

Proposed Part 8 Residential Development  
Oldtown Mill, Celbridge

## **Planning Statement**

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Kildare County Council

December 2023



**HRA | PLANNING**  
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DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING

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## **1.0 INTRODUCTION**

### **1.1 Legislative Background**

The Social Housing Public Private Partnership (PPP) Programme represents one of the many strands of delivery to increase the quantity of social housing and is supported as a delivery mechanism in 'Housing for All'. The success of this model for social housing delivery is evident as it has already provided 1,000 high-quality new homes, with another 3,500 in the pipeline. The proposed development is part of the fifth bundle of sites to be developed under this programme.

Part XI of the Planning and Development Act 2000 as amended and the procedures set out in Part 8 of the Planning and Development Regulations 2001 as amended, relate to development by, on behalf of, or in partnership, with the Local Authority. Under Section 179 of the Planning and Development Act 2000, as amended, a Local Authority is entitled to carry out prescribed development or a class of development, subject to compliance with the provisions of that section.

### **1.2 Background to the Part 8 proposal**

The Social Housing PPP programme consists of the design, construction, financing and maintenance of approximately 3,000 homes in five project bundles of social housing developments on sites around Ireland to be delivered by Public Private Partnership (PPP). The Department of Housing, Local Government and Heritage is the approving authority for the programme with the NDFA as financial advisor, procuring authority and project manager.

The Design Team has advanced proposals on behalf of the National Development Finance Agency (NDFA) in consultation with Kildare County Council. The units are to be delivered using an 'availability-based PPP model'. Under this model a consortium designs (in accordance with the Part 8 consent), builds, finances and maintains the social housing units on behalf of the local authority subject to a contract. The maintenance and upkeep services are provided for a period of 25 years after construction. After this the units are returned to the local authority in good, pre-defined, condition.

The sites for this project always remain in State ownership and are made available to the PPP Company by way of a license. As the model is 'availability-based', the private sector partner is responsible for ensuring that units are available for occupation. The local authority is the landlord and is responsible for nominating tenants from the local authority social housing waiting list, based on the local authority's allocation scheme.

Bundle 5 includes ten sites, two of which are in the administrative area of Kildare County Council.. Each site includes a mixture of housing typology (for example apartment, duplex, detached or semi-detached house) and site development works. The subject site has a mixture of 40 no. houses and 20 no. apartments.

### **1.3 Structure of Planning Report**

This planning report was prepared on behalf of the NDFA and Kildare County Council to accompany a Part 8 proposal for the development of 60 no. residential units on a site of circa 1.7 hectares in area, located at Oldtown Mill Road, Celbridge, Co. Kildare. This report is structured to provide:

- A description of the site and surrounding area, and of the proposed development.

- An outline of how the development complies with national policy, regional policy; and o local policy.
- An outline of the traffic and transportation consideration, drainage and water supply; and
- Provides a review of environmental matters, including ecology, environmental impact assessment and appropriate assessment.

## **2.0 SITE DESCRIPTION AND SURROUNDING AREA**

### **2.1 Location and Surroundings**

The site is located in Celbridge Town, located within Kildare County Council's administrative boundary. The settlement of Celbridge town had a population of 20,601 persons in 2022. Located to the northeast of County Kildare, the town is located to the south east of Maynooth (approx. 6.5km), to the south west of Leixlip (approx. 6.7km), to the northeast of Naas (approx. 19km) and to the west of Dublin City Centre (approx. 20km).

Celbridge is served by Dublin Bus and Bus Éireann. Hazelhatch Train Station located approximately 4.3km southeast of the subject site, is served by the Portlaoise/Limerick, Kildare/Waterford and Galway services from Dublin. There are several services operating daily to and from Dublin via Hazelhatch Train Station. Currently a feeder bus runs to and from the town centre of Celbridge to Hazelhatch Train Station to connect with the Dublin rail services. A second train station, Leixlip Louisa Bridge Train Station, is located approximately 6.5km to the northeast of the subject site with services to and from Dublin and to and from Longford via Maynooth.

The site comprises an infill site adjacent to The Glen housing estate on the Oldtown Mill Road. To the north of the site lies a new housing estate currently under construction 'Manor Mill View' and to the south are existing houses known as The Orchard. Open agricultural land extends westwards from the site. A neighbourhood shopping centre is located approximately 1.3 kilometres to the south east and Celbridge town centre lies approximately 2.2 kilometres to the south.

Identified as a Tier 3 Self Sustaining Town in the settlement hierarchy for the county, Celbridge is recognised in the Kildare Development Plan 2023 – 2029 as having a high level of population growth and a weak employment base. The town is identified for population growth. With a population of 20,601 persons in 2022, the growth in population slowed to 1.5 per cent in the last inter census period. The Kildare Development Plan 2023 - 2029 (CDP) strategically plans for the future growth of the town with a housing target of 914 no. housing units between Q1 2023 – Q4 2028.

### **2.2 Site Description**

The site is located within an existing residential suburb and is accessed from the east via Oldtown Road. There is a new housing development under construction on adjoining land to the north with housing units and their rear gardens backing onto the northern and southern boundaries of the site. Mature trees defined the south western boundary of the site. There is open agricultural land to the west of the site, used primarily as livestock pastures. A metal gate and wire fencing with intermittent hedgerow planting defines the interface between the site and the existing housing areas to the east.

The site was previously used as a construction compound and spoil deposition area in circa 2000 – 2005, but it has not been actively managed since that time. It has since been colonised by vegetation.

The underlying bedrock is dark limestone & shale, which is a locally-important aquifer. Subsoils are limestone till. Soils within the site are made ground. The south-western half of the site was formerly used for the deposition of building spoil and topsoil, with mounds of approximately 5m height. The north-eastern part of the site is lower-lying, but consists of soil / spoil that has been compacted by construction vehicles.

The EPA database of rivers and streams does not show any watercourses within or adjacent to the site. The closest watercourse is the Toolestown Stream (a minor tributary of the River Liffey), which is located approximately 500m south of the site at the closest.

There are no identified habitats or species of ecological note within the site. The mature tree line along the northern and south western boundaries of the site are of moderate value. The remainder of the site is dry meadow, scrub and pioneer vegetation on mounds of building waste which is deemed to be of low value. The Ecological Impact Assessment Report prepared by NM Ecology confirms that the majority of the habitats on site are not of significance with the exception of the tree line on the northern and western boundaries which is to be retained.

There are no recorded archaeological monuments or protected structures within or adjoining the site. A report from John Purcell Archaeological Consultancy confirms that the site has been partially disturbed as a result of excavation works in the past. These works included deep excavation and removal of topsoil. Original fabric is only visible at the west of the site and no significant impact on the archaeological landscape is predicted.



**Figure 1.0** Site Context

### 2.3 Planning History

A number of files were reviewed in consideration of development on the subject site. Although planning permission was never granted for development previously on the subject site, there is planning history of relevance on the site and on the adjoining site to the north.

The subject site and the adjoining land to the north was subject to Stage 2 Strategic Housing Development (SHD) consultation (ABP 300948-18) in April 2018. The development sought to construct Phase 3 of Oldtown Mill and provide for 123 no. dwellings. This application never proceeded to the final application stage.

Subsequently, planning permission was sought and granted for 75 no. residential units on the adjoining land to the north, under planning file reference P19/1282. The layout and configuration of the adjoining development to the north has influenced the design approach on the subject site, as detailed in Figure 2.0. Further condition 3(b) of the grant of permission requires that the hedgerow along the south boundary of the site shall be removed by the developer. A timescale shall be agreed in writing with the planning authority.



**Figure 2.0** Layout of Permitted Housing Development to the north.

### **3.0 SITE SELECTION & CONSIDERATION OF ALTERNATIVES**

#### **3.1 Site Selection**

The subject land is in the ownership of Kildare County Council and therefore can be efficiently utilised to meet some of the demand for social housing arising in Celbridge town. Oldtown Mill is a significant and well established residential area and the subject site is the only remaining 'gap site' to be developed within the Oldtown Mill residential area. Site selection was restricted to consideration of that land in the ownership of the County Council and which could be adequately serviced and integrated to provide much needed social housing.

Site selection has taken a plan led approach to development having regard to the objectives in the Kildare Development Plan 2023 – 2029 (KDP), which seeks to promote compact development through the development of underutilised and brownfield sites. Zoned as Objective C New Residential in the Celbridge Local Area Plan 2017 – 2023 the objective is "to provide for New Residential Development". Objective CS 09 in the KDP seeks to "review and prepare on an ongoing basis a portfolio of Local Area Plans (LAPs) for the mandatory LAP settlements, including Celbridge". The subject site is essentially an infill site within an established residential area and it is reasonable to anticipate that the subject land shall continue to be zoned in any forthcoming LAP.

The position of the site is within an established residential neighbourhood, in proximity to an established neighbourhood centre and 2.2km north west of Celbridge town centre. Scoil Mochua is the closest school to the site approximately 250 metres to the east, however, it is a 1.6 kilometre walk/cycle. These services and facilities will facilitate integration of the development into the existing social and urban structure.

#### **3.2 Consideration of Housing Tenure & Type**

The provision of social housing units on this site, will facilitate diversity in tenure and facilitate housing mix in the outer western suburb of the city and in an area, that is dominated by private housing.

The Census of Population 2022 confirmed that there were 5,639 houses in the Electoral District (ED) of Cellbridge in 2022 with 152 of these vacant or almost 3 per cent. Of the total 5,350 households in the ED, 92 per cent of the total housing stock is privately owned or rented (owned with mortgage or loan, owned outright and rented from private landlord). Only 7 per cent comprise social housing, either rented from the local authority, a voluntary housing body or occupied free of rent. The proposed addition of 60 no. social housing units increases the total provision of social housing in the area to just over 8 per cent.

Given the significant area associated with Celbridge ED, which could have the potential to dilute the impact of different tenure types, a narrower study of the surrounding neighbourhood was undertaken with a 1km catchment from the site. This 1km study area was used to assess existing housing tenure. According to the Census of Population 2022, there are 1,456 no. households within a 1km radius of the site. The composition of social and private housing is the exact same as within Celbridge ED, comprising 92 per cent of units in private ownership and 7 per cent of units rented from the local authority and / or voluntary body or occupied free of rent. Including the proposed development within the overall housing statistics increases social housing provision in the area to just over 8 per cent.

This ratio of private to social housing mix is considered acceptable on the plausible assumption that dominance by any single tenure should not exceed 50 per cent. Accordingly, the proposed

development must be considered appropriate to the area providing for balanced and integrated housing tenure in this area of the town.

Kildare County Council had a housing stock of 5,436 dwelling units, as of October 2021. At a county level the housing stock comprises mostly 3 bed units (61%), followed by 2 bed units (19.4%) and 1 bed units (11.9%). This percentage distribution is generally similar across the MDs, except for Celbridge-Leixlip where 2 beds account for a larger proportion of stock, at 25.6%, whereas proportionately there are a less number of 1 beds, at 6.7%. An underlying tenet of national housing policy is the provision of smaller units to allow for downsizing. This is necessary to afford households in a receipt of a form of social housing support, the opportunity to downsize in their local area should they no longer require larger units.

### **3.3 Consideration of Design**

Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high quality residential development, creating a sense of place for future residents, whilst integrating into the existing built environment. A number of site specific characteristics have influenced the overall design approach, including:

- Retention of the mature trees and hedgerows on the western and south western site boundaries for biodiversity and amenity value in accordance with Objective BI O26 of the Development Plan.
- Condition 3(b) of the permission granted for the adjoining residential development to the north and which required removal of the hedgerow on the northern boundary of the subject site.
- Position and location of adjoining permitted open space to the north and the opportunity to create linkages.
- Integrated provision of SUDs and adoption of a nature based approach to provision and management.
- Configuration of existing and permitted housing which backs onto the northern and southern site boundaries.
- Pursuit of a balanced approach to scale and form of development cognisant of the established and prevailing character of Celbridge.

### **4.0 NEED FOR DEVELOPMENT**

Kildare County Council, in line with the policies set down in the Policy Document “Delivering Homes – Sustaining Communities” published by the Department of the Environment in 2007, continues to provide a wide range of housing services throughout the County. The Kildare County Development Plan (Chapter 3 Housing) intends to accommodate the full spectrum of current and future housing needs of all members of society throughout the county. It aims to provide clear guidance on making provision for specialised housing requirements and addressing the needs of communities, ultimately delivering sustainable residential communities across the county. The Housing Needs Demand Assessment (HNDA) for Kildare reports that the total number of social housing applicants, as of 2 November 2021, was 3,417 (households).

Kildare County Council's Housing Need and Demand Assessment (HNDA) Tool projects that, based on a housing supply target of 13,840 units by 2031, approximately 3,934 households will need social housing support, and an additional 1,818 households will require affordable housing, which includes

options for either affordable purchase or cost rental. This is in line with their earlier estimate that approximately 30.2% of new households formed between 2023 and 2031 will require social housing support, while 10.6% will fall under the 'affordability constraint' category. These figures demonstrate the need for action and the supply of social housing right across the country.

The proposed development will only accommodate just over 2 per cent of households that have a housing need in the county. Given the critical housing situation nationwide and in Kildare, the proposed development is urgently required to address what is only a small proportion of the social housing need in the town.

## 5.0 PROPOSED DEVELOPMENT

### 5.1 Development Description

The project details are contained in the proposed development drawings and 'Architectural Design Statement' prepared by the project Architect (MCORM); the Engineering Report and associated engineering documents prepared by the project Engineer Malone O'Regan and all other associated environmental reports.

The proposed development includes:

- i. 60 no. residential units including 40 no. houses and 20 no. apartments comprising 20 no. one bed units; 15 no. two bed units; 21 no. three bed units; and 4 no. four bed units; with renewable energy design measures (which may be provided externally) for each housing unit
- ii. Rear garden sheds serving the residential units;
- ii. Landscaping works including provision of (a) open space and kick about areas; (b) natural play features; and (c) new pedestrian and cycle connections;
- iii. Associated site and infrastructural works including provision for (a) 2 no. ESB substations and switchrooms; (b) car and bicycle parking; (d) public lighting; (e) bin storage; (f) temporary construction signage; (g) estate signage; and (h) varied site boundary treatment comprising walls and fencing; and
- iv. all associated site development works, including removal of existing spoil from the site in advance of construction works.

The proposed development satisfies current Department of Housing, Local Government and Heritage's specifications and Kildare County Council's housing standards as expressed through the Kildare Development Plan 2023 - 2029. The following tables set out the principal detail of the proposed development in terms of landuse, residential numbers, general sizes, tenure and typology.

Tenure Type	Total No.	beds	No.	Typology	% of tenure	Unit Size (GFA) m <sup>2</sup>
House	40	2 Bed	15	Terrace	25%	85.8sqm
		3 Bed	21	Terrace & Semi-detached	35%	99.2 – 102.4sqm
		4 Bed	4	Semi-detached	7%	121.9sqm
Own Door Apartment	20	1 bed	20	Duplex – one bed over one bed	33%	53.6 – 59.9sqm

Site Area	1.7 hectares
Open Space	20.7% gross of overall site
	15.4% excl SUDs areas
Density	35.3 u/ha

## 5.2 Design Approach

The architect's design statement enclosed with the planning application (in accordance with the requirements of Section 15.3 of the Development Plan) reflects and states the intention of the local authority, through the proposed design, to deliver a high quality residential development that responds to the existing context and site constraints and which seeks to create an integrated, permeable and sustainable community. The design and layout adheres to best practice design principles in addition to a response to the physical constraints presented by the site.

The proposed development has been designed to provide high quality homes in a mix of one, two, three and four bed units at a density of 35.3 units per hectare on an infill site fronting onto the Oldtown Mill Road. Whilst the predominant unit type is a terraced or semi-detached housing unit, the development does accommodate 20 no. own door apartment typologies in the form of duplex units. The ground floor apartment units have been provided with rear gardens, whilst the first floor apartment unit is provided with a balcony from the living area.

The design of the scheme has been focused on integrating into the existing built environment and in particular the existing housing development to the south and the proposed housing development under construction to the north. Accordingly residential cells have been positioned to back onto the northern and southern boundaries, with a new street created through the middle of the site, facilitating 2 no. pedestrian links with the development to north. The internal access road has been designed to facilitate future potential connectivity to unzoned lands to the south west of the site, whilst pedestrian connectivity is provided at two locations to the north of the site

The architectural design of the residential units adopts a contemporary distinctive use of simple geometry, proportions and material finishes. This approach is reflected throughout the scheme and through the variety of tenure types. The design presents an aesthetic visual and functional relationship between the residential units and the street due to the proximity of building line and boundary treatments. Building design will achieve A2 BER rating. Effective consideration has been given to the juxtaposition and relationship of units as they occur especially at the end of each street, and adjacent to amenity areas through dual orientation of design. All terminating/corner units present dual aspect design onto the street/open space areas in order to achieve effective passive and natural surveillance of those areas.

## 5.3 Open Space & Landscaping

Three distinct public open space areas are provided within the development with a significant area of public open space positioned at the rear of the site on its western boundary, adjoining other proposed public open space within the adjoining residential development to the north. Pedestrian linkages are

provided with the adjoining development at this location. The second area of open space is accommodated centrally within the development, providing a distinct public courtyard with extensive passive surveillance, linking the front and back of the site. The third area of open space is positioned on the eastern site boundary, adjoining Oldtown Mill Road, opening the site onto the existing access road. The open space fronting onto Oldtown Mill Road assimilates with the block of duplex units to the north of the site creating a defined entrance to the scheme.

A high level of passive surveillance to the network of streets and spaces is provided. Cumulatively, a total of 0.355 hectares of public open space is provided within the development proposal, equating to 20.7% of the overall site area.



**Figure 3.0** Proposed Site Layout

## 5.4 Parking

On-street car parking (75 no.) is provided throughout the development in general accordance with the provisions of Table 15.8 of the KDP. Whilst a total of 77 no. spaces are required as per Development Plan requirements, a total of 75 no. are provided, having regard to the fact that all apartment units are one beds only and are unlikely to generate 1.5 spaces per unit as per the requirement in the Development Plan. In accordance with the requirements of the KDP EV ducting infrastructure has been provided.

Type	No. Units	Requirement/unit	Requirement	Provided
House	40	1 space per 1 - 3 bed units	36	36
		1 no. space per 4 bed + plus 0.5 visitor space	6	4
Apartments	20	1.5 spaces per unit + 1 visitor space per 4 apartments	35	35
Electric Vehicle Recharging Point		Ducting Infrastructure only Required. No chargers	-	-
<b>TOTAL</b>			<b>77 spaces</b>	<b>75 spaces</b>

Bicycle parking is accommodated within the curtilage of all units at ground floor level, including the apartment units, which require provision of 1.5 bicycle spaces per unit (1 space per bedroom + 1 visitor space per 2 apartments). A total of 5 no. Sheffield bicycle stands are provided to accommodate visitor bicycle parking.

A number of reports accompany the proposed development from a traffic management perspective including a Traffic Mobility Management Plan which concludes that the proposed development will not have a negative impact on the surrounding road network and reviews public transport accessibility and the car parking strategy for the site. It proposes an action plan to encourage more sustainable mobility patterns amongst the prospective residents.

## 5.5 Water Services Infrastructure

An Engineering Services Report has been prepared by Malone O'Regan Engineers which details water service specifications.

### *Foul Water*

Foul water from new housing units will be collected within a gravity drainage network and directed towards the main sewer which runs from the Oldtown Mill Road in a 225mm uPVC pipe out towards Shackleton Road. These underground sewers carry foul water from other areas adjacent to the site. Due to the relative levels of the existing drainage and the proposed site levels, it is possible to achieve a gravity connection to the foul water drainage pipework installed.

### *Potable Water*

A 150mm diameter watermain is located under the footpath in Oldtown Mill Road to the east of the proposed development. It is proposed to provide a potable water supply to the development off the existing main in Oldtown Mill Road. The estimated total daily water demand is 34,950 litres/day.

### *Surface Water*

In order to minimise the volume and rate of runoff from the site, a number of sustainable drainage systems (SuDS) are proposed, including swales, tree pits, rain gardens, permeable paving, Integrated Constructed Wetlands (ICW) and rainwater harvesting.

In October 2023, Causeway Geotech Ltd. completed a comprehensive programme of site investigations for the site. The report concludes that the site is not suitable for infiltration drainage systems. As a result, it is necessary to attenuate surface water on site. Surface water runoff from new internal road surfaces, footpaths, other areas of hardstanding and the roofs of buildings will be collected within a gravity drainage network and directed towards the wetland pond at the southwest corner.

The attenuation system is sized to cater for a 1 in 100-year storm event. The outflow from the attenuation pond is limited by a Hydrobrake flow control device which restricts the flow to 3.42 litres/s.

### **5.6 Construction**

Subject to securing consent, it is intended for the main works to commence in 2025. No 'out of the ordinary' construction processes have been identified or are expected. Shallow strip foundations are proposed to construct the units.

The subject site comprises a number of spoil heaps comprising excavated material from neighbouring residential development sites. This fill, with an estimated volume of 30,000m<sup>3</sup> (based on an assumption of 10,000 m<sup>2</sup> at an average depth of 3m) will need to be disposed of to a licensed waste facility in proximity to the site. Although this 'waste' is not generated by the proposed development per se, it nonetheless does need to be disposed of as part of the proposed works on site, thereby giving rise to waste during construction / enabling works.

## **6.0 ENVIRONMENTAL CONSIDERATIONS**

The development strategy and design approach has been influenced by a number of climatic and environmental variables and considerations on the site.

### **6.1 Sustainability & Climate Action**

A Climate Action, Sustainability & Part L Compliance Report has been prepared by Semple McKillop Consulting Engineers. This report includes a Compliance Report on Part L & HC 12 Building Energy Rating Assignment and Compliance with TGD Part L of the Building Regulations.

The design team has adopted a top down pyramid approach to reduce the demand for energy by designing efficiency into the elements at design stage such as building fabric, glazing, air permeability, HVAC and lighting systems. Whilst the Energy Strategy for the site has yet to be finalised, as ultimately the PPP Company will develop their own proposals for the site, the report does provide output specification to set parameters to be achieved and details some systems that will not be allowed. In line with reducing fossil fuels there will be no fossil fuels (Gas or Oil) on the site in line with the Governments 'Climate Action Plan 2019'.

Maximum U-Values and an air tightness for the development are set out in the report which are higher than Part L but are seen as the first step in the Lean, Clean, Green approach implemented to use less

energy. The report concludes that the development has the opportunity to deliver a low-cost solution for home owners through a number of energy efficient, low emission sustainable solutions.

## 6.2 Ecological Impact Assessment

An Ecological Impact Assessment (EclA) was prepared by NM Ecology, to identify important ecological features, to assess the impact of development on those features and to recommend appropriate mitigation where necessary, all in accordance with Policy BI P1 and Objective BI O1of the Development Plan.

The report confirms that there are no designated sites in the vicinity of the site. Four designated sites were identified in the surrounding area, all of which are approx. 3 – 5 km from the site. No surface water (or other) pathways were identified between the site and any designated sites, so any risk of impacts can be ruled out.

Habitats within the proposed development site include hedgerow, scrub, dry meadow and recolonising bare ground. The hedgerow is a mature feature of considerable age that is considered to be of local ecological importance, which has been incorporated into the development cognisant of condition 3 attached to the neighbouring development to the north, which conditions that a substantial part of the hedgerow on the northern boundary be removed. The EclA confirms that the other habitats have developed over the last 20 years due to the cessation of management at the site and they are considered to be of Negligible importance.

The report acknowledges that development of the site will require the clearance of scrub and dry meadow vegetation. Biodiversity enhancement features have been incorporated within the site to compensate, at least in part, for the loss of existing vegetation.

## 6.3 Landscape & Biodiversity

The Landscape & Biodiversity Design incorporates wildlife considerations in the retention/ protection/ management and reinforcement of existing hedgerows/treelines and undisturbed areas of grasslands. The approach to landscape design and management was informed by an Arboricultural Assessment undertaken by CMK Hort + Arb Ltd. to provide base-line data on the composition and condition of trees within the site in accordance with Objective BI O29 of the Development Plan. The 130m hedgerow on the western and southwestern boundaries will be retained with a low intervention fence placed to the site side of the hedgerow. Only 24m of hedgerow will be retained on the north western boundary of the site as a condition attached to the permission of the adjoining residential development to the north necessitates the removal of 115m of hedgerow. The assessment identified 17 no. trees on site and it is necessary to remove 6 no. trees to facilitate development, including 2 no. young, 1 no. mature and 2 no. early mature Italian Elders along with 1 no. young Lime Cultivar. These removals will be mitigated with the planting of 50 no. street trees of various sizes and varieties as detailed in the Landscape & Biodiversity Report prepared by Mitchells and in accordance with Objectives BI O27 and BI O28 in the County Development Plan.

Existing trees and hedgerows on the site will be protected where possible in line with the objectives of the Landscape & Biodiversity Masterplan and brought back into a managed state and reinforced with new planting in accordance with the principle of Objective BI O30 in the Development Plan. Varied habitats are created for ecological connections and landscape visual amenity including:

- Attenuation pond and swales with profiled marginal planted shelves and integrated constructed wetlands,
- Bioretention tree planting pits within the residential street network,
- Rain Gardens
- New tree planting,
- Community Orchards, and
- Flexible amenity lawn areas.

Planting and management of the landscape areas shall be undertaken in accordance with pollinator friendly management objectives as outlined in the “All Ireland Pollinator Plan 2021-2025 and promoted in Objective B1 O3 in the Development Plan. A coordinated approach within the landscape design has been taken to site services, in particular SUDS integration for water management and habitat creation.

#### 6.4 Flood Risk Assessment

The purpose of the Flood Risk Assessment (FRA) is to assess the potential flood risk to the proposed development site and to assess the impact that the development as proposed may or may not have on the hydrological regime of the area in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The study was principally focused on examining flooding risks to the proposed site from the River Liffey and the Kilwogon Stream.

The site is not located near any major open watercourse. The most significant hydrological feature is the River Liffey which is located some 1.5km to the southeast of the site. The FRA concludes that the site is not expected to be impacted during the occurrence of a 0.1% AEP (1 in 1000 year) fluvial flood event. The pluvial flood mapping carried out by the OPW indicates that the proposed development site does not fall within the predicted extreme 0.1% (1 in 1000 year). The report concludes its assessment by stating that the overall development of the site is not expected to result in an adverse impact to the existing hydrological regime of the area or to result in an increased flood risk elsewhere.

#### 6.5 Appropriate Assessment Screening

An Appropriate Assessment Screening Report prepared by NM Ecology has had regard to inter-alia; Part XAB of the Planning and Development Act 2000 (as amended) and appropriate best practice guidance including: ‘Assessment of Plans and Projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission, 2001); and, Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government (DoEHLG, 2010).

The screening report confirms that there is no likelihood of significant impacts on any European sites, having regard to the fact that the site is not within or adjacent to any European sites, so there is no risk of direct effects; there are no surface water (or other) pathways linking the site to any European sites, so there is no risk of indirect effects; and there are no SPAs in the vicinity of the site.

#### 6.6 Environmental Impact Assessment Screening

An Environmental Impact Assessment (EIA) Screening Report was prepared by HRA Planning to assess the proposed development and to undertake a determination as to the likelihood of significant effects on the environment, and the requirement or otherwise, for Environmental Impact Assessment (EIA). The proposed development of 60 no. dwelling units is below the 500-unit mandatory threshold and

represents 12% of the threshold number of dwelling units. Accordingly, the development does not trigger mandatory EIA.

The preliminary examination confirms that there is no real likelihood that the proposed development, by reason of its 'nature, size and location' is likely to give rise to significant effects on the receiving environment, save for localised, short-term temporary impacts associated with removal of existing spoil from the site. Furthermore, it was concluded that having regard to the urban location of the development proposal, further consideration should be given to the likelihood of potential significant effects on the environment arising from the proposed development when considered by itself or cumulatively with other projects.

Accordingly, a screening determination was undertaken having regard to Schedule 7 criteria and Schedule 7A information. It was concluded, having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:

- The scale, nature and location of the proposed impacts;
- The potential impacts and proposed mitigation measures; and
- The results of the any other relevant assessments of the effects on the environment

It is considered that the proposed development would not be likely to have significant effects on the environment and it is concluded that an environmental impact assessment report is not required.

## **7.0 NATIONAL POLICY & GUIDELINES**

### **7.1 National Planning Framework – Project Ireland 2040**

The National Planning Framework (NPF) published in February 2018 sets out a strategic development strategy for the country up to 2040. Amongst its key messages is the need to provide the highest possible quality of life for people and communities via well designed and managed built and natural environments. The emphasis within the NPF with respect to future development relates to managing the sustainable growth of compact cities, towns and villages to achieve effective density and consolidation supported by effective public transport infrastructure. The NPF sets high level planning objectives (National Strategic Outcomes) in order to meet the national objectives, including:

- Compact Growth
- Enhanced Regional Accessibility
- Strengthened Rural Economies and Communities
- Sustainable Mobility
- A Strong Economy, supported by Enterprise, Innovation and Skills
- High-Quality International Connectivity
- Enhanced Amenities and Heritage
- Transition to a Low Carbon and Climate Resilient Society
- Sustainable Management of Water, Waste and other Environmental Resources
- Access to Quality Childcare, Education and Health Services

The NPF provides for a number of National Policy Objectives (NPO) which must be adhered to in the advancement of development throughout the State. The NPF seeks to “*deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements*” (NPO 3a) and seeks to “*deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints*” (NPO 3b).

The NPO’s promoting consolidation are further supported by NPO 11 which states that “*in meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth*”.

The infill/brownfield targets set out in NPOs 3a, 3b and 3c of the NPF recognises the necessity for significant and sustained increase in urban housing output and in particular apartment type development. The NPF states that this is necessary, in order to avoid a continuation of the outward expansion of cities and larger urban areas. The NPF states that “*in many European countries, it is normal to see 40%-60% of households living in apartments*”.

NPO 33 seeks to “*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*”

The proposed development complies with a number of the NPO’s within the NPF with particular regard to development within the existing built up footprint of a settlement. The proposed development is strategically located on infill lands in an area of Celbridge which has experienced significant growth in recent years. The site is serviceable and is well connected to the existing road network.

The proposed scheme features a variety of dwelling types designed to a high standard, and with easy access to a wide range of amenities of which future residents can avail including parks, schools and a neighbourhood centre, all within easy reach of the subject site. It is thus considered that the proposed development is wholly compliant with the policies and principals of the National Planning Framework.

## 7.2 Climate Action Plan 2024

On 20 December 2023, the Government launched its Climate Action Plan 2024 (CAP24) its third annual update to Ireland’s Climate Action Plan 2019, the first CAP to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021 and following the introduction in 2022 of economy-wide carbon budgets and sectoral emissions ceilings. The plan provides for the implementation of the carbon budgets and sectoral emissions ceilings, and establishes a roadmap to halve national greenhouse gas emissions by 2030 and achieve net zero no later than 2050.

On the role of the public sector, CAP24 states the following:

*“The public sector will play a leadership role in driving far-reaching climate action across its buildings, transport, waste, and energy usage, as well as wider society. This will include reducing emissions by 51% by 2030 and increasing the improvement in energy efficiency in the public sector from the 33% target in 2020 to 50% by 2030, as well as increasing climate literacy in the public sector, implementing green public procurement and retrofitting public sector buildings.”*

CAP24 acknowledges the role of waste prevention and the circular economy in driving down greenhouse gas emissions “*through maximising the efficiency of our material use*”. It identifies key

actions related to circular economy and waste, including the implementation of the WAPCE and Whole of Government Circular Economy Strategy, and the prevention of plastic, food, construction and commercial waste. It states that *“Avoiding waste in the first instance is a climate action we can take every day”*.

Chapter 14 of the CAP specifically addresses the role of built environment in decarbonisation. It notes that the sector accounted for 11.1% of Ireland’s greenhouse gases in 2022, down from 12.3% in 2021. The residential sector accounts for the majority of these – at 10.2% of total emissions. To play its part in achieving these targets, the residential sector will need to reduce its emissions by ~20% by 2025 relative to 2018 levels. CAP24 sets out key decarbonisation targets for the built environment sector as follows:

- All new dwellings designed and constructed to Nearly Zero Energy Building (NZEB) standard by 2025, and Zero Emission Building (ZEB) standard by 2030;
- Equivalent of 120,000 dwellings retrofitted to BER B2 or cost optimal equivalent by 2025, and 500,000 dwellings by 2030;
- Up to 0.8 TWh of district heating installed capacity by 2025, and up to 2.5 TWh by 2030;
- 170,000 new dwellings using heat pumps by 2025, and 280,000 by 2030
- 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030

This bundle of social housing is currently programmed to deliver homes to be occupied by 2026. Under the 25-year PPP Company maintenance agreement, this means that the homes will be returned to the State after 2050 which coincides with the target date for reaching carbon neutrality. The Climate Action, Sustainability & Part L Compliance Report, prepared by Semple McKillop Consulting Engineers as detailed in Section 6.1 of this report acknowledges that the development has the opportunity to deliver a low-cost solution for home owners through a number of energy efficient, low emission sustainable solutions. The houses and apartments will be energy efficient and meet current Building Regs and NZEB requirements, achieving a BER A2 for dwellings.

### 7.3 Ministerial Guidelines

A number of national planning guidelines may be considered of relevance to the development proposal, including:

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Design Manual for Quality Housing (2022)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024
- Urban Design Manual - A Best Practice Guide (2009)
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Streets (2013)
- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2022)
- Urban Development and Building Heights- Guidelines for Planning Authorities (2018)

Those of particular relevance to the proposed development are detailed below.

### Childcare Facilities – Guidelines for Planning Authorities 2001

Section 2.4 of the Guidelines details appropriate locations for childcare facilities and requires that one childcare facility is provided for every 75 units. A Social Infrastructure Audit has been undertaken by HRA Planning and accompanies the proposed development under separate cover. It deals with childcare provision in the area and the requirements generated by the proposed development. The Childcare Guidelines require the provision of childcare facilities at a ratio of 20 childcare spaces for every 75 proposed dwellings. The proposed development of 60 no. units falls below the mandatory threshold and when one considers the proposed 20 no. 1 bedroom units, which is not likely to generate a childcare demand, the development only has the potential to generate a requirement for 10 no. childcare spaces.

By letter dated 15<sup>th</sup> May 2023, the Kildare Childcare Committee confirmed that in Celbridge, in March 2023, there were 20 no. childcare services with a total of 554 children registered for the ECCE (free pre-school years for ages 3-5) in pre-school. There are 477 no. children availing of the National Childcare Scheme. With 103 no. vacancies identified, there is adequate provision in operation locally to absorb potential demand for childcare spaces.

### Design Manual for Quality Housing

This Manual seeks to provide guidance on the design of Social Housing developments in respect of site layouts and the internal layouts of individual dwellings, principally to local authorities and Approved Housing Bodies (AHBs), and their consultants. The sample site layouts included in the Manual set out the urban design and placemaking priorities, consistent with compact growth, to assist in the delivery of high-quality and sustainable housing developments. The Manual seeks to promote a consistent approach nationally by local authorities and AHBs in respect of design priorities and space standards.

The principles of the Design Manual have been incorporated into the proposed development, including the urban structure, permeability, density and diversity in design.

### Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009. The Guidelines build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. The Guidelines expand on higher-level policies of the National Planning Framework, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing.

To achieve compact growth, the Guidelines support medium-density housing models, alongside traditional housing and apartment developments, recognizing the significant population growth forecast and changing demographics. The guidelines also recommend specific standards for housing, such as minimum separation distance, private and public open space provisions, and car parking.

Celbridge identified as a Tier 3 Self Sustaining Town within the Dublin Metropolitan Area, Table 3.3 of the Guidelines provides the density ranges for metropolitan towns and villages with the subject site located within the suburban area of the town. It is a policy and objective of the Guidelines that residential densities in the range 35 dph to 50 dph (net) shall generally be applied at suburban and edge locations

of Metropolitan Towns, with densities of up to 100 dph (net) open for consideration at ‘accessible’ suburban / urban extension locations. The proposed development with a net density of 35.3 dwellings per hectare falls within the range of density provisions promoted in the Guidelines.

The Guidelines contain a number of Specific Planning Policy Requirements (SPPR’s) which seek to reduce traditional development management standards relating to a minimum quantum of private and public open space, rear garden sizes and car parking. This is done in an effort to afford greater flexibility to development proposals and to facilitate increased densities and compact growth. Notwithstanding, the reduced development standards promoted in the Guidelines, the proposed development continues to provide and comply with the provisions of the Kildare Development Plan 2023 – 2029, which affords higher standards, including typical separation distances of 22m between opposing first floor windows as stipulated in Section 15.2.2 and Table 15.2 of the Development Plan.

In the Guidelines Policy and Objective 5.1 – Public Open Space generally requires the provision of 10 – 15% net public open space provision but does acknowledge that in some circumstances a planning authority might decide to set aside in part or in whole the public open space requirement arising under the development plan. A total provision of 0.355 hectares of public open space as part of the proposed development, equating to 20.5% of the overall gross site area, fully accords with the provisions of the Guidelines.

The development proposal is therefore in compliance with the recently published Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 as detailed in Table 4.0.

Table 4.0 Specific Planning Policy Requirements Apartment Guidelines 2022		
Policy & Objective No.	Summary	Development Compliance
3.1	The recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level.	The Guidelines specify that residential densities in the range 35dph to 50dph (net) shall generally be applied at suburban and edge locations of Metropolitan Towns shall be applied. The proposed net density of 35.3 dwellings per hectare falls within the range of density provisions promoted in the Guidelines.
4.1	The principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 shall be implemented.	The principles of the Design Manual have been incorporated into the proposed development. Compliance with the requirements of DMURS can be found in the report prepared by the project Engineers Malone O’Regan.
5.1	The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.	A total provision of 0.355 hectares of public open space as part of the proposed development, equating to 20.5% of the overall gross site area, fully accords with the provisions of the Guidelines.

4.2	The key indicators of quality urban design and placemaking set out in Section 4.4 are to be applied within statutory development plans and in the consideration of individual planning applications.	The Key Indicators of quality and design as detailed in Appendix D of the Guidelines has been considered and are detailed in the Architectural Design Report.
SPPR 1	A separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained.	A 22m separation distance has been maintained between opposing first floor windows. A number of gables are located in proximity to the northern and southern site boundaries. However, these gables do not comprise first floor habitable windows and so overlooking does not arise. Accordingly, a 22m separation distance is not required in such instances
SPPR 2	Minimum private open space standards for houses: 1 bed house 20sqm 2 bed house 30sqm 3 bed house 40sqm 4 bed+ house 50sqm	Two, three and four bedroom houses of 85sqm, 100sqm and 110 sqm with minimum private open space of 55sq, 60sqm and 75sqm have been provided in excess of the requirements in the Guidelines. See Housing Quality Assessment prepared by MCORM Architects.
SPPR 3	Car parking should be minimised and substantially reduced and applicants should provide a rationale and justification for the number of car parking spaces proposed.	Section 5.4 of this report and Table 3 justifies the provision of car parking in accordance with the requirements of the development plan.
SPPR 4	Cycle Parking and Storage to be provided. Minimum cycle parking of 1 space per bedroom to be applied with additional space for visitor parking.	Bicycle parking is accommodated within the curtilage of all units at ground floor level, including the apartment units, which require provision of 1.5 bicycle spaces per unit (1 space per bedroom + 1 visitor space per 2 apartments). A total of 5 no. Sheffield bicycle stands are provided to accommodate visitor bicycle parking.

#### Urban Design Manual - A Best Practice Guide (2009)

The core principles of design, including place-making, environmental responsibility, social equity and economic viability, that are required when creating places of high quality and distinct identity are detailed. There are 12 'Best Practice Design Manual' criteria which should be incorporated in new residential development. The 12 criteria are assessed in the Architectural Design Statement prepared by MCORM Architects, demonstrating how they have influenced the overall design approach on the site, including:

- *Context: How does the development respond to its surroundings?*
- *Connections: How well is the new development / site / neighbourhood connected?*
- *Inclusivity: How easily can people use and access the development?*
- *Variety: How does the development promote a good mix of activities?*
- *Efficiency: How does the development make appropriate use of resources, including land?*
- *Distinctiveness: How do the proposals create a sense of place?*
- *Layout: How does the proposal create people-friendly streets and spaces?*
- *Public realm: How safe, secure and enjoyable are the public areas?*
- *Adaptability: How will the buildings cope with change?*
- *Privacy / amenity: How do the buildings provide a high quality amenity?*

- *Parking: How will the parking be secure and attractive?*
- *Detailed design: How well thought through is the building and landscape design?*

**Design Manual for Urban Roads and Streets**

The ‘*Design Manual for Urban Streets and Road*’ (DMURS) sets out statutory guidance and standards in relation to the design of individual streets. The application of DMURS is necessary to ensure that strategic movements are catered for along desire lines and that all street networks offer route choice and maximise the number of safe and attractive walking and cycle routes between key destinations. The application of DMURS is key to ensure sustainable mobility and the creation of high quality and attractive settlements.

Policy and Objective 4.1 of the recently published Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024 states that “*it is policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking*”. These Guidelines, therefore, must be promoted within the proposed development.

Section 1.2 of DMURS requires that street layouts be interconnected to encourage walking and cycling and offer easy access to public transport. Section 3.2 identifies types of streets, including arterial streets, link streets and local streets. Section 4.0 details the maximum radius to be used on various type of roads and streets and details the appropriate widths.

Compliance with the requirements of DMURS can be found in the report prepared by the project Engineers Malone O’Regan.

**Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities 2023**

Duplex units are apartments and therefore these Guidelines apply to the development proposal. The key relevant Specific Planning Policy Requirements (SPPRs) are summarised in Table 4.0 and are applied to the development to demonstrate compliance. The table refers to the 20 no. own door apartment units only which have been designed in duplex form.

Table 5.0 Specific Planning Policy Requirements Apartment Guidelines 2022		
SPPR Number	Summary	Development Compliance
SPPR 1	Housing 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) and there shall be no minimum requirement for apartments with three or more bedrooms	Proposed mix is as follows: 20 no. 1-bed units and 40 no. 2 – 4 bed units. The 1 bed units therefore comprise 33% of the overall development. The proposed development is a housing and duplex mix and the provision must be viewed in the context of the wider typology mix.

SPPR 4	Minimum apartment floor areas 1 bedroom apartment units (2 persons) -45 sqm. The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard, by a minimum of 10%	All 1 bed units comprise a minimum of 53.6sqm, with floorspaces ranging from 53.6sqm – 59.9sqm in excess of requirements in the Guidelines. The minimum floor area of the apartment units has been exceeded by 22%. Please refer to the schedule of accommodation prepared by MCROM Architects.
SPPR 4	Dual Aspect 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.'	All units are dual aspects
SPPR 5	Floor to ceiling heights Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use	Floor to ceiling height of ground floor units is 2.7m.
SPPR 6	Apartments per core A maximum of 12 apartments per floor per core may be provided in apartment schemes.	This SPPR does not apply as the units are duplex units.

There are a number of non-specific policies in the Guidelines with which the proposed development has had regard to. Appendix 1 of the Guidelines contain minimum quantitative standards for bedroom floor areas, storage space, communal amenity space and private amenity space. The schedule of accommodation prepared by MCORM Architects details compliance with these standards.

In relation to the provision of communal amenity space for the one bed units in the development, the minimum requirement is 5sqm of communal open space for 1 bed units. The provision of 20 no. units therefore requires provision of 100sqm of communal open space. The total open space provision on the site is 3,550sqm or 20.7% of the net developable area. This is in excess of the 2,550sqm required to meet the 15% as set by the Kildare Development Plan. The gross open space provision at 20.7% is therefore inclusive of the communal open space requirements.

Whilst the requirements for play areas as specified in the Guidelines do not apply because the proposed apartment development does not comprise two beds or more, nevertheless the proposed development includes a significant natural play space within the western open space area as detailed on the Landscape & Biodiversity Plans. Adequate secure bicycle storage space is provided for all duplex units in accordance with the provisions in the Kildare Development Plan.

#### Urban Development and Building Heights- Guidelines for Planning Authorities

Reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is significant scope to build up and consolidate the development of existing urban areas. There is therefore a presumption in favour of buildings of increased height in town/city cores and in other urban locations with good public transport accessibility. There are a number of broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines. These are not considered in this report as the proposed development comprises a two storey development, reflective of existing building height in the area.

There is only one relevant Specific Planning Policy Requirement (SPPR) from the Guidelines applicable to the development proposal, as follows:

*“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more”.*

As already detailed in this planning statement the proposed development at 35.3 units per hectare satisfies the provisions of the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities. The development affords building variety with the provision of two storey terraced, detached and duplex units. The mono pitch of the duplex units offers visual variety.

## **8.0 REGIONAL POLICY**

### **8.1 Regional Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019-2031)**

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) sets out a twelve year strategic development framework for development and transcribes the NPF objectives to the regional level. The RSES is a strategic document, which identifies high-level requirements and policies for the Eastern and Midland Region, setting out the high-level statutory framework to empower each local authority to develop County Development Plans (CDPs) and Local Area Plans (LAPs) that are coordinated with regional and national objectives.

Within Kildare, the RSES notes that Maynooth, Leixlip and Celbridge fall within the Dublin Metropolitan Area: large towns which have strong connections with the city. The RSES makes a provision for increasing the targeted growth within the Metropolitan Area stating that: there is a further allowance of transition population targets in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP.

It is a principle of the RSES to reduce transport demand and encourage low carbon transport modes and promote sustainable transport systems. The RSES supports a feasibility study for the provision of highspeed rail links between Dublin and Limerick/Junction Cork and enhanced rail services including the extension of the DART to Celbridge/Hazelhatch in north Kildare.

The RSES seeks to promote the regeneration of cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region’s citizens (NSO 1). Regional Policy Objective (RPO 5.4) requires that future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing: Design Standards for New Apartments’ Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.

The RSES also points out that there is a need to incentivise mobility in the housing market, to address social isolation among older people and to offer more choice by way of an increased supply of accommodation for all life stages. The RSES highlights the importance of housing quality to secure positive health outcomes and that achieving compact growth targets will require active land management responses to ensure that land and building resources within existing settlements are used to their full potential.

Whilst the vision and objectives in the RSES are strategic in context and nature, the wider objectives of the RSES have been complied with by reason of compliance with the national guidelines as detailed above. Further, relevant objectives in the RSES have been translated into local policy via the Kildare Development Plan 2023 – 2029 as referenced in Policy HO O3 of the Development Plan which seeks to co-operate with the Eastern and Midland Regional Assembly in planning for new homes and meeting housing needs for the Dublin Metropolitan Area (which includes Maynooth, Leixlip, Celbridge, and Kilcock) through the implementation of the Dublin Metropolitan Area Strategic Plan.

## **9.0 LOCAL POLICY**

### **9.1 Kildare Development Plan 2023 - 2029**

The Kildare Development Plan 2023 – 2029 (Development Plan) identifies Celbridge as a ‘Self Sustaining Town’, which is defined as a town with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.

The housing target for Celbridge as set out in the Development Plan is 914 no. units between Q1 2023 – Q4 2028. Policy CS O1 seeks to ensure that the future growth and spatial development of County Kildare is in accordance with the population and housing allocations contained in the Core Strategy which aligns with the regional growth strategy as set out in the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midland Region and further specified in the ‘Housing Supply Target Methodology for Development Planning’. The proposed development of 60 no. units on the subject site falls well within the core strategy housing target.

Policy CS O9 seeks to review and prepare on an ongoing basis a portfolio of Local Area Plans (LAPs) for the mandatory LAP settlements (and environs, where appropriate) of Naas, Maynooth, Newbridge, Leixlip, Kildare, Athy, Celbridge, Kilcock, Monasterevin, Sallins, Clane and Kilcullen in accordance with the objectives of the County Development Plan and all relevant Section 28 Ministerial Guidelines, thereby ensuring that coordinated and effective spatial planning can be facilitated in the town, including development on the subject site.

Section 3.2 of the Development Plan and Objective SC O16 seeks to ensure that planning applications for residential developments over 20 units are accompanied by an audit of social and community infrastructure and an implementation and phasing programme in relation to social and community infrastructure. In accordance with Objective SC O17 a Social Infrastructure Audit was prepared by HRA Planning having regard to a 15 minute walk-time and the services and facilities located within that catchment.

Policy HO P1 in the Development Plan seeks compliance with a number of DHLGH Guidelines in the advancement of residential development. Compliance with Guidelines has already been considered and demonstrated in Section 7.3 of this report.

Table 3.1 in the Development Plan promotes appropriate densities in Large Towns of 30 – 50 units per hectare in outer suburban / greenfield locations. Policy HO P5 promotes residential densities appropriate to its location and surrounding context and Objective HO O5 ensures appropriate densities are achieved in accordance with the Core Strategy. The proposed development has taken all of these objectives into consideration, with a density of 35.3 units per hectare promoted on the site.

Objective HO O15 seeks to a) Require that new residential developments provide for a wide variety of housing types, sizes and tenures. b) Specify target housing mixes, as appropriate, for certain sites and settlements as part of the Local Area Plan process. c) Require the submission of a 'Statement of Housing Mix' with all applications for 10 or more residential units. d) Require that all new residential developments in excess of 5 residential units provide for a minimum of 20% universally designed units in accordance with the requirements of 'Building for Everyone: A Universal Design Approach' published by the National Disability Centre for Excellence in Universal Design. As detailed already in this report in Table 1.0 the development proposes a wide variety of housing types and sizes. Tenure diversity is accommodated having regard to the existing tenure mix immediately surrounding and within a 1km radius of the site as detailed in Section 3.2 of this report. A Statement of Housing Mix is appended to the Architectural Design Statement and 20%, 12 no. units, have been designed to be Universal Design compliant. These consist of the ground floor apartment units and the Type C 3 bed house.

Objective TM O21 in the Development Plan seeks to ensure site layout proposals detail present possible future connections to pedestrian/cycle links and improve permeability between existing and proposed developments including adjacent developments thereby facilitating the '10-minute settlement' concept. The development proposal provides for 2 no. pedestrian and cycle connections to the development to north, whilst facilitating direct access to Oldtown Mill Road.

There are a number of objectives in the Development Plan which seek to promote a nature based solution to the treatment of surface water from sites. Objective IN O24 only considers underground retention solutions when all other options have been exhausted. It clarifies that underground tanks and storage systems will not be accepted under public open space, as part of a SuDS solution. Objective IN O25 and IN O23 promotes the use of green infrastructure (e.g., green roofs, green walls, planting, and green spaces) as natural water retention measures.

In response, a comprehensive SUDs strategy has been prepared for the site, with an emphasis on nature based solutions through the provision of swales, rain gardens permeable paving and a wetland pond. The use of underground tank and storage systems has been avoided. In October 2023, Causeway Geotech Ltd. completed a comprehensive programme of site investigations for the site. The report concludes that the site is not suitable for infiltration drainage systems. As a result, it is necessary to attenuate surface water on site draining to a wetland pond in the rear southwest of the site.

In full compliance with Objective IN O26, some 20.7% of open space has been provided on site. When one excludes the area of open space incorporating the wetland pond and SuDS systems, as detailed in Figure 4.0 (895sqm), there still remains 15.4% of open space to satisfy the public open space requirements in the Development Plan. SuDS do not form part of the 15% public open space requirement as per the Development Plan.

With respect to Objective BI 026 regard has been had to the provisions in the Development Plan which prevent, in the first instance, the removal of hedgerows to facilitate development. Removal of hedgerows on site has been kept to an absolute minimum. As detailed in Section 6.3 of this report, the entire hedgerow along the south western site boundary has been retained in full. The treatment of the northern and south western hedgerow has been dictated by an adjoining development granted planning permission for a residential development under 19/1282. Only 24m of hedgerow will be retained on the north western boundary of the site as a condition attached to the permission of the adjoining residential development to the north necessitates the removal of 115m of hedgerow. Once the adjoining development is complete it is a condition of the adjoining permission to the north that a new native hedgerow is planted inside the adjoining northern site boundary which will provide screening to the proposed development and contribute to biodiversity enhancement at this location.

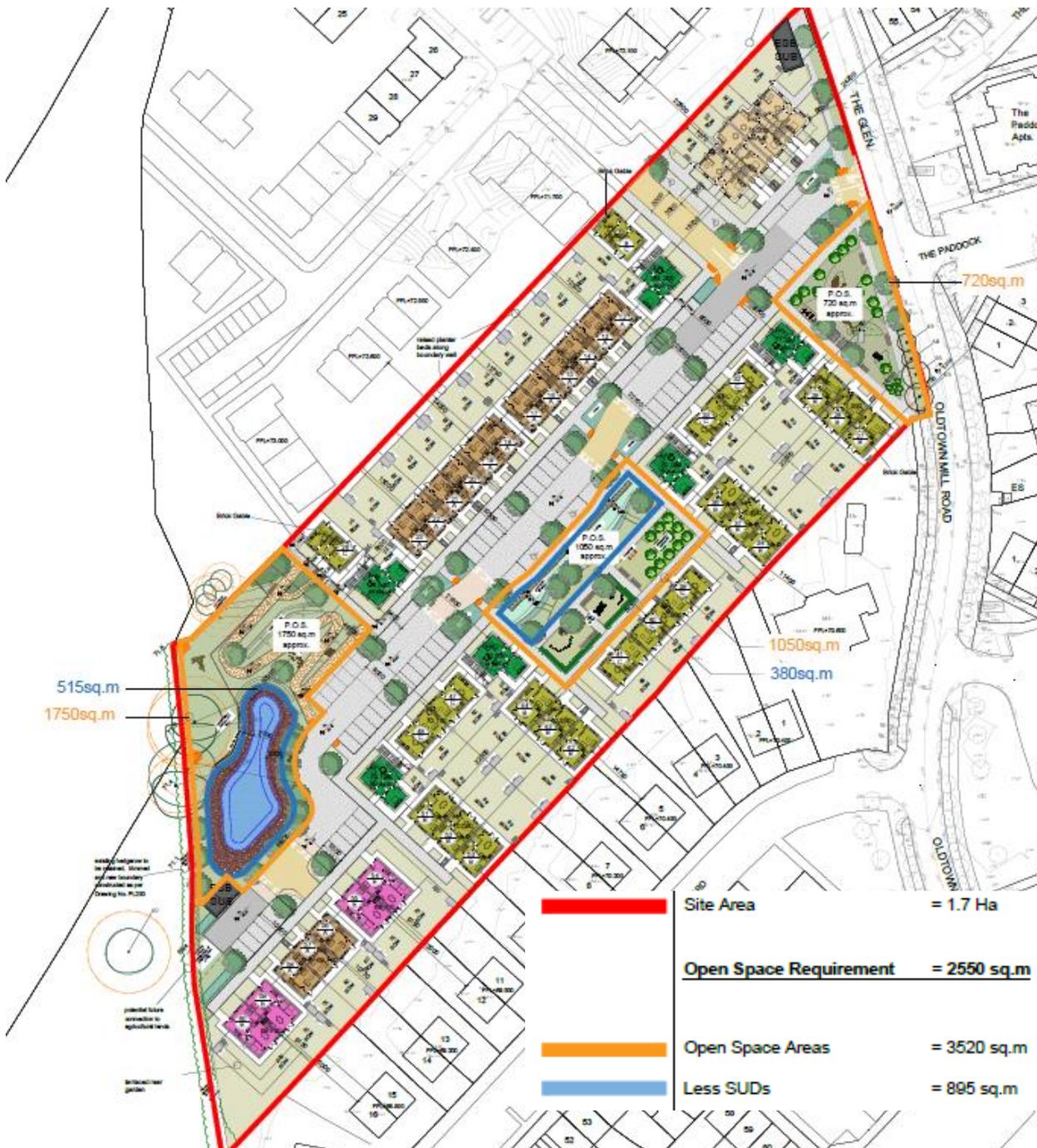


Figure 4.0 Calculation of Open Space Provision less SUDs area

Development Management Standards

Whilst the previous paragraphs evaluate the proposed development against a number of objectives in the Development Plan, there is also a need to consider a number of relevant development management standards provided in Chapter 15 of the Plan. The relevant standards have been extracted from the Development Plan as detailed in Table 6.0 and an evaluation of the development proposal provided.

Table 6.0 Development Management Standards Kildare Development Plan 2023 – 2029	
Development Plan Standards	Development Evaluation
Section 15.2.2 - Overlooking / separation distances – 22m between directly opposing first floor windows but may be reduced or innovative design, where overlooking into habitable rooms does not occur.	A 22m separation distance has been maintained between opposing first floor windows. A number of gables are located in proximity to the northern and southern site boundaries. However, these gables do not comprise first floor habitable windows and so overlooking does not arise. Accordingly, a 22m separation distance is not required in such instances.
Section 15.2.3 - All new developments are required to have regard to the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and British Standard (B.S.) 8206 Lighting for Buildings, Part 2, 2008: Code of Practice for Day Lighting	A Daylight & Sunlight Assessment was prepared by Digital Dimensions and supports the proposed development. The report concludes that the scheme is well designed for sunlight, with 70% of the duplex units meeting the minimum recommended 1.5 direct sunlight hours. All of the proposed communal and private amenity spaces achieve sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st March in accordance with BR209:2022 (third edition). The proposed development meets the recommendations of the BRE guidelines. In No.9 The Orchard, there is a minor impact to a single window, (ID no. 9), where the window will have a VSC of 26.1% with the proposed development in place. However, the window comprises an extension protruding from the rear of the house, which also has two roof-lights, which retain 98.4% of their access to the sky. As a result, this room will be well served by windows 9, 10 & 11, continuing to provide a good level of daylight and the impact is deemed to be minor.
Section 15.2.6 - Development should be designed in such a fashion that it will not prejudice the provision of vehicular or pedestrian access, or key infrastructural services in adjoining lands.	The proposed single street through the site is capable of being extended into adjoining land to the west, should such land be zoned for future development.
Section 15.4.1 – Development Capacity, compact growth and requirement for a Social Infrastructure Audit.	A Social Infrastructure Audit was prepared by HRA Planning in support of the proposed development, having regard to existing services and facilities within a 15 minute walk of the site.
Section 15.4.2 – Development Phasing	There is no phasing proposed on site. The 60 no. units shall be delivered as one phase.

Section 15.4.3 – Implement densities as set out in Table 3.1 of the Development Plan and relevant Guidelines	The development proposes a density of 35.3 units per hectare in accordance with the Guidelines. Further, it is noted that the Kildare Development Plan targets residential densities between 35 – 40 units per hectare as per the Core Strategy table (Table 3.1).
Section 15.5.4 - Housing Mix Statement required	Table 1.0 in this report provides details on housing mix and this is further supplemented with information in the Architectural Design Statement.
Table 15.2 requires Minimum Floor space and Open Space Requirements for Houses	Two, three and four bedroom houses of 85sqm, 100sqm and 110 sqm with minimum private open space of 55sq, 60sqm and 75sqm have been provided in accordance with the requirements in the plan. See Housing Quality Assessment prepared by MCORM Architects.
Section 15.4.7 – Compliance with Apartment Guidelines	The 20 no. apartment units have been designed in full compliance with the Apartment Guidelines as detailed in the Architectural Design Statement, Appendix A Housing Quality Assessment.
Section 15.6.6 - On greenfield sites, the minimum area of open space that is acceptable within the site is 15% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 8%.	A total of 20.7% of gross open space is provided on site. Whilst 4.6% of the site is subject to SUDs measures there still remains 15.4% of the site which is not subject to any SUDs measures and is solely provided as public open space.
Section 15.6.6 - SUDS are not generally acceptable as a form of public open space provision, except where they contribute in a significant and positive way to the design and quality of open space. Where the Council considers that this is the case, in general a maximum of 10% of the open space provision shall be taken up by SUDS.	A total of 20.7% of open space is provided on site, comprising 15.4% which is not subject to any SUDs measures.
Section 15.6.7 - It is expected that private open space provided will exceed the standards whenever possible and such minimum standards will only be acceptable for up to 50% of the units in any development and will be discouraged throughout.	The smallest area of private open space is 64sqm notwithstanding that 15 no. two bed units only require 55sqm of public open space and 21 no. three bed units require 60sqm of private open space. Accordingly, the majority of housing units exceed minimum private open space standards.
Apartment units shall meet the minimum private open space requirements which is 5sqm for one bed units.	First floor one bed apartment units have been provided with balconies of minimum 5sqm in accordance with the guidelines with ground floor units provided with larger rear gardens.
Section 15.7.1 – requires compliance with DMURS	The principles of the Design Manual have been incorporated into the proposed development.

<p>Section 15.7.2 Cycle Parking - 1 space per bedroom + 1 visitor space per 2 apartments</p>	<p>Bicycle parking is accommodated within the curtilage of all units at ground floor level, including the apartment units, which require provision of 1.5 bicycle spaces per unit (1 space per bedroom + 1 visitor space per 2 apartments). A total of 5 no. Sheffield bicycle stands are provided to accommodate visitor bicycle parking.</p>
<p>Section 15.7.8 – Car Parking</p>	<p>Table 3.0 in this report details how the car parking standards have been provided in compliance with the Development Plan.</p>
<p>Section 15.8 Surface water requirements and required SUDs measures</p>	<p>A comprehensive SUDs strategy has been prepared for the site, with an emphasis on nature based solutions through the provision of swales, rain gardens permeable paving and a detention basin / pond.</p>

## 10.0 CONCLUSION

The proposed development on an infill, previously disturbed site is consistent with the policies and objectives of the Kildare Development Plan 2023 – 2029 and the Development Management Standards provided in Chapter 15.0.

The proposed development provides a suitable mix of housing, separation distance and car parking together with the quantitative requirements for private and public open space, all in accordance with the provisions of the statutory Development Plan. The overall building form and layout responds to its site and context and satisfactorily assimilates into the urban landscape. Further the density proposed is appropriate for a suburban site having regard to the pattern of both permitted and adjoining development and the provisions of the Core Strategy table in the Development Plan.

There is adequate service infrastructure in the area to accommodate the development proposal including water and transport infrastructure. The proposed development seeks to address and meet some of the critical need for housing within the town of Celbridge, providing much needed accommodation for those on the Housing Waiting List.

The proposed development, is consistent with the provisions of the Kildare Development Plan 2023 – 2029 and national guidelines, all in accordance with the proper planning and sustainable development of the area.