



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report ABP-303298-18

Strategic Housing Development

136 no. dwellings, 1 vehicular link at Kill Hill Lane, 2 no. vehicular connections to the Avenue and all associated site works.
www.killhill2.ie

Location

Kill Hill and Earls Court, Kill, Co. Kildare.

Planning Authority

Kildare County Council

Applicant

McCourt Investments Ltd.

Prescribed Bodies

TII
Department of Culture, Heritage and the Gaeltacht
Heritage Council
An Taisce- the National Trust for

Ireland
Irish Water
Kildare County Childcare Committee

Observer(s) 42 submissions- see Appendix A

Date of Site Inspection 21st March 2019

Inspector Lorraine Dockery

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1.0 Introduction

This is an assessment of a proposed strategic housing development submitted to An Bord Pleanála under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

2.0 Site Location and Description

- 2.1. The site and its environs, as described in the Inspector's Report of ABP-300558-18 is as follows:

'The subject site is located on the eastern side of Kill Village in County Kildare. To the west, the site is bounded by the existing Earl's Court residential development which comprises a mixture of terraced, semi-detached and detached two storey dwellings. To the north west, the site adjoins a recently completed national school site. To the north, the site fronts onto Kill Lane which is currently unsurfaced.

The site slopes down generally from east to west and the highest part of the site is located in the south east corner. To the east, the site adjoins rising ground in the vicinity of Kill Hill and this area bears the characteristics of a large archaeological monument. The field boundary along the eastern margins of the site is characterised by a distinctive ditch and bank with mature hedgerow.

Overhead 110Kv power lines cross the site running from east to west. Site boundaries particularly along the eastern and southern boundaries of the site are characterised by mature hedgerows and there are a significant number of mature trees located within and bounding the site. The site also includes a former construction compound, and contains steel transport containers, scaffolding material and portacabins.

The stated area of the site is 6.3 ha'.

- 2.2. I would generally concur with this description.

3.0 Proposed Strategic Housing Development

- 3.1. The proposed development provides for 136 no. dwellings, vehicular and pedestrian links/connections, heritage trail and associated site works.

3.2. The following tables set out some of the key elements of the proposed scheme:

Table 1: Key Figures

Site Area	6.3 ha gross/ 4.2 ha nett
No. of units	136
Density (nett)	32 units/ha based on site area of 4.2 ha
Height	1.5–2 storeys
Public Open Space provision	1.9 ha stated (stated 45% of nett site area)
Access	One access from Kill Lane
Car Parking Provision	269 spaces (260 residents/9 visitors)

3.3. Table 2: Unit Mix

	1 bed	2 bed	3 bed	4 bed	Total
Apartments	8	-	-	-	8
Houses	-	25	85*	18	128
TOTAL	8	25	85*	-	136
As % of total	5.8%	18.3%	62.5%	13.2%	100%

* Of which 46 no. can be either 3 or 4 bed units

3.4. Table 3: Unit Type

Type	Maisonette	Detached	Semi-Detached	Terrace	Apt
Number	8	8	82	38	-

3.5. Table 4: Part V Provision

Requirement: 14 units	Provision: 14 units (6 x 1 bed, 6 x 2 bed, 2 x 3 bed)

3.6. No childcare facility is proposed and a justification for lack of same is included within Appendix M- Childcare Assessment.

- 3.7. A letter from ESB International (dated 8/12/2017) has been submitted with the application, which states that based on the information available, ESB would have no objection to the proposed development. Conditions attached.
- 3.8. A letter of consent from Kildare County Council (dated 01/11/2017) is attached to the file which states that they have no objection to a planning application being lodged in relation to development at this location, incorporating road improvements/upgrade works on the adjacent public road.
- 3.9. A letter from Michael McHugh (dated 8/12/2017) is attached to the file stating that he is the owner of No. 16 Earls Court Green and gives his consent for lands hatched green on attached map be included in this application for permission. I note that the map referred to is not attached to the file. However, I am aware of the location of the property referred to.
- 3.10. There is a letter attached to the file from An Bord Pleanála to Irish Water (dated 27/11/2017) in relation to the Irish Water CPO Upper Liffey Valley Sewerage Scheme, which states that there are no objections remaining to the proposed CPO. Accordingly, it is open to Irish Water to confirm/refuse to confirm the order, under section 126 of the Planning and development Act 2000, as amended.
- 3.11. A Screening Statement for Appropriate Assessment was submitted with the application which concludes that there is no likelihood of any significant effects on Natura 2000 sites arising from the proposed development, either alone or in combination with other plans or projects. It concludes that it is considered that a Stage 2 Appropriate Assessment is not required.

4.0 Planning History

06/1091

Permission GRANTED for 124 houses

12/86

Permission EXTENDED until 19/09/2017 for above application

ABP-300558-18

Application, lodged under the Strategic Housing provisions, REFUSED permission for 130 dwellings, vehicle connection and upgrade works and associated site works. The reasons for refusal are as follows:

1. Having regard to the existing deficiency in the provision of adequate sewerage infrastructure serving the subject site, it is considered that the proposed development would be premature pending the carrying out and completion of Contract 2B of the Upper Liffey Valley Sewerage Scheme. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. Having regard to the proposed density of development, at a net density of 26 number units per hectare, it is considered that the proposed development would not be developed at a sufficiently high density to provide for an acceptable efficiency in land usage given the proximity of the site to the built-up area of Kill village and in close proximity to educational facilities and to the established social and community services in the immediate vicinity. In addition, the proposed development does not have an adequate mix of dwelling types, being predominantly semi-detached and detached housing. It is considered that the low density proposed would be contrary to the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), issued to planning authorities under section 28 of the Planning and Development Act, which indicate that net densities less than 30 number dwellings per hectare should

generally be discouraged in the interests of land efficiency. The proposed development would, therefore, be contrary to these Ministerial Guidelines and contrary to the proper planning and sustainable development of the area.

3. It is considered that, having regard to the correspondence and the accompanying map dated 1st day of February 2018, received by An Bord Pleanála from the Development Applications Unit of the Department of Culture, Heritage and the Gaeltacht, regarding the re-classification of Recorded Monument KD020-001-003 from enclosure / ring-barrow / tumulus to hillfort and the resultant expanded buffer that corresponds with the area of archaeological potential around the hillfort and the archaeological complex to the south comprising sites and monument numbers KD019-010, KD019-056, KD019-057 and KD019-008004 protected by Preservation Order number 3 of 2007 published by the National Monuments Service, the proposed development would be likely to injure or interfere with a historic monument which stands registered in the Register of Historic Monuments under Section 5 of the National Monuments Acts, or which is situated in an archaeological area so registered. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

5.0 Section 5 Pre Application Consultation

- 5.1. A Section 5 pre application consultation took place at the offices of An Bord Pleanála on the 11th September 2018. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála was of the opinion that the documentation submitted required further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála. The applicant was advised that further consideration of the documents as they relate to the following issues was required:

Infrastructural Constraints

Further consideration/clarification of the documents as they relate to wastewater infrastructure constraints in the network serving the proposed development in particular as it relates to Contract 2B of the Upper Liffey Valley Sewerage Scheme.

The documentation at application stage should clearly indicate the proposals to address the constraints, the compulsory purchase order process and completion of same and the timelines involved in addressing the constraints relative to the construction and completion of the proposed development. (The prospective applicant may wish to satisfy themselves that an application is not premature having regard to the information sought above).

Density

Further consideration of documents as they relate to the density in the proposed development, specifically in relation to the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009). Particular regard should be had to the need to develop at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the proximity of the site to established social and community services in the immediate vicinity.

Unit Mix

Further consideration of documents as they relate to the layout of the proposed development particularly in relation to unit mix and particularly the prevalence of 3-bed units and limited number of 1 & 2 bed units within the documents should be given further consideration.

- 5.2. Furthermore, the prospective applicant was advised that the following specific information should be submitted with any application for permission:
1. A plan of the areas excluded for the calculation of net density in addition to a plan of the open space within the site clearly delineating public and private spaces.
 2. Detailed design of proposed surface water management system proposed including attenuation proposals and cross sections of all SuDS features proposed on site in the context of surface water management on the site.
 3. Details of all materials proposed for the proposed buildings, open spaces and paved areas.
 4. A full and complete drawing that details all boundary treatments within the development and on external boundaries including fencing proposed during the construction process.
 5. A detailed phasing plan for the proposed development should be provided.

6. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority.

Applicant's Statement

A statement of response to the Pre-Application Consultation Opinion was submitted with the application, as provided for under section 8(1)(iv) of the Act of 2016. This statement provides a response to each of the issues raised in the Opinion- infrastructural constraints, density and unit mix.

6.0 Relevant Planning Policy

National Policy

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant S.28 Ministerial Guidelines are:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated 'Urban Design Manual')
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities
- Urban Development and Building Heights, Guidelines for Planning Authorities
- Design Manual for Urban Roads and Streets
- The Planning System and Flood Risk Management' (including the associated 'Technical Appendices)
- Childcare Facilities – Guidelines for Planning Authorities

Other relevant national guidelines include:

- Framework and Principles for the Protection of the Archaeological Heritage Department of Arts, Heritage, Gaeltacht and the Islands 1999

Local Policy

Kildare County Development Plan 2017-2023 is the operative County Development Plan.

The site is within the area of the Kill Small Town Plan which is included within the Development Plan.

Zoning

The majority of the site is zoned 'Objective C, New Residential' which seeks to 'provide for new residential development and other services incidental to residential development'.

A small portion that provides pedestrian and private driveway access from The Green is zoned 'Objective B, Existing Residential/Infill'.

Map Ref V2-1.5B also includes Objectives for Kill and details listed monuments at Kill Hill, KD020-001 and KD020-002.

Section 12.8 Archaeological Heritage identifies policies and objectives as they relate to archaeological heritage and protection.

Table 12.5 outlines National Monuments which are subject to Preservation Order in County Kildare, and includes an Archaeological Complex at Kill Hill, comprising the following listed monuments: KD019-010, KD019-056, KD019-057 and KD019-008004, these are mapped and located to the south of subject site. A Zone of Archaeological Potential also extends around these sites and others towards the centre of Kill Village.

Paragraph 1.5.7 of the Kill Small Town Plan sets out the principles governing the future development of the town. These include consolidating development within the town centre followed by the sequential development of land / sites in a logical progression from the town centre to the edge of the development boundary.

Paragraph 1.5.8.1 notes that the settlement strategy for County Kildare allocates a housing target for Kill of 422 units between 2011 and 2023. Residential development

is identified as being accommodated on four sites, one of which is the site the subject of this application.

Paragraph 1.5.8.5 of the Plan for Kill relates to water and wastewater and notes that future development may be impacted by limitations on the existing sewerage system and specifically the connection to the Oberstown WWTP.

Paragraph 1.5.8.8 relates to archaeology and notes the significant archaeological heritage in Kill. A zone of archaeological heritage has been identified and the subject site lies outside of this area. There are a number of other identified sites in close proximity to the site of the proposed development.

7.0 Third Party Submissions

7.1. In total, 42 third party submissions were received. I note that there were templates from smaller group of objectors. One submission was received from a public representative and two from resident's associations, Earls Court Resident's Association and Residents of the Green. In addition to this, individual submissions that represented a mix of templates or no template were received. A list of all submissions received is contained within Appendix A of this report. Many of the submissions received acknowledge the need for housing, however their primary concern in most instances relates to the provision of an access through Earl's Court development. The submissions may be broadly summarised as follows, with reference made to more pertinent issues within the main assessment:

Traffic

- Increased volumes of traffic
- Removal of proposed access point to rear of proposed development
- Proposed vehicular/pedestrian links are not required and will bring unnecessary traffic through Earl's Court
- Permeability through existing housing estates should be subject to local public consultation, as per Chapter 15 of Kildare CDP

Zoning

- LAP should be prepared to ensure proper planning of the area
- Proposal considered not to be sequential development
- Proposal considered to be material contravention of Development Plan in relation to zoning

Amenity

- Impacts on visual and residential amenity including, inter alia, impacts on privacy, overlooking, noise, pollution; devaluation of property
- Non completion of previous phases of development; previous phases remain unfinished for approximately 20 years; quality of finishes on existing development; disused water pump at entrance to estate; enforcement notices
- Appropriate construction measures/conditions required eg noise, hours of works, street cleaning
- Health and safety concerns/littering/ anti-social behaviour/security concerns
- Quality of proposed development- extent of north facing rear gardens, lack of sense of place
- Different house design and layout to existing Earl's Court development- development should not be called Earl's Court

Infrastructure

- Capacity of existing water and sewage services
- Concerns regarding flooding
- Lack of childcare provision, medical facilities, garda stations and schools in the area- inadequate social infrastructure assessment

Other Matters

- Impacts on equine and agricultural uses in vicinity
- Lack of public consultation
- Taking in charge of existing development should be a condition of any grant of permission

- Encroachment on archaeological area- impacts on Kill Hill, insufficient buffer zone
- Impacts on River Liffey
- Extent of VIA submitted
- Destruction of wildlife/extent of Ecological Impact Assessment/bats and badgers
- Clarification regarding hedgerow between school fencing and Earl's Court and in relation to tree removal
- Interest of McCourt investment Company Director should have been declared as owner of No. 16 The Green, Earl's Court
- Inaccuracies in drawings (extension to rear of 11 The Grove, Earls Court)
- Procedural issues in relation to issuing of Opinion by ABP

8.0 Planning Authority Submission

8.1. In compliance with section 8(5)(a) of the 2016 Act the planning authority for the area in which the proposed development is located, Kildare County Council, submitted a report of its Chief Executive Officer in relation to the proposal. This was received by An Bord Pleanála on 25th February 2019. The report may be summarised as follows:

8.2.

Information Submitted by the Planning Authority

Details were submitted in relation to, inter alia, summary of views of third party submissions, Chief Executive Views, summary of Views of Elected Members.

Details included local policy context, zoning, planning history, quantitative assessment which includes density, open space provision, childcare facility, Part V provision, car and bicycle parking, qualitative assessment which includes urban design assessment, taking in charge, archaeological buffer zone. The overall considered view is that the proposed new residential development with a stated density of 32.4 dwelling per hectare would considerably exceed density levels for Edge of Small Town, such as Kill indicated in both County Development Plan and in

Section 28 Guidelines for Sustainable Residential Development in urban AR3eas (2009). The increased density proposed, is more suited to larger towns with better services. The density proposed together with the proximity of the dwellings 63-71 to the National Monument at Kill Hill, is of particular concern to the planning authority.

The Planning Authority recommends that permission be granted for the proposed development, subject to conditions which include a revised layout for the area relating to the block of houses no. s60-83, so as to provide either (i) the complete omission of the block and the area return to public open space or (ii) an increased separation distance to the Kill Hill National Monument

Summary of Inter-Departmental Reports

Water Services Division:

No objections, subject to conditions

Transportation Department:

Grant of permission recommended, subject to conditions

Housing Department:

Conditions attached

Environment Section:

No objections; conditions attached

Environmental Health Division:

No objections

Parks Section

Refusal recommended due to insufficient details

Conservation Officer

No conservation input required at this stage

The main issues raised in the assessment were as follows:

- Edge of Small town category where density range of 15-20 units/ha is considered appropriate- considers that lower density than that proposed

would be more appropriate at this transitional location

- Subject site is considered to be unique in terms of its setting and its proximity to a National Monument and while residential density is an important issue in terms of the delivery of housing, it is not considered that density should be the pertinent consideration at this unique location adjoining a National Monument
- Housing mix is generally considered acceptable
- Quantity of public/private open space and storage is in accordance with CDP requirements
- Housing Department are satisfied with Part V proposals
- Required standards for car/bicycle parking have been met
- Confirms that existing estate Earl's Court has not been taken in charge and the estate has not been finished to the satisfaction of Kildare County Council
- Concerns in relation to proximity of houses no's 63-71 to National Monument

The report includes a summary of the views of relevant Elected Members, as expressed at the Naas Municipal District Committee meeting held on 15/01/19 and are summarised below:

- Similarities with previous application on site
- Crèche provision
- Proposed heritage trail
- Insufficient car parking provision
- Local authorities and elected members should make decisions on SHD applications
- Concerns in relation to adequate infrastructure provision to cater for proposed development

9.0 Prescribed Bodies

9.1. The applicant was required to notify the following prescribed bodies prior to making the application:

- The Minister for Culture, Heritage and the Gaeltacht:
- The Heritage Council:
- An Taisce

- Kildare County Childcare Committee
- Irish Water
- Transport Infrastructure Ireland
- Inland Fisheries Ireland

Four bodies have responded and the following is a brief summary of the points raised. Reference to more pertinent issues are made within the main assessment.

Irish Water

Based upon the details provided by the developer and the CoF issued by Irish Water, it confirms that subject to a valid connection agreement being put in place between Irish Water and the developer, the proposed connections(s) to the Irish Water network(s) can be facilitated.

Transport Infrastructure Ireland

Will rely on planning authority to abide by official policy in relation to development on/affecting national roads as outlined in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), subject to the following:

- Proposed development shall be undertaken strictly in accordance with Transport Assessment. Any recommendations should be incorporated as conditions on the permission, if granted. Any additional works required as a result of the Assessment should be funded by the developer

Minister for Culture, Heritage and the Gaeltacht- DAU

Archaeology

Notes that the documents forwarded include a report and recommendations arising from archaeological assessment carried out at the proposed development site, including archaeological test excavation. It is considered that the material available in that regard is sufficient to enable the archaeological implications of the proposed development.

Based on the information currently available, the recommendation of the Department would be that conditions be attached to any permission.

Recommended conditions attached

Inland Fisheries Ireland:

The proposed development is located on the in the catchment of the Kill and Liffey (one of the foremost salmonid fisheries in this region) Rivers. The Kill River supports a significant population of brown trout in the Kill area and downstream of its confluence with the Painestown River also provides significant spawning habitat for River Liffey Atlantic salmon. The River Liffey is exceptional among most rivers in the area in supporting Atlantic salmon and Sea trout in addition to resident Brown trout (both *Salmo trutta*) populations. The presence of these fish populations highlights the sensitivity of local watercourses and the catchment in general. The river is regarded as a very important fishery.

Conditions attached in relation to best practice. In addition, the following recommended conditions are attached:

- All works should be completed in line with the submitted CMP which ensures that good construction practices are adopted throughout the construction period and contains mitigation measures to deal with potential adverse impacts identified in advance of the scheme.
- It is essential that the receiving foul and storm water infrastructure has adequate capacity to accept the predicted volumes from this development with no negative repercussions for quality of treatment, final effluent quality and the quality of receiving waters.

10.0 Assessment

10.1.1. I have had regard to all the documentation before me, including, *inter alia*, the report of the planning authority; the submissions received; the provisions of the Kildare County Development Plan 2017 and Kill Small Town Plan; relevant section 28 Ministerial guidelines; provisions of the Planning Acts, as amended and associated Regulations; the Record of Section 5 Consultation Meeting; Inspector's Report at Pre-Application Consultation stage and Recommended Opinion; together with the Notice of the Pre-Application Consultation Opinion. I have visited the site and its environs. In my mind, the main issues relating to this application are:

- Principle of proposed development
- Design, height and layout
- Impacts on amenity
- Traffic and transportation
- Drainage
- Archaeology
- Other matters
- Appropriate Assessment
- Environmental Impact Assessment

10.1.2. The attention of the Bord is drawn to the fact that a SHD application on this site was refused permission in March 2018 (Ref. 300558-18). The reasons for refusal have been cited above and in summary relate to deficiencies in sewerage infrastructure, density, unit mix and archaeology.

10.2. Principle of Proposed Development

10.2.1. I note the nature and scale of the development proposed, namely an application for 136 residential units on lands which are substantially zoned 'Objective C, New Residential' which seeks to 'provide for new residential development and other services incidental to residential development' within the operative County Development Plan. A small portion of the site that provides pedestrian and private driveway access from The Green is zoned 'Objective B, Existing Residential/Infill'.

10.2.2. I am satisfied that the lands are zoned for residential development and I am of the opinion that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

10.2.3. I am also satisfied that the proposal as provided for in this current application is acceptable in principle and is in accordance with the provisions of the National Planning Framework with regards to the sustainable development of such sites. I am of the opinion that given its zoning, the delivery of residential development on this prime, underutilised site, in a compact form would be generally consistent with policies and intended outcomes of the NPF and Rebuilding Ireland – The Government’s Action Plan on Housing and Homelessness in this regard. The site is located in an existing serviceable area. I do not consider the proposal to be a material contravention of the Development Plan in this regard. The rezoning of lands is a matter for the local authority and is outside the remit of this application. The proposal serves to widen the housing numbers within the general area and would improve the extent to which it meets the various housing needs of the community. I am satisfied that the proposal does not represent leap-frogging of development, as has been stated in some of the submissions received. The appropriate development of this site, would, in my opinion, represent a sequential approach to development and is to be welcomed in principle. I have no information before me to believe that existing services and facilities within the general area do not have capacity to support the proposed development. Therefore, having regard to all of the above, the proposal is considered acceptable in principle.

10.3. **Design, height and layout**

10.3.1. The proposal involves the construction of 136 residential units in a mix of maisonettes and dwellings. The residential units will consist of 128 no. houses, generally two storeys in height and 8 maisonettes. The proposal generally does not extend higher than two-storeys, although some 2.5 storey units are noted. Over 66% of units proposed are detached/semi-detached properties. All but two of the one-bed units are earmarked for Part V use.

10.3.2. I have a number of reservations in relation to the proposed development. The attention of the Bord is drawn to the fact that the layout of the proposed scheme has

only marginally changed from that previously refused permission on the site. I acknowledge the constraints of the site in terms of the archaeological buffer and the required buffer for the powerlines traversing the site. Notwithstanding this, I have serious reservations regarding the layout of the proposed scheme, which is considered to be poor. The site is rectangular in shape and extends for in excess of 500 metres along its length. It has a gross site area in excess of six hectares. It has the potential to create its own identity without detriment to the character of the village of Kill. There is the potential to create character areas, a sense of place, a greater variety of unit type and areas of higher/lower density in accordance with the principles of the Urban Design Manual. This has not been satisfactorily achieved in this current proposal. The entrance to the scheme is weak and I draw the attention of the Bord to the private open space associated with Units 1 and 20, bounding the public roadway located immediately as one enters the proposed development. Two metre high dry dash block walls at this location are considered to be a wholly unsatisfactory response, as is the fact that one will be looking into these rear garden areas as one travels along the access roadway. High boundary walls associated with rear gardens are located at a number of locations along the main spine road. I draw the attention of the Bord to the access road at the centre of the site bisecting the public open space, again this is considered unsatisfactory. The overall layout is considered to be dominated by roads and I draw the attention of the Bord to the layout surrounding public open space No. 1 in this instance. While I note some streets are 4.8m in width, the vast majority are 5.5m and in my opinion, no clear hierarchy of streets is evident, in compliance with the principles of DMURS. The length of the access roadway from Unit No. 90 to 113 is such that it may give rise to speeding. The extent of hard surface/roadway in front of Units 28 to 35 is also highlighted, with parking spaces apparently randomly located thereon. The same issue of excessive width/hardstanding is noted in front of Units 120-124. It is unclear to me how one accesses Unit No. 136 at the western side of the site. Two parking spaces are delineated on the submitted drawings but access to them is unclear, considering only a pedestrian access to Earl's Court is proposed at this location. The attention of the Bord is drawn to the fact that the issue of layout did not form a reason for refusal in the decision in the previous SHD application on the site, although it was stated that a comprehensive redesign of the scheme was necessary having regard to the need to provide for an increased residential density.

- 10.3.3. The Notice of Pre-Application Consultation Opinion which issued from An Bord Pleanála referred to further consideration of the documents as they relate to the proposed residential density and housing mix. The number of units has increased by five from that originally submitted at pre-application stage from 131 units to 136 units. I note the previous SHD refusal on the site which proposed 130 units at a density of 26 units per hectare, specifically reason No. 2, outlined above, which essentially considered that the density was inadequate, as was the mix of units, which were predominantly detached and semi-detached dwellings. It states that that net densities less than 30 units per hectare should generally be discouraged in the interests of land efficiency.
- 10.3.4. While the increase in actual numbers is only 5 since the previous refusal, the density of development proposed is now stated as 32 units/hectare. This figure has been arrived at due to the increase in the archaeological buffer area, which has been excluded from the density calculations, as has the area underneath the powerlines. While I accept the exclusion of the buffer zone from the density calculations, it is noted that the excluded area differs in extent to that requested by the DAU in the previous application. The applicants have stated that this buffer zone has been amended in consultation with the DAU and the amended distances are set out in Figure 11 of the submitted Archaeological Assessment. It would have been helpful if the Department had included the recommended buffer distances, as they did previously, with their current report. While the DAU have not expressed any concerns in this regard, I note that in some instances the extent of the buffer excluded from the density calculations is greater than set out in Figure 11. The differences are quite marginal but it might suggest that the density proposed is actually slightly lower than the stated 32 units/hectares. I refer the Board to the map attached with the DAU submission in File No. 300558-18 in this regard, together with Figure 11 as contained within the submitted Archaeological Assessment.
- 10.3.5. The issue of housing mix was raised as a reason for refusal in the previous SHD application on the site and was also raised in the pre-application consultation meeting and in the Section 5 Opinion was issued. In my opinion this matter has not been addressed satisfactorily. The proposed development remains suburban in nature, with an inappropriate housing mix. Eight one-bed units are proposed, however only two are available on the public market with the remainder being

earmarked for Part V. No apartments are proposed, all of the properties are dwellings with the exception of eight maisonettes. In excess of 66% of the current proposal remains detached and semi-detached properties, with over 75% of the units being three and four bed properties. This is considered wholly inadequate at this location. The previous application on the site, for which housing mix formed a reason for refusal, comprised 87.7% three and four units with almost 85% being detached and semi-detached properties. The figures show little difference between the two schemes in this regard. The applicant has been advised of such, both in the previous refusal and in the pre-application consultation associated with this proposal, and in my opinion the response to same is inadequate. As proposed, the development does not cater for a good population mix within the scheme, nor does it cater to persons at varying stages of the lifecycle. Section 4.6 of the operative County Development Plan 2017 deals with mix of dwelling types and states that the Plan sets out to ensure that new residential development provides a wide variety of housing types that reflect and cater for the diverse housing needs of the county's population. Policy MD 1 is noted in this regard.

10.3.6. I note section 28 ministerial guidelines in this regard, in particular the Sustainable Residential Development in Urban Areas- Guidelines for Planning Authorities and the associated Urban Design Manual, which sets out 12 criteria, drawn up to encapsulate a range of design considerations for residential development. Criteria No. 4, variety, recognises that a successful neighbourhood will be one that houses a wide range of people from differing social and income groups and recognises that a neighbourhood with a good mix of unit types will feature both flats and houses of varying sizes. In addition, the NPF recognises that currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms. The NPF further recognises the varying housing needs that are required to be met, which include the housing needs of older people, people with disabilities, the travelling community, social housing generally, families of varying sizes and income levels and students. I consider that given the scale of the proposed development, relative to the overall size of Kill, the proposed development will be an important and substantial intervention at this

location. It is therefore imperative that it adheres to good planning practices, is not catering to a homogenous population and adds variety to the general area. This is not being achieved in this instance. Given the significance of the site, located at the entrance to the town, it is important that the proposal provides a positive contribution to the housing mix. I draw the attention of the Bord to the fact that the adjoining Earl's Court development appears to be comprised primarily of three and four bed dwellings, as does a substantial portion of the remaining housing stock in Kill. I consider that this development, as proposed, is essentially providing more of the same for Kill, which already appears quite well served with such properties.

10.3.7. Related to this, is the fact that 44% of the site is stated to be public open space.

While I acknowledge the extent of open space associated with the archaeological buffer zone, I query the need for other such areas, which are large in extent and with which I question their usability into the future. In this regard, I refer the Bord to Open Spaces Areas 1(a)(b)(c) and Area 4. In addition, the layout of the scheme around Area 1 is questionable. Smaller, highly landscaped areas would be more appropriate at these locations, given the extent of open space associated with the powerline buffer area and archaeological zone. The reduction on these areas of open space would aid in increasing density within the overall site and may aid in providing a more satisfactory layout. In addition, I note the extent of private open space proposed for some properties. Some dwellings have private open space at almost 150 square metres, with many properties having rear gardens in excess of 100 square metres. The need for such an amount of private open space is questionable. I also note the retention of the hedgerow along the western site boundary, within the rear garden areas of the proposed properties backing onto this boundary. The practicality of this considering it will be included in private ownership is questionable.

10.3.8. Connectivity through the site is noted. I note that two vehicular entrances and one pedestrian entrance is proposed through to Earl's Court housing development, similar to the previous application on site. The vast bulk of the submissions received have raised concerns in relation to these proposed connections. The Bord Order associated with the previous refusal on the site, 300557-18, stated that a comprehensive redesign of the scheme was necessary having regard to the need to provide for an increased residential density and the need to provide for pedestrian and cycle, but not vehicular, access from the lands through the adjoining Earl's Court

housing scheme, in the interests of pedestrian and traffic safety. I do not have issue with the two proposed vehicular access points through Earl's Court and I consider that such connectivity, including pedestrian and cycle connectivity through Earl's Court is considered to be good planning practice and would aid in improving connectivity within the overall area. The Bord may wish to deal with this matter, in the event of permission being granted.

10.3.9. A Heritage Trail is proposed through the site to link up with known archaeological/heritage features in the town. While the principle of this is to be welcomed, exact details of how it is to be provided require clarification. In particular, I note that the proposed trail does not meet up with other proposed footpaths at the site boundaries and requires further refinement.

10.3.10. Having regard to all of the above, I consider that the proposed scheme is unsatisfactory for a number of reasons. The overall layout itself requires further refinement and examination, the entire scheme needs to be tightened up, the density calculations are questioned, the unit mix is inadequate and the overall layout is such that a higher quality scheme could be provided by omitting some of the large tracts of open space and providing a more urbanised layout.

10.4. Impacts on amenity

10.4.1. Impacts on residential amenity have been raised in many of the submissions received. Concerns have been raised in terms of inter alia, overlooking, loss of light, loss of privacy, health and safety concerns and noise pollution.

10.4.2. Having regard to the orientation of the site, the separation distances involved and the design of the proposed units, I do not have undue concerns with regards the impacts on amenity of properties in the vicinity. I note the level differences across the site, but am satisfied that the proposal will not adversely impact on properties in the vicinity. Issues raised in relation to potential anti-social behaviour is outside the remit of this application. Concerns raised in relation to the naming of the proposed development have been raised in many of the submissions received. This matter would be dealt with by means of condition, in the event of permission being granted, for agreement with the planning authority.

10.4.3. Given the nature of the development proposed, I do not anticipate noise levels/littering to be excessive. There may be some noise disruption during the

course of construction works and concerns relating to such were expressed in some of the submissions received. Such disturbance or other construction related impacts is anticipated to be relatively short-lived in nature. A Construction Management Plan has been submitted with the application. If the Bord is disposed towards a grant of permission, I recommend that such issues like wheel wash facilities, hours of works and the like be dealt with by means of condition. In addition, construction traffic should not access the site through Earl's Court. Again, this matter could be adequately dealt with by means of condition. I do not have undue concerns in relation to health and safety matters.

10.4.4. The level of amenity being afforded to future occupants of the residential units is considered good and all units are in excess of minimum standards. An Assessment of Inward Traffic Noise Impacts has been submitted with the application and I am satisfied with the details contained therein.

10.4.5. Having regard to all of the above, I am satisfied that the level of amenity being afforded to future occupiers of the proposed scheme is generally acceptable, subject to condition. I am also satisfied that impacts on existing residential amenity would not be so great as to warrant a refusal of permission. I have no information before me to believe that the proposal if permitted would lead to devaluation of property in the vicinity.

10.5. Traffic and Transportation

10.5.1. The application has been accompanied by a Transportation Assessment Report and a Traffic and Transportation Statement. The proposal including for an existing vehicular access serving the lands to be upgraded by means of a priority junction onto Kill Road to serve the proposed development. Two additional vehicular accesses are proposed through the existing Earl's Court development. A total of 296 parking spaces are proposed, two per dwelling unit plus an additional 24 visitor spaces. The Transportation Assessment concludes that there are no traffic/transportation capacity, traffic safety or operational issues associated with the proposed development that would prevent a positive determination. The site is within the 50km/hr speed limit zone. PICADY analysis indicates that the construction of 136 residential units will have a negligible impact upon the capacity and safety of the road network in the area.

- 10.5.2. I note the report of the Transportation Department of the planning authority, as contained in Appendix B of the Chief Executive Report, which recommends a grant of permission, subject to conditions. They state that issues raised at pre-planning stage in relation to road widths and materials were not addressed by the applicant. If the Bord is disposed towards a grant of permission, the matter may be dealt with by means of condition. The report of Transport Infrastructure Ireland does not raise any concerns in relation to the proposed development, subject to condition.
- 10.5.3. Having regard to all of the information before me, I acknowledge that there will be some increase in traffic movements as a result of the proposed development, if permitted, however, I have no information before me to believe that the road network in the vicinity does not have adequate capacity to cater for this increase. I also have no reason to believe that the proposed development, if permitted would lead to the obstruction for road users or the creation of a traffic hazard at this location.

10.6. **Drainage**

- 10.6.1. The Notice of Pre-Application Consultation Opinion which issued from An Bord Pleanála referred to further consideration of the documents as they relate to the wastewater infrastructure constraints in the network serving the proposed development in particular as it relates to Contract 2B of the Upper Liffey Valley Sewerage Scheme. I note that the first reason for refusal in Ref. 300558-18 related to sewerage infrastructure and specifically stated that having regard to the existing deficiency in the provision of adequate sewerage infrastructure serving the subject site, it is considered that the proposed development would be premature pending the carrying out and completion of Contract 2B of the Upper Liffey Valley Sewerage Scheme. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
- 10.6.2. A pre-connection enquiry report from Irish Water is included with the application, as required. This stated that based upon the details provided and on capacity currently available as assessed by IW, that subject to a valid connection agreement being put in place, the proposed connection to the IW network can be facilitated. It further states that in order to accommodate the proposed wastewater connection, upgrade works are required to increase the capacity of the Irish Water network. Irish Water currently has the project (Upper Liffey Valley Contract 2B) on their current

investment plan which will provide the necessary upgrade and capacity. This upgrade project is scheduled to be completed by 2021 (this may be subject to change) and the proposed connection could be completed as soon as practicably possible after this date.

- 10.6.3. A report received by An Bord Pleanála from Irish Water states that based upon the details provided by the developer, they confirm that subject to a valid connection agreement being put in place, the proposed connection to the IW network can be facilitated.
- 10.6.4. Since the previous refusal on site, the issue has progressed, the Order has been confirmed for the Upper Liffey Valley Sewerage Scheme, Contract 2B (ABP Ref 302370) and it is stated these works are now on Irish Water investment plan for 2021. The applicant is proposing a phasing arrangement in which 20 units are provided to January 2020 with the remaining units being provided in blocks of 30/35 until January 2021 (I assume a typographical error in the Engineering Planning Report which inadvertently states January 2021). The attention of the Bord is drawn to this.
- 10.6.5. It is proposed to drain the attenuated surface water network by gravity into the existing surface water sewer network in the Earl's Court estate. In terms of water supply, it is proposed that the water connection will be made at two locations to the existing watermain in the Earl's Court housing development. I note the report of the Water Services Department as contained in Appendix B of the Chief Executive's Report to An Bord Pleanála. It states that it is apparent that a lot of the drainage design issues outlined during the original SHD application for the subject site remain unresolved. It continues by stating that the scale of the outstanding drainage design and flood risk issues are not of a sufficient level to warrant a refusal of permission. Conditions are recommended. I note that a site specific flood risk assessment has not been submitted with the application. However, the contents of the PFRA map submitted with the application are noted. The OPW mapping website, www.floodmaps.ie shows no recorded flooding in the vicinity of the site. The site was relatively dry underfoot at the time of my site visit and no flooding/ponding was evidenced.

10.6.6. I consider that the previous reason for refusal has been overcome in relation to the Upper Liffey Valley Sewerage Scheme, Contract 2B. If the Bord is disposed towards a grant of permission, I recommend that a condition relating to phasing and occupancy of residential units should be attached to any such grant.

10.6.7. Matters raised by the planning authority in their report relating to surface water drainage and flood risk show a lack of information being provided in this matter, which the applicant was previously advised to submit. While the planning authority state that the drainage design and flood risk issues are not at a sufficient level to warrant recommending refusal on their part, the attention of the Bord is drawn to this matter.

10.7. **Archaeology**

10.7.1. The third reason for refusal in the previous application on the site, Ref. 300558-18 related to archaeology and stated that it was considered that, having regard to the correspondence and the accompanying map dated 1st day of February 2018, received by An Bord Pleanála from the Development Applications Unit of the Department of Culture, Heritage and the Gaeltacht, regarding the re-classification of Recorded Monument KD020-001-003 from enclosure/ring-barrow/tumulus to hillfort and the resultant expanded buffer that corresponds with the area of archaeological potential around the hillfort and the archaeological complex to the south comprising sites and monument numbers KD019-010, KD019-056, KD019-057 and KD019-008004 protected by Preservation Order number 3 of 2007 published by the National Monuments Service, the proposed development would be likely to injure or interfere with a historic monument which stands registered in the Register of Historic Monuments under Section 5 of the National Monuments Acts, or which is situated in an archaeological area so registered. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

10.7.2. In response to the above, the buffer zone has been increased from that previously proposed. A different range of separation distances are now proposed from the National Monument. The planning authority has expressed some concerns in relation to the setback distances proposed in some instances. However, I note the report of the Department of Culture, Heritage and the Gaeltacht in relation to archaeology which does not raise objection to the proposal and states that based on

information currently available, their recommendation would be that conditions to attached to any permission.

- 10.7.3. An Archaeological Assessment report has been submitted with the application. The archaeological buffer zone, as set out by the Department was included in their report in relation to the previous application on the site, Ref. 300558-18. The documents submitted by the applicant state that this buffer zone has been amended, in consultation with the DAU, and the amended distances are set out in Figure 11 of the Archaeological Assessment. As has been stated above, it would have been helpful if the Department had included the revised recommended buffer distances, as they did previously, with their current report. Notwithstanding this, the Department have examined the documentation submitted with the application and have not raised objections in relation to the current proposal, subject to conditions.
- 10.7.4. I note the rich archaeological heritage in the immediate area, some being of national importance, and I note the proximity of the development site from known archaeological features. Having regard to all of the information before me, I am satisfied that the issue of archaeology could be adequately dealt with by means of condition, if the Bord is disposed towards a grant of permission.

10.8. Other Matters

- 10.8.1. I note the Part V proposal which include for the provision of 14 no. units, 6 x one-bed; 6 x two-bed and 2 x three-bed units. The proposed units are pepper-potted throughout the scheme, which I consider acceptable. The planning authority has not raised concern in relation to this matter.
- 10.8.2. No childcare facility is proposed. This was accepted in the previous application on the site. The planning authority has not raised issue with the lack thereof. A Childcare Assessment has been submitted with the application, which outlines a justification for lack of same. I am satisfied with regards to this matter.
- 10.8.3. An Ecological Impact Assessment was submitted with the application, the contents of which appear robust and reasonable. It states that field surveys were undertaken in November 2017 and August 2018 and included a bat activity survey and badger survey. The report concludes that there will be losses for biodiversity at a local level as the lands are developed for housing and change from previous agricultural uses. Overtime, landscaping measures will offer additional habitat for common species. I

consider this to be reasonable. Three species of bats were recorded utilising the site for foraging purposes with no bat roosts confirmed. The report states that it is likely that badgers occur in the vicinity with evidence of their activity noted under the eastern site boundary hedgerow and a disused badger sett was present here. The EclA outlines a range of protection measures, with which I am generally satisfied. No special nature conservation objectives relate to the subject site. The issue of appropriate assessment is dealt with below. While I acknowledge that there will be some loss of biodiversity as a result of the proposed development, I note that this is a zoned, serviceable site within an urban area. I also note the report of Inland Fisheries Ireland in this regard and recommend that their recommended conditions be attached to any grant of permission.

- 10.8.4. I note the landscaping proposals contained within the proposal and I am generally satisfied in this regard. If the Bord is disposed towards a grant of permission, I recommend that the issue of landscaping and boundary treatments, in particular measures proposed for the protection of bats and badgers, be dealt with by means of condition.
- 10.8.5. Given the nature and scale of the development proposed, together with the location of the equestrian zoning on the Kill Town zoning map, I have no information before me to believe that the proposal, if permitted would have impacts on the equine industry.
- 10.8.6. I note that some of the submissions received state that there was a lack of consultation with them by the applicants. It is noted that while it may have been beneficial to all parties, there is no statutory requirement to undertake such engagement.
- 10.8.7. I note the points raised in most of the submissions received in relation to alleged non-completion of the Earl's Court development. This is considered to be a matter of enforcement for the planning authority. Issues raised in relation to taking in charge of previous phases of development are also outside the remit of this application.
- 10.8.8. Issues raised in relation to possible anti-social behaviour/littering/illegal parking are a matter for An Garda Siochana, outside the remit of this planning appeal.

10.8.9. Some minor discrepancies are noted in the submitted drawings. Notwithstanding these discrepancies, there is adequate information on file to allow me undertake a comprehensive assessment of the proposal.

10.9. Appropriate Assessment

10.9.1. The site is not located within any designated Natura 2000 site. There are nine stated sites within a 15km radius of the development site, with the nearest one being approximately 9.5km away (Poulaphouca Reservoir SPA). The development site does not contain any habitats listed under Annex I of the Habitats Directive. The site is not immediately connected to any habitats within European sites and there are no known indirect connections to European Sites. Potential impacts on Natura 2000 sites from the development are restricted to the discharge of surface and foul water from the site. I note the Screening for Appropriate Assessment Report submitted by the applicant, dated December 2018, which concludes that significant effects are not likely to arise either alone or in combination with other projects that would result in significant effects to any Natura 2000 sites.

10.9.2. Based on all of the information before me and having regard to the nature and scale of the proposed development and/or the nature of the receiving environment and/or proximity to the nearest European site, no appropriate assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

10.10. Screening for Environmental Impact Assessment (EIA)

10.10.1. The applicant has addressed the issue of Environmental Impact Assessment (EIA) within the submitted EIA Screening Report. The Screening Report concludes that the EIA of the proposed development is not required. It also states that the proposed development is considered to be sub-threshold in terms of EIA having regard to Schedule 5, Part 2, 10(b) (i) and (iv) of the Planning and Development Regulations 2001-2017.

10.10.2. The current proposal is an urban development project that would be in the built up area but not in a business district. It is therefore within the class of development described at 10(b) of Part 2 of Schedule 5 of the planning regulations, and an environmental impact assessment would be mandatory if it exceeded the

threshold of 500 dwelling units or 10 hectares. The proposal is for 136 residential units on 6.3 hectares. The site area is significantly below the stated threshold of 10 hectares and the number of units significantly below the threshold of 500 units. The proposed development would be located on agricultural land beside existing development. The site is not designated for the protection of a landscape or of natural or cultural heritage. Measures for the protection of archaeology have been included in the application. The proposed development is not likely to have a significant effect on any Natura 2000 site. This has been demonstrated by the submission of an Appropriate Assessment Stage 1 Screening Report that concludes that there will be no impacts upon the conservation objectives of the Natura sites identified. The habitats and species associated with the sites will not be adversely affected and the proposed development does not need to proceed to Stage II of the Appropriate Assessment process.

10.11.3. The development would result in works on zoned, agricultural lands. The majority of the development would be in residential use, which is a predominant land use in the vicinity. The proposed development would use the municipal water and drainage services, upon which its effects would be marginal. The site is not located within a flood risk zone. The proposed development is a plan-led development, which has been subjected to Strategic Environmental Assessment. On the basis of the information on the file, which I consider adequate in order to issue a screening determination, it is reasonable to conclude that there is no real likelihood of significant effects on the environment arising from the proposed development and an environmental impact assessment is not required.

11.0 Conclusion and Recommendation

- 11.1. In conclusion, I consider the principle of residential development to be acceptable on this site. This is a zoned, serviceable site within the development boundary of Kill. The area is well served in terms of facilities and services and the site bounds a new primary school. This site has the potential to add significantly to the town of Kill, through appropriate development.
- 11.2. However, notwithstanding the above, I have serious reservations in relation to the proposal before me. I consider that the previous reason in relation to housing mix

has not been adequately overcome and this issue remains unresolved. The applicant was alerted to the issues surrounding unit mix both from the previous refusal reasons and also from the section 5 pre-consultation process. I consider that the applicant has had ample opportunity to address the potential issue, however the response to same is inadequate in the proposal. I consider this to be an inadequate response to the Opinion and the previous refusal and consider that the development, as proposed, would cater for a homogenous population, with little variety for those outside of that grouping. This is considered not to be in compliance with the operative County Development, in particular Policy MD 1 and Government guidelines on this matter. The NPF recognises that currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. The NPF further recognises that varying housing needs that are required to be met, which include the housing needs of older people, people with disabilities, the travelling community, social housing generally, families of varying sizes and income levels and students. Going forward smaller units will be required to cater for people of varying household sizes and as proposed, the current proposal is not addressing this.

11.3. Linked to this, the layout of the scheme is considered to be of poor quality and if permitted would not provide the standard of development put forward within the various section 28 guidelines, in particular the Urban Design Manual and the 12 criteria espoused therein. While I acknowledge the site constraints in terms of archaeology and powerline buffer zones, the size and length of the site is such that it could create its own character and become a very attractive place in which to reside. This is not being achieved in the current proposal, in my opinion.

11.4. I recommend that permission be refused.

12.0 Reasons and Considerations

1. The proposed development, which is characterised predominantly by three and four bed, detached and semi-detached housing, would be contrary to the section 28 Ministerial Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual issued by the Department of the Environment, Heritage and Local Government

in May 2009, and would contravene Policy MD 1 of the Kildare County Development Plan 2017-2023, which seeks to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the county. Criterion number 4 of the Urban Design Manual recognises that a successful neighbourhood will be one that houses a wide range of people from differing social and income groups and recognises that a neighbourhood with a good mix of unit types will feature both apartments and houses of varying sizes. The National Planning Framework issued by the Department of Housing, Planning and Local Government, recognises the increasing demand to cater for one and two person households and that a wide range of different housing needs will be required in the future. The proposed development is therefore considered to be contrary to the proper planning and sustainable development of the area.

2. The “Urban Design Manual – a Best Practice Guide” issued by the Department of the Environment, Heritage and Local Government in 2009, to accompany the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas includes key criteria such as context, connections, inclusivity, variety and distinctiveness. It is considered that the proposed development results in a poor design concept that is substandard in its form and layout; fails to provide high quality usable open spaces; fails to establish a sense of place; would result in a substandard form of development lacking in variety and distinctiveness, all of which would lead to conditions injurious to the residential amenities of future occupants. Furthermore, the layout of the proposed scheme, being dominated by roads, is contrary to the provisions of the Design Manual for Urban Roads and Streets, issued by the Department of the Environment, Community and Local Government and the Department of Transport, Tourism and Sport in 2013. The proposed development would, therefore, seriously injure the residential amenities of future occupants, would be contrary to these Ministerial Guidelines and would be contrary to the proper planning and sustainable development of the area.

Lorraine Dockery

Senior Planning Inspector

01st April 2019

APPENDIX A

Amanda Cranny

Andrea and Darren Murphy

Andrew Long

Anthony and Lesley O'Rourke

Bridget Byrne

Christina Gobbett Guerin

Claire Kavanagh

Dan and Audrey Bryan

DAU

Deborah and Brian Casciani

Declan and Eileen Try

Deirdre and John Counihan

Duane and Natalie Johnson

Earls Court Residents Association

Elizabeth and Justin Condon

Emmet Stagg

Ger and Stephanie O'Neill

Inland Fisheries Ireland

Irish Water

John and Mary Miley

John Keyes

John McCann

Jonathan and Sharon Martin

Joseph and Yvonne Kessie

Karl and Lorraine Paul

Leesa Mulvaney

Lorraine Moriarty

Lynda and Kevin Malone

Maria and James Byrne

Marina Jones

Mary Cocoman

Michael Loughnane

Rachel and Stephen Curran

Ron Molloy

Rosemary McNulty

Sean Anderson

Sinead and Barry Lawler

Siobhan and Wayne McGarry

Sonia Kenny

The Residents of the Green

TII

Toni and David Malone