CGIs
- Arborist Associates – Tree Survey
- JBA – Flood Risk
- iAcoustics – Noise Consultant

The various inputs from the design team are referenced where relevant within this report. We confirm that the following reports are included herewith to enable Kildare County Council to make a comprehensive assessment of the scheme:

Schedule of Accommodation (including area of dwelling, open space provision etc)	JFA
Architectural Drawings (Existing and Proposed)	JFA
Schedule of Architectural drawings	JFA

Brief Design Statement including (but not limited to): <ul style="list-style-type: none"> • Description of the proposed development, • Rationale for the proposed development, • Details of materials and finishes, • Landscaping proposals, • Reference to green roofs and • any alternatives considered etc. 	JFA
Materiality Report	JFA
Cover Letter (including a full list of planning application enclosures)	BMC
Development Description (based on finalised Architectural drawings)	BMC
Planning Application Form	BMC
Planning Application Report/Statement of Consistency	BMC
Community and Social Infrastructure Audit	BMC
LRD Response letter	BMC
Review and co-ordination of planning application material	BMC
Appropriate Consent Letters	Client/BMC
Landscape Drawings	RMD
Landscape Design and Access Statement	RMD
Landscape Management and Maintenance Plan	RMD
Visual Impact Assessment	RMD
Appropriate Assessment Screening Statement	Malachy Walsh
Ecology Impact Report and Bat Survey	Malachy Walsh
299B Statement	Malachy Walsh
EIAR Screening Report	Malachy Walsh
Engineering Drawings	KB
Drainage Design Report	KB
Foul Water Drainage / IW input	KB
Surface Water Drainage / IW input	KB
M&E/Sustainability Report and Lighting Design -Including all Drawings	MANDE
Flood Risk Assessment and Independent Audit	JBA and ARUP
Traffic Impact Assessment / TTA	NRB
Traffic and Transport Assessment	NRB

Stage 1 & 2 Road Safety Audit / Assessment	NRB
Stage 1 Preliminary Design Surface Water Audit	KB
SUDs Strategy	KB
Sunlight Analysis	3DDB
CGIs/Photomontages	3DDB
Tree Impact Report and Drawings	Felim Sheridan
Arboricultural Assessment	Felim Sheridan
Tree Protection Strategy	Felim Sheridan
Acoustic Assessment	iAcoustics
Waste Management Plan	JFA
Construction Management Plan	Client

Context for the lodgement of this Submission

This Large Scale Residential(LRD) pre-application meeting request is lodged in accordance with Section 32B of the Planning and Development Act 2000 as amended in terms of the particulars enclosed herewith.

Hard and Digital Copies

In addition, we confirm specifically that:

- 6 hard copies and 1 digital copy of all material has been issued to the Planning Authority of Kildare County Council.

3 Site Location and Context

The site is located on the south east edge of the town of Celbridge, Co. Kildare, within 1.5 km of Celbridge town centre and close Hazelhatch and Celbridge train station. Located 23km west of Dublin, Celbridge maintains strong economic & social links to the capital. The site area below is depicted by the red line boundary.



Extent of Lands under Appraisal

The Subject site is located in an area zoned ‘B: Existing Residential/ Infill’ by the Celbridge Local Area Plan 2017-2023, with an objective to ‘protect and enhance the amenity of established residential communities and provide sustainable intensification’.

Section 13.4 of the Celbridge Local Area Plan 2017-2023 presents a land use zoning matrix that outlines land uses permitted under each zoning objective set out within the plan. Zoning objective B permits new dwellings, playgrounds/parks and nursing homes in principle. The proposed development falls under the category of dwelling and therefore is considered generally acceptable subject to compliance with objectives set out in other chapters of the Local Area Plan.

Aside from availing of the many amenities Celbridge has to offer, the site is well placed in that the close to the local primary school and sporting facilities such as Celbridge GAA Club and Celbridge Tennis Club.

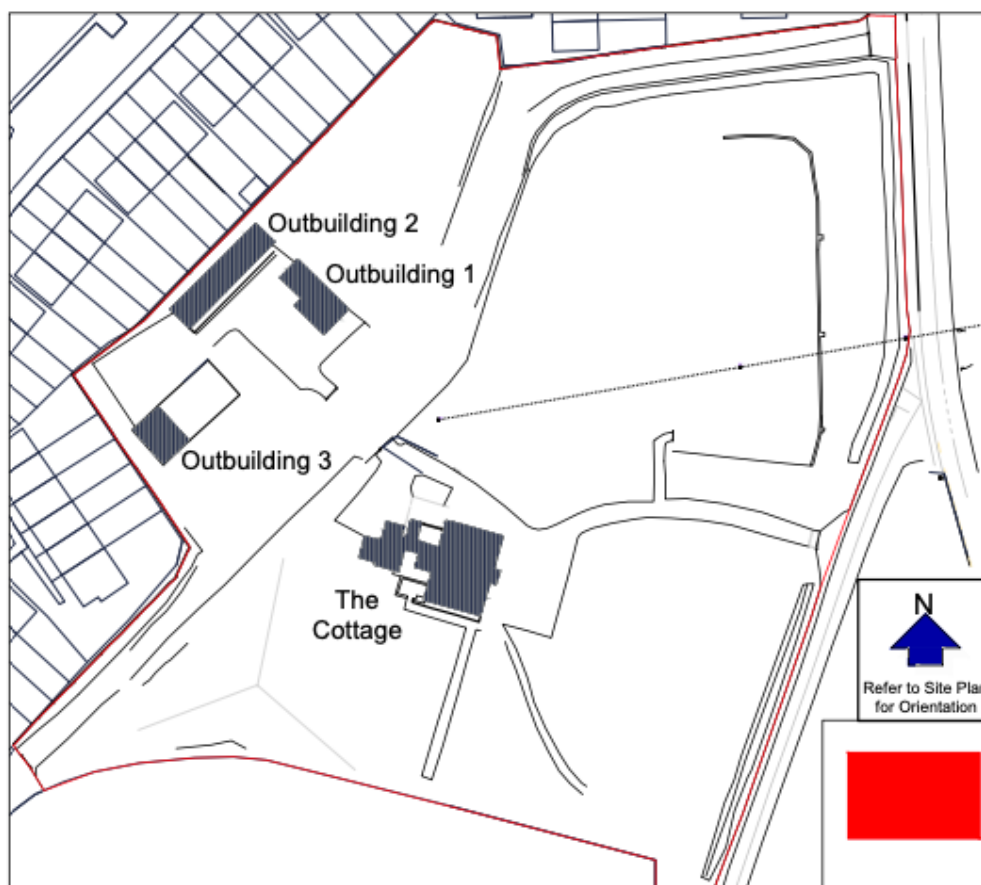
While the site is within a comfortable walking distance of the town centre it also benefits from very good transport links. There is good access to the M4 motorway, which bounds the town to the North and the M7 motorway to the South. The Arrow commuter train line runs from Hazelhatch to Dublin Heuston and the intercity train services provide additional links across the country. There is a connecting shuttle bus service linking the train station with Celbridge town.

Development in the town has mainly been to the south in recent years, focusing on Primrose Gate, St. Wolfstan’s Abbey and Hazelhatch Park. The application lands at Hazelhatch offer an exceptional opportunity to provide another step in fulfilling Celbridge’s local area plan by providing an exemplary residential development. The proposal provides a mix of unit types with 1- & 2-bedroom apartments and 3- & 4-bedroom houses. A free standing creche for 50 children is proposed adjacent to the boundary with Hazelhatch Park.

Consideration has been given to the masterplan prepared for the future development area (KDA 5 Simmonstown) to the south. Particular consideration has been given to connectivity to these lands and the location of the estate road to the south will allow flexibility for pedestrian, cycle and vehicle connections for any future development.

The site fronts directly on the Hazelhatch Road and Simmonstown Road to the east. It is proposed to realign/reconfigure the junction here to provide safer connection between the existing footpaths and the newly proposed path along Simmonstown Road. There are multiple pedestrian/ cycle access points along the road with vehicle access been provided at the south east corner on to Simmonstown Road.

The site is largely greenfield but features an existing dwelling and 3 no. outbuildings which will be demolished to accommodate the development of the subject proposal. Details of the existing buildings on site can be found on the demolition drawings prepared by John Fleming Architects included in the Architectural drawing pack submitted as part of this submission. A map outlining the existing buildings on site prepared by John Fleming Architects can be seen in the figure below.



Existing Buildings on Site

4 Planning History

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

4.1 Subject Site

There is no noted planning history on the subject site.

4.2 Surrounding Sites

Kildare County Council Planning Register Reference 16247– Permission **REFUSED** for Residential development of 14 no. dwellings comprising 1 no. House Type A1, 2 storeys, 3 bed townhouse (108 sqm); 12 No. House Type A, 2 storeys plus attic, 4 bed semi-detached (135 sqm) & 1 No. House Type B, 2 storeys plus attic, 4 bed detached (145 sqm) and all ancillary site works including 735 linear metres of foul sewer outfall along the Hazelhatch Road. Revised by Significant Further Information consisting of: revised plans which provide for 13 no. dwellings, a revised layout reorienting dwellings to front onto Hazelhatch Road and a relocation of proposed pedestrian and cycle access onto Hazelhatch Road and all ancillary site works including 735 linear metres of foul sewer outfall along the Hazelhatch Road. The housing breakdown will comprise 1 No. House Type A1, 2 storey, 3 bed townhouse (111.9sqm); 8 No. House Type A, 2 storey plus attic, 4 bed semi-detached (143.6sqm) & 4 No. House Type B, 2 storey plus attic, 4 bed semi-detached (156.6sqm). This is a reduction of 1 No. unit in proposed house numbers from 14 to 13 at The Commons, Hazelhatch Road, Celbridge, Co. Kildare.

Kildare County Council Planning Register Reference 17914 – Permission **GRANTED** for a development which will consist of 11 No. dwellings comprising: 6 No. House Type A, 2 storey, 4 bed detached (145.7sqm); 1 No. House Type B, 2 storey 4 bed detached (145.7sqm); 1 No. House Type C, 2 storey, 4 bed semi-detached (145.7sqm); 1 No. House Type D, 2 storey, 4 bed semi-detached (145.7sqm); 2 No. House Type E, 2 storey, 3 bed detached (102.7sqm) and all ancillary site works including 644 linear metres of foul sewer outfall along the Hazelhatch Road, at this site. Revised by significant further information consisting of; a reduction in the number of houses from 11 no. to 9no. comprising 5 no. House Type A: 2 storey , 4 bed detached (145.7sqm); 1 no. House Type B: 2 storey, 4 bed detached (145.7sqm); 1 no. House Type C: 2 Storey, 4 bed semi-detached (145.7sqm); 1 no. House Type D: 2 storey, 4 bed semi-detached (145.7sqm); 1 no. house type F: 2 storey, 4-bed detached house (147.9sqm); reorientation of dwellings; an amendment to the site boundary and all ancillary site works including 644 linear metres of foul sewer outfall along the Hazelhatch road at The Common, Hazelhatch Road, Celbridge, Co. Kildare.

4.3 Conclusion

Overall, the following key planning principles have been established for the site:

- The subject site has been identified as a suitable location for significant residential development. The zoning objective of the site as ‘B: Existing Residential/ Infill’ allows for residential development in principle, which is the most appropriate and efficient use for the subject lands.
- The subject proposal is in line with the vision for the area to the south of Celbridge. The site is located directly to the north of the Simmonstown KDA, envisioned to provide new residential homes, and will allow the consolidation of residential development in this area, aiding towards the deliverance of new homes to accommodate the growing population of Celbridge.
- The subject proposal presents an opportunity to diversify the feel of the area, which is currently quite rural despite being adjacent to Celbridge town, and create a more sustainable mixed use residential neighbourhood which offers high quality, high density residential development at an underutilised site.
- It has been established that this residential zoned site is located within an appropriate distance of public transport corridors with multiple bus services and a railway station all within 1km of the subject site.

- The current proposal offers a maximum building height of 5 storeys. This is considered an appropriate design response for the subject site, given that Kildare County Council envision a high-density residential scheme at this location. The proposed height of 5 storeys does not damage the amenity of surrounding properties. Details of this can be found in the preliminary Sunlight and Daylight Analysis prepared by 3D Design Bureau, submitted as part of this pre-application/LRD Meeting request. A justification for the height of the proposal is outlined in the following sections of this report.
- The current design is an improved design response to that originally presented to Kildare County Council during the initial pre planning meetings and one that is reflective of the requirements for the appropriate use of land zoned for residential development. The proposal aims to deliver an appropriate character whilst delivering on increased residential densities and heights in line with recent national policy.
- The principle of the demolition of the existing dwelling and outbuildings on site is considered acceptable and necessary to achieve the sites development potential.

We trust that the Planning Authority will consider the above points in their assessment of the current proposal.

4.4 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 there are no notices of immediate relevance to the subject site.

5 Section 247 Pre-Planning Meeting with Local Authority

The evolution of the scheme has been brought about by engagement with the Planning Authority Kildare County Council. The applicant and design team formally engaged in preliminary discussions with the Planning Authority on the 22nd of April 2021 presenting a draft outline of the proposed development, followed by additional consultations via a formal Section 247 meeting on 27th January 2022.

Comments from the Kildare County Council Planning and other Departments present at this meeting were considered and the design team prepared a revised proposal to present to Kildare County Council for comment.

This revised proposal was sent to Eoghan Lynch of KCC on the 1st of June 2021 by Laura Brock of Brock McClure Planning and Development Consultants. A summary of the comments returned by Kildare County Council and the measures implemented to incorporate them into the final scheme are outlined in section 5.2 and 5.3 below.

All matters raised by the Planning Authority have, where possible, been addressed in the proposal now submitted. Where the applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale in support of the proposal in terms of adherence to national policy.

5.1 Pre-Planning Proposal 1

The initial proposal presented to Kildare County Council at Pre-Planning, proposed the following in summary:

- 4 no. 4 bedroom semi-detached
- 2 no. 4 bedroom detached
- 16 no. 3 bedroom semi-detached (Type A)
- 16 no. 3 bedroom semi-detached (type B)
- 8 no. 3 bedroom terraced
- 4 no. 1 bedroom duplex.



Original Scheme Site Layout presented to KCC 22ND April 2021

The site area was 2.06 hectares, and the proposed development offered a density of 29.6uph. The Celbridge Local area plan 2017-2023 stated that 30-50 units per hectare is appropriate for new development.

The proposed scheme offered 6 different housing unit types across the site.

The proposed development had a singular vehicular access point along Simmonstown Manor Road. An additional access point for pedestrians was in the Northeast corner of the site, exiting onto Hazelhatch Road (R405).

All units proposed in the scheme had a uniform appearance in terms of design and materials used. Black concrete roof tiles and a render and paint finish with some visible brickwork would be implemented on all units.

All units were 2 storeys with a pitched roof. Building height across all units proposed was circa 9 metres, with slight differences in height depending on the unit type.

Each unit had private open space in the form of a back garden.

All units were provided with a driveway for car parking. The 4 no. 1 bedroom duplex units were provided with a single carparking space per unit whilst all other proposed units had 2 no. car parking spaces.

Landscaped areas of public open space were proposed throughout the development. 3 public open space areas totalling 3125sq.m were proposed, covering 15% of the sites total area.

Kildare County Council concluded that a residential development at this site was acceptable in principle, however an increase in density was encouraged and the unit type provided should represent a mix of apartments and traditional houses. It was recommended that the layout of the site should be reconfigured in an updated proposal to allow for increased provision of quality open space areas.

5.2 Pre-Planning Proposal 2

The design team considered the initial comments made by Kildare County Council in the meeting held on the 22nd of April 2021. A revised proposal was sent to Eoghan Lynch of KCC by Laura Brock of BMC on the 1st of June 2021. The updated preplanning proposal consisted of the following:

- Houses-
 - 04 no. 4 bedroom semi-detached
 - 06 no. 3 bedroom semi-detached (Type A)
 - 02 no. 3 bedroom semi-detached (Type B)
 - 12 no. 3 bedroom terraced
 - 04 no. 2 bedroom terraced
- Apartments –
 - Block A – 40 units (20 no. 1 beds, 20 no. 2 beds)
 - Block B- 51 units (20 no. 1 beds, 31 no. 2 beds)
 - Block C- 21 units (09 no. 1 beds, 12 no. 2 beds + creche)



Updated Scheme Site Layout Submitted to KCC 1st June 2021

The site area was 2.1 hectares, and the proposed development offered a density of 67uph. The Celbridge Local area plan 2017-2023 stated that 30-50 units per hectare is appropriate for new development.

140 new apartments and houses total were proposed.

Open space of 4500 sq.m or 21% of the total site area was proposed.

159 no. car parking spaces were proposed (56 for the new houses/100 for new apartments/3 for visitors).

We present the applicants responses to the comments submitted by Kildare County Council on the updated pre planning proposal below:

Kildare County Council Comment

- *The design and finish of the proposed apartments and dwellings should be of a high standard to reflect the mature nature of the site and the edge of town location of the site – examples shown including glass balustrade, buff brick seem appropriate response, and the PA will seek follow through on a standard of finish*

Applicant Response

In response to this we submit that the proposed apartments and dwellings have been finished to a high standard reflecting the mature nature of the site and the sites edge of town location. Details of the materials and finishes proposed can be found on the drawings and in the Design Statement prepared by JFA submitted as part of this application.

Kildare County Council Comment

- *The layout of open space needs some attention – southern open space parcel is not well addressed in current layout – passive surveillance is important, dual frontage dwellings are not sufficient in this regard. In the current proposal the main area of open space at the norther end of the site appears to be semi-private or associated only with the apartments – consequently the dwellings may be underserved or have the perception of being under-served with open space.*

Applicant Response

In response to this we submit that additional open space has been provided along the eastern boundary of the site and confirm the open space within the central courtyard of the apartment blocks is for the communal use of all units within the proposal. The design of the scheme required a balance between appropriate densities, assimilation with the Simmonstown Key Development Area to the south and retention of mature trees on site. The proposed design presents the optimum solution to address these key design constraints and an appropriate quantum of open space is provided within the development as set out in the attached Architectural Design Statement and Landscape Rationale.

Kildare County Council Comment

- *I have concerns about the main central access road the side garden walls, and gable ends of house numbers 14, 15 and 22 do not create a quality public realm open space.*

Applicant Response

The layout and orientation of units has been amended to address the central access route through the site and provide an enhanced public realm as per the attached JFA layout drawings and design statement. We trust this is to the satisfaction of the Planning Authority.

Kildare County Council Comment

- *Treatment of north-western boundary needs further detailing – decision not to go back-to-back with gardens of the court should be explained or revised – the boundary treatment here should be clear – is a new boundary proposed?*

Applicant Response

In response to this we submit that the proposal layout has been designed to protect the residential amenity of existing dwellings at 'The Court' to the west of the development site and 'The Drive' to the north of the development site. It was considered inappropriate by the design team to go back-to-back with the gardens of 'The Court' as this could result in overlooking, overshadowing, and overbearing on the existing dwellings. Car parking spaces have been located along this boundary to serve the apartment blocks located in the central northern portion of the site. The boundary treatment will include the retention of the existing block wall with capping as per the attached RMDA Landscape Architects Boundary Plan.

Kildare County Council Comment

- *Other advice and previous discussions seems to have been incorporated into revised layout, and should be referred to in future iterations of the proposal, a variety of housing typologies may be required to overcome some of the layout concerns, the site itself and the mature trees on site will dictate an element of the layout – and it should be clearly shown in the drawings and design statements where this has been the case, landscaping and open space will need to be comprehensively addressed in any submission.*

Applicant Response

All comments of the Planning Authority have been appropriately considered in the revised design now put forward. This includes detailed design rationale, Landscape design and a variety of unit types to suit the constraints of the site. We trust this is now to the satisfaction of the Local Authority and offers a suitable design response for this site.

5.3 Pre-Planning Proposal 3

As part of the formal LRD pre-planning consultation phase, a revised proposed was submitted to the Local Authority on the 23rd December 2021 in advance of a Section 247 meeting on 27th January 2022. The revised proposal included:

(a) the demolition (total area approx. 800 sqm) of the existing buildings on site and the existing front boundary treatment; and (b) the construction of a new residential and creche scheme of 138 no. units in a mixture of houses and apartment units ranging from 2 to 5 storeys in height as follows:

- Block A (3-5 storey apartment block) comprising 39 no. apartments (19 no. 1 bed and 20 no. 2 bed units)
- Block B (4-5 storey apartment block) comprising 51 no. apartments (24 no. 1 bed and 27 no. 2 bed units)
- Block C (3-4 storey apartment block) comprising 25 no. apartments (11no. 1 bed and 14no. 2 bed units)
- Houses (2 -3 storeys) comprising 23 no. house units (6no. 4-bed semi-detached, 6no. 3 bed semi-detached, 5no. 3-bed terraced and 6no. 3-bed end of terrace)

A separate building will accommodate a Childcare Facility/creche of approx. 242 sqm with outdoor play area of 430 sqm. The proposed scheme as put forward at that stage, is shown below:



Site Layout -
Development at Hazelhatch Road, Celbridge, Co. Kildare

PRE-PLANNING

Proposed Scheme Site Layout presented to KCC 27th January 2022

At the Section 247 meeting the following points were raised on behalf of the Local authority:

- Irish Water connection issues to be resolved as part of application proposal
- Existing flood surface water parameters and flood mapping to be considered and appropriately addressed in design
- Density and heights to be provided with appropriate justification
- Existing trees to be retained where possible with re-design to protect existing mature Walnut and Chestnut trees
- Key traffic and transport issues to be addressed

- High quality materials and finishes to be used, creche set down area to be resolved, open space strategy to be appropriately designed

Applicant Response

All comments of the Planning Authority have been appropriately considered in the revised design now put forward. This includes detailed design rationale, Landscape design retention of trees, a re-design of the creche and associated areas, and drainage and surface water design. We trust the attached details from the design team is now to the satisfaction of the Local Authority and offers a suitable design response for this site.

5.4 Pre-Planning Conclusion

The above demonstrates that comments from Kildare County Council Planning and related Departments made during the pre-planning discussions have been carefully considered and incorporated into the design proposal now put forward. All feedback from Kildare County Council has been closely considered in the design of the proposal. We trust that the final proposal submitted addresses concerns raised by the Planning Authority at the initial pre planning stages. An outline of the final proposed development is provided in section 6 of this report below.

5.5 LRD Meeting

The applicant and design team for this development further engaged with Kildare County Council at an LRD Meeting which was held on 14/06/2022.

All matters raised by the Planning Authority at this meeting or within the Notice of LRD Opinion document have, where possible, been addressed in the proposal now submitted to Kildare County Council. Where the applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale in support of the proposal in terms of adherence to national policy.

6 Description of Proposed Development

6.1 Summary of Proposed Development



Proposed Site Layout Plan prepared by JFA

The proposed development will consist of the demolition of the existing dwelling and outbuildings on site and construction of 137 no. new residential units comprising 115 no. apartment units in 3 no. new apartment blocks (2 no. 5 storeys, 1 no. 4 storeys) and 22no. residential houses ranging from 2 to 3 storeys. A creche facility will be provided to the south west of the development site. A variety of unit typologies are proposed as follows:

- 137 residential units (22 houses and 115 apartments in 3 no. blocks) as follows:
 - Houses –
 - 5 x 4 bed semi detached
 - 6 x 3 bed semi detached
 - 4 x 3 bed terraced
 - 7 x 3 bed end of terraced
 - Apartments –
 - Block A (19 no. 1 bed, 20 no. 2 bed)

- Block B (24 no. 1 bed, 27 no. 2 bed)
- Block C (11 no. 1 bed, 14 no. 2 bed)

135 no. parking spaces will be provided across the site. 44 of these will be for the houses on site and 87 will be for the apartment units. 4 no. parking spaces will be provided for the creche.

The total site area is 2.1 hectares.

Site Density will be 64 units per hectare.

204 Bicycle Parking Spaces are provided for residents and visitors (124 for residents and 8 visitor spaces).

4,380 sq.m of communal open space will be provided, totalling 20% of the sites total area.

Vehicular Access to the site will be from a new site entrance to the southeast corner of the site along Simmonstown Road.

Extensive pedestrian and cyclist pathways linking to adjoining areas are proposed as part of the development, including significant upgrades for pedestrians along Simmonstown Road.

6.2 Detailed Description

6.2.1 Demolition

The subject proposal will provide for the demolition of the existing residential dwelling and 3 no. outbuildings located on the west site of the subject lands.

The floor area of buildings to be demolished is broken down as follows:

- (Out-building 1) - 2-Storey Shed - 129.37 sq.m
- (Out-building 2) - Single storey Stables - 114.29 sq.m
- (Out-building 3) - Corrugated shed - 61 sq.m
- Dwelling House - 3 storeys - Total Area - 495.32 sq.m

Total floor area for demolition is approximately 800sqm. Buildings to be demolished as part of the proposal are detailed on the *Existing Elevations* drawings prepared by John Fleming Architects submitted as part of this application.

6.2.2 Communal Open Space

The delivery of a central area of public open space and a quality landscaping plan has been a key objective from the outset of the design. The design team have recognised the importance of a meaningful communal open space area as part of the proposal and have provided communal open space totalling 4,380 sq.m. This is divided into several areas of open space across the site.

There is an area of open space stretching along the entirety of the sites eastern border. This space features a winding pedestrian footpath with a site access point to the northeast corner of the site. Towards the northeast portion of this open space area is a children's playground featuring a variety of play equipment. The remainder of this space will be landscaped and provide seating areas for residents. A 1.2 metre high 3 bar parkland fence will be provided as the boundary treatment for the eastern site boundary.

There will be a second site access and egress point for pedestrians to the northeast of the development site which will provide direct pedestrian access to an area of communal open space located in the central/northern portion of the site between the 3 no. residential apartment buildings. This area will also provide children's play equipment and is ideally located for passive surveillance by the surrounding apartment buildings. This area will act as the primary area of communal space for the residents of the apartment buildings as it is directly accessible from the ground floor. This area of open space can also be accessed from the north and south by other persons wanting to avail of this area.

A 3rd primary area of communal open space is provided in the central portion of the site. This is a small open space area directly accessible from the apartment units, residential dwellings and creche unit to the west of the site. The accessibility of this open space area and location close to the creche and all residential units makes it an ideal open play space for children.

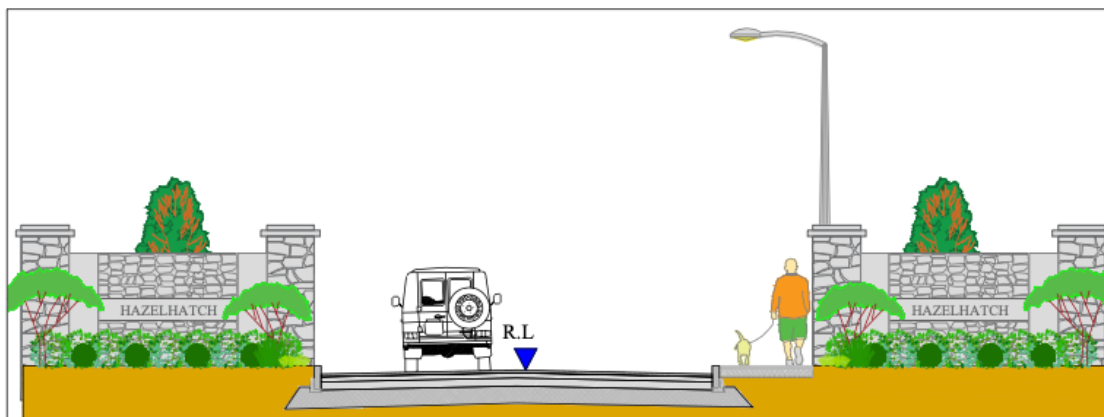
The clusters of lawn areas across the site creates multi-functional flexible open space for residents that can be utilised in multiple ways.

All communal areas proposed are overlooked by dwellings, ensuring adequate passive surveillance across the development. Incidental planting of shrubs at ground floor level of apartment units adjacent to the communal lawn areas provide a natural buffer between the communal space and apartment units located at ground floor level.

Communal open spaces are detailed on the landscape drawings prepared by Ronan MacDiarmada submitted as part of this application pack and depicted in the figure below.



Proposed Landscape Masterplan prepared by RMDA



Proposed Site Entrance Boundary Treatment

6.2.3 Residential Element

The development involves the construction of 137 new residential units. 115 of the proposed units will be apartments provided in 3 no. blocks (2 no. 5 storey blocks and 1 no. 4 storey block). The remaining 22 no. units will be residential houses ranging in height from 2 to 3 storeys.

The proposed development offers a mix of unit types and sizes and caters for a wide demographic to accommodate the growing diverse population of Celbridge and its environs.

The development provides 1 and 2 bed apartment units and 3 and 4 bed houses.

The proposal provides an appropriate response to the constraints of the site and maximises its development potential, providing 64 units per hectare on a previously underutilised site of 2.1 hectares currently occupied by a single residential dwelling close to Celbridge town centre.

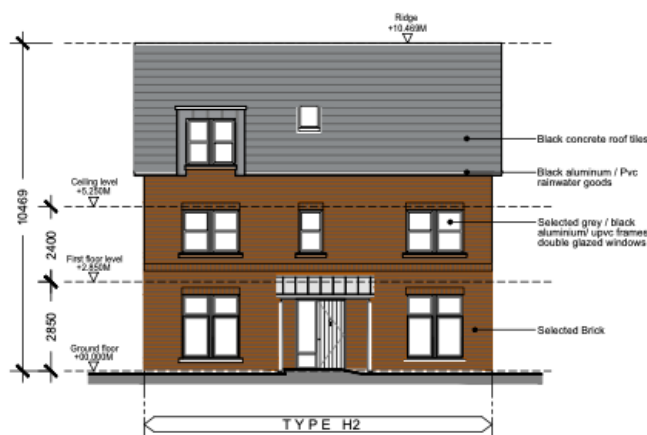
Site elevations prepared by JFA are depicted below.



Typical elevations of Apartment blocks A, B and C



House Type H1 – Front Elevation



House Type H2 – Front Elevation

6.2.4 Dual Aspect

115 no. apartment units are provided as part of the overall scheme of 137 no. units. Of the 115 no. apartment units provided 78 no. apartment units will have the benefit of being dual aspect, equating to 56.5% of all apartment units. This exceeds the requirement for 33% dual aspect units as per the Design Standards for New Apartments – Guidelines for Planning Authorities (Updated 2020) given the site is within 1km of a railway station.

6.2.5 Residential Density

The residential density proposed at this site will be 137 units on a site area of approx. 2.1 ha. This equates to approximately 64 units per hectares. It is our submission that this residential density is supported by national policy which aims to deliver increased height and densities at appropriate locations. The site can accommodate this density given the size of the site and its proximity to a range of services and public transport.

6.2.6 Plot Ratio & Site Coverage

The plot ratio for this development is 0.47. The site coverage for the proposed development is 18%. These figures are in line with requirements.

6.2.7 Communal Facilities

The following communal facilities will be provided for the benefit of residents and, where appropriate, the wider community:

- Outdoor Play spaces for children.

- A creche facility with a capacity of 50 no. children.
- Landscaped areas of communal open space with seating areas.

6.2.8 Childcare Provision

The proposal includes the provision of a free standing creche facility located in the western portion of the site adjacent to the boundary with Hazelhatch Park, an existing residential estate.

This is consistent with the requirement for childcare set out in the Childcare Facilities: Guidelines for Planning Authorities which states that one childcare facility should be required per 75 new dwellings.

It is accepted that occupants of 1-bedroom units will have no requirement for childcare facilities and that 50 percent of all other units will require childcare to be provided.

57 no. 1 bed apartments provided as part of the development can be assumed to have no requirement for childcare facilities.

50 percent of the 81 units larger than 1 bedroom provided as part of the development are considered to have a need for childcare provision.

This means that approximately 41 units will require childcare. The proposed creche facility has a capacity of 50 no. children and is therefore a suitable size to cater for the proposed development.

6.2.9 Car and Bicycle Parking

The proposal includes the provision of 135 parking spaces across the site. These will be divided between the apartment units and the new housing units as follows

- 87 no. for the apartment units
- 44 no. for the housing units

204 no. bicycle spaces are provided as part of the development (124 no. for residents and 80 no. for visitors). 124 no. covered spaces for residents will be provided in a number of blocks throughout the site for ease of access and convenience to all units.

6.2.10 Part V Provision

The proposal provides for 14no. Part V residential apartment units within the scheme (10% of the total 137no. units), which meets the social housing requirements of Kildare County Council. These units are identified in Proposed Part V Site Plan prepared by John Fleming Architects. We also refer to the Kildare County Council Validation letter and Costing's document enclosed as part of the submitted application.

6.2.11 Daylight/ Sunlight

A Daylight and Sunlight Report has been prepared by 3D Design Bureau submitted as part of this pre-application submission. The report concludes that:

"All windows that were assessed would experience an imperceptible level of effect to their VSC, APSH and WPSH.

It should be noted that in some instances the VSC or A/WPSH improves from the baseline state to the proposed state. The reason for this is the removal of various dense evergreen trees. Normally trees and shrubs do not need to be included in the studies carried out in this report, partly because their shapes are almost impossible to predict, and partly because the dappled shade of a tree is more pleasant than the deep shadow of a building (this applies especially to deciduous trees). Where a dense belt or group of evergreens is present on site, it is better to include their shadow in the calculation of shaded area. The arborist report was used to model the evergreen trees in the baseline state, and the retained trees in the proposed state."

We refer to the Daylight and Sunlight Report prepared by 3D Design Bureau enclosed as part of this application for a full analysis of results.

6.2.12 Flood Risk Assessment

A flood risk assessment for the overall development has been carried out by JBA Consulting Engineers and included as part of this pre application submission pack.

The site is identified as being partially within Flood Zone B in the Hazelhatch Further Study (HFS). In order to assess the impacts of the proposed site layout and implement mitigation measures the site and surrounding area has been re-modelled.

The updated model confirms the site is partially within Flood Zone B from an overland flow route along the local access road from the south. When the proposed site development is represented in the model this overland flow route is maintained but is contained to the main access road to the site and also the green space along the eastern boundary, rather than inundating the site. The impacts as a result of the proposed development are negligible in the wider floodplain. The flood risk to the properties to the north of the site is removed due to the proposed landscaping within the site boundary.

The Justification Test was applied and passed as the hydraulic modelling confirms the impact on surrounding water levels is not significant and the development can manage the risk to itself and surrounding lands.

The proposed minimum floor level for the site places the developments above the 0.1% AEP event plus an additional 690mm freeboard. This level also protects the development from the 1% AEP MRFS and HEFS climate change flood events. The residual risk of drainage system design exceedance or the impacts of future climate change on groundwater flood risk will also be lessened due to the freeboard of the developments.

We refer to the Flood Risk Assessment document prepared by JBA Consulting Engineers for a full detailed analysis of results.

6.2.13 Construction

It is intended that the proposed development will be completed in a single phase and that it is envisaged that construction may take between 18-24 months. Construction will proceed in a general sequence as follows:

- Enabling Works including site set-up, hoarding and signage, construction facilities and compound, set down area
- Service diversion works
- Site clearance and demolition works
- Secant piling and basement excavation
- Construction of crane bases
- Reinforced concrete basement and podium/transfer structure
- Super-structure consisting of reinforced concrete walls, precast and RC floor plates, load-bearing blockwork and structural steelwork
- Construction of drainage, water supply and utility service distribution network within the site
- Roads, landscaping and paving
- Building fit-out and commissioning.

This plan will include the permitted site operation hours which are expected to be 07:00-19:00 on weekdays and 09:00-13:00 on Saturdays with no works on Sundays or bank/public holidays in accordance with the Environmental Noise regulations 2006.

A construction Management Plan has been submitted as part of the application for this site.

6.2.14 Traffic and Transport

A Traffic Assessment Report has been prepared by NRB Consulting as part of the application pack submitted. The assessment addresses the following:

- Existing Conditions, Development Proposals and Parking Discussion
- Trip Generation Assignment and Distribution

- Traffic Impact
- Alternative Transport Provision.

The report concludes that the proposed development will have a negligible impact on the established local traffic conditions and can easily be accommodated on the road network without any capacity concerns arising.

The proposed access junction is adequate to accommodate the worst-case traffic associated with the proposed development up to 15 years after completion.

It is considered that there are no operational traffic safety, transportation or road capacity issues affecting the surrounding established road network.

We refer to the Traffic Assessment Report and Mobility Management Plan prepared by NRB Consulting for a detailed analysis of the scheme from a traffic and transportation perspective.

Direct and high-quality pedestrian linkages are provided between the site and the existing pedestrian & cycling facilities on the surrounding road network. Improved pedestrian and cyclist infrastructure is provided on both on the R405 and on the L5062. It should be noted that the cyclist and pedestrian infrastructure has been designed in a ‘best fit’ arrangement so as to maintain, and avoid damage to, existing valuable mature trees. Whilst a dedicated pedestrian & cyclist route is provided in the N-S orientation on the L5062, and in an E-W orientation on the R405, the site boundary has been set back so as to facilitate further improved facilities if desired by KCC.

All of the in-curtilage residential housing parking is adaptable to facilitate EV Charging as required by future occupants within their private demise. For the remainder of the parking spaces provided, they will all be ‘ducted’ to facilitate the retro-fitting of EV charging. For the apartments, whilst all spaces will be ducted to allow the retro-fitting to EV, 20% of the provided parking will be dedicated to EV from the outset, in accordance with best practice and National Guidance.

In the case of a residential development of the nature proposed, with specific spaces likely dedicated to specific apartments or houses, it is considered appropriate to facilitate the retrofitting of spaces, based on demand following occupation, rather than dedicated EV spaces being dedicated to apartments or houses and provided from the outset.

The entire car park of the subject scheme can and will therefore be ducted to accept future cabling to serve a charging point for every car space as demanded. Conduits or ducting will be run underground from the front of the spaces where charging points can be mounted, to the housing or apartment units. Where residents of individual units request a charging point to be installed, the relevant charging point will be pre-wired back to their home electricity meter in the designated meter location. The socket point at the space will have a lockable cover on it so that only that resident may use the power point. This provision around the entire parking area will allow charging points to be installed at any of the car parking spaces with minimum works as and when required.

6.2.15 Visual Impact

The visual impact of the housing development shall be negative at first, due to the reduction in open space and the removal of the existing trees. However, as the subject site provides more accommodation for future residents, the well-designed layout that retains and is sympathetic to the characteristics of the surrounding landscape, it shall have a moderate visual impact that is consistent with emerging trends of the Kildare Development Area to the south and existing developments to the North and North East.

The increase and coherent design of external spaces shall replace the open space of the house and garden. A direct connection to the open space to the south west, from the Hazelhatch Road, R405, Road, utilising the existing woodland, shall provide a positive visual amenity.

The retention of the existing trees/woodland along the east, along with the proposed planting shall tie the proposed dwellings with the natural landscape.

Although the character of the environment shall change, it is in line with emerging patterns of development in the locality, notably Celbridge and the future Simmonstown development area. The

proposal is, however, sympathetic to the surrounding landscape and shall present a moderate visual impact in the long term.

7 Relationship to Surrounding Development

This section of the report provides a summary of the relationship of the proposed development to existing surrounding development.

Description of Surrounding Development

The eastern site boundary runs parallel to Simmonstown Road for approximately 110 metres, and then a further 65 metres parallel to Hazelhatch Road. The exiting site entrance is located along the eastern boundary at Simmonstown Road, providing access to the existing residential dwelling located on the site which will be demolished as part of the proposal. This entrance is for low frequency residential access only and features a roadway to the existing dwelling wide enough to accommodate access and egress for a single vehicle at a time. The remaining length of this boundary is covered by existing trees and vegetation, with a low wooden fence separating the site boundary from Simmonstown Road. There is no existing pedestrian infrastructure in place along this boundary with Simmonstown Road.

The northern portion of the site bounds 'The Close' an existing residential development featuring 2 storey terraced and semi-detached dwellings. This site boundary runs for approximately 90 metres and is defined by heavy shrubbery and tree growth, as well as the boundary wall of 'The Close', a masonry wall of approximately 2 metres tall. The apartment buildings of the proposed development maintains a separation distance of at least 13.1 metres to the closest existing dwelling to the north of the development site.

The sites western border runs for approximately 150 metres and borders 'The Drive' an existing residential development featuring 2 storey terraced and semi-detached dwellings. The site boundary runs along the back garden wall of the existing dwellings at 'The Drive'. The proposed development has been designed to maintain a high level of privacy for these dwellings, and so the proposed creche facility has been located along this boundary. The proposed creche is a low rise building that will not overshadow or overlook the gardens of these existing dwellings. The apartment buildings of the proposed development maintain a separation distance of at least 29.5 metres to the closest existing dwelling to the west of the development site. The proposed dwellings in the southwest corner of the development site maintain an appropriate separation distance of at least 14.4 metres to the existing dwellings to the south west.

The sites southern border runs for approximately 130 metres. This portion of the site borders a large greenfield site included in the Simmonstown Key Development Area and earmarked for residential development. The southern border features tree growth and heavy vegetation, creating a natural border between the development site and the site to the south.

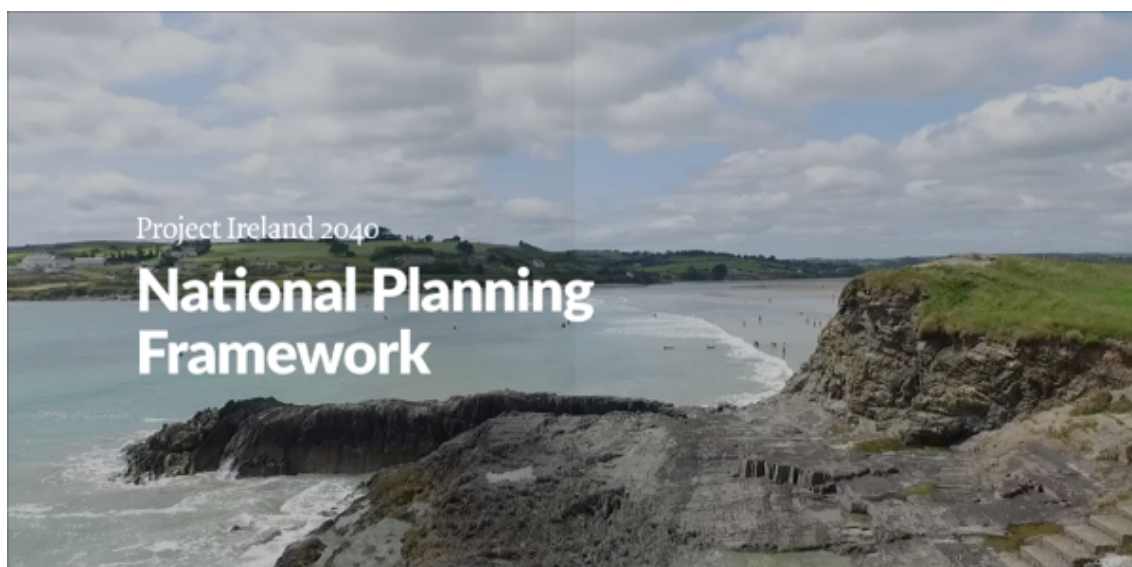
8 Statement of Consistency - Strategic Planning Context

8.1 Strategic Planning Policy Documents

It is our considered opinion that the key policy documents for consideration as part of this Statement of Consistency are identified as follows:

- National Planning Framework – Project Ireland 2040
- Rebuilding Ireland: Action Plan for Housing and Homelessness
- Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031
- Regional Planning Guidelines for the Greater Dublin Area 2010–2022
- Design Manual for Urban Roads and Streets 2019
- Smarter Travel – A New Transport Policy for Ireland 2009-2020
- Transport Strategy for the Greater Dublin Area 2016-2035
- Sustainable Residential Development in Urban Areas (2009)
 - a. Urban Design Manual - Best Practice Guidelines
- Delivering Homes, Sustaining Communities (2008)
 - a. Best Practice Guidelines - Quality Housing for Sustainable Communities
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)
- Sustainable Urban Housing - Design Standards for New Apartments (2018)
- Urban Development and Building Height Guidelines (2018)
- Housing for All – A New Housing Plan for Ireland (2021)

8.2 National Planning Framework – Project Ireland 2040



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. It caters for:

- The extra one million people that will be living in Ireland by 2040.
- The additional two thirds of a million people working in Ireland by 2040; and
- The half a million extra homes needed in Ireland by 2040.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.

- Better outcomes for communities and the environment, through more effective and coordinated planning, investment, and delivery.

As a strategic development framework, this Plan sets out the long-term context for the Country's physical development and associated progress in economic, social, and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional, and local levels.

The key high - level objectives of the Plan are:

- To continue a path of economic, environmental, and social progress that will improve our prosperity, sustainability and well - being.
- To ensure that Irelands many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodates and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

The NPF sets out that the Eastern and Midlands region 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.

It is worth highlighting that the projected level of population and jobs growth in the Eastern and Midland Regional Assembly area respectively represents 475,000 - 500,000 additional people and 330,000 additional jobs by 2040.

The national planning framework promotes the creation of mixed tenure communities by stating *"More affordable homes must be provided in our urban areas as part of the creation of mixed-tenure communities."*

The NPF recommends the following in relation to compact urban development *"At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development."*

It is also apparent from the NPF that low-density housing development, and underused sites, have been a feature of Ireland's housing landscape in cities, towns and the open countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in the urban areas.

The sites zoning allows for residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable form of development.

It is submitted that the current proposal for 137 new residential units and a creche will deliver on the above objectives of the NPF. We note specifically that the addition of 248 bed spaces, in total, is an appropriate level of development at this, highly accessible site.

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

National Policy Objective 1 -

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 3a -

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

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 31 -

Prioritise the alignment of targeted and planned population and employment growth with investment in the provision of childcare facilities and new and refurbished schools on well located sites within or close to existing built-up areas that meet the diverse needs of local populations.

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.

National Policy Objective 74 -

Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.

We submit that the proposal for a high-density residential development at this highly accessible location is consistent with the National Planning Framework for 2040.

8.3 Rebuilding Ireland: Action Plan for Housing and Homelessness



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 plan outlines that “Accelerating delivery of housing for the private, social and rented sectors is a key priority for the Government. Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets peoples different needs and is of lasting quality is one of the greatest challenges facing the country at present.”

The plan repeatedly states the need for housing to be in appropriate locations, “In addition to the scale of housing provision, the delivery of housing in the right place is also central to enabling a good standard of living and improving quality of life. Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.”

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 138 new residential units at a key location adjacent to services and amenities. The site has the benefit of accessibility to public transport services and is considered a significant opportunity site for the delivery of residential units.

We submit that the proposal is consistent with the Action Plan for Housing and Homelessness.

8.4 Housing For All – A New Housing Plan for Ireland

Housing for All

A new Housing Plan for Ireland



The Housing for All (HFA) plan has been introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure. It caters for:

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Over 300,000 new homes to be built by 2020, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State led building programme in our history and is financed by the biggest State funding commitment ever. The HFA also has the largest ever housing budget in the history of the State to transform our housing system, with an excess of €20 bn in funding through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years.

It is also apparent from the HFA plan that high-density housing is to be supported. Within the plan, a new fund the Croí Cónaithe (Cities) Fund has been introduced to further the implementation of planning permissions for apartments. Housing policy objective 15, no. 15.1 states that the HFA plan will “Introduce

the Croí Cónaithe (Cities) Fund to ensure that planning permissions for apartments in high density areas already secured by 2021 are activated by the end of 2025 for build to sell.”

In addition to this, the new fund will focus on “activating housing supply through enhanced viability measures targeted at developing properties for individual household purchasers, including first-time buyers and right-sizers.” The fund will “stimulate activation of existing planning permissions for **build-to-sell apartment developments** of four floors or more, above a certain density threshold, and this will be complemented by the sanction of a tax to activate vacant lands for residential purposes.”

Moreover, housing policy objective 11, no. 11.2 supports high-density housing: “Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.”

Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management: “Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.”

Furthermore, the HFA plan will drive economic sustainability and reduce constructions costs. Objective 23, 23.11 states that the HFA plan will “Reduce C&D waste and associated costs by working with the construction industry on demonstration projects to show how best practice (specifically in relation to urban high-rise apartment developments) waste segregation and other waste management measures, can reduce overall C&D disposal costs.”

The subject proposal provides 137 new residential units which will contribute towards the government’s target deliverance of 33,000 new residential units per year between 2021 and 2030.

We submit that the proposal is consistent with Housing for All – A New Housing plan for Ireland

8.5 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031



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

The RSES provides a:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.

- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being within the ‘MASP Boundary’ and is identified as part of the wider Dublin Metropolitan area (DMA) which covers the continuous built-up city area and includes the highly urbanised settlements of Swords, Malahide, Maynooth, Leixlip, Celbridge and Bray and Greystones, which have strong connections within the city.

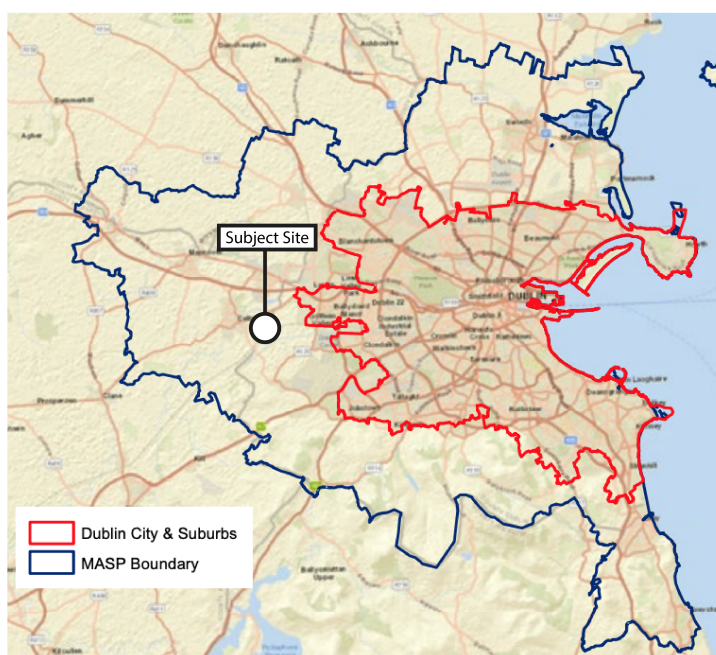


Figure 20 – MASP Area

The Dublin Metropolitan Area Strategy Plan (MASP) Chapter 5 of the RSES identifies several 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.”

RPO 9.4: “Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.”

The RSES supports continued population and economic growth in the Dublin Metropolitan Area, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport, active travel and the development of strategic amenities to provide for sustainable communities.

The proposed development offers a variety of unit types and sizes to cater for a wide demographic. The proposal provides a density of c. 64 units per hectare which is appropriate to aid towards the goal of higher density for new developments within the boundary of the Dublin Metropolitan Area.

We submit that the proposal is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

8.6 Smarter Travel - A New Transport Policy for Ireland 2009-2020



The Government has committed in ‘Smarter Travel - A Sustainable Transport Future: A New Transport Policy for Ireland 2009 - 2020’ to reducing the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase.

The key goals of the Guidelines are as follows:

- Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services.
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%.
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels.
- A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.

Achieving sustainable transport will require a suite of actions that will have complementary impacts in terms of travel demand and emissions. These are as follows:

- Actions to reduce the distance travelled by private car and encourage smarter travel.
- Actions aimed at ensuring that alternatives to the car are more widely available.
- Actions aimed at improving the fuel efficiency of motorised transport.
- Actions aimed at strengthening institutional arrangements to deliver the targets.

Smarter Travel acknowledges that good progress is being made in meeting the above targets and actions by providing better guidance on planning and development through the delivery of Planning Guidelines.

A Transportation Assessment Report prepared by NRB is submitted as part of this pre-application submission which outlines a Preliminary Travel Plan that will be implemented to ensure that, in-so-far-as-possible, the impacts of traffic are reduced and minimised where practical, while providing several environmental and economic advantages detailed in section 5 of the Transport Assessment.

We submit that the proposal for a high-density residential development at this highly accessible location is supportive of the objectives of Smarter Travel - A New Transport Policy for Ireland (2009-2020).

8.7 Transport Strategy for the Greater Dublin Area 2016-2035



The National Transport Authority has prepared this strategy. The Vision of this strategy is for the Greater Dublin Area to be a competitive, sustainable city-region with a good quality of life for all by 2030.

The Strategy includes five overarching objectives to achieve the vision, which are as follows:

- Build and strengthen communities
- Improve economic competitiveness
- Improve the built environment
- Respect and sustain the natural environment
- Reduce personal stress

The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.

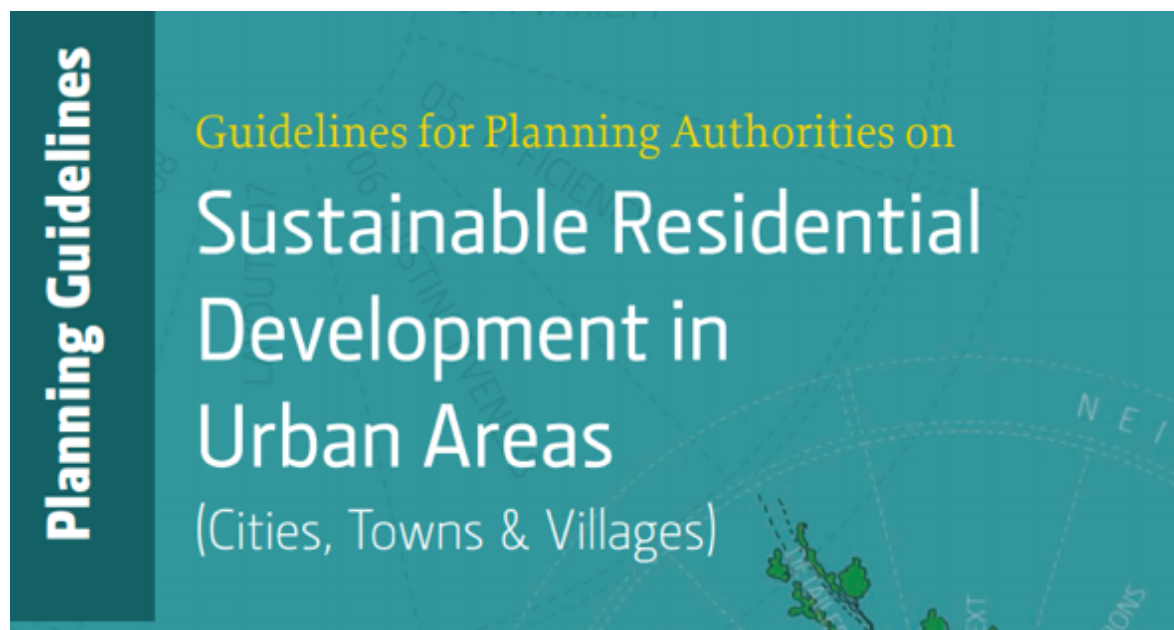
The Strategic Infrastructure proposals are presented by mode of transport and relate to heavy rail infrastructure, light rail infrastructure, bus infrastructure, cycling infrastructure, walking and road network. Whilst the key objectives of the Transport Strategy relate to the main town centre area, we wish to highlight that the current proposal for residential development moves away from car provision for each resident of the development. This can be achieved as a direct result of the proximity of high-quality public transport, pedestrian and cycle connections, employment centres and local services and facilities.

We submit that the proposal for a high-density residential development at this highly accessible location is supportive of the objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.

9 Section 28 Ministerial Guidelines

Each of the relevant strategic policy documents are now considered below and their relevance to the subject site and the developments compliance with same, is assessed in detail.

9.1 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.

The development site can be best described as Outer Suburban/ 'Greenfield' outlined in section 5.11 (f) of this document:

"These may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities".

The document goes on to state that:

'Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares'.

The density of the proposed development is c. 64 uph and is considered to be appropriate having regard to the National Planning Framework, Regional Planning Guidelines and Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities (2018) which promotes an increase in residential density.

The development provides a variety of unit types and sizes to cater for a wide range of demographics in the Kildare area currently, and to deal with the demand for varying unit typologies as the population increases.

The building height of maximum 5 no. storeys is considered appropriate on this site to deliver a sustainable residential density and maximise the development potential of the site. The proposal has been carefully designed to protect the residential amenity of existing dwellings to the north and west at 'The Close' and 'The Drive' housing estates to prevent any unduly overlooking or overshadowing.

The development is located on the southern periphery of Celbridge (population over 5000) which puts the development in the category of 'Larger Towns' as outlined in the guidelines. 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

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

- Appropriate building heights are proposed in accordance with performance criteria under the Building Height Guidelines.
- Overshadowing is not considered an issue in this case, and we note the submission of a Daylight and Sunlight Analysis herewith prepared by 3D Design Bureau to further elaborate on this matter.
- An adequate level of parking is delivered across the site with 135 no. spaces total being provided, providing an overall parking ratio of 1.01 across all units.
- Multiple safe communal open spaces are provided throughout the development site overlooked by dwellings and equipped with children's play spaces and landscaped areas for residents.
- A coherent and permeable network of open spaces is proposed.
- Pedestrian access and permeability are key across the site and specific attention has been given to accessibility and the connectivity of the site with surrounding street interfaces.
- Residential amenity facilities are delivered within the scheme.

Density

The proposed development aims to deliver an appropriate density and form of residential development to accommodate the growing population of Celbridge on this site located to the south of the town centre.

A density of c. 66 units per ha is proposed at this site. It is submitted that this is an appropriate approach to development at this location given the site location, prominence and proximity to facilities and public transport. As the site is considered a greenfield site, section 2.7 of the guidelines state that:

'where substantial areas of brownfield or greenfield sites are going to be (re)developed, it is strongly recommended that a local area plan (LAP) be prepared to facilitate the sustainable development of the area and to avoid it being developed in a piecemeal and incoherent fashion over a long period of time'.

The Celbridge Local Area Plan 2017-2023 is in place for the development area and sets forward an appropriate density for development in the Celbridge area. Section 6.2.2 of the LAP states that

'higher densities will generally be considered in town centre infill locations and proximate to public transport, with medium to lower densities being considered at outer suburban sites'

The subject proposal is close to public transport with a variety of bus routes to the north and Celbridge Rail Station to the South, all within 1km of the subject site offering excellent connectivity to Dublin city centre and west towards Galway.

The density proposed arose from the initial pre planning meeting with KCC planners where it was stated that an increase in density and a variety of unit types were required to maximise the development potential of the site and cater for the immediate needs of the Celbridge area.

The proposal provides an appropriate intensification of the residential use on the site, and provides a new unit type in the area via the provision of 1 and 2 bedroom apartment units while also providing 3 and 4 bedroom houses, which typically characterise the residential development in the surrounding area.

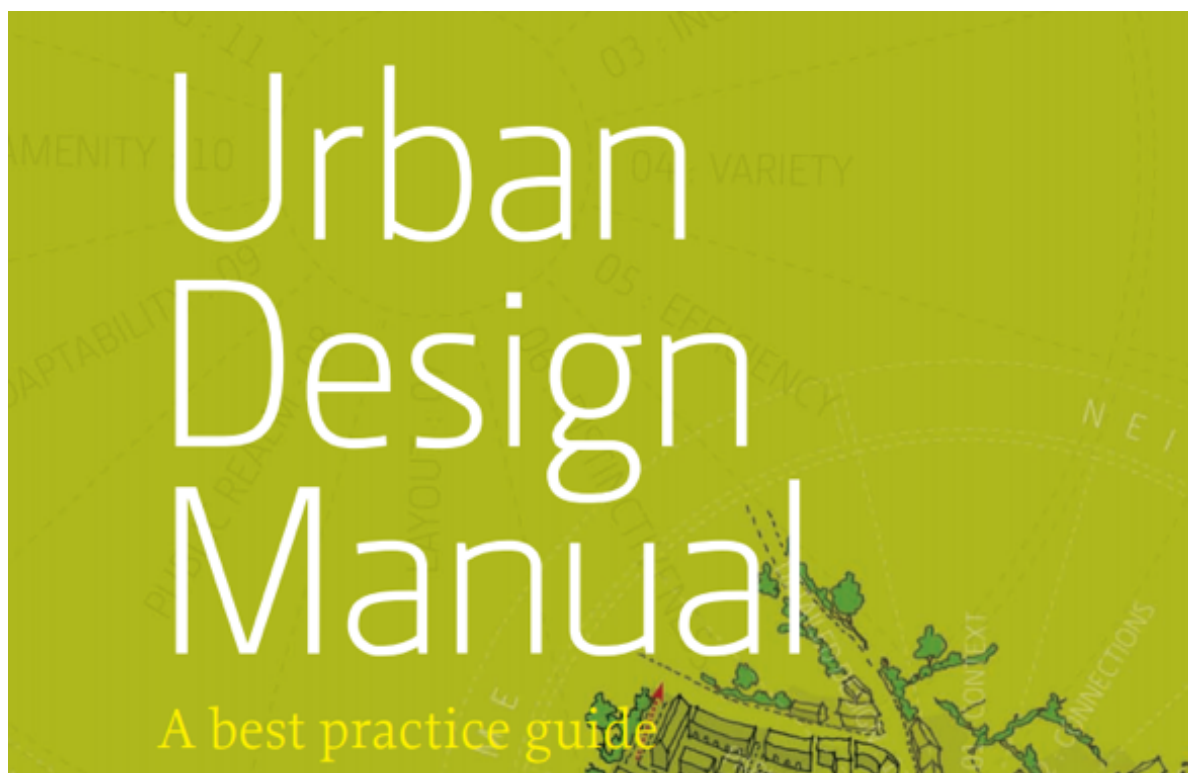
It is considered that the proposed development is located on suitably zoned land allowing residential development. The density requirement set out by local and national guidance and the feedback from Kildare County Council has been taken into consideration when designing the scheme.

The site layout maximises permeability through an appropriate block size, block height and connectivity. Careful consideration has been given to adjoining levels of amenity and compliance with Development Plan standards has been achieved.

Generous separation distances are achieved to existing residential dwellings to the north and east of the site at 'The Drive' and 'The Close'. The design team has carefully considered the existing dwellings when designing the subject proposal to ensure that these dwellings would not be undermined by the height, massing, or scale of the proposal.

The proposed apartment element of the development complies with the minimum standards required for internal floor areas and private, communal, and public open space requirements set out in the 2018 Apartment Guidelines and Kildare County Development Plan.

Urban Design Manual



Aside from the above, we draw attention to the compliance of the scheme with the ‘sister’ document for these guidelines, the ‘Urban Design Manual’. This pre planning submission is accompanied by a Design Statement, prepared by John Fleming 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 Design Statement should be read in conjunction with this Planning Report and with the plans and particulars accompanying this pre-planning submission.

For the purposes of this report, compliance with the key requirements of the Urban Design Manual are noted below:

CRITERIA	RESPONSE
CONTEXT How does the development respond to its surroundings?	<p>The proposal seeks to provide a development that is self-sufficient in terms of privacy, access to open space, and parking. Appropriate access points are provided to the development – both pedestrian and vehicular.</p> <p>The development has been designed to protect the amenity of surrounding residential estates. The design team has carefully considered the location of the new apartment blocks and dwellings on the site to not unduly overshadow or overbear surrounding existing dwellings, injuring their amenity.</p> <p>The buildings on site vary in height from a single storey creche facility to 2-3 storey houses to 4-5 storey apartment block units. The varying height across the site is considered appropriate to provide a variety of unit types and sizes at appropriate locations.</p> <p>The site maximises connections to Celbridge town via cycling and pedestrian paths and linkages to public transport connections.</p>
CONNECTIONS	<p>The proposal delivers on the following in terms of connections:</p> <ul style="list-style-type: none"> ○ Appropriate access points are provided to the development.

How well is the new neighbourhood/site connected?	<ul style="list-style-type: none"> ○ The site's proximity to Celbridge Town Centre and public transport links ensures a safe and easy access from the site to amenities and facilities in the area.
INCLUSIVITY How easily can people use and access the development?	<p>We note the following in terms of usability and access to and within the scheme:</p> <ul style="list-style-type: none"> ○ Pedestrian access and linkages to the site are in existence and with distances to nearby public transport and amenities are convenient and set out above. ○ Pedestrian access is further enhanced within the development with 'pedestrian priority' given in the northern portion of the site, where no internal roads are proposed. ○ The proposed development will provide a range of accommodation types. ○ The units are designed to allow for full Part M accessibility.
VARIETY How does the development promote a good mix of activities?	<ul style="list-style-type: none"> ○ Variety in the development is provided through a range of design proposals in both the built environment and in the landscaping layout. ○ In the built environment, there are a different unit typology which allows for accommodation for a variety of users. ○ The landscaped elements are divided between several areas throughout the site which gives residents a variety of area avail of. ○ Passive security is designed to provide total surveillance. ○ Communal facilities are provided within the scheme which can allow for a range of activities to be provided to future residents.
EFFICIENCY How does the development make appropriate use of resources including land?	<p>The scheme proposes a high-density development on a currently underutilised site in in a highly accessible location adjacent to Hazelhatch Road to the South of Celbridge Town Centre.</p> <p>The scheme implements a massing strategy to maximise resources whilst responding to the surrounding site context. The changing heights across the development site from 2-5 storey have been carefully considered to mitigate any impact on developments surrounding the site.</p>
DISTINCTIVENESS How do the proposals create a sense of place?	<p>The scheme promotes the principles of DMURS - Design Manual for Urban Roads and Streets. This balance of road planning, public space and site layout will provide an inviting and enticing setting for a new community.</p> <p>The proposal features landscaping unique to the subject site which will create an immersive open space area for residents synonymous with the proposed development. The proposal features appropriate boundary treatments to provide a level of privacy for residents of the proposed development.</p>
LAYOUT How does the proposal create people-friendly streets and spaces?	<p>As can be seen from the layout, pedestrian priority is maintained within the scheme and adjoining it with new connections also proposed.</p> <p>There are many opportunities for people to gather and meet in a variety of communal amenity areas.</p>
PUBLIC REALM How safe, secure and enjoyable are the public areas?	<p>The public spaces within the scheme are easily accessible from all units. The layout of communal open space areas has been arranged to ensure that these spaces are safe secure and well maintained.</p>
ADAPTABILITY How will the buildings cope with change?	<p>The development offers a range of unit types and sizes. As a family grows, they could move within the development to another unit that better suited their needs without having to relocate a long distance away.</p>
PRIVACY AND AMENITY How do the buildings provide a high quality amenity?	<ul style="list-style-type: none"> ○ Appropriate set back distances are maintained. ○ Landscaped buffer zones are provided to all apartment units at ground floor level. ○ Private open space is in line with all required development standards.
PARKING How will parking be secure and attractive?	<p>Parking areas are private for the houses provided as part of the development and all parking areas within the development site benefit from passive surveillance from several units.</p>

DETAILED DESIGN How well thought through is the building and landscape design?	RMDA worked closely with John Fleming Architects to devise a scheme that complements and respects the original design concept. The landscaping proposal enhances the development and ensures that the individual amenity of the units and wider residential amenity of the scheme is of high quality.
--	---

Table 5 - Compliance with Urban Design Manual

The above table clearly outlines how the development proposal is envisaged to deliver on the key provisions of the Urban Design Manual. We submit that the current proposal is supportive of the objectives of the Sustainable Residential Development in Urban Areas (2009) / Urban Design Manual.

9.2 Delivering Homes Sustaining Communities (2007)



The Department's 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 these are the focal point in terms of the consistency of the current proposal.

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 view that the proposal for the site has delivered on the key principles of this document by delivering the following:

- The proposed development will provide a quality living environment in 1- and 2-bedroom apartments and 3- and 4-bedroom houses designed to meet or exceeds standards and ample amenities and open space provided.
- Pedestrian Access is prioritized within the scheme. The proposed layout facilitates connection to the adjoining sites, which will be subject of future redevelopment as per the Simmonstown KDA.
- All open spaces are safe and benefit from passive surveillance.

- The chosen materials have been selected for their aesthetic and durable qualities over the life cycle of the scheme.

A Housing Quality Assessment has been prepared by John Fleming Architects and submitted with this planning application. We direct to this assessment for full details on the extent of proposals. We submit that the current proposal is supportive of the objectives of the Delivering Homes Sustaining Communities (2007) and the associated Best Practice Guide ‘Quality Housing for Sustainable Communities’.

9.3 Guidelines for Planning Authorities on Childcare Facilities (2001)

Childcare Facilities

Guidelines for Planning Authorities

The Childcare Guidelines provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines state: *“Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities.”*

The Guidelines identify several appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments
- The vicinity and concentrations of workplaces, 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

Notwithstanding the locations identified above, the Guidelines state that proposals should have regard to the following:

- Child Care (Pre-School Services) Regulations, 1996.
- Suitability of the site for the type and size of facility proposed.
- Availability of outdoor play area and details of management of same.
- Convenient to public transport nodes.
- Safe access and convenient parking for customers and staff.
- Local traffic conditions.
- Number of such facilities in the area; and
- Intended hours of operation.

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.

A childcare facility with a capacity of 50 no. children will be provided as part of the subject proposal.

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

9.4 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.

We refer to the enclosed Flood Risk Assessment prepared JBA Consulting for full details on the assessment carried out in line with the above guidelines. The key conclusions of this document are as follows:

The site is identified as being partially within Flood Zone B in the Hazelhatch Further Study (HFS). In order to assess the impacts of the proposed site layout and implement mitigation measures the site and surrounding area has been re-modelled.

The updated model confirms the site is partially within Flood Zone B from an overland flow route along the local access road from the south. When the proposed site development is represented in the model this overland flow route is maintained but is contained to the main access road to the site and also the green space along the eastern boundary, rather than inundating the site. The impacts as a result of the proposed development are negligible in the wider floodplain. The flood risk to the properties to the north of the site is removed due to the proposed landscaping within the site boundary.

The Justification Test was applied and passed as the hydraulic modelling confirms the impact on surrounding water levels is not significant and the development can manage the risk to itself and surrounding lands.

The proposed minimum floor level for the site places the developments above the 0.1% AEP event plus an additional 690mm freeboard. This level also protects the development from the 1% AEP MRFS and HEFS climate change flood events. The residual risk of drainage system design exceedance or the impacts of future climate change on groundwater flood risk will also be lessened due to the freeboard of the developments.

9.5 Guidance on Appropriate Assessment for Planning Authorities (2009)

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 200 site (i.e., SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 - 2010).

We can confirm that on review of the NPWS website, the application site is not located proximate or adjacent to a Natura 2000 site. We note however that the proposal is accompanied by an Appropriate Assessment Screening Report prepared by Malachy Walsh and partners which concludes that:

‘beyond reasonable scientific doubt, based on objective information, and considering the conservation objectives of the relevant European sites, that significant impacts from the project, individually or in combination with other plans and projects, on the following Natura 2000 sites can be excluded: Rye Water Valley/Carton SAC (001398), Glenasmole Valley SAC (001209), Red Bog Kildare SAC (000397), Poulaphouca Reservoir SPA (004063).

It can be excluded, based on 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 Malachy Walsh and Partners (MWP) 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 Board that the current proposal complies with the key objectives of the Birds and Habitats Directives. We trust the above conclusion is satisfactory.

9.6 Sustainable Urban Housing: Design Standards for New Apartments 2020 (as amended)

Sustainable Urban Housing: Design Standards for New Apartments

Guidelines for Planning Authorities issued under
Section 28 of the Planning and Development Act,
2000 (as amended)

December 2020



‘Sustainable Urban Housing: Design Standards for New Apartments 2020’ are 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. The 2020 Apartment Guidelines replace the 2018 version and are updated to reflect the conclusions from the review of co-living and shared accommodation.

The Design Standards for new Apartment’s detail 3 no. locations where apartment developments are generally suitable. The development is classed as being in an ‘Intermediate Urban Location’ within the guidelines which are defined as the following in section 4.21:

suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.

The relevant guidance relating to the location of apartments in intermediate urban areas as outlined in the Design Standards for new Apartments document are outlined below:

- *Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;*
- *Sites within walking distance (i.e. between 10-15 minutes or 1,000- 1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.”*

We submit that the apartment element of this development is appropriate at this location given its location in proximity to Celbridge Town Centre to the North, Celbridge Rail Station to the south and the proximity to high and reasonably frequent urban bus services.

The current proposal provides for 138 no. residential units and this statement of consistency sets out the compliance of the proposal with the key policy requirements and standards as they relate to the 115 no. 1 and 2-bed apartment units within the scheme as follows:

Specific Planning Policy Requirement 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

Applicant Response to SPPR1

The proposed development mix is as follows:

- 57 no. 1 bed units (41.3%)
- 58 no. 2 bed units (42%)

We submit the proposal is in compliance with the above SPPR given that the development will not exceed the 50% maximum for one bed units.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas:

- *Studio apartment (1 person) 37 sq.m*
- *1-bedroom apartment (2 persons) 45 sq.m*
- *2-bedroom apartment (4 persons) 73 sq.m*
- *3-bedroom apartment (5 persons) 90 sq.m*

Applicant Response to SPPR3

The subject proposal complies with the minimum apartment floor areas as follows:

- 1 bed units 49.6 to 57sqm
- 2 bed units 67.6 to 83 sqm

We also note most of the apartments exceed the minimum floor area standard by a minimum of 10%. Please refer to the Housing Quality Assessment prepared by John Fleming Architects for more information on unit floor areas.

Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

Applicant Response to SPPR4

The site can be classified as a Central / Accessible location given proximity to public transport and location in context of Celbridge Town Centre and therefore a standard of 33% applies.

A total of 78 no. of the 115 units proposed will have the benefit of dual aspect equating to 56.5% of the units. The dual aspect units are corner units with windows facing in two distinct directions to allow for access to light and cross ventilation. Any north only facing apartments are kept to a minimum with all units having more than one outdoor facing window direction. An additional 12 units also have a single aspect with a projecting bay window that allows light and ventilation from more than one direction. This is seen as an innovative means to improve access to sunlight, daylight and natural ventilation and we ask the Planning Authority to consider this as a viable mechanism to enhance residential amenity within the scheme.

The arrangement of the massing into 3 distinct blocks provides a large number of units which are positioned on a building corner, which allows for natural dual orientation.

Given this, we submit the proposal compiles with the dual aspect ratio requirements of the Apartment Guidelines.

Specific Planning Policy Requirement 5

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

Applicant Response to SPPR5

The proposed floor to ceiling height of all floors of the buildings will be at least 3.0m. We note the Guidelines state the following:

*“Building Regulations Technical Document F deals with Ventilation. It provides guidance on ceiling height in habitable rooms. The suggested minimum floor to ceiling height, consistent with good room design, the use of standard materials and good building practice is **generally 2.4m.**”*

Given this, we submit the proposal complies with the floor to ceiling height requirements of the Apartment Guidelines.

Specific Planning Policy Requirement 6

A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.

Applicant Response to SPPR6

The number of apartment units per core will vary per block. We can confirm that the number of apartments per floor per core will not exceed 12 no. with the highest number being 11 no. units. We refer the Planning Authority to the enclosed floor plans for detail on this.

Internal Storage

The Board will note that compliance with Guidelines is achieved in respect of storage to individual units in all units. All storage spaces are separated so no one space exceeds 3.5sqm. This highlights the overall design quality put forward.

No. of bedrooms	Minimum storage requirements	Proposed
1 bedroom	3 sqm	3 to 4.6 sqm
2 bedrooms	5 sqm (3 person)	5 to 7.2 sqm
	6 sqm (4 person)	6.1 to 8.7 sqm

3 bedrooms	9 sqm	N/A
------------	-------	-----

Please refer to the Housing Quality Assessment prepared by John Fleming Architects for further details on storage compliance.

Private Amenity Space

We submit that compliance with the minimum required areas for private amenity space is achieved in all units. We submit this is consistent with the design standards and is acceptable in this instance given the overall design quality put forward.

No. of bedrooms	Minimum floor areas for private amenity space	Proposed
1 bedroom	5 sqm	6 – 8 sqm
2 bedrooms	6 sqm (3 person) 7 sqm (4 person)	6 to 8 sqm 7.0 to 100 sqm
3 bedrooms	9 sqm	N/A

All balconies will meet or exceed the minimum depth requirement of 1.5 m.

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.**”

The proposed development of 138 units provides for the following unit mix:

- 57 no. 1 bed units
- 58 no. 2 bed units
- 17 no. 3 bed units
- 6 no. 4 bed units

Guidance on the provision of a childcare facility suggests that 1 facility (20 spaces) is required for every 75 units. It is evident from a review of planning policy that one bedroomed units are not considered to contribute to childcare demand under the Apartment Guidelines (2018). **Therefore, a total of 58 no. 2 bed units (with typically one child), 17 no. 3-bed units and 6 no. 4-bed units have the potential to require childcare.**

The Childcare Guidelines (2001) have identified that only 50% of units will require childcare. The following requirements are therefore identified:

- 50% of 83 no. units = $83/2 = 42$ units

While the demand arising from the proposed development is below the minimum requirement of 73 units, it is considered prudent to include a childcare facility as part of the proposed development.

Under the 2001 Childcare Guidelines, minimum floor space requirements per child are 2.32 sqm for 2-6 years and 2.00 sqm for afterschool care. This is exclusive of kitchen, bathroom and hall, furniture or permanent fixtures.

The proposal will provide for a childcare facility (GFA approx. 242 sqm) in a standalone building, accessible to all within the development and external users if necessary. Appropriate drop off and car parking will be provided to cater to this facility.

We therefore submit the proposed development is acceptable in addressing the anticipated demand that might arise from the proposed development.

Refuse Storage

The Apartment Guidelines requires that the storage and collection of waste materials be provided in apartment schemes. The Guidelines also state that *“Refuse facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage and in-sink macerators are discouraged as they place a burden on drainage systems.”*

The waste storage areas shown in the architectural drawings have been strategically located within each block and are sufficiently sized. There will be sufficient space to allow for the segregation of waste into appropriately sized receptacles within minimal collection frequencies. As part of any forthcoming application, the applicant will prepare a full Operational Waste Management Plan, which will provide further detail on how waste will be managed during the operation of the site.

Communal Amenity Space

We submit that the proposal fully complies with the minimum required areas for communal amenity space with 3 and 4 bed housing units also included in the calculation below.

No. of bedrooms	Minimum floor areas for private amenity space	Required
1 bedroom	5 sqm	290 sqm
2 bedrooms	7 sqm	399 sqm
3 bedrooms+	9 sqm	207 sqm
	Total required	896 sqm

We submit that approx. 4,380 sqm of communal amenity space will be provided within the development which is above standard requirements. This accounts for 20% of the site. The space can be broken down as soft landscaping, hard landscaping, seating areas, play areas and pedestrian paths.

Bicycle Parking and Storage

The Apartment Guidelines require that *“planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.”*

We submit that the proposal is an acceptable compromise on cycle parking standards in the County Development Plan and the apartment design guidelines for cycle parking as identified in the below table.

Minimum Requirement	Required	Proposed
1 cycle space per bedroom	248 cycle spaces	124 cycle spaces

1 visitor cycle space per 2 residential units	69 visitor cycle spaces	80 cycle spaces
Total	317 cycle spaces	204 cycle spaces

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

Our review of these 3 categories identified that the site can be categorised as a Central and/or Accessible Urban Location. This categorisation is made on the basis that the site is “within easy walking distance (i.e. up to 5 minutes or 400-500m) to / from high frequency (i.e. min 10 minute peak hour frequency) urban bus services. (page 5)” and “within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas)”;

Regarding car parking, the Apartment Guidelines set out the following requirements for Central and / or Accessible Urban Locations:

“Central and/or Accessible Urban Locations:

*In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, **the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.** The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity.*

*These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. **This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services.***

We can confirm that the subject site is located within approx. 15-minute walk of Celbridge Town Centre, and within 1km from the Celbridge and Hazelhatch Railway station. The very intention of the guidelines is to minimise, substantially reduce or wholly eliminate car parking for Central and/or Accessible Urban Locations. It is submitted that the subject site is a prime location for this principle to be applied.

A total of 135 no. car parking spaces are proposed to cater to the residential element of the proposed development (ratio of 1.01 spaces per unit). Given the accessible nature of the site and proximity to key public transport, the ratio of 1.01 is considered appropriate for the site. The enclosed Traffic and Transport Assessment, prepared by NRB Consulting, set out further justification for this provision.

We submit to the Board that the proposal is consistent with the overall principles of the Sustainable Urban Housing: Design Standards for New Apartments (2020)

9.7 Design Manual for Urban Roads and Streets 2019



The Design Manual for Urban Roads and Streets (DMURS), 2019, 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 this project. The four key design principles have been incorporated as follows:

- **Connected networks:** To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and more sustainable forms of transport.

The development proposes a new site entrance for vehicular access and egress in the south-eastern corner of the development site. This entrance will provide access to the entirety of the development site via a network of internal roads. The singular site access and egress point for vehicles prevents the residential development being used as a throughway by other road users and limits car traffic through the site to those who live there and visitors. This encourages lower speeds and lower traffic flow through the site, creating a safer environment for pedestrians.

- **Multi-functions streets:** The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.

There is limited scope for encouraging multi-functional streets within the development site given the singular nature of the proposal as a residential development. However, the proposal promotes multi-functional use for pedestrians and cyclists through 2 no. pedestrian access points located along Hazelhatch Road and internal pedestrian and cycle routes joining up to the internal vehicular roadway.

- **Pedestrian focus:** The quality of the street is measured by the quality of the pedestrian environment.

Pedestrians are considered throughout the development with improved connectivity throughout the site and along the site perimeter. Additionally, internal roads have been omitted from much of the northern portion of the development encouraging increased pedestrian activity and ensuring pedestrians have priority over vehicles.

The restriction of vehicular access around the sites northern perimeter allows a large area of pedestrian focused space to be provided which is safe and removed from traffic traversing the site.

- Multidisciplinary approach: Greater communication and co-operation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.

The multi-disciplinary approach is reflected in the chosen design which arose from bi-weekly meetings with the design team. This has ensured a holistic and considered approach to designing the development has been maintained.

We submit that the proposal for a high density, mixed tenure development at this highly accessible location is supportive of the objectives of Design Manual for Urban Roads and Streets (2013).

9.8 Urban Development and Building Height Guidelines (2018)



The publication of the ‘**Urban Development and Building Heights, Guidelines for Planning Authorities (2018)**’ is intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. We note that section 1.14 of the document sets out the following:

*“Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.*”

The Urban Development and Building Height Guidelines are the predominant context for assessment of height in this case.

From the outset, it is noted that the Building Height Guidelines (2018) expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

“In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.”

The development is considered to be located in a ‘suburban/edge location (City and Town)’. Section 3.4 of the guideline’s states that:

‘Newer housing developments outside city and town centres and inner suburbs, i.e. the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards). Such developments deliver medium densities, in the range of 35-50 dwellings per hectare net. Such developments also address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more bedroom homes across a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer periods of time without necessitating relocation. These forms of developments set out above also benefit from using traditional construction methods, which can enhance viability as compared to larger apartment-only type projects’.

Section 3.6 of the guidelines regarding building heights in suburban/ edge locations states that:

‘Development should include an effective mix of 2,3 and 4 – storey development which integrates well into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets’.

The development provides 2-3 storey townhouses and 3 no. 4-5 storey apartment blocks providing a density of approximately 66 units per hectare on a site located to the south of Celbridge. It is considered that the 5 storey apartment blocks are appropriate in this case to achieve a higher density level on the site while also providing a range of 1 and 2 bed apartment units and 3 and 4 bed houses.

SPPR 4 of the Urban Development and Building height guidelines relates directly to the subject development and states that:

‘It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more’.*

The proposed development provides 2-3 storey townhouses and 3 no. 4-5 storey apartment blocks providing a density of approximately 66 units per hectare on a site located to the south of Celbridge. It is considered that the 5 storey apartment blocks are appropriate in this case to achieve a higher density level on the site while also aiding towards the provision of a wide range of unit types and sizes, with 1 and 2 bed apartment units and 3 and 4 bed houses being provided as part of the proposal.

Specific Planning Policy Requirements

The following Specific Planning Policy Requirements are considered particularly relevant to the current site context and the compliance of the scheme with these SPPRs is set out below.

SPPR 3 (A)

“It is a specific planning policy requirement that where;

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”

Applicant Response to SPPR 3A

The performance of the proposal vis a vis the building height criteria is further assessed below in sub-section ‘Development Management Criteria’.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority, that the proposed development satisfies a number of criteria. The relevant criteria, followed by an applicant response is set out below to clearly set out for the Planning Authority that the current proposal qualifies as a site that can accommodate additional building height:

At the scale of the relevant city / town	
Assessment Criteria	Response
<i>“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i>	The site is well served by excellent public transport and cycle connections to and from the surrounding area. There are a number of bus routes serving Celbridge town to the north of the site offering connections to Dublin City Centre and Hazelhatch and Celbridge Rail Station is located to the South of the site, offering frequent rail services heading east towards Dublin City Centre and West towards Galway.
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	The proposal is not located within an architectural sensitive area. However, careful consideration has been given to the successful integration of the scheme into the existing character and topography of the site and area. The Architectural Design Statement and Landscape Design Statement prepared by JFA and RMDA respectively confirms the proposal, while substantial, would result in a positive contribution to the character and urban fabric of this area in terms of landscape character and quality due to both the low sensitivity, quality and nature of the existing site and the proposed revitalisation and new architectural character.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.”	The proposed development would not reduce the visual amenity of the surrounding area. Careful consideration has been given to existing properties located to the North and West of the development site and appropriate set back distances have been maintained so as to not reduce the residential amenity experienced by surrounding dwellings.

	A variety of unit types and heights will be provided across the development site offering a variety in scale and form while also meeting density objectives set out by Kildare County Council at preplanning.
At the scale of district/ neighbourhood/ street	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposal responds to the natural and built environment for the reasons set out under the response to ‘at the scale of the relevant city/town’ above. Careful consideration has been given to the proposal regarding how it addresses the surrounding area with particular attention given to the streetscape, the neighbouring properties and surrounding development. The high-quality design submitted provides an appropriate transition between the neighbouring sites, whilst delivering on appropriate densities on an underutilised site.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	Careful consideration has been given to ensure that a monolithic appearance is avoided. Different materials, fenestration and massing of the buildings will break up the building and create interest. The stepping down in height from the apartment buildings at 4-5 storeys to the dwellings at 2-3 storeys allows for a variety across the site and creates a unique townscape, avoiding the feel of a monolithic suburban estate. We refer the Board to the Architectural Design Statement prepared by John Fleming Architects enclosed herewith for further details.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).	There is no inland waterway or marine frontage within the current proposal. We can confirm that initial investigations have concluded that there will be no inappropriate flood risk because of the proposal. A full site-specific flood risk assessment has been prepared by JBA Consulting Engineers addressing this.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The high-quality design proposed will ensure that the development will be legible and attractive when viewed from the wider area. Internally, the site provides pedestrian and cyclist linkages which integrates the development.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”	The appropriate mix of unit types and sizes will be incorporated into the proposed development in order to contribute to a currently limited market for this type of housing. The mix of 1- and 2-bedroom apartments and 3 and 4 bedroom

	houses provides variety and options within a single development for future residents.
At the scale of the site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	<p>A detailed design rationale for the form, massing and height of the proposed development is set out in the enclosed Architectural Design Statement by John Fleming Architects. In addition, the Daylight/sunlight analysis demonstrates that the proposed development will have an imperceptible impact on surrounding existing dwellings.</p> <p>The design of the subject scheme, particularly the orientation of the blocks was carefully considered to minimise the potential for overlooking and overshadowing of each other.</p>
<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings - Part 2: Code of Practice for Daylighting'.</p> <p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution</p>	<p>The Daylight and Sunlight Assessment prepared by 3D Design Bureau, enclosed herewith, confirm that there are acceptable levels of access to natural daylight and overshadowing is minimised. In these assessments appropriate regard is given to the relevant daylight provision guides, and we therefore consider the proposal to be acceptable in this regard.</p> <p>There is therefore no requirement for compensatory design solutions beyond what is proposed in the scheme in terms of a breakdown in massing, appropriate balcony depths and substantial areas of glazing to allow adequate light to penetrate each unit.</p>
Site Specific Assessment	
Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	A full analysis of the microclimate can be prepared and submitted as part of any forthcoming application if appropriate.
In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	The appointed ecologists, Malachy Walsh and Partners, have prepared the appropriate assessments and documentation as part of this pre-planning submission to Kildare County Council. An AA screening report and separately an Ecological Impact statement are submitted with

	this application. The possibility that the subject development may have a significant impact on Natura 2000 sites may be excluded in this instance. Relevant design criteria such as appropriate glazing is incorporated where necessary to avoid impacts on bird flight paths.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links	As the subject buildings are not considered to be of significant height this assessment is not required in this instance
An assessment that the proposal maintains safe air navigation.	Given the development is removed from any airports or air strips this report is not required.
An urban design statement including, as appropriate, impact on the historic built environment	<p>An Architectural Design Statement has been prepared by John Fleming Architects and is enclosed. There are no Protected Structures onsite, and the site is not located within an Architectural Conservation Area.</p> <p>We also refer the Board to the Townscape and Visual Impact Assessment prepared by Park Hood confirming that there is little potential for the proposal to have a negative impact on protected structures in the surrounding area.</p>
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	The relevant environmental assessments have been considered. We note as per the EIAR Screening Statement enclosed here with an EIAR is not required. Full environmental assessments, such as an AA Screening Report and Ecological Impact Assessment have been prepared by qualified ecologists, Malachy Walsh and Partners, and are attached to this pre-planning application.

It is in consideration of the above that the current proposal for 2 to 5 storeys in height can be positively considered by the competent authority. Specifically, the proposal has addressed the specific development criteria requirements of the Guidelines and is in compliance with the key SPPRs. Most notably the site's location is considered to address the very spirit and intent of the Guidelines that being one proximate to public transport with high frequency services. The current site is therefore appropriate for increased building height and residential densities.

We submit to the Board that the proposal is consistent with the Urban Development and Building Height Guidelines for planning authorities (2018)

10 Statutory Planning Context

The Kildare County Development Plan 2017-2023 and the Celbridge Local Area Plan 2017-2023 provide the relevant statutory planning context for the subject site. Both plans will remain valid for 1 more year, subject to any review, variations, extensions, or alterations made during the lifetime of the permission.

The consistency of the proposed development with the key policies, objectives and standards of the County Development Plan is set out below.

10.1 Kildare County Development Plan 2017-2023



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 Council 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.'

The Development Plan chapter 2 outlines the core strategy for Kildare County until 2023. The following core strategy objectives listed in section 2.16 are relevant to the proposed development in this instance:

Objective CS 1 - *Provide new housing provision in accordance with the County Settlement Hierarchy.*

Objective CS 2 - *Direct appropriate levels of growth into the designated growth centres and moderate sustainable growth towns*

Objective CS4 - *Deliver sustainable compact urban areas through a plan-led approach.*

Objective CS 10- *Ensure that developments are accessible to and meet the needs of all individuals and local community groups.*

Objective CS 11 - *Seek the delivery of physical and community infrastructure including strategic open space and recreational areas in conjunction with high quality residential developments to create quality living environments.*

We submit that the design of the proposed development will provide:

- a range of quality homes and associated facilities (including a creche) as well as communal open space areas which will create a sustainable neighbourhood at this location,
- a mixture of tenures, detailed on the area schedule prepared by JFA.
- 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 Celbridge Rail Station) and future linkages to land to the south of the development site which is included in the Simmonstown Key Development Area Plan and will be developed in the future as a new neighbourhood.

10.1.1 Housing Policies and Objectives

Objective HSO 1 - *Secure the implementation of the Housing Strategy 2017-2023*

Objective HSO 2 - *Apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use, or for a mixture of residential and other uses.*

Objective HSO 3- *Increase the stock of social housing within the county in order to meet the long term housing needs of those households on the local authority housing list.*

Objective HSO 4 - *Promote social integration and facilitate a diverse range of dwelling tenures within housing developments, including social housing within all Municipal District Areas of the county.*

Objective 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.*

Objective HSO 6 - *Meet the county's housing need for social housing provision through a range of mechanisms, including Part V of the Planning and Development Act 2000 (as amended), a social housing building programme, acquisition, leasing, the Housing Assistance Payment (HAP) scheme, the Rental Accommodation Scheme (RAS) and the utilisation of existing housing stock.*

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

In accordance with the Housing Objectives set out above, the applicant can confirm that there are a total of 4 different housing types proposed within this scheme of 138 residential units.

An appropriate mix of 1, 2, 3 and 4 bed accommodation is provided in the form of houses and apartments. These residences will cater 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.

10.1.2 Sustainable Communities Policies and Objectives

Objective HCO 2 - *Encourage appropriate densities for new housing development in different locations through the local area plan process while recognising the need to protect existing residential communities and the established character of the area.*

Objective 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.*

Objective HCO 4 - *Require the submission of a design statement with planning applications that incorporate 10 or more residential units.*

The proposed scheme 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.

10.1.3 Residential Urban Design Policies and Objectives

Policy HD 1 - *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*

Objective HDO 1 - *with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development Ensure that residential development contributes to the creation of sustainable communities in accordance in Urban Areas, DEHLG (2009) and the companion Urban Design Manual- A Best Practice Guide, DEHLG (2009).*

Objective 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).*

Objective 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.*

The compliance of the proposal with government guidance is clearly set out in 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, Celbridge 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 Celbridge and environs. The proposal delivers a sustainable approach to development with appropriate densities and a layout that has been informed by government guidance documents.

10.1.4 Location and Density Policies and Objectives

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

Objective LDO 1 - *Ensure that the density of residential development maximises the value of existing and planned physical and social infrastructure and makes efficient use of zoned lands in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).*

Objective LDO 3 - *Require higher residential densities at appropriate locations as set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).*

The development plan defines the following 'Outer Suburban/Greenfield sites suitable for new residential development, which characterise the development site, which is located south of Celbridge:

'Outer Suburban / 'Greenfield' Sites Outer Suburban or 'Greenfield' sites are the open lands on the edge of large towns. The development of these sites may require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. It is therefore necessary to achieve net residential densities that make efficient use of these lands in the context of their location and provide a variety of housing types in order to justify the development of these sites. In certain cases, to facilitate a choice of housing types within the county, limited provision may be made within large towns for lower density schemes provided that, within a neighbourhood or district as a whole, appropriate densities are achieved'

The development plan outlines a general density parameter of 30-50 units per hectare for outer suburban sites. The subject site offers a density of approximately 64 units per hectare which is considered suitable in this instance to maximise the development potential of the site, which is in a valuable location proximate to Celbridge Town centre and public transport, on lands zoned for residential development adjacent to the Simmonstown KDA area to the south, which is earmarked for major redevelopment to provide a new residential neighbourhood.

The proposed development site is located to the south of Celbridge and can be classified as an outer suburban site.

Table 4.2 of the Kildare County Development Plan outlines the indicative density levels that should be provided at 'Outer Suburban/ Greenfield sites on the edge of large towns with a population of >5,000. A general density parameter of 35-50 units per hectare is expected at these locations as per the Development Plan.

Section 2.7 of the guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas states that:

'where substantial areas of brownfield or greenfield sites are going to be (re)developed, it is strongly recommended that a local area plan (LAP) be prepared to facilitate the sustainable development of the area and to avoid it being developed in a piecemeal and incoherent fashion over a long period of time'.

It is noted that the Celbridge Local Area Plan 2017-2023 does not provide a specific density requirement for the subject lands. Policy RD2 of the Local Area plan states that:

It is the policy of the Council to require that all new residential development provides for a sustainable mix of house types, sizes and tenures and that new development complements the existing residential mix.

The proposed development aims to deliver an appropriate density and form of residential development to accommodate the growing population of Celbridge on the site, located to the south of the town centre by providing a mix of unit types and sizes, from 1 and 2 bed apartment units to 3 and 4 bed houses, and a density of 64 units per hectare, maximising the development potential of the site.

The Celbridge Local Area Plan 2017-2023 does however set out a general appropriate density level for the entire Celbridge Area. Section 6.2.2 of the LAP states that

'higher densities will generally be considered in town centre infill locations and proximate to public transport, with medium to lower densities being considered at outer suburban sites'

The subject site is located in an outer suburban area as per the Kildare County Development Plan 2017-2023 but is zoned B: Existing Residential/ Infill' by the Celbridge Local Area Plan 2017-2023, with an objective to:

'Protect and enhance the amenity of established residential communities and provide sustainable intensification'.

The zoning objective of the site should allow for a higher density development to be proposed at this location, which will offer a sustainable intensification of the site.

The proposed density of c. 64 units per ha is considered an appropriate approach to development at this location, given the proximity to facilities/ services in Celbridge Town Centre and public transport.

The subject site is located proximate to an array of public transport with bus routes to the north, including the 67 bus which runs from Celbridge to Merrion Square, providing a connection from the development site to Dublin City Centre. Celbridge and Hazelhatch Rail Station is located to the South, within 1km of the subject site offering excellent connectivity to Dublin City Centre and west towards Galway via frequent train services.

The proposal is in compliance with objective HSO8 of the Kildare County Development Plan, which states that it is an objective of Kildare County Council to:

‘Ensure that an appropriate mix of housing types and sizes is provided in each residential development’.

The density proposed arose from the initial pre planning meeting with KCC planners where it was stated that an increase in density and a variety of unit types were required to maximise the development potential of the site and cater for the immediate needs of the Celbridge area. The development will provide much needed housing in the Celbridge area to provide for the growing population of the town and the diversity of the housing that is required, providing 1 and 2 bed apartments as well as 3- and 4-bedroom houses.

We submit that the proposed density is also consistent with objective 35 set out in the National Planning Framework: Project Ireland 2040 which states that it is a national objective to:

‘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 height’.

The density guidance set out by local and national guidance and the feedback from Kildare County Council has been taken into consideration when designing the scheme.

The site layout maximises permeability through an appropriate block size, block height and connectivity. Careful consideration has been given to adjoining levels of amenity and compliance with Development Plan standards has been achieved.

Generous separation distances are achieved to existing residential dwellings to the north and east of the site at ‘The Drive’ and ‘The Close’. The design team has carefully considered the existing dwellings when designing the subject proposal to ensure that these dwellings would not be undermined by the height, massing, or scale of the proposal.

A balance has been struck here given the urban/rural nature of the site, the County Development Plan requirements and National Policy guidance on appropriate density.

An appropriate balance needs to be found between residential density requirements and the designated unit numbers for zoned land as outlined in the Core Strategy. The densities proposed by way of this pre-planning submission is considered appropriate for the subject site given its zoned nature and proximity to existing transport networks as well as recent National Policy Guidance in this regard.

10.1.5 Mix of Dwelling Types Policies and Objectives

Policy MD 1 - Ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the county in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual to support a variety of household types.

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

Objective MDO 3- Require that applications for residential or mixed use development with a residential element are accompanied by a Statement of Housing Mix, in accordance with Table 17.3, to address the mix of dwelling types proposed. The Statement of Housing Mix should demonstrate a need for such accommodation, based on local demand and the demographic profile of the area.

There are a total of 4 different housing types proposed within this scheme of 138 residential units. An appropriate mix of 1, 2, 3 and 4 bed accommodation is proposed that caters for the needs of the older population, young couples, families and provides 14 no. units of social housing.

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

10.1.6 Design and Layout Types Policies and Objectives

Policy 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.*

Objective DLO 1 - *Create high quality living environments for residents in terms of individual dwelling units and the overall layout, design and function of the developments through the implementation of the standards set out in Chapter 17 Development Management Standards and the principles set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the companion Urban Design Manual – A Best Practice Guide (2009) and the Design Standards for New Apartments Guidelines for Planning Authorities (2015).*

Objective DLO 2 - *Promote new residential developments that take account of energy efficient and renewable energy opportunities.*

Objective DLO 3 - *Support dwellings that are designed to be sufficiently adaptable to enable people to live comfortably through different stages of their lives and changing household needs.*

Objective DLO 4 - *Promote the carrying out of basic habitat assessments to inform the design of new developments in order to ensure that proposals for development integrate the protection and enhancement of green infrastructure, biodiversity and landscape features (including trees and hedgerows) where possible and minimise adverse impacts on existing habitats (whether designated or not), by including mitigation and/or compensation measures, as appropriate.*

Objective DLO 5 - *Develop typologies for adaptable housing types that meet the life cycle needs of communities having regard to CSO sociodemographic data.*

We confirm that John Fleming Architects have designed a high quality residential development. An Architectural Design Statement is enclosed as part of this pre-planning submission, 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 pre-planning submission.

John Fleming Architects can confirm that the proposed materials are a mix of nap render and brick in varying shades and colours, with glass balconies on the apartment blocks along with glazing and cladding finish to add visual interest. 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.

10.1.7 Private and Semiprivate Open Space Policies and Objectives

Policy 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.*

Objective OSO 1 - *Ensure that all private open spaces for dwellings, apartments and duplexes are designed in accordance with the standards set out in the Guidelines for Planning Authorities on Design Standards for*

New Apartments (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the companion Urban Design Manual – A Best Practice Guide (2009).

In compliance with OS1, John Fleming 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.

10.1.8 Public Open Space Policies and Objectives

Policy 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.

Objective PSO 1 - Ensure that public and semi-private open space in new residential development complies with the quantitative and qualitative standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and in Chapter 17 of this Plan.

Objective PSO 2 - Ensure that there is a clear definition between public, semi private and private open space and that all public and semi-private open spaces benefit from passive surveillance from residential development.

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 this pre-planning submission.

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:

- New pedestrian and cycle links to Hazelhatch Road leading towards Celbridge Town Centre.
- Potential pedestrian and cycle links to the area included in the Simmonstown KDA to the south of the site
- New pedestrian and cycle links towards Celbridge Rail Station to the South.

10.1.9 Residential Development Standards

The Key Development Standards from Chapter 17 of the Kildare County Development Plan 2017-2023 are examined below in the context of the proposed development:

Height

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”*

The proposal development provides for heights of 2-5 storeys.

John Fleming 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.

In addition it is noted that Section 17.2.1 further states that:

*“Tall buildings, defined here as buildings that **exceed five storeys and/or 15 metres**, will only be considered at areas of strategic planning importance identified in a Local Area Plan. The potential of roof top spaces in tall buildings for open space/amenity use should be considered, subject to considerations of design, relationship with surrounding properties, use and management”. (our emphasis)*

The proposed 5 storey element of the overall development exceeds 15 metres and is 16.7 metres at parapet height.

A justification for the proposed height has been provided in preceding sections including the Building Height Guidelines that allow for increased heights at appropriate locations such as this, with appropriate design for integration into the surrounding area.

Overlooking

In general, the development plan requires a separation distance of 22m between rear opposing windows.

John Fleming Architects can confirm that the proposed development delivers on this requirement across the proposal.

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.

We refer to the Design Statement included as part of this pre-planning submission pack prepared by John Fleming Architects.

Density

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

We note that a general residential density of 30-50 units per hectare is envisaged for outer suburban/greenfield sites within the development plan.

Regarding this we submit that the proposed development provides a density of approximately 64 no. units per hectare. This level of density is considered appropriate to maximise the development potential of the site. The density of the proposal emerges from pre planning meetings held with Kildare County Council, who requested a higher density proposal for this site.

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.

John Fleming Architects have included a Housing Quality Assessment as part of the material submitted with this pre-planning submission.

The following Housing Mix is proposed for the subject proposal:

- 5 no. 4 bedroom semi-detached
- 6 no. 3 bedroom semi-detached
- 11 no. 3 bedroom terraced

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.

Layout

Section 17.4.4 of the Kildare County Development Plan outlines the standards that layouts of new residential developments should be expected to adhere to:

- 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’.

We submit that the proposed scheme has been designed to comply with the detailed guidance regarding proposed layouts as contained in the Design Manual for Urban Roads and Streets DTTS and DECLG (2013) and the guidance outlined in the Kildare County Development Plan.

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.

Floor Areas

Table 17.4 of the Development Plan sets out the minimum floor area and storage requirements for dwelling houses as depicted below:

Unit Type (House)	Floor Area	Storage Area
One Bedroom	55m ²	3m ²
Two Bedroom	85 m ²	6m ²
Three Bedroom	100 m ²	9m ²
Four Bedroom	110m ²	10m ²

The proposed development provides 22 no. 3 and 4 bedroom houses. We confirm that all 3 bed houses exceed the minimum floor area of 100 sq.m and storage area of 9 sq.m. All 4 bed houses exceed the minimum required floor area of 110 sq.m and storage area of 10 sq.m.

Table 17.6 of the Development Plan sets out the minimum floor area and storage requirements for apartments as depicted below:

Unit Type (Apartment)	Floor Area	Storage
Studio	40m ²	3m ²
One Bedroom	45m ²	3m ²
Two Bedroom	73m ²	6m ²
Three Bedroom	90m ²	9m ²

The proposed development provides 115 no. 1 and 2 bedroom apartment units. We confirm that all 1 bed apartment units exceed the minimum floor area of 45 sq.m and storage area of 3 sq.m. All 2 bed apartments exceed the minimum required floor area of 73 sq.m and storage area of 6 sq.m.

We refer to the architectural drawing pack and design statement prepared by John Fleming Architects for detailed information.

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.

John Fleming Architects can confirm that a total of 20% of the overall site (4,380 sq.m) will be delivered as public open space. This is in excess of the Development Plan standards. This is set out in the enclosed Design Statement prepared by John Fleming Architects submitted as part of this pre-planning submission.

The public open space lands are spread throughout the site and will be easily accessible by all residents, providing landscaped features, seating areas and play spaces for children.

Private Open Space

Table 17.5 of the Development Plan sets out the minimum private open space requirements for dwelling houses as depicted below:

Unit Type (House)	Floor Area
One Bedroom	48m ²
Two Bedroom	55 m ²
Three Bedroom	60 m ²
Four Bedroom or more	75m ²

We confirm that all 3 bedroom houses provided meet or exceed the minimum requirement for private open space of 60 sq.m. All 4 bedroom houses provided meet or exceed the requirement for private open space of 75 sq.m.

Table 17.7 of the Development Plan sets out the minimum private open space requirements for dwelling houses as depicted below:

Unit Type (Apt)	Private Space	Communal Space
Studio	4m ²	4m ²
One Bedroom	5m ²	5m ²
Two Bedroom	7m ²	7m ²
Three Bedroom	9m ²	9m ²

We confirm that all 1 bed apartments provided meet or exceed the minimum requirement for private open space of 5 sq.m. All 2 bedroom houses provided meet or exceed the requirement for private open space of 7 sq.m.

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

135 no. car parking spaces are proposed for the proposed development (including 7 no. disabled car parking spaces).

We also refer to the enclosed Traffic Impact Assessment report prepared by NRB Consulting for further details in relation to car parking which accompanies this planning submission.

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 Plan and National Policy.

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.

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 124 no. secure, covered, stacked bicycle parking for residents and 80 no. spaces for visitors. This is in excess of the Development Plan Standards for bicycle parking.

We refer to the enclosed Transport Assessment report prepared by NRB Consulting Engineers for further details in relation to bicycle parking which accompanies this pre-planning submission.

Development Capacity

17.4.1 outlines the standards for Development Capacity in Kildare:

‘Where land is being developed for housing, the following considerations will be taken into account in the assessment of the proposal:

- The need for land to be used economically;
- Appropriate density;
- The capacity of the physical and social infrastructure to cater for the design population;
- The adequacy of community facilities;

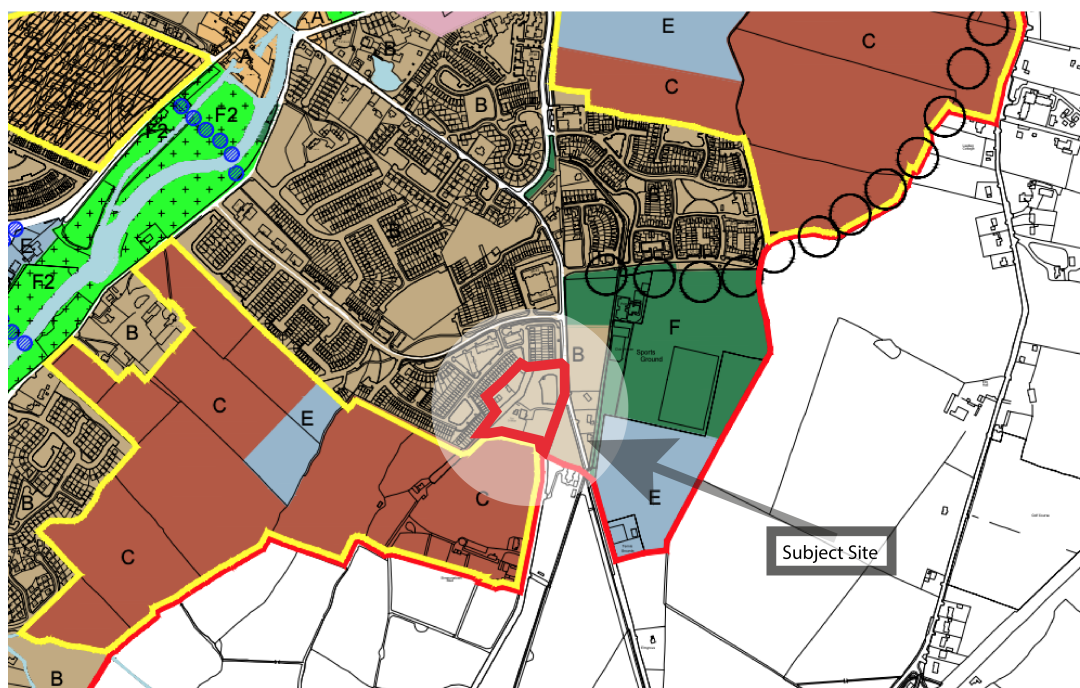
- Adequate privacy and residential amenity for individual dwelling units;
- The safety of proposed layouts and the capacity of the existing transportation network to absorb future development; and
- Adequate provision for cycle and vehicular parking, open space, landscaping and planting'

We submit that the proposed development provides an economical use of land zoned for residential development at an appropriate density. A creche facility is provided as part of the proposed development and the layout of the site has been carefully considered to provide adequate privacy and access to amenity areas for each individual unit. Cycle and vehicular parking are provided, with 204 no. bicycle parking spaces and 135 no. car parking spaces provided across the development site. Generous open space areas are provided across the development site.

10.2 Celbridge Local Area Plan 2017- 2023

The consistency of the proposed development with the key policies, objectives and standards of the Celbridge Local Area Plan is set out below.

10.2.1 Zoning



The Subject site is in an area zoned 'B: Existing Residential/ Infill' by the Celbridge Local Area Plan 2017-2023, with an objective to 'protect and enhance the amenity of established residential communities and provide sustainable intensification'.

Section 13.4 of the Celbridge Local Area Plan 2017-2023 presents a land use zoning matrix that outlines land uses permitted under each zoning objective set out within the plan. Zoning objective B permits new dwellings, playgrounds/parks, and nursing homes in principle. The proposed development falls under the category of dwelling and therefore is considered generally acceptable subject to compliance with objectives set out in other chapters of the Local Area Plan.

It is worth noting that the subject lands border the Simmonstown Key Development area to the south of the site, which are earmarked for residential development. The subject site offers an opportunity to consolidate residential development in the area, making use of a currently underutilised site zoned for residential development, with existing residential development along the northern site border, and the

area earmarked for residential development included in the Celbridge LAP as the Simmonstown KDA to the south of the site.

10.2.2 Spatial Planning Context

The Kildare County Development Plan 2017-2023 sets out the overall planning policy for the sustainable development of Kildare in accordance with national and regional policy.

Celbridge is defined as a Moderate Sustainable Growth Town in the Metropolitan Area of Dublin. Moderate Sustainable Growth Towns are defined as towns which are strong district service centres and have a continuing role as commuter locations.

Growth of these towns is directly related to the capacity of high-quality public transport connections and the capacity of social infrastructure.

10.2.3 Strategic Vision

Section 3.2 of the Local Area Plan outlines the Strategic Vision for the Celbridge area from 2017-2023.

The following strategic objectives are relevant to the subject proposal:

- *To accommodate 10% of Kildare's housing growth over the period 2017-2023 in accordance with the County Development Plan Core Strategy.*
- *To support and facilitate the development of high quality, integrated residential neighbourhoods and deliver social and community infrastructure and facilities in tandem with new housing.*
- *To ensure development proposals conform with best practice urban design principles on the basis that well planned and integrated development will enhance the town and its environs and improve the quality of life of its residents'.*

We submit that the proposal complies with the strategic vision for residential development in Celbridge, providing 137 new residential units on appropriately zoned land. The development provides a diverse high quality mix of units and delivers a creche and 10% social housing units in tandem with the overall proposal.

The design team has taken part in weekly meetings to ensure that the proposal maximises the development potential of the site and ensures that the development is consistent with the vision for residential development in Celbridge, providing a high quality environment for future residents of the scheme.

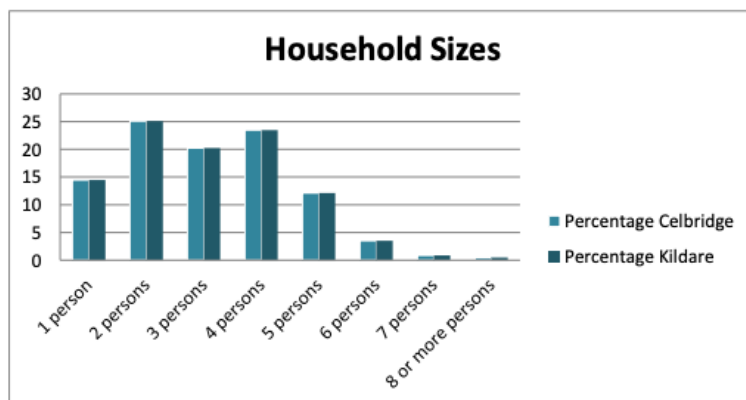
10.2.4 Housing

Chapter 6 of the Local Area Plan outlines the objectives for housing and community in the Celbridge area.

It is noted that:

'The age profile of Celbridge includes a high percentage of children, young people and people in the working age cohorts. The 0- 24 age cohort makes up 37% of the population relative to 33.2% nationally, while the 25-44 age cohorts make up 31% of the population compared to 29.5% nationally. In contrast, approx. 6.5% of the population is over 65 years compared to almost 13% nationally'.

The below Table outlines the household sizes in Kildare and Celbridge by percentage:



It is evident from the breakdown of the population demographics presented in the Local Area Plan and the average household size in Celbridge that there is a diverse population in terms of age and a large variation in the number of people per household.

The design team has considered the average household size and demographics of the area when designing the proposal, which offers a variety of unit types from 1-2 bed apartment units and 3-4 bed homes. We submit that the proposed development offers an appropriate range of unit types and sizes to cater for the needs to the demographics of Celbridge.

The following specific housing policies and objectives listed in the Local Area Plan are of relevance to the subject proposal:

Residential Development – Capacity and Delivery

Policy RD1 - It is a policy of the Council to ensure that sufficient zoned land continues to be available at appropriate locations in Celbridge to satisfy the housing needs of the town and that each household has access to good quality housing that is appropriate to its circumstance.

Objective RDO1.2 – To secure the provision of social infrastructure and community and recreational facilities in tandem with residential development, in accordance with the implementation strategy described in Chapter 13.

Objective RDO1.4 – To focus the majority of new housing in Celbridge within walking or cycling distance of a school cluster, the town centre, neighbourhood centre or transport routes.

Objective RDO1.6 - To ensure that, notwithstanding compliance with policy RDO1.5, applicants comply with all other normal siting and design considerations.

We submit that the development is on lands suitably zoned for residential development on a site to the South of Celbridge Town centre. The development offers a creche facility for 50 no. children, to be provided in tandem with proposed residential units. The development complies with the requirement for provision of Part V units and offers 10% of the development total units as social housing.

Residential Density, Mix and Design

Policy RD2 - It is the policy of the Council to require that all new residential development provides for a sustainable mix of house types, sizes and tenures and that new development complements the existing residential mix.

Objective RDO 2.1 –To require all new residential developments meet the standards and guidance set out in:

- The Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, DEHG (2009)
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2015)

- The Design Manual for Urban Roads and Streets, DTTS and DECLG (2013)
- The policies, objectives and development management standards contained in this LAP and the Kildare County Development Plan

Objective RDO 2.3 – To require the submission of a Design Statement (DCP 17.3 refers) and Housing Mix.

Objective RDO 2.4 - To apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use or for a mixture of residential and other uses (save where the development is exempt from the provisions of Part V)

We submit that the proposed residential development provides a sustainable mix of unit types, tenures and sizes, providing 1 and 2 bed apartment units and 3 and 4 bed housing units. The proposed development has been designed to comply with the standards and guidance set out in national and local policy documents. A design statement prepared by John Fleming Architects is submitted as part of this pre-planning pack.

We submit that the proposal fully complies with the requirements for Part V provision and offers 10% of the total units as social housing. Details of this are included on the Part V drawings prepared by John Fleming Architects submitted as part of this pre-planning pack.

Education, Childcare and Health Facilities

Policy COM1 - It is the policy of the Council to facilitate and secure the provision of social infrastructure to support existing and new communities, in a manner, which provides flexibility to respond to varied, and changing community needs.

Objective COMO1.1 - To support and facilitate improvements to existing educational, childcare and healthcare facilities within the Celbridge LAP area.

Objective COMO1.2 - To require the provision of childcare spaces in the Key Development Areas, in accordance with the phasing requirements set out in Chapter 13.

The proposed development includes the provision of a creche facility for 50 no. children. A variety of children's play spaces with specialised equipment are provided across the development site, which borders the Simmonstown Key Development Area to the South. This is outlined in the Landscape Drawing Pack prepared by Ronan MacDiarmada Landscape Architects submitted as part of this pre-planning pack.

Community and Recreational Facilities

Policy COM2 – It is the policy of the Council to facilitate and support a broad range of community and recreational facilities to serve the needs of the residents of Celbridge

Objective COMO2.1 - To support and facilitate the continued provision of multi-functional community facilities to meet the needs of the population of Celbridge.

Objective COMO2.2 - To ensure that adequate and safe amenity and recreational open spaces are available for all groups of the population at a convenient distance from their homes and places of work

Objective COMO 2.3 - To support and facilitate the provision of play facilities in Celbridge, including playgrounds and a skate park, for children of all ages having regard to children with special needs.

The subject proposal includes a range of children's play spaces and equipment within a considered open space network within the site. We refer the Planning Authority to the attached Landscape Rationale by RMDA Landscape Architects for further details on the amenity and recreational facilities within the subject proposal and submit the subject proposal is in compliance with the relevant objectives of the Local Area Plan in this regard.

11 Conclusion

We invite the Planning Authority to consider the proposal now put forward in the application documents attached herewith. 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. Housing for All, NPF, Rebuilding Ireland and RSES) and we ask that that is considered in the review of this proposal.
- The site is opportunely located, in terms of proximity to public transport and local amenities/services, to deliver much needed residential accommodation.
- The proposed use is acceptable in principle at this site and under the zoning. There is therefore an appropriate planning context for this proposal along with the childcare facility proposed.
- We confirm that we have addressed insofar as possible all feedback received from Kildare County Council.

We ask that these points are considered in the review of the proposal, and we trust that this planning submission will be viewed as a more positive move towards the delivery of sustainable development on suitably zoned lands.