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# **Statement of Response to Pre-application Consultation Opinion**

## **Residential Development**

**Lands at Capdoo & Abbeylands, Clane, Co. Kildare**

**Westar Investments Ltd**

**November 2019**



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## 1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have prepared this Statement of Response to Pre-application Consultation Opinion on behalf of our client, Westar Investments Ltd, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands at Capdoo & Abbeylands, Clane, Co. Kildare. Following consultations with Kildare County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted and a pre-planning consultation meeting was facilitated on 18<sup>th</sup> June 2019.

An Bord Pleanála subsequently issued a Notice of Pre- Application Consultation Opinion on 5<sup>th</sup> July 2019, which identified 4 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application. These 4 no. items were as follows:

1. *Further consideration/amendment of the documents as they relate to the provision and design of car parking within the proposed development. The documentation submitted at application stage should provide a robust rationale for the amount of car parking that is proposed. This should have due regard to the pattern of demand for travel that is likely to arise from the occupation of the proposed development, as well as to the likely demand from households to have access to private transport even where it does not provide the primary mode for travel to work or school.*

*The documentation should also take proper account of the advice concerning car parking and cycle parking design provided for in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities – 2018 and the design and layout of car parking outlined in the Design manual for Urban Roads and Streets. Visitor car parking and car parking associated with apartments requires particular attention to ensure residential amenity is not compromised. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.*

2. *Further consideration/amendments of the documents as they relate to the provision of high quality, safe and usable public open space. Particular attention is drawn to; the configuration and location of open spaces (public and semi-private), especially in relation to proposed apartments and duplex apartments; amalgamation and interconnectivity of open spaces and rationale for same; the potential for passive supervision and usability of open spaces and play areas; the design of the streets, associated on-street parking, turning heads and the creation of building edges/street frontages that reflect a clearly defined street hierarchy within the scheme; the location and design of bin and bicycle storage also requires greater consideration. The application of the principles of the Design Manual for Urban Roads and Streets and the advice provided by the Guidelines for Planning Authorities on Sustainable Residential Development in urban Areas' (including the associated 'Urban Design Manual') is strongly advised. Further consideration of these issues may require amendment to the documents and/or design proposals submitted.*
3. *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 phasing proposals to address the constraints such as they 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).*
4. *Further consideration of the documents as they relate to surface water management for the site. This further consideration should have regard to the requirements of the Drainage Division as indicated in their report dated 21 May 2019 and contained in Appendix B of the Planning Authority's Opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment relating to groundwater and pluvial flood risk, in addition appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk. A Flood Risk Assessment should be prepared in accordance with 'The Planning System and Flood Risk*

*management' (including the associated 'Technical Appendices'). Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.*

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development Act 2000 (As amended by the Residential Tenancies Act 2016), the provision of the following specific information:

1. *A detailed residential density calculation that should have regard to, inter alia, the methodology for the calculation of densities provided for in the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) in relation to such Outer Suburban/Greenfield sites. Particular regard should be had to appendix A of the guidelines that sets out how to measure residential density.*
2. *A report and map that details pedestrian and cycle facilities connecting the proposed development with nearby centres, existing transport services and existing amenities and facilities.*
3. *Landscaping proposals including an overall landscaping masterplan for the development site and a site layout plan indicating the full extent of tree retention and removal if proposed. This plan should show how new public open spaces will successfully integrate with existing open space areas and amenity walks, such as the 'Liffey Walk'. Details of proposed tree protection measures during construction. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments should be submitted. Sections should be submitted at key locations where the public open spaces interface with proposed residential units.*
4. *A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority. Streets should be shown up to the boundaries of the site and facilitate future access.*
5. *A detailed phasing plan for the proposed development, to include the delivery of housing and public open space.*
6. *Waste management details.*
7. *Details in respect of the proposed residential units including a schedule of Accommodation and Quality Assessment Report that has regard to Specific Planning Policy Requirements set out in the Sustainable Urban Housing: Design Standards for Apartment Guidelines, Guidelines for Planning Authorities 2018 as they pertain to the proposed development. A Building Life Cycle Report in respect of the proposed apartments.*
8. *Construction and Demolition Waste Management Plan*

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

1. Irish Water
2. Transport Infrastructure Ireland
3. Inland Fisheries Ireland
4. County Kildare Childcare Committee

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

## 2.0 Response to Issues Raised

The following sets out how the applicant and design team have addressed the 4 no. issues raised in the Board's Notice of Pre-Application Consultation Opinion to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

### 2.1 Item No. 1 – Car & Cycle Parking Facilities

The Board required the following in relation to Car & Cycle Parking Facilities to serve the proposed development:

*Further consideration/amendment of the documents as they relate to the provision and design of car parking within the proposed development. The documentation submitted at application stage should provide a robust rationale for the amount of car parking that is proposed. This should have due regard to the pattern of demand for travel that is likely to arise from the occupation of the proposed development, as well as to the likely demand from households to have access to private transport even where it does not provide the primary mode for travel to work or school.*

*The documentation should also take proper account of the advice concerning car parking and cycle parking design provided for in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities – 2018 and the design and layout of car parking outlined in the Design manual for Urban Roads and Streets. Visitor car parking and car parking associated with apartments requires particular attention to ensure residential amenity is not compromised. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.*

#### 2.1.1 Applicants Response to Item No. 1

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

### 2.2 Item No. 2 – Public & Semi-Private Open Spaces

The Board required the following in relation to the Public & Semi-Private Open Spaces serving the proposed development:

*Further consideration/amendments of the documents as they relate to the provision of high quality, safe and usable public open space. Particular attention is drawn to; the configuration and location of open spaces (public and semi-private), especially in relation to proposed apartments and duplex apartments; amalgamation and interconnectivity of open spaces and rationale for same; the potential for passive supervision and usability of open spaces and play areas; the design of the streets, associated on-street parking, turning heads and the creation of building edges/street frontages that reflect a clearly defined street hierarchy within the scheme; the location and design of bin and bicycle storage also requires greater consideration. The application of the principles of the Design Manual for Urban Roads and Streets and the advice provided by the Guidelines for Planning Authorities on Sustainable Residential Development in urban Areas' (including the associated 'Urban Design Manual') is strongly advised. Further consideration of these issues may require amendment to the documents and/or design proposals submitted.*

#### 2.2.1 Applicants Response to Item No. 2

In response to the above, the subject proposal incorporates the following changes to the proposal put forward at the pre-planning consultation meeting:

- The positioning of the apartment and duplex apartment blocks within the scheme has been reconsidered. Previously, the majority of the proposed duplex blocks featured adjacent to the

site's northern boundary. In the current scheme, the majority of apartment and duplex apartment blocks have been repositioned adjacent to the linear park proposed adjacent to the River Liffey and the other duplex and apartment blocks within the scheme are proximate to the large public open space areas provided centrally on the site. The benefits of re-positioning the apartment and duplex apartment blocks is two-fold as, firstly, it provides the residents of these blocks with direct access to a large public open space area which supplements their private open space areas, and secondly, the apartment and duplex units provide an increased level of passive surveillance of the public open space areas.

- A project Landscape Architect, Landmark Designs, has been engaged and they have prepared a Green Infrastructure Strategy/Landscape Design Rationale which ensures high quality, safe and usable public open spaces are provided on site.
- The parking areas associated with apartment and duplex apartment blocks have been reconsidered. In the current scheme, car parking areas have been confined to the side or rear of the blocks to allow the provision of larger communal open space areas to serve the residents. Further to this, landscaping has been added to the car parking areas to soften their appearance and improve visual amenity within the immediate area.
- The scheme's road/street layout has been improved to create a clear street hierarchy within the scheme, create building edges/street frontages and reduce the number of turning heads. The revised road/street layout also provides additional connects to the land immediately north of the site which is earmarked for future development. The Green Infrastructure Strategy/Landscape Design Rationale, prepared by Landmark Designs, and the Architectural Design Statement, prepared by Brian Connolly Associates, illustrate the hierarchy of streets achieved in the proposed scheme. The revised road/street layout adopts the principles of the Design Manual for Urban Roads and Streets and the advice provided by the Guidelines for Planning Authorities on Sustainable Residential Development in urban Areas' (including the associated 'Urban Design Manual'). The application is accompanied by a Statement of Consistency with DMURS, prepared by Brian Connolly Associates.

### 2.3 Item No. 3 – Wastewater Infrastructure

The Board required the following in relation to Wastewater Infrastructure serving the proposed development:

*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 phasing proposals to address the constraints such as they 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).*

#### 2.3.1 Applicants Response to Item No. 3

The Confirmation of Feasibility Statement Letter from Irish Water, dated 7<sup>th</sup> October 2019 (included as an appendix in the Infrastructure Design Report prepared by Brian Connolly Associates), outlined the following in relation to the capacity of the Upper Liffey Valley Sewerage Scheme:

*It is feasible for 230 units to connect prior to the Upper Liffey Valley Sewerage Scheme (Contract 2B) and associated upgrades in Clane being completed in 2022 (programme subject to statutory process and change). Upon completion of the Upper Liffey Valley Sewerage Scheme, the remaining 75 no. units can be accommodated.*

As illustrated in the Phasing Plan (Drawing No. 309-3B), prepared by Brian Connolly Associates, which accompanies this application the proposed development will be constructed in 4 no. phases. The 4 no phases involve the following:

- Phase A - Construction of 49 no. residential units adjacent to the sites western entrance and development of River Liffey linear park;
- Phase B - Construction of 104 no. residential units adjacent to the sites eastern entrance and immediately north of the sites western entrance;

- Phase C - Construction of 68 no. residential units in the north-western part of the site; and
- Phase D - Construction of 84 no. residential units in the north-eastern part of the site.

The first 3 no. phases of development put forward result in a total of 221 no. dwellings which is consistent with the 230 no. units deemed feasible in the short term by Irish Water. The 4<sup>th</sup> phase of development involves the 84 no. residential units and it is anticipated that it will be 2023 before construction of this phase is completed, by which time the upgrade works to the Upper Liffey Valley Sewerage Scheme will be completed.

The phasing proposals put forward as part of the subject application appropriately address the constraints associated with the foul sewerage network serving the proposed development, in particular as it relates to Contract 2B of the Upper Liffey Valley Sewerage Scheme.

### **2.3 Item No. 4 – Wastewater Infrastructure**

The Board required the following in relation to Surface Water Management for proposed development:

*Further consideration of the documents as they relate to surface water management for the site. This further consideration should have regard to the requirements of the Drainage Division as indicated in their report dated 21 May 2019 and contained in Appendix B of the Planning Authority's Opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment relating to groundwater and pluvial flood risk, in addition appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk. A Flood Risk Assessment should be prepared in accordance with 'The Planning System and Flood Risk management' (including the associated 'Technical Appendices'). Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.*

#### **2.4.1 Applicants Response to Item No. 4**

A Site Specific Flood Risk Assessment has been prepared by IE Consulting as part of the subject application. This assessment considers the items outlined above. In advancing the final surface water management scheme for the site, Brian Connolly Associates have had regard to the findings of this Site Specific Flood Risk Assessment as well as the requirements of the Kildare County Council's Drainage Division, as indicated in their report dated 21 May 2019 and contained in Appendix B of the Planning Authority's Opinion. The surface water management scheme included with the subject application, prepared by Brian Connolly Associates, appropriately responds to the above items raised.

### **3.0 Statement of Response to Specific Information Required**

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

#### **3.1 Detailed Residential Density Calculation**

The application is required to be accompanied by a detailed residential density calculation which has regard to, inter alia, the methodology for the calculation of densities provided for in the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) in relation to such Outer Suburban/Greenfield sites. Particular regard should be had to appendix A of the guidelines that sets out how to measure residential density.

A discussion on the proposed residential density features in the Statement of Consistency & Planning Report, prepared by Hughes Planning and Development Consultants, which accompanies this application.

#### **3.2 Pedestrian & Cycle Connections**

The application is required to be accompanied by a report and map that details pedestrian and cycle facilities connecting the proposed development with nearby centres, existing transport services and existing amenities and facilities.

The application is accompanied by a Mobility Management Plan, prepared by Roadplan Consulting, which include details of pedestrian and cycle facilities proximate to the proposed development.

### **3.3 Landscape Masterplan**

The application is required to be accompanied by a landscaping masterplan indicating tree retention/removal, illustrating how new open spaces will integrate with existing open spaces, providing details on type/location of proposed hard/soft landscaping, play equipment, street furniture, public lighting and boundary treatments.

The application is accompanied by landscape drawings and a Green Infrastructure Strategy/Landscape Design Rationale, prepared by Landmark Designs, which addresses the above items.

### **3.4 Taken in Charge Lands**

The application is required to be accompanied by a map of areas to be taken in charge. A Taking in Charge Drawing (Drawing No. 309-4) features in the architectural drawing set, prepared by Brian Connolly Associates, which accompanies the application.

### **3.5 Development Phasing**

The application is required to be accompanied by a detailed phasing plan clearly indicating the delivery of housing and public open space. A Phasing Plan (Drawing No. 309-3B) features in the architectural drawing set, prepared by Brian Connolly Associates, which accompanies this application.

### **3.6 Waste Management**

The application is required to be accompanied by details regarding waste management. An Operational Waste Management Plan, prepared by Redkite Environmental, accompanies this application.

### **3.7 Schedule of Accommodation**

The application is required to be accompanied by both a schedule of accommodation, which has due regard for the Specific Planning Policy Requirements set out in the Sustainable Urban Housing: Design Standards for Apartment Guidelines, Guidelines for Planning Authorities 2018, and a building life cycle report in respect of the proposed apartments.

The application is accompanied by a Housing Mix Statement, prepared by Brian Connolly Associates, and a Building Life Cycle Report, prepared by FM Safety.

### **3.8 Construction and Demolition Waste Management Plan**

The application is required to be accompanied by a Construction and Demolition Waste Management Plan. A Construction Waste Management Plan, prepared by Redkite Environmental, accompanies this application. We note the subject proposal does not include any demolition.

## **4.0 Conclusion**

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

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

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



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Director  
for HPDC.