
Statement of Response to Pre-application Consultation Opinion

Residential Development

Lands at Capdoo & Abbeylands, Clane, Co. Kildare

Westar Investments Ltd

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1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have prepared this Statement of Response to the Pre-application Consultation Opinion on behalf of our client, Westar Investments Ltd, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands at Capdoo & Abbeylands, Clane, Co. Kildare. Following consultations with Kildare County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted and a pre-planning consultation meeting was facilitated on 8th October 2020.

An Bord Pleanála subsequently issued a Notice of Pre- Application Consultation Opinion on 29th October 2020 under Ref. ABP – 307465-20. The opinion states that An Bord Pleanála “*has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission to the Planning Authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.*”

The opinion further states that “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” and notes 11 items to be submitted with any application as follows:

1. *Notwithstanding that the proposal constitutes a reasonable basis for an application, demonstrate/justify the suitability of the proposed site to accommodate the proposed height and residential density with regard to the provisions of the current Kildare County Development Plan, and any variation that may be in place at the time of making the application, and relevant national and regional planning policy including the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’); The ‘Design Standards for New Apartments – Guidelines for Planning Authorities’ (2018) and the ‘Urban Development and Building Heights – Guidelines for Planning Authorities’ (2018).*
2. *A report that addresses and provides a clear design rationale for the proposed design, scale, and character of key buildings/street frontages, materials and finishes of the proposed development including specific detailing of finishes and frontages for the proposed apartment blocks, and the maintenance of same. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.*
3. *A report detailing the extent, location and visual dominance of car parking proposed, having regard to the location of the site and its proximity to public transport services.*
4. *A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.*
5. *A report that addresses and provides a justification for the proposed housing mix.*
6. *A report that addresses and provides a clear rationale for connectivity and permeability within and through the site.*
7. *Childcare Demand and Concentration Report, which identifies demand for childcare places likely to be generated by the proposal and the capacity of the childcare facility previously granted on the subject site and existing facilities in the vicinity to cater for such demand.*
8. *School Demand and Concentration Report, which identifies demand for school places likely to be generated by the proposal and the capacity of the existing schools in the vicinity to cater for such demand.*
9. *Address issues raised in the report of Irish Water to An Bord Pleanála dated 5th August 2020 and in the report of Drainage Division of the planning authority dated 15th July 2020.*

10. *A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces and Part V provision.*
11. *A material contravention statement, in respect to any and all elements of the development that may materially contravene the Development Plan objectives or policies applicable to the site, whether, core strategy, density, housing typology, car parking, open space or other.*

Further to the above, the Board's Notice of Pre-Application Consultation Opinion sets out the statutory bodies to be notified of the making an application, pursuant to section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. They are as follows:

1. Irish Water
2. County Kildare Childcare Committee

A copy of the current application has been sent to the prescribed bodies identified by the Board by soft copy. Copies of the applicable cover letters are enclosed with the application.

2.0 Statement of Response to Specific Information Required

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development.

2.1 Demonstrate/justify the suitability of the proposed site to accommodate the proposed height and residential density with regard to the provisions of the current Kildare County Development Plan

The application is accompanied by a Statement of Consistency & Planning Report and a Material Contravention Statement prepared by Hughes Planning which demonstrates and justifies the density and height proposed. In summary, the subject lands are located in the eastern environs of Clane Town c. 650m from the Town Centre and within walking distance of public transport services. The proposed development provides heights from two to three to four storeys. The proposed development has duly considered the height of the adjoining built form and adjoining land uses within the immediate area to provide what is considered to be an appropriate maximum height of four no. storeys within the application site. It is further noted that the majority of the site is to be constructed at two storey height thus providing a strong degree of integration with existing residential developments in the wider area.

The proposed development also provides for a residential density of 41 units per hectare in accordance with guidance set out within the Sustainable Residential Development in Urban Areas which required a minimum density of 35-50 units per hectare for the subject lands. The proposed density provides for an increase in house types proposed with a mix of one, two, three and four bed houses, apartments, duplexes and maisonettes proposed.

The suitability of the proposed site is further set out in the Architectural Design Statement prepared by C+W O'Brien Architects. Please refer to this report and the Statement of Consistency & Planning Report and the Material Contravention Statement for further details on the suitability of the proposed development for the subject lands.

2.2 Design Rationale

The application is required to be accompanied by a report that addresses and provides a clear design rationale for the proposed design, scale, and character of key buildings/street frontages, materials and finishes of the proposed development including specific detailing of finishes and frontages for the proposed apartment blocks, and the maintenance of same. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.

The application is accompanied by an Architectural Design Statement prepared by C+W O'Brien Architects which details in full the design rationale for the proposed development as well as detailed elevational drawings setting out proposed materials and finishes. 3D images of each of the proposed

blocks are also contained on the elevations. Please refer to the enclosed design statement and architectural drawing pack prepared by C+W O'Brien Architects for further details.

2.3 Car Parking

The application is required to be accompanied by a report detailing the extent, location and visual dominance of car parking proposed, having regard to the location of the site and its proximity to public transport services.

The rationale for the proposed car parking facilities is provided in the Statement of Consistency & Planning Report and the Material Contravention Statement, prepared by Hughes Planning and Development Consultants, which accompanies this application. The subject application is also accompanied by a Traffic Impact Assessment and Mobility Management Plan, both prepared by Roadplan Consulting.

The proposed development includes a total of 575 no. car parking spaces, inclusive of 256 no. spaces to serve the proposed apartments/duplex units, 242 no. spaces to serve the houses and 59 no. visitor parking spaces. The development also provides 18 no. parking spaces to serve the crèche facility. Further to vehicular parking, the development provides a total of 311 no. bicycle parking spaces provided throughout the development.

The site is located a 4-minute walk (approximately) from the R403/Maxol bus stop which serves Go Ahead bus route no. 120. This service operates 7 no. days a week from 5:53am to 00:14 am, running, on average, 1 no. bus per half hour. A second bus stop is located 11 minutes (approximately) from the site which serves Transport for Ireland route 139. This is a daily service, which runs one bus an hour between 7:20am to 23:30pm. An additional bus stop located at Cloisters nearby, serves route 846 which is provided by JJ Kavanagh & Sons. The bus services provide regular access to Connolly and Heuston Stations, University College Dublin, Dublin City Centre, Liffey Valley, Naas, Celbridge and more. The 139 bus route provides direct access to the upcoming Maynooth DART line which will run 9 daily return trips. Regional Road R403 also provides access to routes 120, a, b, c, d, e, f and x which provide direct access to Dublin City Centre and University College Dublin. In addition, Kavanaghs Bus Service provides direct transport to Naas via bus stops situated c. 650m from the site in the centre of Clane.

The dominance of roads has been reduced as a result of the dwellings and roads being formed around the strong network of interlocking open space areas formed around the existing hedgerows/trees being retained on site. These open space areas feature a network of pedestrian and cycle paths through the scheme and adjacent to the River Liffey. The road network featuring in the subject proposal is formed around the green infrastructure network and pedestrian/cycle network with the dominance of the road network links through the site far reduced when compared with the scheme proposed under ABP Ref. ABP-305905-19. The road network has also been simplified from that featuring in the proposal under ABP Ref. ABP-305905-19 and a clearer hierarchy of roads has also been provided, with main through routes and home zones more clearly discernible in the current proposal. The car parking areas serving the proposed Apartment Blocks and Duplex Units have been simplified and the buildings around them positioned to shield views of these areas positioned around them in such a way as to reduce views of these areas. Undercroft car parking is proposed at blocks A, B and Duplex/Apartment Block C thus reducing views of car parking and allowing for landscaped podiums. In addition, more landscaping is proposed throughout the development including in the proposed car parking areas and at their entrances. The culmination of these changes reduces the dominance of surface car parking within the proposed development.

2.4 Taken in Charge Lands

The application is required to be accompanied by a map of areas to be taken in charge. A Taking in Charge Drawing (Drawing No. 2040) features in the architectural drawing set, prepared by C+W O'Brien Architects which accompanies the application.

2.5 Housing Mix

The application is required to be accompanied by a report that addresses and provides a justification for the proposed housing mix. Please refer to the enclosed Housing Mix report prepared by Hughes Planning which provides a justification for the proposed housing mix.

2.6 Connectivity and Permeability

The application is required to be accompanied by a clear rationale for connectivity and permeability within and through the site. Please refer to the Landscape Design Rationale prepared by Landmark Designs Ltd., and the Architectural Design Statement prepared by C+W O'Brien which outlines the connectivity and permeability within and through the site.

2.7 Childcare report

The application is required to be accompanied by a Childcare Demand and Concentration Report which identifies the demand for childcare places likely to be generated by the proposal and the capacity of the childcare facility previously granted on the subject site and existing facilities in the vicinity to cater for such demand.

The application is accompanied by a Childcare Demand and Concentration Report prepared by Hughes Planning and Development Consultants which demonstrates that the proposed childcare facility accommodating 76 no. children will appropriately serve the proposed development. Please refer to the enclosed report for further details.

2.8 School report

The application is required to be accompanied by a School Demand and Concentration Report which identifies demand for school places likely to be generated by the proposal and the capacity of the existing schools in the vicinity to cater for such demand.

The application is accompanied by a School Demand and Concentration Report prepared by Hughes Planning and Development Consultants which demonstrates that the proposed development can be accommodated within the existing educational facilities in Clane. Please refer to the enclosed report for further details.

2.9 Irish Water

The application is required to address the issues raised in the report of Irish Water to An Bord Pleanála dated 5th August 2020 and in the report of Drainage Division of the Planning Authority dated 15th July 2020.

The issues raised by Irish Water and The Drainage Division of the Planning Authority are addressed in Section 4 of the Infrastructure Design Report prepared by BCA Consulting Engineers enclosed with the application.

2.10 Phasing Plan

The application is required to be accompanied by a phasing plan which includes the phasing arrangements for the delivery of public open spaces and Part V provision. A Phasing Plan (Drawing No. 0008) features in the architectural drawing set, prepared by C+W O'Brien Architects which accompanies the application.

2.11 Material Contravention

The application is required to be accompanied by a material contravention statement, in respect to any and all elements of the development that may materially contravene the Development Plan objectives or policies applicable to the site, whether, core strategy, density, housing typology, car parking, open space or other.

The application is accompanied by a Material Contravention Statement prepared by Hughes Planning and Development Consultants which justify the granting of planning permission for the development. Please refer to the enclosed report for further details.

3.0 Conclusion

This report sets out how the various issues raised by An Board Pleanala, in their Notice of Pre-Application Consultation Opinion, in relation to the proposed residential development at Lands at Capdoo & Abbeylands, Clane, Co. Kildare

The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall development and ensure that a high-quality residential development will be provided.

It is therefore submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.



Anne McElligott MPI
Associate Director
for HPDC Ltd.