

06.135 - Proposed Residential Development at

Ballymany, Newbridge, Co. Kildare.

Statement of Response to An Bord Pleanála Pre – Application Consultation Opinion

SHD - ABP - 300556- 18

An Bord Pleanála considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, was of the opinion that the documents submitted with the request to enter into consultations required further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considered that the following issues outlined in blue below should be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

The responses to the each of the items outlined by An Bord Pleanála are dealt with specifically following each element below. Please refer to the enclosed drawings and document in support of this planning application for the full schedule and details of the proposals.

1 Infrastructure

- a. Further consideration of the documents as they relate to the proposed development in light of the identified Road Objective SRO 5 in the Newbridge Local Area Plan 2013 with regards to the provision, or otherwise, of a link road along the extent of the proposed site boundary. In this regard, the delivery of this infrastructural upgrade relative to the delivery of the proposed dwelling units on site should be addressed in detail. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

Further consideration of the design proposals as they relate to the Link Street have led to considerable and positive changes to the proposed development. It is now proposed to provide the link street for the full extent of the lands in the control of the applicant. The resulting proposal provides for a higher density of development, and facilitates better connectivity. The Link Street has been designed in a holistic manner, taking full account of the guidance provided in DMURS, and of the connectivity, place making, movement and aesthetic functions of this piece of infrastructure.

Following receipt of this ‘Opinion’ from An Bord Pleanála on 22nd February 2018, further consultations were held with Kildare County Council Roads Department on 14th March and 28th March 2018 with JFOC Architects and NRB Consulting Engineers to discuss the revised proposals in detail. At pre-planning stage, it had been proposed to provide the first 270m of this link street on the subject site, and to facilitate the provision of the balance of the

connection. Revised proposals for this planning application now include the full length of the street as envisaged under the infrastructure objective on the lands within the control of the applicant.

The design team has engaged the services of Dr. Sarah Rock of Placemakers Ireland to prepare a revised strategy for the overall development, and in particular for the link street from the R445 to the Rathcurragh Public Open Space. The link street constitutes a significant component of Objective SRO5 of the Newbridge Local Area Plan 2013 – 2019 to form a strategic infrastructure link from Standhouse Road to Green Road. Revisions to the proposal include that the full extent of the infrastructural upgrade will be provided on the lands within the control of the applicant as a part of this planning application.

The tree – lined avenue style Link Street has been redesigned with advice from Placemakers Ireland and NRB Consulting Engineers as an active street, in accordance with the Design Manual for Urban Roads and Streets 2013. As well as achieving the aspirations of movement and connectivity, the design also provides for a high quality and active aspect from the coherent streetscape of dwellings, in addition to a connected green infrastructure of substantial grass verges and tree lines for the entirety of this street. A detailed description and analysis of the design proposals for this street have been included in the Movement and Connection Report that accompanies this planning application. This report concludes that the design of this DMURS compliant street has been resolved to great effect to achieve a quality new community using a balanced, place based and integrated approach. A coherent street network that will be attractive, efficient, legible and safe has been the result. The quality of the street environment and public realm will benefit from active street edges, passive surveillance, and high levels of street-tree planting.

At the entrance to the proposed development at the junction of the R445, a new part 4 and part 6 storey, landmark apartment building is proposed. This building will define the edge of Newbridge and will act as a gateway building on the approach to the town. The revisions contained herein reflect the requirement to comply with item 1 (a) of An Bord's opinion.

Sufficient land has been maintained free of development in front of the apartment building to facilitate a more significant four armed junction to complete the objective of SRO5 for a four armed junction with the R445, and as requested by Kildare County Council at pre-planning stage.

We would refer An Bord Pleanála to the recent grant of permission to Cowlara Ltd (reg ref. 16658/ PL09.249038) for a mixed-use development comprising a total of 228 number dwelling houses, a single storey crèche facility 307m and a two-storey 120 number bedroom nursing home on the north –eastern side of the R445 which will facilitate another significant section of objective SRO5. The final connection between these two sites, on adjoining lands in the ownership of others, while outside of the control of both of these applicants, can be facilitated.

- b. Further consideration/ clarification of the documents as they relate to the wastewater infrastructure constraints in the network serving the proposed development. The documentation at application stage should clearly indicate the nature of the constraints, the proposals to address the constraints and the timelines involved in addressing these constraints relative to the construction and completion of the proposed development.

We would refer An Bord Pleanála to the letter issued from Irish Water dated 21st December 2017. This letter clearly indicates that our client's development can be accommodated in the existing drainage infrastructure. An Bord Pleanála will also be aware of their recent decision to grant permission to Cowlara Ltd (reg. ref. 16658/ PL09.249038) in respect of the development adjacent to our client's property. This development is now approved for connection to the Drainage Infrastructure.

A Statement of Design Acceptance has been received from Irish Water in respect of the proposed development.

Please refer to the Engineering Services Report from Donnelly Troy Consulting Engineers in respect of the details of the proposals in relation to infrastructure for the proposed development. Donnelly Troy have also outlined their continued correspondence and engagement with Irish Water following the initial response to the pre-connection enquiry, confirming that the proposed development can be accommodated as outlined in the enclosed drawings and documentation.

2 Density

Further consideration/ justification of the documents as they relate to the density proposed in the proposed development. This consideration and justification should have regard to, inter alia, the minimum densities provided for in the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) in relation to such Outer Suburban/ Greenfield sites. The further consideration of this issue may require an amendment to the documents and/or design proposal submitted relating to density and layout of the proposed development.

At the pre-planning meeting with An Bord Pleanála, the density of the proposed development of 152 No. dwellings was 30 dwellings per hectare. The revised proposals now presented to An Bord Pleanála for 180 dwellings have been the subject of extensive design consideration and provide for a residential development at a density of 35.5 dwellings per hectare. We contend that this is an appropriate and effective response to this site. Great effort has been made to ensure that a high quality and sustainable development is delivered at a density appropriate to this location and consistent with the relevant guidelines and development plans.

The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) 2009 set out guiding principles to produce high quality and

sustainable development. Appropriate density has been identified as a key determinant of the success and long term sustainability of new residential developments. It is government policy to promote sustainable patterns of settlement, such as higher residential densities, particularly in locations which are, or will be, served by public transport. The proposed development is located approximately 2km from Newbridge Train Station, 1km from nearest bus-stops and 0.5km from the M7 Motorway. Note that the CSO 2011 Census results for Newbridge indicate that the most popular means of travelling to work is by car, with this mode of transport accounting for 61.8% of all journeys.

The proposed development at Ballymany is on residential zoned lands that is best characterised as outer suburban on a greenfield site at the edge of Newbridge. Sites such as this are defined in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) 2009 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. 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.”*

As discussed in detail in the Statement of Consistency with National Guidance on Residential Development accompanying this application, the proposed development at Ballymany will strike a balance between a significant improvement upon the ragged edge that is currently presented to the ‘Unique’ landscape of the Curragh from which it will be viewed, and providing an appropriate level of development for this edge of town location. The Curragh, is designated with the highest landscape sensitivity classification, “unique” in the Kildare Development Plan. Unique landscape areas are defined as those *‘with little or no capacity to accommodate uses without significant adverse effects on the appearance or character of the landscape having regard to unique and special sensitivity factors.’* The characteristics of the flat Curragh landscape, and the existing suburban development is such that the appropriate response to development at that site is for a typology of primarily two to two-and-a-half storey development, with a higher scale of development closest to Newbridge, the R445 and to the adjacent shop and petrol station.

Considering the balanced approach to this development, the resulting nett density of 35.5

dwellings per hectare, is consistent with the provisions of the Sustainable Residential Density Guidelines.

Category	Location for New Residential Development	General Density Parameters (Units per Ha)	
Large Towns (Pop >5,000)	Town Centre & Brownfield Sites	Site Specific	Subject to the design principles and standards set out in: Chapter 12 Architecture and archaeological Heritage Chapter 16 Urban Design Guidelines Chapter 17 Development Management Standards
	Public Transport Corridors	50 units per ha	
	Inner suburban/infill	Site Specific	
	Institutional Lands	35-50units per ha	
	Outer Suburban /'Greenfield'	30-50 units per ha	
Small Towns & Villages I (Pop 2,000-5,000) and Small Towns & Villages (Pop 400-2,000)	Centrally located sites within Small Towns/Village	30-40 units per ha	
	Edge of centre sites within Small Town/Village	20-35 units per ha	
	Edge of Small Town/Village	15-20 units per ha with lower density in some cases	
Rural Settlements (Pop 50-600)	Infill, backland and edge of centre sites within Rural Settlements	15 units per ha with lower density in some cases	

Source: Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)

Table 4.2 of the Kildare County Development Plan (above) indicates that densities for outer suburban/greenfield sites should be 30–50 units per hectare. The nett density of the proposed scheme at 35.5 dwellings per hectare is in accordance with policy LD1 of the Kildare County Development Plan 2017 - 2023 – to promote residential densities appropriate to its location and surrounding context.

Furthermore, the Newbridge Local Area Plan 2013-2019 policy HL 6 is *“to restrict apartment developments generally to town centre locations or suitably located sites adjoining public transport connections”* and *“Duplex units shall not generally be permitted”*. To remain substantially consistent with the objectives of the Newbridge Local Area Plan, and cognisant of the Sustainable Residential Guidelines on density, a single block of apartments has been located at the entrance to the site, facing the R445 and closest to public transport, and local services and amenities.

It should also be noted that density at the lower end of the prescribed range on this site may be

considered appropriate due to the location of the site in proximity to The Curragh, which is provided with the highest landscape sensitivity classification, “unique” in the Kildare Development Plan. Unique landscape areas are defined as those *‘with little or no capacity to accommodate uses without significant adverse effects on the appearance or character of the landscape having regard to unique and special sensitivity factors.’*

3 Design, Layout and Unit Mix

Further consideration/justification of the documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the above mentioned Guidelines and the Design Manual for Urban Roads and Streets. In addition to density which is addressed above, the matters of unit mix and design, the configuration of the layout, elevational treatments and finishes should all be given further consideration. Further consideration of the documents as they relate to the development of a gateway building fronting onto the R445 having regard to the prominent location of this element of the proposal. The treatment and usability of the public realm surrounding the proposed building fronting onto the R445 and its interface with the adjoining areas of parking may also require consideration and/or justification in the documentation submitted at application stage. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

i. ‘12 Criteria’ – set out in the Urban Design Manual 2009

Please refer to the Statement of Consistency with National Guidance enclosed with this planning application for a detailed appraisal of the quality and sustainability of the urban and detailed design, and the consistency of the proposals with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) 2009 and the accompanying Urban Design Manual. Brief responses to the points itemised here are outlined in this document. These issues are elaborated on in more detail in the Statement of Consistency, Design Statement and in the detailed drawings enclosed with the application.

ii. Design Manual for Urban Roads and Streets 2013 (DMURS)

Please refer to the Movement and Connectivity Report prepared by Placemakers Ireland and JFOC Architects in support of this proposed planning application for details in respect of the design of the street network and street typologies, and detailed demonstration of the consistency of the revised proposals with DMURS 2013. A detailed consideration of the context, receiving environment, connectivity and movement have been driving factors in the detailed design scheme proposed.

iii. Unit Mix

An appropriate mix of unit sizes and typologies as outlined in the Statement of Consistency with National Guidance enclosed in respect of the revised proposals. There will be a total of 145 dwelling houses, and 35 apartments provided as follows:

Total Number of Dwellings	180	
4 Bedroom Dwellings	49 Houses	27.2%
3 Bedroom Dwellings	83 Houses + 13 Apartments	53.3%
2 Bedroom Dwellings	13 Houses + 7 Apartments	11.1%
1 Bedroom Dwellings	15 Apartments	8.4 %

iv. Configuration of Layout

Revised proposals on lands within the control of our client for the layout include the provision of the entirety of the Link Street from the R445 to the Rathcurragh Public Open Space. The configuration of the site layout plan stems from the detailed analysis of the existing context, the provision of the Link Street and a design emphasis on quality placemaking and is articulated in the attached Design Statement

v. Elevational Treatments and Materials

The palette of materials proposed is of a traditional manner; sand-cement render, slate coloured roof tiles, and high quality glazing. This is in keeping with adjacent developments and the situation of the development at the edge of Newbridge. The overall aesthetic is one of coherence and quality, balancing integration with the existing and a unique identity. Dwellings are designed with a great deal of clarity, demonstrating a quiet rhythm and a very high quality contemporary aesthetic utilising traditional materials. Please refer to the house and apartment plans enclosed on JFOC drawing 06.135.PD107 – PD152 and the 3D images prepared in support of this planning application.

vi. Gateway Building- Apartments & associated public realm/ parking

Significant amendments have been made to the proposed development to include provision for a landmark apartment building at the entrance to the site. This apartment building has been located appropriately at the access to the site, highlighting both the entrance to the new development and providing a new signature building on the approach to Newbridge. Landscaping and open spaces have been

incorporated into the design of the building. Please refer to the enclosed Statement of Consistency with National Guidance, Design Statement and JFOC drawings 06.135.PD143 – 06.135.PD151 for further details. Parking, bin stores and bicycle storage are discretely contained in a landscaped parking courtyard configuration to the rear of the apartment block. This courtyard is also overlooked and well supervised by the balconies of the apartments and houses No. 141 – 145. Please refer to the 3D images prepared in support of this planning application.

Furthermore, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1 A detailed phasing plan for delivery of the proposed development

Please refer to JFOC Architects drawing 06.135.PD104 and the Construction and Environment Management Plan by Simon Clear and Associates Planning and Development Consultants enclosed.

2 A site layout plan showing which areas are to be taken in charge by the planning authority

Please refer to JFOC Architects drawing 06.135.PD106 enclosed.

3 A site layout plan indicating pedestrian and cycle connections with the adjoining residential development and also to transport modes (train station/ bus stops) in the vicinity

Please refer to JFOC Architects drawings 06.135.PD103 and 06.135.PD105 and the Movement and Connectivity Report prepared by JFOC Architects and Placemakers Ireland enclosed with this planning application for a detailed response.

4. A detailed landscaping plan which clearly shows the proposed treatment of boundaries and retention of existing trees or hedgerow, where applicable.

Please refer to landscape design proposals and boundary treatment proposals prepared by Landmark Designs Planning and Development Consultants and the Arboricultural Report with the accompanying tree protection plans enclosed with this planning application. The proposed boundary treatments, new planting proposals and trees to be removed and retained are detailed therein.

5 Site Specific Construction and Environment Management Plan (CEMP)

Please refer to the Construction and Environment Management Plan by Simon Clear and Associates Planning and Development Consultants enclosed.

6 Colour coded layout plan identifying different unit types proposed

Please refer to JFOC Architects drawings 06.135.PD103 and 06.135.PD105 enclosed with this planning application. Detailed legends of the dwelling types proposed are included on these site layout plans.

7 Photomontages showing the proposed development from various vantage points in the vicinity

Please refer to JFOC Architects 'Photomontages and Visualisations' enclosed with the planning application.

8. A site layout plan clearly outlining location of Recorded Monuments in the vicinity of the site.

Please refer to Icon Archaeology's Test Excavation Report in respect of this proposed development and JFOC Drawing 06.135.PD157 enclosed with the planning application.

9. Details relating to bat surveys undertaken.

Please refer to the Bat Survey undertaken by Faith Wilson, Ecologist on the site of this proposed development. In addition, the Construction and Environment Management Plan by Simon Clear and Associates Planning and Development Consultants and landscape design proposals prepared by Landmark Designs have taken account of the findings of the Bat Survey in their proposals enclosed with the planning application.

10. Further consideration of the submitted noise impact assessment, which further addresses the potential noise impact from the M7 motorway and clearly outlines noise mitigation measures, if considered necessary.

AWN Consulting has provided detailed analysis of any potential noise impacts on the proposed development, and has further assessed the potential benefits of constructing sections of 'noise' barriers along a section of the M7 to the south of the lands the subject of this planning application at Ballymany, Newbridge, Co. Kildare. Please refer to these two reports enclosed with this planning application