

STATEMENT OF RESPONSE TO AN BORD PLEANÁLA'S CONSULTATION OPINION



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**Metropolitan
Workshop**

**IN RESPECT OF A
PROPOSED RESIDENTIAL DEVELOPMENT
AT FARRANKELLY, DELGANY, GREYSTONES, CO.
WICKLOW**

September 2019

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1.0 INTRODUCTION

1.1 The pre-application consultation opinion from An Bord Pleanála in relation to the proposed strategic housing development at Farrankelly, Delgany, Greystones, Co. Wicklow was received on the 26th February 2019 (case reference no. ABP-303291-18).

1.2 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 of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.”

1.3 The opinion further states that “An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development”. The issues listed are under the following headings:

- Frontage onto Priory Road;
- Levels across the site and co-ordinating development (including treatment and use of private and public open space);
- Arrangement of Duplex units and their curtilage

1.4 Section 2 of this report sets out how the applicant has responded to each of the issues raised by the Board in their Consultation Opinion, with particular reference to The Design Statement , and accompanying reports and drawings prepared by the design team and which accompany this application. This Statement of Response, and the associated amendments to the scheme, in turn responds to the key issues raised by the Planning Authority’s opinion as set out in their Report on the pre-application proposals and the Board’s Opinion.

1.5 Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017 states:

‘(5) At the conclusion of a pre-application consultation, the Board may do either or both of the following: (b) notify the prospective applicant that specified information should be submitted with any application for permission for the proposed development, including photographs, plans, maps, drawings or other material or particulars and, where the Board considers it appropriate, either or both—’.

1.6 The pre-application consultation opinion from An Bord Pleanála states pursuant to Article 285(5)(b) that the following specific information should be submitted with any application for permission:

- *A plan showing the net site area for the calculation of the density of the proposed development in accordance with Appendix A and section 5.11 of the 2009 sustainable urban residential guidelines. If the proposal departs from the provisions of the county development or local area plan in this regard the prospective applicant should have due regard to section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016.*
- *A report demonstrating the provision of proper pedestrian and cycle links within the proposed development and to adjoining development and along public roads. The report should demonstrate compliance with the applicable guidance set out in DMURS. A taking in charge plan should be submitted which shows links to adjoining land up to the boundary of the site without any intervening strips.*

- *A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted.*

- *A Site Specific Flood Risk Assessment Report. The prospective applicant is advised to consult with the relevant technical section of the planning authority prior to the completion of this report which should describe this consultation and clarify if there are any outstanding matters on which agreement has not been reached with regard to surface water drainage.*

- *A phasing scheme for the development which would indicate how open space, and childcare facilities and access for the proposed housing would be provided in a timely and orderly manner.*

- *Details of proposed boundary and surface treatments throughout the development, and of landscaping and planting. Proposals should also be submitted to ensure ongoing public access to the facilities on the active open space that could be incorporated into an agreement with the planning authority or a condition attached to a planning permission.*

- *A draft construction management plan.*

- *A draft waste management plan.*

1.7 A detailed response to each of the points raised above has been provided within this response report and has been included as part of the planning application documentation.

Figure 1.1 – Overall Masterplan



Source: Metropolitan Workshop Architects (A0_1609_101_101_Proposed Site Layout Plan)

2.0 STATEMENT OF RESPONSE TO ISSUES RAISED

2.1 The following sets out how the applicant has addressed the four issues raised in the Board's Notice of Pre-Application Consultation Opinion, with reference to the accompanying documentation submitted, to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

2.2 The Site Layout Plan prepared by Metropolitan Workshop Architects shows the overall layout in context.

2.1 Response to Item 1 – Priory Road

2.3 Item 1 of the An Bord Pleanála opinion states the following:

“Further consideration/amendment of the documentation as they relate to the frontage along Priory Road, having regard to the change in the character and function of that road from a rural lane to a street within the urban area that is envisaged in the local area plan.”

2.4 In relation to Issue No.1 referred to in the pre-application consultation opinion from An Bord Pleanála, further consideration has been given to the layout of the proposed development.

2.5 The existing character of Priory Road is that of a semirural/sylvan typology with hedgerows to the northern side and one-off single storey bungalows to the south side. There is an existing gate to access the fields part way along Priory Road and this is the proposed location for the new future junction between Priory Road and the main link street.

2.6 The levels along Priory Road, which fall from 57.75m OD from the north-western frontage to 52.08m OD at the south-eastern portion of the frontage (adjoining Eden Gate) have provided the context for the proposed arrangement which is to provide for dormer type dwellings, to the north of the Priory Road access, and to provide 2 storey dwellings fronting onto Priory Road (with access internally within scheme) on either side of the Priory Road access, to provide an appropriate urban design response to the context.

2.7 Review of the frontage along Priory Road through the omission of the shared local street, (located behind Priory Road) and its replacement with 3 no. direct access points to serve the 9 no. dwellings, reconfiguration of the southern element of the site adjoining Priory Road and Eden Gate, (through the omission of unit no. 106 as previously proposed in the pre-application submission).

2.8 The two storey dwellings located at the southern end respond to the levels of the site which drop at this location and is considered more appropriate than a continuation of the dormer arrangement to the north of the link street.

2.9 The design intent is to provide an appropriate transition in form and character along Priory Road whereby dormer typologies are provided, including an urban edge, which overlooked by residential accommodation with some planting responding to the existing condition.

2.10 A continuous footpath is provided to the roadside edge on the outside the planning strip giving some delineation between public and semi-public while at the same time allowing the path to feel overlooked and safe.

Figure 2.1 – Revised Priory Road Arrangement - Plan

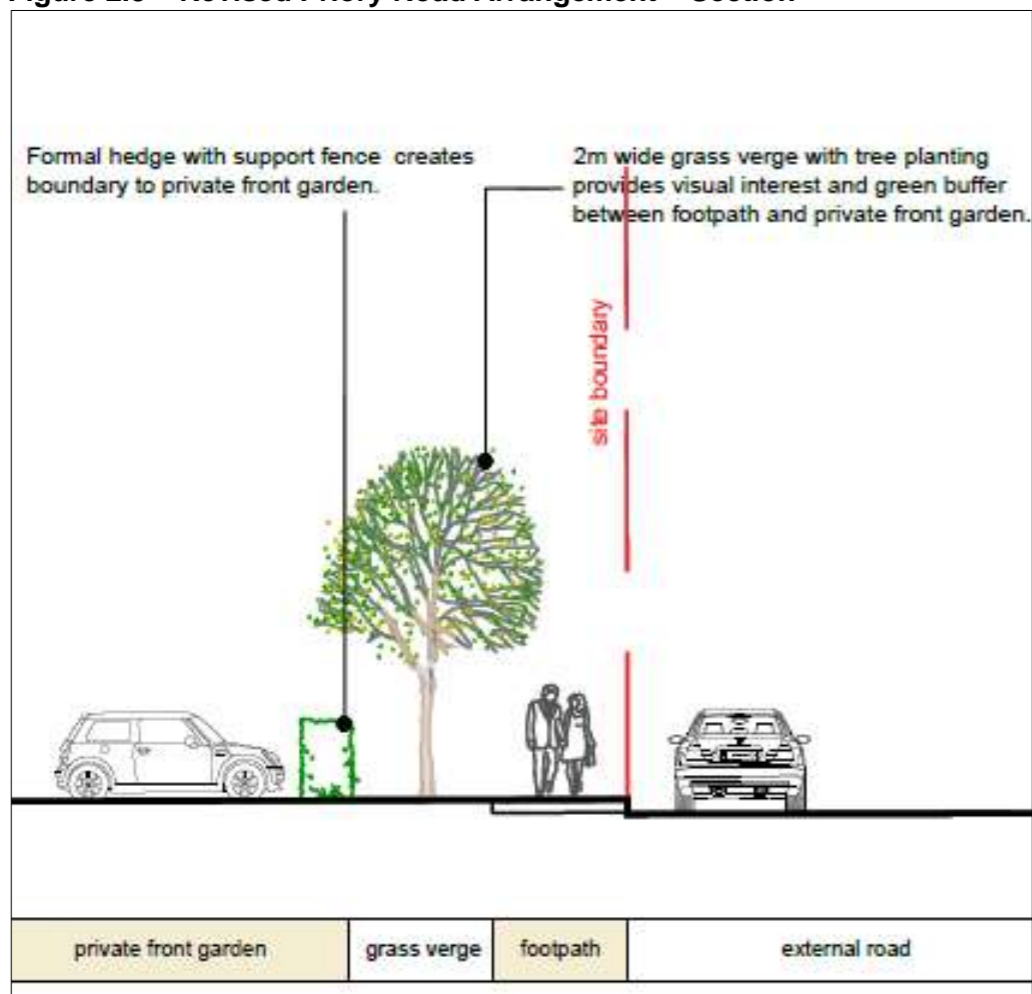


Figure 2.2 – Revised Priory Road Arrangement – CGI



Source: Metropolitan Workshop Architects

Figure 2.3 – Revised Priory Road Arrangement – Section



Source: KFLA Architects

2.11 The Priory Road access includes A1 type houses which turn the corner to provide both a frontage onto Priory road and the main link street. A similar approach occurs on the easternmost house fronting onto Priory Road.

Figure 2.4 – Revised Priory Road Arrangement – Entrance



Source: Metropolitan Workshop Architects

2.2 Response to Item 2 – Levels and Open Space

2.12 Item no. 2 of the An Bord Pleanála opinion states:

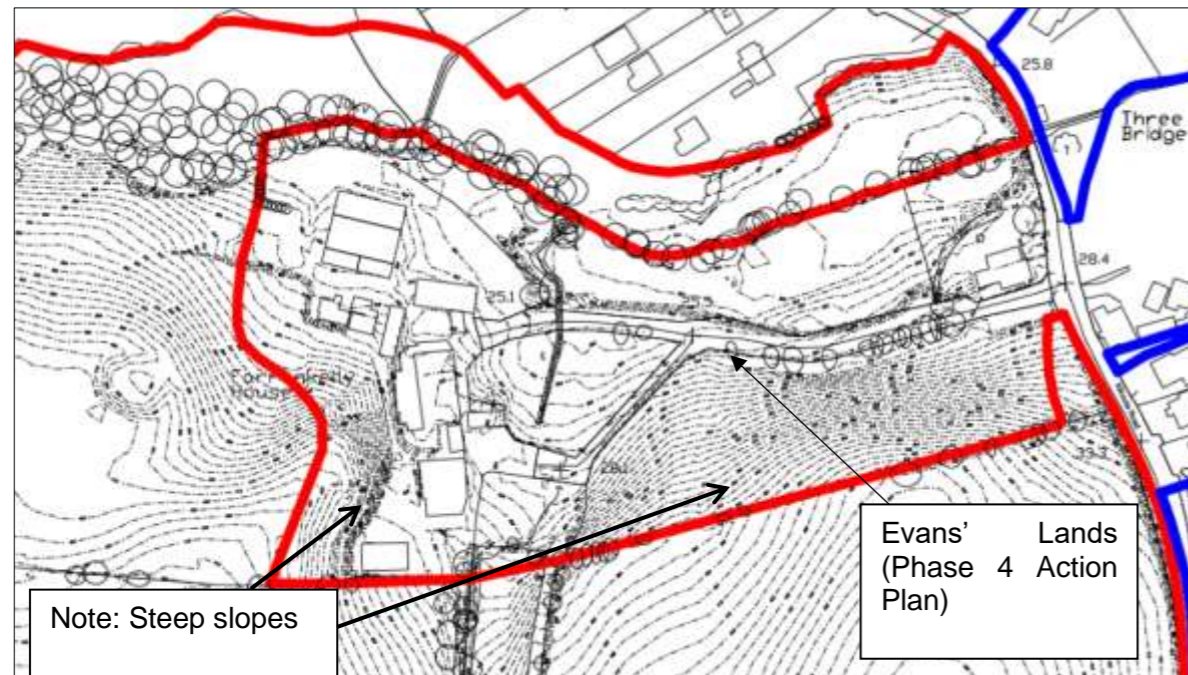
“Further consideration of the documentation as it relates to the levels across the site and its impact on co-ordinating development with the remainder of the lands under the AAP6 zone that are outside the site, and on the treatment and use of private and public open space across the scheme development.”

2.2.1 Co-ordinating development with remainder of lands under AAP6

2.13 It is noted that Cairn Homes Properties Ltd., ownership within the AP6 lands relates to c. 14 hectares of residential zoned land, with the remainder of the AP6 lands comprising lands under the ownership of the Evans’ families (with an additional c. 3 hectares of residential land). These are set out in the agreed Farrankelly Action Plan, (which is included with the SHD application for reference). These lands are to the north east of the proposed scheme with a boundary along the Three Trouts stream. The lands are currently in agricultural and commercial use and enjoy a separate access from the Kilcoole Road however the proposed scheme has been cognisant of providing future links to the adjoining lands on all sides including the northern boundary.

2.14 The proposed development allows for a vehicular link to the AP6 Phase 4 lands (under separate ownership), which is located in the north east of the site where the topography is flatter and the future typology more likely to be 2-3 storey houses on a more traditional street network. (allowing for levels). It is noted the AP6 Phase 4 lands would also have their own access point to the south of Three Trouts bridge. It is also proposed to allow for a (pedestrian link) accessed from the internal link street. This connection has been designed along this boundary from the main link street in Character Area No.1 as vehicular traffic can be brought in though the existing access from Kilcoole Road.

Figure 2.5 – Extract from Topographical Layout showing levels

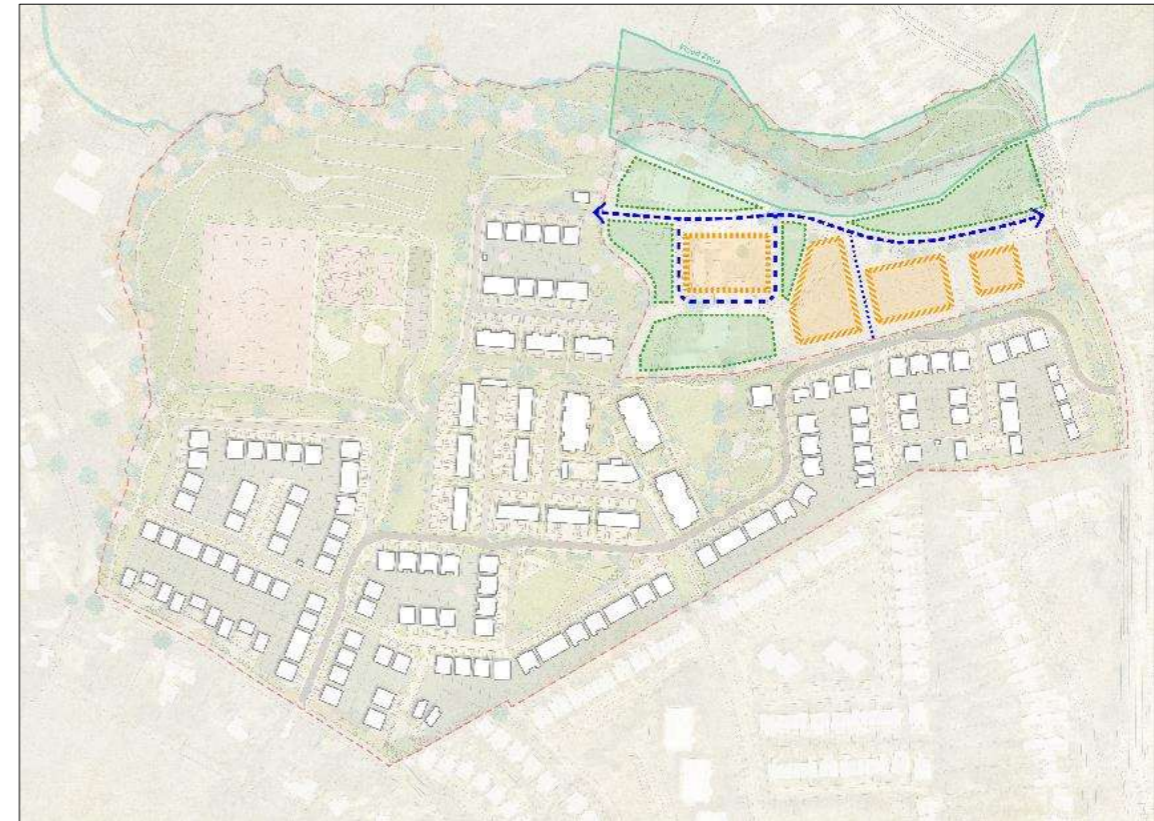


Source: Metropolitan Workshop Architects

2.15 Along the internal link road, a pedestrian connection could be provided. The levels within the site and adjoining the adjacent lands within the future separate phase of development (as per Action

Plan) results in a small number of locations being able to accommodate links. To provide additional links would result in significant intervention into the slope which would require an inefficient layout.

Figure 2.6 – Indicative High Level Integration to Future Phase 4 Farrankelly AP6 Lands



Source: Metropolitan Workshop Architects – Note indicative

2.16 The agreed Action Plan indicates that the development of the Evans’ lands would occur (independently) in a subsequent phase to the build out of the Carin Homes lands (a letter of consent from the adjoining landowner is included with the approved Action Plan 6 (enclosed). The proposed development allows for a potential vehicular connection into the adjoining lands along the northern portion of the lands. This is the only location which the levels would allow such a connection to be made.

Figure 2.7 – Links to Future Farrankelly AP6 Lands

Source: Metropolitan Workshop Architects

- 2.17 With reference to Figure 2.6, the figure shows how the integration of the subject lands has taken into account the slopes and potential access points to the adjoining lands. It is noted this is conceptual in nature, and would need to be progressed to detailed design stage as the lands are under separate ownership.
- 2.18 It is highlighted that the greenway along the northern boundary is indicated as to be taken in charge by Wicklow County Council. This includes lands within the ownership of Cairn Homes, which are outside the Action Plan, but so as to provide enhanced integration, not only with this SHD application, but with adjoining lands, to the south, it has been included as part of improving and co-ordinating development in the Farrankelly AP6 area.
- 2.19 This would allow for future connections to be made from within the adjoining lands to the greenway. It is considered that links should be provided from within the adjoining lands at the optimum location, rather than showing links at this point in time. This would allow a degree of flexibility for the adjoining landowner. It is also noted that there are lands fronting onto the R761, which do not form part of the Farrankelly Action Plan area.

2.2.2 The treatment and use of private and public open space across the scheme development

- 2.20 The landscaping proposals have been formulated having careful regard to the recreational needs of the future residents of the proposed development, and integrating the landscaping proposals into the wider structure of the agreed Farrankelly Action Plan. We refer the Board to the enclosed Landscape Design Report and associated drawings prepared by Kevin Fitzpatrick Landscape Architects, which is included with the SHD application.
- 2.21 The objective of the overall landscape design is to:
- Develop an integrated pedestrian movement and cycle network that allows for secure and easy movement throughout the subject lands, with links to adjoining areas.
 - Facilitate the creation of a series of usable and high-quality public open spaces.
 - Design high quality public open spaces that focus on creating a 'sense of place' and individual character for the development areas.
 - Provide a 'Green Streets' approach that allows for street trees and planting that form a buffer between pedestrians and traffic.
- 2.22 The location layout and usability of the proposed public open spaces are of the highest quality and will contribute positively to the residential amenity of future residents. The open space provision for the entire scheme was carefully considered by the design team, and it is submitted the detailing and high quality finish as illustrated on the Landscape Masterplan (drawing no. 101), prepared by Kevin Fitzpatrick, Landscape Architects, confirms a high degree of amenity for future residents of the scheme.
- 2.23 This current proposal delivers high quality open space, with a variety of hard and soft landscaped areas providing for both passive and active recreation for all ages.
- 2.24 For clarity there are a series of open space elements within the proposed development, with different uses envisaged as follows:
- Active Open Space – 4.5 hectares**
- 2.25 The subject lands include Active Open Space of c. 4.5 hectares, which is currently under the ownership of the Evans' family. As part of the SHD application, it is proposed to deliver Active Open Space early in the build out of the overall lands (to commence in phase 1) in tandem with the general earthworks relating to the housing element of the scheme.

Figure 2.8 – Active Open Space (4.5 hectares)



Source: KFLA Architects

function as a recreational route and will be defined by a change in surface material. The route will begin at the south-west corner of the site and work its way around the site boundary up to the north-east corner. A small bridge will cross the Three trouts stream.

Figure 2.9 – Three Trouts “Greenway”



Source: KFLA Architects

2.30 A pedestrian/cycle link will join on to the green route from the main part of the site, through open space no. 1 and past the apartments to the north. Additional woodland planting will be planted at certain sections along the site boundary to create the atmosphere of a continuous woodland walk.

2.31 The design intent is to create a high quality and appropriate landscape for future residents, which will meet their recreational needs and provide an attractive visual setting and social amenity space. The principles of inclusivity for all age groups, universal accessibility and sustainable development are applied to ensure an inclusive and environmentally responsible design solution. The public open spaces have been designed and located so as to complement residential layout and should be visually as well as functionally accessible to the maximum number of dwellings within the housing area. The approach is to ensure that the open space provision is located within easy walking distance of dwellings.

2.26 The Active Open Space will include a football pitch as well as a tennis court and multi-use pitch. In addition, it is proposed to provide a play area and an informal kickabout area to the front of the proposal. Some parking is also provided (c. 25 car parking spaces and 30 no. cycle spaces).

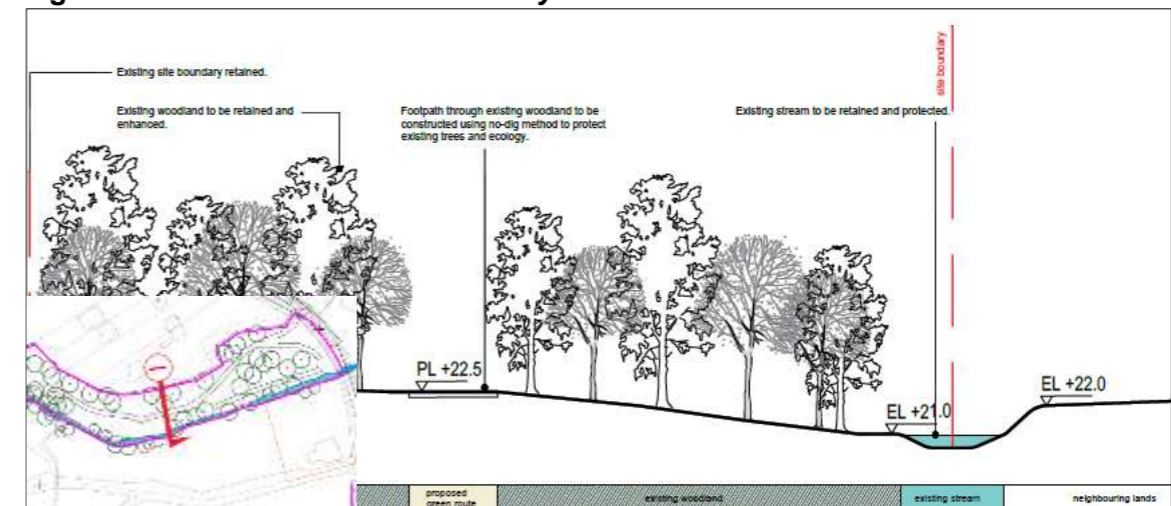
2.27 The northern portion of the proposal includes for running/training areas, which will use the contours of the land where possible. It is noted the Active Open Space will be ultimately taken in charge by the Council.

Three Trouts Greenway

2.28 The 'Three Trouts Stream' and associated woodland is also of high priority. Similar to the treatment of the existing hedgerows, this linear space will become an integral linking feature in the wider green route strategy, while the dense belt of woodland would remain as part of a greenbelt buffer zone. In terms of amenity use, the proposed walkway through the space would become a recreational asset to the wider local community, as well as future residents.

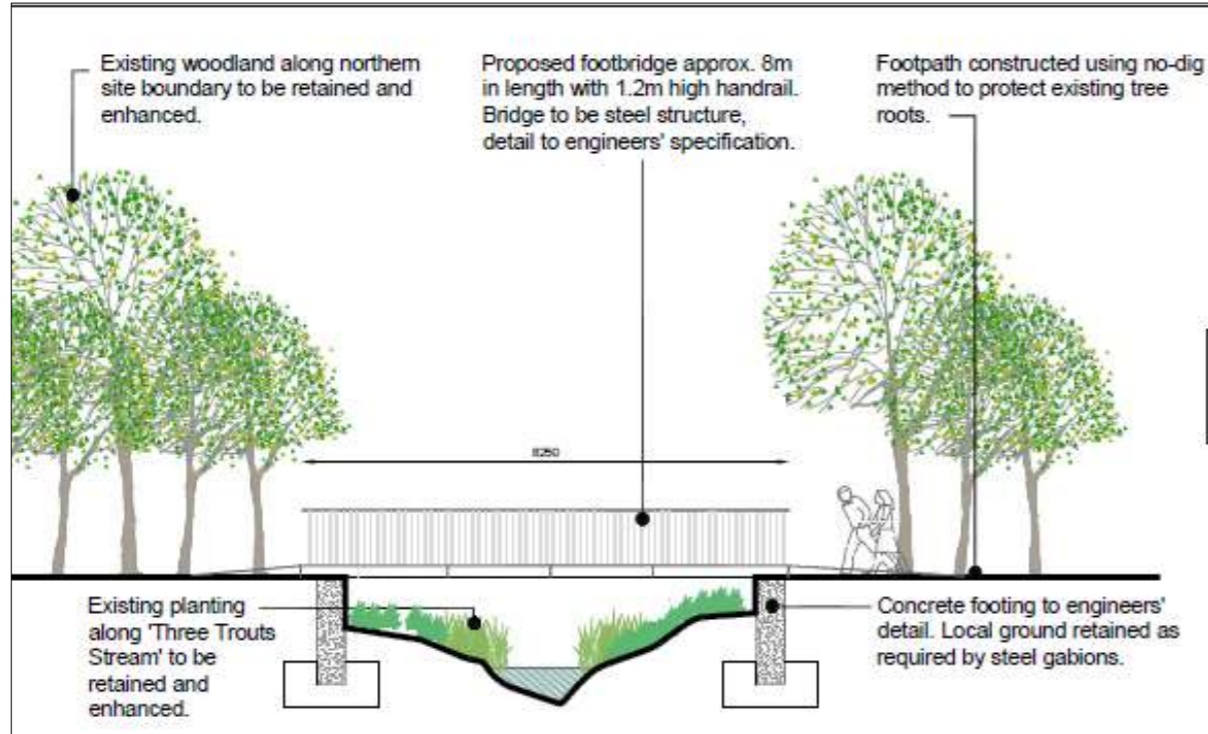
2.29 The green route proposed meanders through the existing woodland, utilizing existing tracks and topographical features, and provides an alternative circulation route for users, which connects to footpaths and existing tracks located outside of the site boundary. The proposed green route will

Figure 2.10 – Three Trouts “Greenway” - Section



Source: KFLA Architects Section I – Drawing 109

Figure 2.11 – Section through “Three Trouts” Stream



Source: KFLA Architects – Section FF – Drawing no. 107

2.32 The section lines are shown below:



2.33 All of the public open space areas meet the requirements of Appendix 1 of the Wicklow County Development Plan, and have been designed to be generous in width to make them usable and have been integrated at an early stage of the design process so as to avoid residual areas with little or no function. The design team has ensured that there are a series of open space areas which are functionally accessible to the maximum number of dwellings within the new residential area.

2.34 The proposed development provides approximately 15% of Public Open Space within the development on the 3 no. areas of public open space, which is considered appropriate having regard to the context of the subject site and the additional substantial adjoining variety of public open space being provided in the form of the Active Open Space (4.5 hectares) and the “Three Trouts” greenway (c. 2.4 hectares). This miscellany of open spaces gives every resident easy and convenient access to recreational amenity, and allows distinct landscape treatments and elements to be included in the design.

Figure 2.12 – Section through Open Space no. 1 – with Residential Amenity Building in background



Source: KFLA Architects – Section CC – Drawing no. 107

2.35 Within all open spaces there are areas for informal play, casual recreation and passive leisure. The quality of these spaces is enhanced by the inclusion of features such as natural play elements, seating, paths, native planting and landform, and the utilisation of environmentally appropriate materials. The palette of materials will also be used to integrate the proposed architectural forms and materials within the landscape.

Semi-private Spaces and Communal Spaces

2.36 Within the apartment blocks there is an allowance of semi-private communal open space for use by the residents of the block. The quantum of space for each apartment is in accordance with the DoHPLG Planning Guidelines for Design Standards for New Apartments.

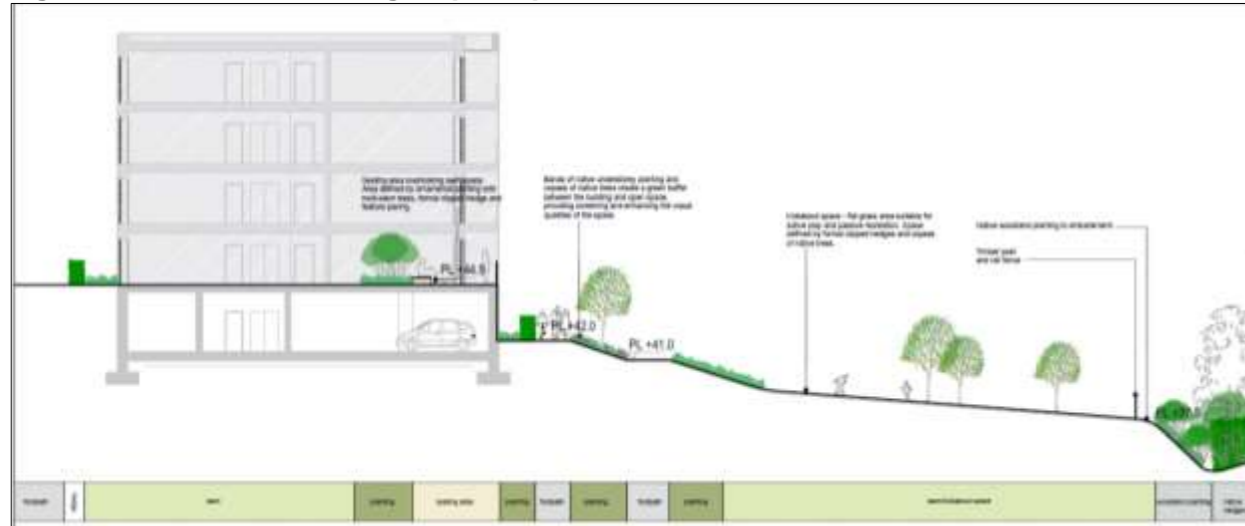
2.37 The semi-private landscape spaces in the scheme have all been carefully considered to provide residents with usable and attractive open space. Where possible both a south-facing seating space and small lawn area have been provided along with bands of ornamental shrub and groundcover planting to provide privacy and shelter.

2.2.3 Passive Surveillance of Open Spaces

2.38 With regard to the passive surveillance of open spaces, the design provides for substantial overlooking of open spaces within the scheme design. The objective of the design team has been for dwellings to address the greens (pocket parks) and neighbourhood parks as much as possible. This over-arching design principle will ensure that there is a high degree of passive surveillance throughout the proposed development, providing a safe and secure environment for future residents and visitors to the area, using all the attractive green spaces throughout the scheme.

2.39 It is also noted that the design of the development includes apartment buildings located on the corners of the residential blocks which provide additional presence and overlooking of the opens space areas.

Figure 2.13 – Section through Open Space no. 1



Source: KFLA Section AA

Figure 2.14 – ABP Pre-application Duplex Arrangement



Source: Metropolitan Workshop Architects

2.3 Response to Item 3 – Duplex Apartments

2.40 Item no. 3 of the An Bord Pleanála opinion states:-

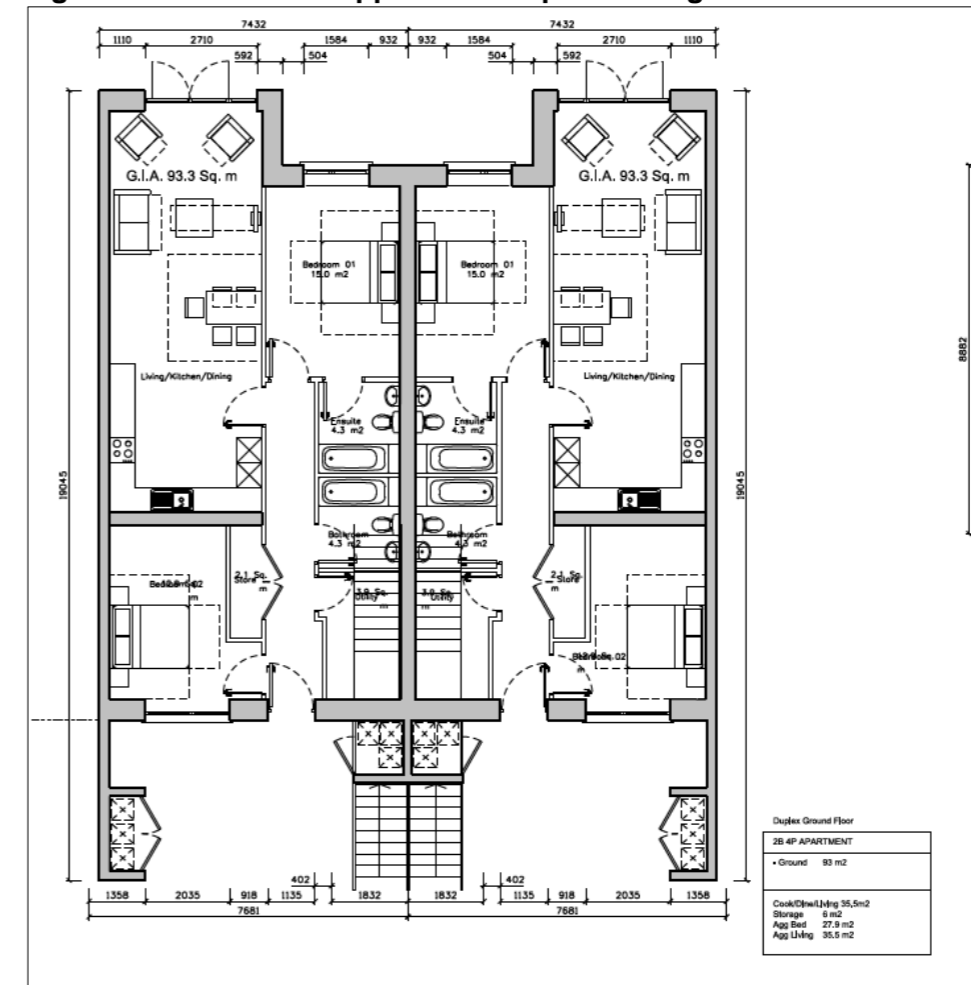
“Further consideration/amendment of the documentation as it relates to the proposed buildings containing duplex apartments which should be sufficient to demonstrate that a proper relationship would be provided between the curtilage of those buildings and the adjoining land on all sides.”

2.41 In response to this item, the configuration of the proposed duplex units has been amended to provide a more defined relationship between the building curtilage and the adjoining lands. It is noted an issue raised by the Board, as discussed at the pre-application consultation meeting with An Bord Pleanála and Wicklow County Council was that there could be more delineation provided for between the ground floor amenity space of the duplex unit and the wider areas.

2.3.1 Previously Proposed ABP Pre-application Duplex Arrangement

2.42 The previously proposed ground floor arrangement is shown below.

Figure 2.15 – ABP Pre-application Duplex Arrangement – Ground Floor



Source: Metropolitan Workshop Architects

2.3.2 Revised Duplex Arrangement

2.43 The new arrangement is shown below which now shows a delineated terraced area at ground floor level, which also includes a planted area to provide additional privacy, offering a higher degree of residential amenity compared to the arrangement proposed at ABP pre-application stage.

Figure 2.16 – Revised Duplex Arrangement



Source: Metropolitan Workshop Architects

2.44 The proposals provide a high degree of integration to the roads, and provide a strong urban and active edge onto the internal streets.

2.45 The duplex block Type A comprise a two storey three bedroom apartment over a single storey two-bedroom apartment and all units have their own front door off the street. The higher density character area contains duplex accommodation to the southernmost and westernmost blocks around the perimeter ensuring front doors face onto the public open spaces. The blocks have been carefully designed however to be dual fronted so that the accommodation on the interior streets do not feel like rear façades. This is achieved by allowing the ground floor units to have terraces facing onto the street with secondary access from this side. This private open space is treated in a similar fashion to an apartment as it provides overlooking to the street but enjoys the benefit of a privacy strip. The terrace open space of the first floor own door unit is on the same side as the stepped entrance to maximise the views and west facing orientation.

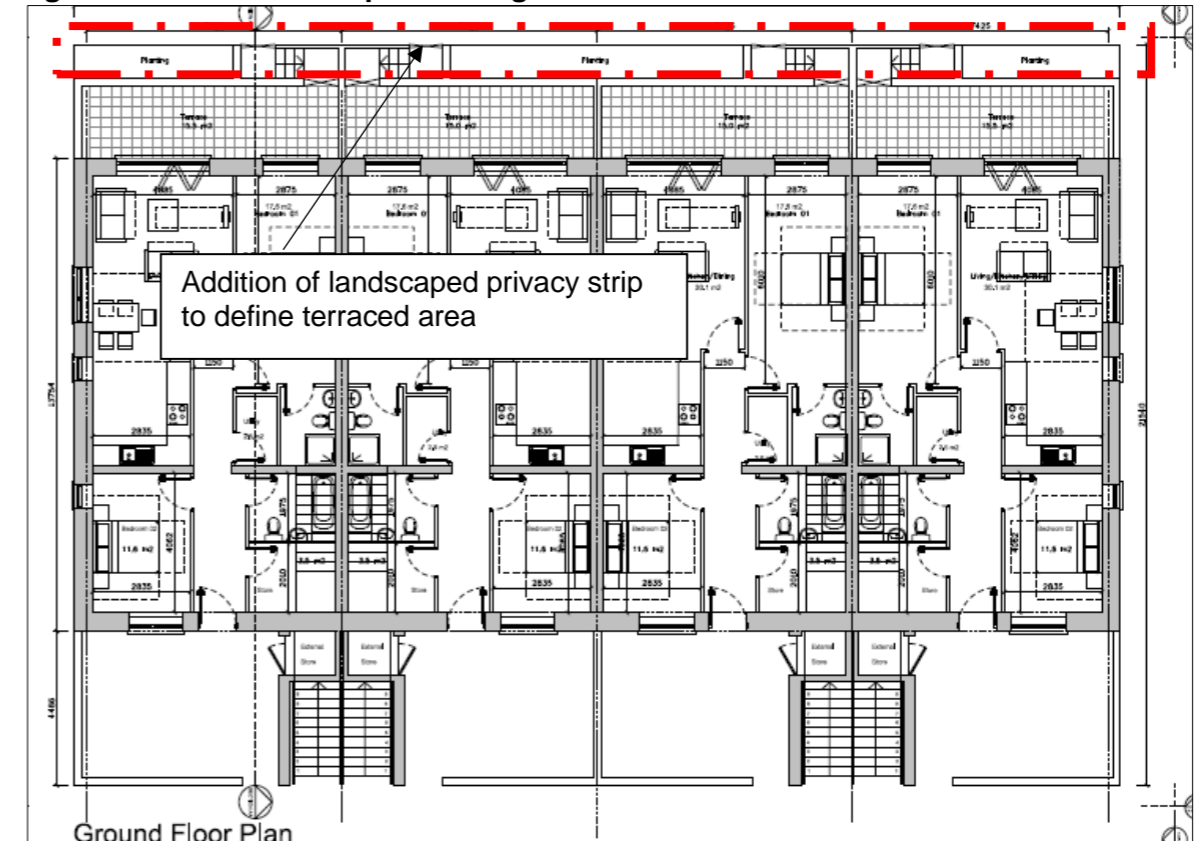
2.46 As set out in the KFLA Landscape Design Report, included with the SHD submission, there will be planted buffers for the outdoor terraces, the facades and windows of all apartment blocks and duplexes, ensuring that residents have a certain amount of privacy within their own apartments and views are screened from the public areas into the private spaces.

2.47 Some streets such as local street 14 are lined on both sides with duplex accommodation. In such cases overlooking and variety is ensured through having front doors facing one side of the street with gardens overlooking the other side. In this instance the topography provides a slight level

difference between street and garden level ensuring that privacy is maintained while providing an active edge. A landscaped strip provides further delineation. On the opposite side of the street front doors and stair access is provided at ground level. Routes are provided between the buildings to enable permeability

2.48 3 no. Duplex Block Type B units are proposed along local street 13. The stepped entrance to Duplex block B address local street 11 while the first floor terrace is on the south side overlooking the open space and avails of the south views and orientation. Overall, the proposed duplex units will provide a high degree of residential amenity and will be situated in a high-quality urban setting with integrated landscaping throughout.

Figure 2.17 – Revised Duplex Arrangement



Source: Metropolitan Workshop Architects [A1_1609_101_050_Duplex Type A_ Proposed Plans

Figure 2.18 – Duplex Arrangement CGI



Source: Metropolitan Workshop Architects

Figure 2.19 – Cairn Homes Duplex Example (Parkside)



Source: Cairn Homes

Figure 2.20 – Duplex Elevation



Source: Metropolitan Workshop Architects

Figure 2.21 – Duplex Elevation



3.0 STATEMENT OF RESPONSE TO SPECIFIC INFORMATION REQUIRED

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

3.1 Item no. 1 – Density and Local Area Plan

3.2 Item no. 1 seeks:-

“A plan showing the net site area for the calculation of the density of the proposed development in accordance with Appendix A and section 5.11 of the 2009 sustainable urban residential guidelines.

If the proposal departs from the provisions of the county development or local area plan in this regard the prospective applicant should have due regard to section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016.”

3.1.1 Proposed Density

3.3 In response to the above we refer the Board, to Drawing no. 1609-101-120A, prepared by Metropolitan Workshop Architects, which sets out the net site area for the calculation of the density of the proposed development.

3.4 The SRD note that a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. While the Local Area Plan indicates a density of c. 22 units per hectare (gross), it is considered, that having regard to the location of the site, and national strategic guidance contained in the SRD, and also to An Bord Pleanála precedent, that an appropriate density range of between 35 and 50 net, is appropriate for the subject site.

3.5 The design approach is based on a need to protect the amenities of the surrounding residential development, where similar housing is proposed (2 storey and dormer) and that the apartments are located centrally within the scheme layout. The design intent is to protect the amenities of the adjoining neighbours and general character of the area and its amenities.

3.6 The areas excluded have had regard to Appendix A of the SRD 2009, which excludes the following from the gross site area:

- *major and local distributor roads;*
- *primary schools, churches, local shopping etc.;*
- *open spaces serving a wider area; and*
- *significant landscape buffer strips.*

3.7 It is also noted that Appendix 1 of the Wicklow County Plan states that:

“Density’ will only be allowed to be generated from land that is capable of being built upon; land which is ultimately unsuitable for such purposes (e.g. due to excessive slope) will not be considered to be part of the density equation even if it forms part of the overall site. Any such areas should be clearly shown on planning applications drawings;”

Figure 3.1 – Site Calculations



Metropolitan Workshop Architects Drawing no. 1609-101-120A

3.8 The net density has been calculated to exclude the proposed link road (and sightlines/setbacks) to be delivered in accordance with the RO7 Road objective, which traverses the site in an east to west direction, and its construction, which relates to c. 1.08 hectares. The eastern entrance onto the Kilcoole Road, provides an additional area, which is sufficiently set back from the road edge which will facilitate the future alignment of the R761, at this location. The alignment has been discussed between ROD and with Wicklow County Council, in this regard.

3.9 The zoned open space areas such as greenway (c. 2.4 hectares), and the active open space (c. 4.5 hectares) have been excluded from the overall site area of 21.21 hectares.

3.10 In addition, the proposed development is required to retain existing notable trees within the proposed layout and in particular the layout maintains Tree Protection Objective (T06) which relates to a line of Scots Pine in the western portion of the subject lands.

3.11 Furthermore undevelopable areas, arising from topography and gradient (and due to significant landscape buffers [e.g. to maintain protected tree lines] and sloped areas which relates to c. 1.3 hectares. Having regard to the above, this amounts in a net area of c. 11.94 hectares, which results in a net density of 35.7 units per hectare. The open space within the residential area is included in the 11.91 hectares.

3.1.2 Section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016

3.12 Section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016 states that:

“where the proposed development materially contravenes the said plan other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.”

3.13 As set out in Section 37(2)(b) of the Planning and Development Act states that an Bord Pleanála may materially contravene a development plan or Local Area Plan where national planning policy objectives take precedence.

3.14 Section 37 (2) (b) of the Planning and Development Act states:-

“(2) (b) Where a planning authority has decided to refuse permission on the grounds that a proposed development materially contravenes the development plan, the Board may only grant permission in accordance with paragraph (a) where it considers that—

- (i) the proposed development is of strategic or national importance,*
- (ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or*
- (iii) permission for the proposed development should be granted having regard to regional planning guidelines for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or*
- (iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan”.*

3.15 An appropriate justification is set out within the enclosed Statement of Material Contravention should An Bord Pleanála consider the proposed density of development a material contravention of the Wicklow County Development Plan 2016-2022 and the Greystone-Delgany and Kilcoole Local Area Plan 2013 – 2019. The statement demonstrates that the proposed increased density is appropriate on the subject lands in line with the Section 28 Guidelines and in accordance with the National Planning Framework 2040.

3.16 It is considered that the proposal will provide a sustainable density of development, which respects the adjoining established pattern of development in the area, and is in accordance with the proper planning and sustainable development of the area.

3.2 Item no. 2 – Detail of Permeability and Links (including compliance with DMURS)

3.17 Item no. 2 seeks:

“A report demonstrating the provision of proper pedestrian and cycle links within the proposed development and to adjoining development and along public roads. The report should demonstrate compliance with the applicable guidance set out in DMURS.

A taking in charge plan should be submitted which shows links to adjoining land up to the boundary of the site without any intervening strips.”

3.2.1 Details of Permeability

3.18 In response to this item we refer the Board to the enclosed Design Statement, prepared by Metropolitan Workshop Architects and DMURS document prepared by ROD Consulting Engineers.

3.19 Footpaths will be provided throughout the proposed development and these will link with existing footpaths and facilities (to the south to Eden Gate). It is also proposed to construction a 650m section of the Three Trouts Stream Greenway at the north end of the site, and this will form part of the overall greenway set out in objective TS12 to link from Delgany through to the coast at the southern edge of Greystones. This greenway will include a connection to the Kilcoole Road at Three Trouts Bridge, where a toucan crossing will be provided to connect with the existing Mill Lane, which continues northeast to Mill Road leading towards the Town Centre.

3.20 A greenway link connecting from Eden Gate to the proposed development Spine Road is provided in accordance with Local Objective AP6. This greenway then continues through the proposed development to connect to the proposed Three Trouts Stream Greenway. The proposed development will have a high level of permeability for pedestrians across the site, and numerous access points for connectivity to the surrounding area so that walking will be direct and convenient for local trips. This will include two connection points to the greenway describe above. In this respect the proposed development will facilitate the residents of adjoining neighbourhoods by opening up walking routes throughout.

3.21 The nearest local shops are at the Eden Gate Centre which is a 5 minute walk, which will be accessible through the pedestrian link through Eden Gate to the south of the site.

Figure 3.2 – Internal Connectivity



Source KFLA

Figure 3.3 – Proposed and Potential Connections



Source: Metropolitan Workshop Architects

calming features have also been designed into the development – all in accordance with best practice (DMURS). Block sizes have been kept to circa 40-60m in length and long runs of straight road have been avoided.

Figure 3.4 – Typical Local Street



Source: Metropolitan Workshop Architects – Design Statement

3.2.2 DMURS Compliance Report

3.22 In response to this item we refer the Board to the enclosed DMURS compliance report prepared by ROD Engineers (Appendix in TTA). The design proposals are the outcome of an integrated design approach that seeks to provide a sustainable community connected by well -designed streets which deliver safe, convenient and attractive networks within and through the subject lands.

3.23 The design is the outcome of an integrated design approach that seeks to provide a sustainable community connected by well-designed streets which deliver safe, convenient and attractive networks within and through the subject lands.

3.24 All local streets are accessed off the main link street and provide access within communities and neighbourhoods They have been designed to slow down vehicular traffic with these streets becoming less attractive for through traffic. This creates a low priority for vehicular movement.

3.25 Home zones have been created around the development to provide for shared priority areas for local clusters of residential units. Vehicle movements have been designed for access whilst discouraging through traffic on linked home zones.

3.26 This is achieved by both physical and psychological traffic calming measures such as the creation of a shared priority streets prioritising pedestrians and cyclists.

3.27 Home zones are also differentiated by the 'distinctive' surface material and the narrowing of the carriageway to reduce vehicle speeds and provide active frontage creating more 'viable' streets.

3.28 Reduction of vehicle speed and traffic safety is a fundamental principle behind the layout. In general, all streets are designed for maximum vehicle speeds of 30 km/h or 20 mph. Traffic

Figure 3.5 – Typical Local Street



Source: Metropolitan Workshop Architects – Design Statement

Figure 3.6 – Typical Home Zone



Source: Metropolitan Workshop Architects – Design Statement

3.29 We refer the Board to the proposed taking in charge plan, which is included with the SHD application.

Figure 3.7 – Taking in Charge Plan



Source: Metropolitan Workshop Architects A3_1609_101_122_Proposed Site Layout Plan - Taking in Charge

3.30 It is proposed that the link street and the areas of open space comprising the greenway and the Active Open Space are taken in charge, by the Planning Authority. The underground pumping station will be taken in charge by Irish Water.

3.3 Item no. 3 – Housing Quality Assessment and Building Lifecycle Report

3.31 Item no. 3 seeks:

“A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted.”

3.3.1 Housing Quality Assessment

3.32 In response to this item we refer the Board to the enclosed Housing Quality Assessment prepared by Metropolitan Workshop Architects, which details how the proposed development complies with the relevant standards contained in the 2018 Guidelines on Design Standards for New Apartments.

3.33 The following is noted with reference to the Specific Planning Policy Requirements (SPPRs):

Specific Planning Policy Requirement 1 (Mix)

3.34 Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios).

3.35 The Proposed development complies with SPPR 1 as it includes 93 no. apartments, comprising 38.7% (36 no. 1 bedroom units), 57% (53 no. 2-bedroom units) and 4.3% (4 no. 3-bedroom units).

Specific Planning Policy Requirement 3 (Minimum Areas)

3.36 Specific Planning Policy Requirement 3 (SPPR3) seeks the following Minimum Apartment Floor Areas:

Specific Planning Policy Requirement 3	
Minimum Apartment Floor Areas:	
• Studio apartment (1 person)	37 sq.m
• 1-bedroom apartment (2 persons)	45 sq.m
• 2-bedroom apartment (4 persons)	73 sq.m
• 3-bedroom apartment (5 persons)	90 sq.m

3.37 The proposed development complies with the minimum apartment floor area requirements set out in SPPR3.

Table 3.1 – Apartments

	No. of Bedrooms	No.	2018 Standards	Size of Apartments	Compliant
APT 1A	1 bed	32	45	52.1	Yes
APT 1B	1 bed	2	45	55.5	Yes
APT 1C	1 bed	2	45	62.6	Yes
APT 2A	2 bed	20	73	85.3	Yes
APT 2B	2 bed	24	73	86.5	Yes
APT 2C	2 bed*	9	63	71.1	Yes
APT 3A	3 bed	2	90	106.7	Yes
APT 3B	3 bed	2	90	115	Yes

Source: Metropolitan Workshop Architects – Housing Quality Audit. * 3 person apartment.

Specific Planning Policy Requirement 4 (Aspect)

3.38 According to the Apartment Guidelines, in suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme. The proposed development includes 52% dual aspect units.

Specific Planning Policy Requirement 5 (floor to ceiling heights)

3.39 The apartment blocks comply with the requirement for floor to ceiling heights of 2.7m at ground floor level.

Specific Planning Policy Requirement 6 (Max units per core)

3.40 SPPR 6 notes that a maximum of 12 apartments per core may be provided within apartment schemes.

3.41 The proposal complies with this SPPR6.

3.42 The Housing Quality Audit, prepared by Metropolitan Workshop Architects demonstrates how the proposed apartments comply with appendix 1 of the Apartment Guidelines 2018 in respect of sizes

of apartments, minimum aggregate floor areas, widths, storage, minimum private open space and communal open space.

3.3.2 Building Lifecycle Report

3.43 We refer the Board to the enclosed Building Lifecycle Report prepared by Cairn Homes in accordance with paragraph 6.13 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2018.

3.4 Item no. 4 – Site Specific Flood Risk Assessment Report

3.44 Item no. 4 seeks:

“A Site Specific Flood Risk Assessment Report. The prospective applicant is advised to consult with the relevant technical section of the planning authority prior to the completion of this report which should describe this consultation and clarify if there are any outstanding matters on which agreement has not been reached with regard to surface water drainage.”

3.45 We refer the Board to the enclosed Site Specific Flood Risk Assessment Report prepared by ROD Consulting Engineers, which concludes that:

- *PFRA study flooding maps show that the subject site in where all of the proposed development is going to be built is within Flood Zone C. Also taking into account that CFRAM study flooding mapping cases show a more accurate flooding scenario than PFRA flood mapping cases, therefore the subject site is deemed to be in within Flood Zone C and is very unlikely that the proposed site would flood. Three Trout Stream would have certain degree of flooding in the zone as it is a floodplain, but as there are no dwelling proposed in the area the extents of the floods would not reach the proposed development from the studies carried out in PFRA's and CFRAM's.*
- *There is no compensatory storage required in this particular study area.*
- *From the data collected and the sources that are mentioned in this flood risk assessment report, the subject site should not be impacted by flooding taken into account the possibility of risks and factors of flooding associated with Cairn Homes Housing Scheme, Farrankelly site.*

3.5 Item no. 5 – Phasing Scheme (Open Space, Childcare and access)

3.46 Item no. 5 seeks:

“A phasing scheme for the development which would indicate how open space, and childcare facilities and access for the proposed housing would be provided in a timely and orderly manner.”

3.47 In response to this item we refer the Board to drawing no. A3_1609_101_121_Proposed Site Layout Plan – Phasing prepared by Metropolitan Workshop Architects, which shows the overall phasing of the proposed development. It is envisaged that there would be 2 no. main phases of development.

Figure 3.8 – The proposed phasing plan



Source: Metropolitan Workshop Architects (drawing no. A3_1609_101_121_Proposed Site Layout Plan – Phasing)

3.48 Phase 1 will comprise the construction of the Active Open Space (4.5 hectares) and the provision of the Greenway (2.4 hectares), the construction of the Road Objective R07 between the Kilcoole Road (R761) and Priory Road (with associated link to boundary of Eden Gate to the south), the residential amenity building of c. 325 sq. m (located in the eastern portion of Public Open Space no. 1) along with Public Open Space no. 2. In addition it is proposed to construct 173 no. dwellings in Phase 1 as follows:

- 11 no. detached houses;
- 110 no. semi-detached;
- 20 no terraced terrace houses;
- 32 duplex units.

3.49 It has been agreed with the Roads Department of Wicklow County Council that the RO7 objective will be built in the first phase of development and will be opened subsequently, when Wicklow

County Council have provided upgrades to the Priory Road. The R07 Objective has been designed to facilitate the proposed full quantum of development and the entrance onto the Kilcoole Road can accommodate the proposal. The R07 link is not required to facilitate the development and the Kilcoole (R761) entrance has been designed to accommodate the full scheme, and that the proposal can operate without the link in place. In accordance with the RO7 objective, the proposed layout includes a potential link to the Eden Gate development to the south, with a minimum width of 10m, in order to facilitate the development of a possible traffic route, should the need arise in the future.

3.50 Phase 2 will provide the remainder of the dwellings (253 no.), public open spaces and the creche of c. 599 sq. m. as follows:

- 9 no. detached houses;
- 68 no. semi-detached houses;
- 27 no. terraced houses;
- 56 duplex units;
- 93 no. apartments.

3.51 It is anticipated that the proposed creche could accommodate in the region of 110 no. childcare spaces and it is intended that the creche is delivered in phase 2 of the development having regard to the existing and committed provision of creche places in the area, which is set out in the Social Infrastructure Assessment prepared by John Spain Associates.

3.52 The Apartment Guidelines state that one bedroom or studio units should not be considered to contribute to childcare provision and that subject to location this may also apply in part or whole to units with two or more bedrooms. It is noted Policy CD24 of the Wicklow CDP also allows for a development to have regard to the existing distribution of childcare facilities and demographic profile of the area. It is noted 31% of all the 426 no. dwellings are 1 and 2 bedroom units (apartments and duplexes).

3.53 Due to the existing provision and capacity in the permitted Glenheron Creche (16/1412), which will cater for c. 98 children, it is considered that a creche is not required in the first phase of development at Farrankelly. It is estimated that the overall capacity is c. 123 no. places (including the Glenheron creche). The creche forms part of a wider Cairn Homes scheme, which is nearing completion.

3.54 It is noted that the creche will commence construction in early 2020, to be complete by September 2020, and open subject to occupation by an operator.

3.55 From a review of the potential demand for a creche, it is estimated that as little as 17 no. childcare places may be required. This is based on a proportion (8.4% estimate) of the overall full development of c. 1,053 people to be accommodated within the scheme. This in turn would equate to 88 children potentially requiring childcare (based on 8.4% of the population). This would potentially generate a need to accommodate 88 children between 0 – 4, assuming all of the children used childcare.

3.56 However, it is noted that the percentage of children availing of childcare is just 19% as outlined in the QNHS 2016, while the remainder of children are minded by other relatives, au pairs etc. Using the CSO figures, and a similar proportion (19%) of the 0-4 age cohort which avail of childcare places, this would equate to a potential creche requirement of c.17 places (based on 19% of 88 children).

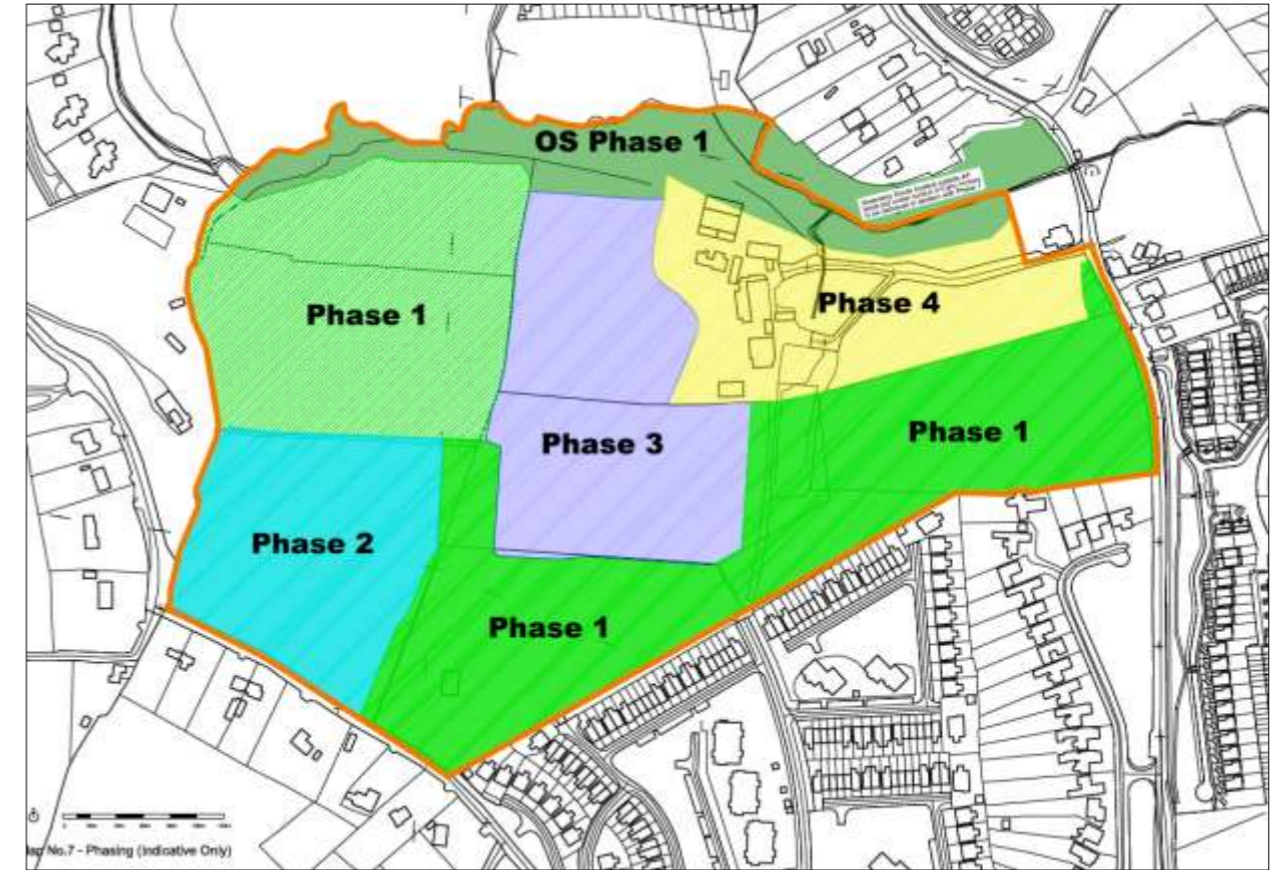
3.57 It is therefore proposed that the provision of a creche be deferred to the second phase of development. This would prevent an over-provision of childcare spaces in the short term, support existing creche providers, while still catering for the initial spaces through the existing supply, which is located to the east of the proposed development.

Figure 3.9 – Childcare Provision



Source: Google Maps & Social Infrastructure Assessment

Figure 3.10 – Extract from the approved Action Area Plan



3.6 Item no. 6 – Boundary Treatments and proposals to ensure ongoing public access to facilities on the active open space

3.1 Item no. 6 seeks:

“Details of proposed boundary and surface treatments throughout the development, and of landscaping and planting. Proposals should also be submitted to ensure ongoing public access to the facilities on the active open space that could be incorporated into an agreement with the planning authority or a condition attached to a planning permission.”

3.6.1 Boundary Treatments

3.2 In response to this item we refer the Board to the Landscape Design Report prepared by Kevin Fitzpatrick Landscape Architects (KFLA), which shows the proposed boundary and surface treatments, throughout the development, including landscaping and planting. Section 2 above outlines the quantity, type and location of the hard and soft landscaping.

3.3 There are different boundary treatments indicated on the following KFLA Drawings:

- 0285-108 – Boundary Treatments Plan
- 0285-109 – Perimeter Boundary Sections
- 0285-110 – Boundary Details 1
- 0285-111 – Boundary Details 2

3.4 The general perimeter planting around the site will be native and naturalized broad-leaf hedgerow and tree-planting, along with dense woodland and understory planting to create visual screening and improve biodiversity. Native plants Blackthorn, Hawthorn, Hazel and Holly are all used in the hedgerow mix and tree-planting in the hedgerows consists of Common Birch, Native Oak, Horse Chestnuts and Common Alder.

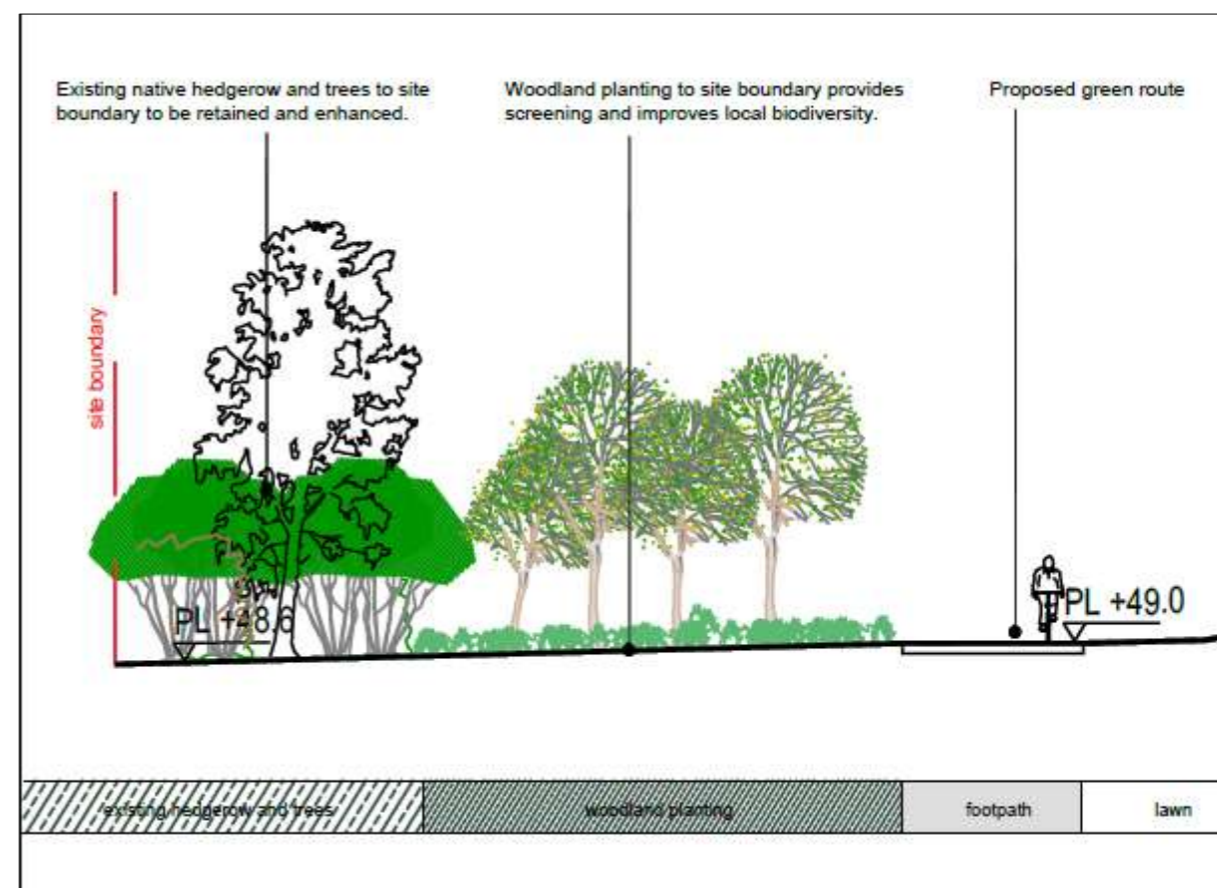
3.5 Internally within the scheme, the boundary treatments are shown on Drawing no. 0285-108 – Boundary Treatments Plan, prepared by KFLA.

3.6 The boundary detail and a selection of sections are detailed to the south in respect of Eden Gate and Glenbrook.

3.7 With reference to the western boundary, the existing native hedgerow and trees to the subject lands will be retained and enhanced, with additional woodland planting.

3.8 A number of the play areas throughout the scheme are designed as a ‘Natural Play Area’, this is where a preference is given to natural play features, materials, and objects over the standard manufactured play equipment.

Figure 3.11 – Western Boundary - Section



Source: KFLA

3.6.2 Public Access to Facilities on the Active Open Space

3.9 With reference to the ensuring ongoing public access to the Active Open Space, it is anticipated that the lands at Farrankelly will be taken in charge by Wicklow County Council. The overall “Taking in Charge” plan is shown on drawing no. 123, prepared by Metropolitan Workshop Architects, included with the SHD application (see section 3.2 above).

3.10 Carin Homes are proposing the following condition:

- “(a) The development, including all roads, footpaths, cycle paths, verges, public lighting, open spaces, surface water drains, attenuation infrastructure and all other services, as permitted under this order, and as amended by the conditions of this permission, shall be carried out and completed in accordance with the “taking-in-charge” standards of the planning authority. The areas to be taken in charge, upon completion of the development, shall be in accordance with the areas shown on drawing number (A3_1609_101_122_Proposed Site Layout Plan - Taking in Charge), unless otherwise agreed with the local authority.*
- (b) The areas not to be taken in charge, as defined by this condition, shall be maintained by a properly constituted private management company, details of which shall be agreed in writing with the planning authority.*
- (c) All of the areas of public open space to be taken in charge shall be maintained by the developer until such time as the development is taken in charge by the local authority.*
- (d) Public Access to the Active Open Space shall be provided prior to commencement of Phase 2 (Drawing 1609_101_121_Proposed Site Layout Plan – Phasing) and open for use unless otherwise agreed in writing with the planning authority.”*

3.7 Item no. 7 – Draft Construction Management Plan

3.11 Item no. 7 seeks:

“A draft construction management plan.”

3.12 In response to this item, we refer the Board to the enclosed Construction Management Plan prepared by Cairn Homes.

3.8 Item no. 8 – Draft Waste Management Plan

3.13 Item no. 8 seeks:

“A draft waste management plan.”

3.14 In response to this item, we refer the Board to the enclosed Draft Waste Management Plan prepared by Byrne Environmental.

4.0 CONCLUSIONS

4.1 This document outlines how the items outlined in the pre-application consultation opinion from An Bord Pleanála in relation to the proposed residential development at Farrankelly, Delgany, Greystones, Co. Wicklow have been addressed in full by the applicant and design team prior to lodgement of the application to An Bord Pleanála.

4.2 The document also addresses the specific information requested by An Bord Pleanála and identifies the source or location of the response within the planning submission documentation.

4.3 The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

4.4 The layout and design changes incorporated into the final scheme will result in improvements to the overall design and layout and will a sustainable approach to the development of these lands. It is respectfully 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.