

Proposed Part 8 Residential Development
Coolaghknock Glebe, Kildare

Planning Statement

Kildare County Council

May 2024



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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 89 no. houses and 42 no. own door apartment / duplex units.

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 131 no. residential units on a gross site of circa 4.6 hectares in area, located at Coolaghknock Glebe, Kildare town, 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 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 the eastern suburbs of Kildare, forming a development edge adjoining the National Stud / Greenbelt. The uses surrounding the site are largely agricultural in nature. To the north of the site is Connagh residential development and the R413 Melitta Road. Coolaghknock Housing Estate adjoins the site to the west, with undeveloped greenfield land to the east and south. Greenfield land extends to the south of the site for a distance of circa 0.65km before reaching the R445 Dublin Road.

Kildare Business Park, comprising a number of businesses and employment opportunities, is located immediately north of the site on the opposite side of the R413. A number of schools are located circa 700m west of the development off the R413 including Kildare Town Educate Together, Gaelscol Mhic Aodha and Naoionra ni Shionnaigh. Across the road from the schools, at the junction of Maryville and the R413 is a neighbourhood centre, comprising a convenience store, butchers and other small service providers.

Kildare Town has a centrally located train station and a relatively compact town centre, making it favorably predisposed to sustainable transport. The train station is located on the main southern rail line which connects Dublin with the regional cities of Cork, Galway, Limerick and Waterford. The Kildare Town Transport Strategy has proposed a range of measures to improve public transport throughout the town, including the area around the train station. The town is served by several bus services offering connections to towns within Kildare, Dublin and the rest of Ireland. There are a number of bus-stops in the town, but currently there are none on the R413 in proximity to the site. The closest bus-stop is on Station Road circa 1.5km from the site.

Identified as a Tier 2 Self Sustaining Growth Town in the settlement hierarchy for the county, Kildare town is recognised as having a moderate level of jobs & services. The town is identified as having capacity for continued commensurate growth to become more self-sustaining. The Kildare Development Plan 2023 - 2029 considers that measured growth can be permitted.

With a population of 10,302 persons in 2022, the population in the town grew by a significant 19.3 per cent in the last inter census period (2016). The Kildare Development Plan 2023 - 2029 (CDP) strategically plans for the future growth of the town with a housing target of 1,182 no. housing units between Q1 2023 – Q4 2028. This accounts for 4.7% of the total county housing and population growth to the town of Kildare.

2.2 Site Description

The site comprises 4.6 hectares of greenfield land with a surface track extending from the Connagh residential development to a pumping station, positioned centrally on the western site boundary. The overall site is defined by a mature hedge field boundary on the western, southern and north eastern

boundaries, with a high stone wall defining the southern eastern boundary, adjoining the Curragh Plains. A hedgerow also runs centrally on an east west axis through the site.

A topographical survey shows that the site generally slopes upward from south to north from +96.61m to +103.47m. The steepest changes in elevation occurs in the southwestern and northwestern corners with most of the site being between +100.5m to +101.5m.

The EPA database of rivers and streams does not show any watercourses within or adjacent to the site. The closest watercourse is the Tully Stream (a tributary of the River Barrow), which is approx. 1.8 km south of the Site at the closest point. Due to its distance from the site and the presence of intervening buildings and roads, it can be concluded that the site has no connection to Tully Stream

The site features habitats like hedgerows, neutral grassland, and artificial surfaces. The mature hedgerows, of local ecological importance, are recommended for retention in the development, while other habitats are of negligible importance. A bat survey highlighted the northeast farmland and hedgerow as a foraging area for common pipistrelle bats, leading to proposals for bat-sensitive lighting to minimise disturbance.

There are no recorded archaeological monuments or protected structures within or adjoining the site. A report from John Purcell Archaeological Consultancy confirms that the proposed development does not include any recorded archaeological monuments. However, a review of the archaeological evidence has shown that the site is in an area of archaeological potential. The proposed development does not include any recorded archaeological monuments, but a burial was excavated in 1966 on the subject site. Subsequent archaeological investigation in the immediate environs of this burial did not reveal any further remains and development proceeded in this area. This random find shows the potential for further burials or other archaeological deposits in the area. In order to assess the sub surface potential of the site archaeological testing shall take place in advance of works commencing on site.

2.3 Planning History

There is no significant planning history on the site. The southern extremity of the site had planning permission for stables in 2004 (planning reference 04/1826).

The site is accessed via an existing Part VIII housing development (Connagh Road, Close, Green, Crescent) that was completed pre 2009 (circa 72 units). A 'Phase 2' Part VIII scheme was planned for the proposed site but that development was not completed. There are existing services on site associated with the 'Connagh' scheme consisting of a foul sewerage pumping station and surface water attenuation tank with associated drainage lines and utilities (demarcated in blue in Figure 2.0). The foul pumping station is in the ownership of Uisce Eireann. The area of the pumping station is not included in this application.



Figure 1.0 Site Characteristics and Features Source: Project Architects

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 unmet demand for social housing arising in Kildare town. Site selection was restricted to consideration of that land in the ownership of the County Council, located within the defined development boundary for the town and which could be adequately serviced and integrated to provide much needed social housing. The subject site is significantly underutilised, solely accommodating a pumping station and access road.

Site selection has had regard to the provisions of the Kildare Development Plan 2023 – 2029 (KDP), which seeks to address many issues associated with housing in the county, including housing need, improving social mix and catering for those with particular needs. The development also complies with the zoning objectives for the land as set out in the Kildare Local Area Plan 2023 – 2029 (LAP). The subject site is identified as 'New Residential Phase 2' land in the LAP where the objective is *"to protect future development lands from inappropriate forms of development which would impede the sequential expansion and consolidation of the town in terms of providing for new residential development for future plans"*. However, the LAP does clarify that *"in the event that there is a significant unmet social housing*

demand in the Kildare Town area, proposals for social housing schemes on Phase 2 may be considered during the plan period subject to all other assessments". Section 4.0 deals further with this issue and demonstrates the unmet social housing demand in the town which supports development on this Phase 2 land.

The LAP extends across a significant area and seeks to establish a framework for the planned, coordinated and sustainable development of Kildare town and for the conservation and enhancement of its natural and built environment. The LAP provides guidance on how sustainable development can be achieved, what new developments are needed, and where public and private resource inputs are required.

The position of the site adjoins an established residential neighbourhood with a variety of existing services and facilities in the vicinity of the site. Kildare Business Park, comprising a number of businesses and employment opportunities, is located immediately north of the site on the opposite side of the R413. A number of schools are located circa 700m west of the development off the R413 including Kildare Town Educate Together, Gaelscol Mhic Aodha and Naoionra ni Shionnaigh. Across the road from the schools, at the junction of Maryville and the R413 is a neighbourhood centre, comprising a convenience store, butchers and other small service providers. Although the site is slightly removed from the town centre, it does adjoin established residential development and it is accessible to a range of services and facilities within easy walking and cycling distance.

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 town all in accordance with Objective HCO 2.1 in the LAP including the provision of appropriate housing designed for older people and/or people with disabilities.

In examination of the delivery of 131 no. social housing units, it is pertinent to consider existing tenure types within the Kildare Electoral Division. The Census of Population 2022 confirmed that there were 4,125 housing units in the Electoral District (ED) of Kildare in 2022 with 209 of these vacant or almost 5 per cent. Of the total 3,870 households in the ED, 80 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 19.2 per cent comprises social housing, either rented from the local authority, a voluntary housing body or occupied free of rent. The proposed addition of 131 no. social housing units increases the total provision of social housing in the area to 22.6 per cent.

Given the significant area associated with Kildare 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 369 no. households within the defined area comprising 79 per cent of units in private ownership and 20 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 does increase the provision of social housing in the area, from 20 per cent to 36.9 per cent.

Notwithstanding the increase in social housing provision in the area as a result of the proposed development, the 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.

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 southern, western and north eastern site boundaries for biodiversity and amenity value in accordance with Objective BI O26 of the Development Plan.
- Protection of biodiversity on site including bat foraging area at the north eastern extremity of the site.
- Avoiding areas of pluvial flooding at the western boundary of the site.
- Integrated provision of SUDs and adoption of a nature based approach to provision and management.
- Provision of a new spine road through the site providing access to adjoining land to the south.
- Pursuit of a balanced approach to scale and form of development cognisant of the established and prevailing character of Kildare town.

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 town of Kildare is stated as a first area of preference for 540 social housing applicants / cases on the housing list. The Kildare Local Area Plan (LAP) confirms that this figure rose to 637 applicants/cases by October 2022. Further examination of the social housing list in January 2024, revealed that from those who have Kildare Town as a first preference 235 applicants / cases are already resident within the town and represent an unmet housing demand from existing population within the town.

Section 3.4 of the LAP recognises that there are a number of planning permissions at the early stages of development/commencement which will deliver approximately 118 no. Part V social housing units and which will address a portion of the unmet social housing requirement. This figure, determined in January 2023, has slightly changed in that the Part V units in Greyabbey View have now been delivered. Accordingly, there still remains 97 no. units to be delivered.

Given the existing unmet housing demand from existing population within the town and the potential for only 97 no. units to satisfy this demand between January 2024 and the plan period, it is considered that the proposed development of 131 no. units can address some of the existing shortfall.

Overall, the proposed development will only accommodate 3.3 per cent of households that have a housing need in the county and has the potential to accommodate 24.2% of the demand in the town. 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. 131 no. residential units including 89 no. houses and 42 no. own door apartment / duplex units to be delivered on a phased basis, comprising 42 no. one bed units; 36 no. two bed units; 45 no. three bed units; and 8 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;
- iii. 1 no. crèche facility of 325sqm with potential for community use until such time as crèche becomes viable;
- iv. Landscaping works including provision of (a) open space and kick about areas; (b) natural play features; (c) new pedestrian and cycle connections; (d) compensatory tree planting; and (e) infiltration basin;
- v. 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
- vi. all associated site development 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 and the Kildare Local Area 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.

Table 1.0: Principal Figures

Tenure Type	Total No.	beds	No.	Typology	% of tenure	Unit Size (GFA) m ²
Houses	89	2 Bed	36	Terrace	27%	87.4sqm
		3 Bed	45	Terrace & Semi-detached	34%	101.6 – 107.8sqm
		4 Bed	8	Semi-detached	6%	124.8sqm
Own Door Apartment	42	1 bed	42	Duplex – one bed over one bed	32%	52.5 – 59.9sqm

Table 2.0: Development Areas

Gross Site Area (total site defined in red outline)	4.6 hectares
Net Site Area (excludes creche and pumping station)	3.7 hectares
Open Space	17.9% gross of overall site
	15.7% excl SUDs areas
Density	35.4 u/ha
Creche	325sqm accommodating 60 no. children

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 focused on the creation of homezones, 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 35.4 units per hectare as an extension to the Connagh housing development. Whilst the predominant unit type is a terraced or semi-detached housing unit of two storeys in height, the development does accommodate 40 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 incorporating the existing pumping station and access road provided as part of the existing housing development to the north. Accordingly, five integrated housing cells have been created to the north of the spine road with the area to the south reserved for a crèche, public open space and SUDs features. The mature hedgerow along the south and east of the site has been retained. The internal spine road separates the local park from the housing, which has also been designed to facilitate future potential connectivity to unzoned lands to the south of the site. whilst pedestrian connectivity is provided at two locations to the north of the site. A landscape buffer has been maintained along the south eastern boundary of the site to soften the visual transition between the open plains of the Curragh and the urban edge of the settlement.

Residential Units

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.

Creche

A creche facility is proposed comprising 325sqm. The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that in larger new housing estates the provision of one childcare facility with 20 places for each 75 dwellings should be required. The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities nuances the requirement by clarifying that one bedroom units are excluded for the purposes of calculating requirements.

The provision of 131 no. units within the development is above the 75 no. unit threshold for consideration of a requirement for a childcare facility under the Childcare Facilities Guidelines for Planning Authorities (2001). Further, if one removes the 42 no. 1 bed units within the development, the remaining 89 no. units continues to generate a demand for a creche facility. Applying a childcare requirement rate of 0.26 per unit as per the Childcare Facilities Guidelines, the proposed development generates a creche capable of accommodating a minimum of 23 no. children.

The proposed creche is intended to accommodate 5 no. classrooms with 60 no. children and a staff of circa 10 no. persons. However, having regard to other creche proposals in the area including a planning application for a creche comprising 390sqm in floor area (planning reference P23/597) located off the Melitta Road to the north of the site, the demand for full childcare provision may not be required until the proposed development is fully completed and occupied. Accordingly, it is proposed that the creche could be used for other community purposes until such time as it becomes commercially viable to operate.

5.3 Open Space & Landscaping

A significant local park has been provided extending from the site of the proposed creche southwards along the entire length of the western site boundary. The local park is broken up into four distinct areas, all connected with a defined pathway, encouraging walking and facilitating permeability. An Integrated Construction Wetland (ICW) feature is provided at the southern extremity of the site as a SUDs feature. Although this area is excluded from the public open space calculation, functionally it does contribute to the public open space provision accommodating 3 no. sports stations around its perimeter.

Moving northwards beyond the pumping station is a dedicated sports pitch with bike stands and a seating area. The remaining area of the public park has been subdivided into two distinct play areas including a hangout area for an older age group, and a dedicated area for younger children including a mounded play ground / area with outdoor seating.

5.4 Parking

A total of 184 no. car parking spaces have been provided on site in general accordance with the provisions of Table 15.8 of the KDP, divided between 36 no. on curtilage spaces, 128 no. on street spaces and 20 no. creche spaces. 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	89	1 space per 1 - 3 bed units	81	81
		1 no. space per 4 bed + plus 0.5 visitor space	12	12
Apartments	42	1.5 spaces per unit + 1 visitor space per 4 apartments	73	71
Creche	60 no. children & 10 no. staff	1 space per 2 staff and 1 space per 4 children	20	20
Electric Vehicle Recharging Point		Ducting Infrastructure only required. No chargers	-	-
TOTAL			186 spaces	184 spaces

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 20 no. visitor bicycle spaces are accommodated external to the units, with Sheffield bicycle stands provided to accommodate the parking. With respect to the proposed creche, a total of 8 no. bicycle spaces have been provided as per development plan requirements (1 per 10 children and 1 per 5 staff).

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

The foul and process water drainage infrastructure has been designed in accordance with Irish Water Technical Standard for Wastewater Gravity Sewers and the Irish Water Code of Practice for Wastewater Infrastructure. Existing foul water drains run from Melitta Road down into foul water pumping station located in the centre of the site. The underground drains carry foul water from other areas for pumping from the site back up to Melitta Road. Due to the relative levels of the existing drainage and the

proposed site levels, it is possible to achieve a gravity connection to the existing foul water drainage pipework and pumping station on site.

Potable Water

A 100mm diameter watermain is located under the footpath in Coolaghknock Avenue and Park to the west of the proposed development. A 150mm diameter watermain is located under the footpath in Coolaghknock Glebe to the north and west of the proposed development. The watermain in Coolaghknock Avenue and Park is at a higher level than the subject site. Thus, it is proposed to use provide a potable water supply to the development off the existing main in Coolaghknock Glebe estate.

Surface Water

Existing greenfield run-off of the development site will be calculated and used as the minimum benchmark for the SuDS design, thereby ensuring that the post development run-off will not exceed the greenfield run-off. The run-off calculation is based on the drained area of the new development. Surface water discharges will be retained within the various SuDS systems up to and including the 1 in 100-year event plus 20% for climate change. The proposed SuDS techniques are detailed on the planning drawings and include bioretention swales, tree pits, rain gardens, permeable paving and Integrated Constructed Wetlands (ICWs). ICWs are considered appropriate due to the space available and the adequate levels available.

The SuDS measures not only replicate the pre-development surface water runoff systems and treatment for rainfall, but they also aim to replicate the existing habitats from the pre- development stage.

The project is fully compliant with the Greater Dublin Drainage Study (GDDS), a policy document designed to provide for future drainage infrastructure in an integrated manner and to ensure long term improvement to the quality and quantity of storm water run-off in the capital. 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 drained to the infiltration basin. The infiltration basin is sized to cater for a 1 in 100-year storm event. The outflow from the infiltration basin is limited by a hydrobrake flow control device which restricts the flow to 8.46 litres/s.

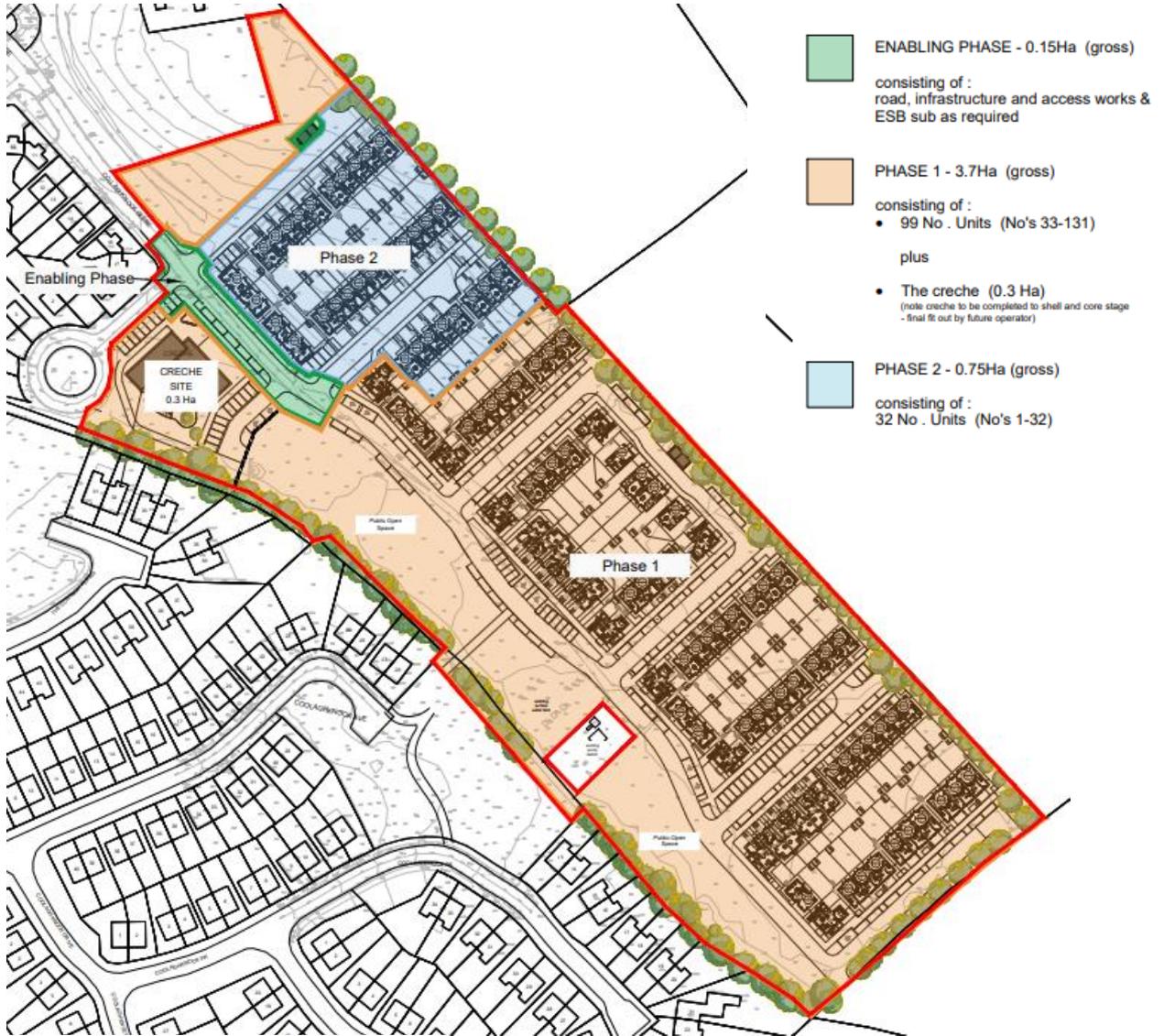
5.6 Phasing

It is proposed to deliver the development into two distinct phases as detailed in Figure 4.0, including the delivery of circa 99 no. residential units and the creche as Phase 1 and the remainder of the development as Phase 2. Open space provision shall be delivered commensurate with the delivery of houses within each phase of development.

In compliance with Objective SC O79 in the Development Plan, the phasing plan has been carefully crafted to ensure childcare provision is delivered in new communities prior to or in tandem with phase 1 of any residential development and is fully operational prior to the occupation of any residential units within the subject site.

Having regard to the provisions of this objective in the development plan, it is noted that planning permission is currently sought for a creche, (planning reference P23/597) in proximity to the site. Located off the Melitta Road to the north of the site, the proposal seeks to accommodate a creche of circa 390sqm. Currently the subject of a further information request, the proposed development will

will provide additional childcare facilities in the general area to serve existing residential need. Accordingly, there may be no immediate need for the creche proposed as part of the development proposal until such time as the proposed development, in its entirety, is completed. Having regard to the requirement to construct the creche as part of Phase 1 of the development, consent is required to utilise the building for community purposes until such time as the need for additional childcare facilities



in the area has been established and the development is complete.

5.7 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 timeline is indicative at this stage and is subject to change depending on consent approval, the tender process and other external factors including existing supply chain constraints at the time of going to market. It is assumed that all construction related activity will be undertaken in accordance with best practice / industry guidance and shall adhere to relevant emission, discharge and noise limit thresholds

Figure 3.0 Proposed Indicative Phasing of Development

during construction. A Construction & Environmental Management Plan (CEMP) has been prepared in support of the development proposal and will be implemented by the appointed Contractors on site.

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 O1 of the Development Plan.

The site features habitats like hedgerows, neutral grassland, and artificial surfaces. The hedgerows are considered to be of local ecological importance, but other habitats are of negligible importance. The majority of existing hedgerows will be retained and incorporated into the development, but it will be necessary to clear some internal hedgerows. This will be compensated by the planting of a new native hedgerow along the north-eastern boundary of the site, resulting in an overall neutral effect on hedgerows.

The landscaping scheme for the proposed development will include a detention basin, hedgerows, street trees and orchards. The ecological assessment report confirms that proposed measures will compensate for the loss of baseline vegetation, and will introduce some features that are not currently present at the site, resulting in a net gain in the biodiversity value of the site.

Small mammals like hedgehogs and possibly stoats, pygmy shrews, and Irish hares inhabit the site, with no signs of larger mammals like otters or badgers. Common birds, including the conservation-important barn swallow, were observed, prompting recommendations for site clearance outside nesting

seasons or pre-clearance surveys. A bat survey highlighted the northeast farmland and hedgerow as a foraging area for common pipistrelle bats, leading to proposals for bat-sensitive lighting to minimise disturbance.

The site is not in close proximity to any designated areas, with the nearest, the Curragh proposed Natural Heritage Area, approximately 300 meters to the northeast and unconnected to the site. Three other designated sites are identified within 3-5 km, but the absence of surface water or other connecting pathways to the site rules out the risk of impacts.

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 Aboricultural Assessment undertaken by CMK Hort + Arb Ltd. to provide base-line data on the composition and condition of trees and hedgerows within the site in accordance with Objective BI O29 of the Development Plan.

The proposed design has necessitated the removal of circa 214m of hedgerow throughout the site with most of this removal comprising a hedgerow running east-west through the centre of the site. In contrast, some 465m of hedgerow is being retained. The hedgerow being removed will be mitigated with significant new hedgerow planting along the eastern site boundary and a significant number of 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. Further a hedgerow of some 20m in length is being planted on land in the ownership of Kildare County Council adjoining the subject site, thereby further enhancing biodiversity in the area.

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 030 in the Development Plan. Varied habitats are created for ecological connections and landscape visual amenity including:

- Infiltration basin 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) prepared by Malone O'Regan Engineers 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) There are no hydrological features in the immediate vicinity of the site. The closest watercourse

is the Tully Stream (a tributary of the River Barrow), which is approx. 1.8 km south of the site at the closest point. Due to its distance from the site and the presence of intervening buildings and roads, it can be concluded that the site has no connection to Tully Stream.

The Flood Study study was principally focused on examining flooding risks to the proposed site including fluvial and pluvial flood risk. According to the Desktop Flood Risk Assessment, the flood risk assessment mapping indicates that the proposed development site does not fall within any current fluvial flood zones. A finished floor level of 87.87m is proposed for the residential development inclusive of 20% allowance for climate change.

The Strategic Flood Risk Assessment undertaken in respect of the Kildare Development Plan 2023 – 2029 identified a small section of the western boundary of the site within a pluvial flood risk assessment zone. Some soakways in the area lack capacity resulting in overland flow when full. These included the soakways and holding tanks servicing the Maryville, Beechgrove, Dara Park and Melitta Park residential estates. The subject site is not reported to have infiltration capacity issues.

The report concludes that the site is not located near any major open watercourse and the development of the site is not anticipated to negatively affect the existing hydrological regime of the area or increase flood risk in other locations.

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 concludes that the nearest European site to the project area is the Pollardstown Fen Special Area of Conservation (SAC), located 3.7 km to the northeast. For indirect impacts, there is no connection to any watercourses, leading to the ruling out of all potential pathways. The site's inland location, being far from any Special Protection Areas (SPAs), poses no risk to SPA birds.

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 131 no. dwelling units is below the 500-unit mandatory threshold and represents 26.2% of the threshold number of dwelling units.

The site area of the proposed development measuring circa 4.6 hectares in area is not situated within a business district and is significantly below the 10-hectare threshold for urban development³ in the case of; 'other parts of a built-up area'. The site, therefore, does not trigger mandatory EIA.

The preliminary examination confirms that there is no real likelihood that the proposed development, by reason of its 'nature and size' is likely to give rise to significant effects on the receiving environment, save for localised, short-term temporary impacts associated with the construction stage.

However, there are a number of locational characteristics, including biodiversity, landscape, cultural heritage and hydrology which give rise to environmental sensitivities on the site. These sensitivities could be impacted by the development proposal if not managed appropriately. Accordingly, 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.

A screening determination was therefore 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 and in the delivery of people, homes and

communities. The NPF seeks to *“plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services”* (NPO 28) and 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”* (NPO 33).

The NPO’s promoting housing and revitalising our towns and villages 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 recognises the necessity for significant and sustained increase in urban housing output (NPO 32) and in particular apartment type development citing that *“in many European countries, it is normal to see 40%-60% of households living in apartments”*.

The proposed development complies with a number of the NPO’s within the NPF with particular regard to addressing social housing need and creating a sustainable community with supporting community facilities in the form of a creche and significant recreational space and facilities. The proposed development is strategically located on lands identified for the accommodation of unmet social housing demand within the recently adopted Kildare Local Area Plan 2023 – 2029, 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 principles 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)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)
- 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 (2023)
- 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. As justified in Section 5.2 of this report, the creche proposed as part of the development, is intended to accommodate 5 no. classrooms with 60 children and a staff of circa 10 no. persons.

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.

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas

The Guidelines contain specific policies and objectives regarding the scale and location of new residential development, the need for high quality design of residential areas, and the use and development of infill, greenfield and brownfield sites. Section 1.9 recites general aims of sustainable residential development, including the need to prioritise walking, cycling and public transport over the use of cars, and to provide residents with quality of life in terms of amenity, safety and convenience.

The Guidelines promote densities on outer suburban and greenfield sites in the general range of 35-50 dwellings per hectare involving a variety of housing types. The subject site is located on a site identified for social housing provision adjoining the built up area of the town, which has been partially developed with an access road and pumping station, adjoining existing residential development. The development proposes a density of 35.4 units per hectare in accordance with the Guidelines. Further, it is noted that the Kildare Development Plan and Kildare Local Area Plan targets residential densities between 35 – 40 units per hectare in Kildare as per the Core Strategy table.

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?*

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.

Kildare identified as a Tier 2 Self Sustaining Growth Town falls into the Large Town category in the Guidelines. Table 3.5 of the Guidelines targets a density of 30 – 50 units per hectare in suburban / urban extension locations such as the subject site. The proposed development at a density of 35.4 units per hectare fully accords with the provisions of 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 0.66 hectares of public open space as part of the proposed development, equating to 17.9% of the overall net 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 30dph to 50dph (net) shall generally be applied at suburban and urban extension locations of Large Towns shall be applied. The proposed net density of 35.4 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 0.66 hectares of public open space as part of the proposed development, equating to 17.9% of the overall net 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.
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 with minimum private open space of 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 20 no. visitor bicycle spaces are accommodated external to the units, with Sheffield bicycle stands provided to accommodate the parking.

Design Manual for Urban Roads and Streets

The internal layout of the development has been designed with traffic safety a key priority. Reduction of vehicle speed is a fundamental principle behind the layout., all designed in accordance with the Design Manual for Urban Roads and Streets.

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

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 5.0 and are applied to the development to demonstrate compliance. The table refers to the 42 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: 42 no. 1-bed units and 82 no. 2 – 4 bed units. The 1 bed units therefore comprise 32% 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 52.5sqm, with floorspaces ranging from 52.5 – 59.9sqm in excess of requirements in the Guidelines with all apartments exceeding the standard by at least 16.6%. 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.
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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 42 no. units therefore requires provision of 210sqm of communal open space. The total open space provision on the site is 6,200sqm or 17.9% of the net developable area. This is in excess of the 5,600sqm required to meet the 15% as set by the Kildare Development Plan. The gross open space provision at 17.9% exceeds the minimum open space requirement by 600sqm and 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 local park 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 and Kildare Local Area 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 35.4 units per hectare satisfies the provisions of the Development Plan and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. The development affords building variety

with the provision of two storey terraced, semi-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.

The Regional Settlement Hierarchy provides for three distinct areas across the Eastern and Midland Region comprising of the Dublin Metropolitan Area, the Core Region and the Gateway Region. Kildare town is located in the Core Region, comprising the peri-urban 'hinterlands' in the commuter catchment around Dublin. The RSES recognises that many of these areas have emerged mainly as commuting towns, experiencing high rates of population growth but with a weak level of services and functions for resident populations. These towns will require 'catch up' investment in local employment and services in order to become more self-sustaining and to improve sustainable mobility, particularly in those places where there are high levels of car dependency.

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 and enhanced rail services including electrification on the Kildare line to be delivered by 2027.

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 Objectives seeks to provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'¹³, '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.

9.0 LOCAL POLICY

9.1 Kildare Development Plan 2023 - 2029

The Kildare Development Plan 2023 – 2029 (Development Plan) identifies Kildare town as a ‘Self Sustaining Growth Town’, which is defined as a town with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.

The housing target for Kildare town as set out in the Development Plan is 430 no. units between Q1 2023 – Q4 2028. The housing target increases to 628 units in the Kildare Local Area Plan as the period extends to Q4 2029 and an allowance is made for 25% additional provision. Policy CS O1 in the development plan 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 131 no. units on the subject site falls well within the core strategy housing target for the town even before one considers that the proposed development is intended solely to satisfy the unmet social housing demand arising in the town.

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. The Kildare Local Area Plan 2023 – 2029 forms part of this suite of documentation, which is reviewed in Section 9.2 of this report.

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 35.4 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%, and 35 no. units, have been designed to be Universal Design compliant. These consist of 20 no. 1 bed duplex units at ground floor level and 15 no. 3 bed houses.

Objective TM O21 in the Development Plan seeks to ensure site layout proposals detail present and 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 is accessed via the existing housing development to the north. The proposed open space along the western site boundary adjoins existing open space provision within the adjoining Coolaghknock Residential Development, thereby facilitating connections with existing pedestrian paths in the adjoining development and providing direct access to the Coolaghknock Residential Development should the need arise in the future.

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 detention basin / pond. There are no proposed underground retention solutions serving the development proposal.

In full compliance with Objective IN O26, some 17.9% of open space has been provided on site. When one excludes the area of open space incorporating SuDS features, as detailed in Figure 4.0, there still remains 15.7% 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 O26 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. Development will result in the removal of circa 214m of hedgerow and associated biodiversity. However, it is proposed to compensate for the loss of these features through provision of additional tree planting on site and the provision of an Integrated Constructed Wetland with natural biodiversity features, bat boxes, hedgehog boxes, wildlife corridors and natural grassland meadows. Further, extensive landscaping is proposed to enhance biodiversity on site, with an additional 20m of hedgerow provided off site on land adjoining the subject site to the north and in the ownership of Kildare County Council. The EclA confirms there is no net biodiversity loss on the site having regard to the extensive landscaping proposed.



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 taken 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.
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 88.1% of the duplex units meeting the minimum recommended 1.5 direct sunlight hours. Of the 110 no. houses and duplex units that have ground level amenity space, 92.7% achieve the targeted sunlight hours. The proposed development meets the recommendations of the BRE guideline for gardens and open spaces. 100% of the living, dining, kitchen and bedroom spaces achieve the target values. There are no dwellings or buildings which have a requirement for daylight within the zone of influence of the proposed development.
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 spine road through the site is capable of being extended into adjoining zoned land to the south, to accommodate future development.

<p>Section 15.4.1 – Development Capacity, compact growth and requirement for a Social Infrastructure Audit.</p>	<p>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. In response to the findings in the report, the development provides for an on site creche facility, recreational play spaces including a natural playground and sports pitch.</p>
<p>Section 15.4.2 – Development Phasing</p>	<p>The development shall be phased such that 99 no units, including infrastructure services, open space and the creche building shall be delivered as part of Phase I with the delivery of the remainder units as Phase II</p>
<p>Section 15.4.3 – Implement densities as set out in Table 3.1 of the Development Plan and relevant Guidelines</p>	<p>The development proposes a density of 35.4 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).</p>
<p>Section 15.5.4 - Housing Mix Statement required</p>	<p>Table 1.0 in this report provides details on housing mix and this is further supplemented with information in the Architectural Design Statement.</p>
<p>Table 15.2 requires Minimum Floor space and Open Space Requirements for Houses</p>	<p>Two, three and four bedroom houses in excess of the minimum floor areas with minimum private open space of 60sqm and 75sqm have been provided in accordance with the requirements in the plan. See Housing Quality Assessment prepared by MCORM Architects.</p>
<p>Section 15.4.7 – Compliance with Apartment Guidelines</p>	<p>The 42 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.</p>
<p>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%.</p>	<p>A total of 17.9% of open space is provided on site, comprising 15.7% which is not subject to any SUDs measures.</p>
<p>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.</p>	<p>A total of 17.9% of open space is provided on site, comprising 15.7% which is not subject to any SUDs measures.</p>
<p>Section 15.6.7 - It is expected that private open space provided will exceed the standards</p>	<p>Some 60sqm of private open space is provided notwithstanding that 36 no. two bed units only</p>

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.	require 55sqm of public open space and 11 no. duplex units only require 5sqm of open space.
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, including the urban structure, permeability, density and diversity in design.
Section 15.7.2 Cycle Parking - 1 space per bedroom + 1 visitor space per 2 apartments	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). Provision is made for 20 no. visitor bicycle spaces external to the units.
Section 15.7.8 – Car Parking	Table 3.0 in this report details how the car parking standards have been provided in compliance with the Development Plan.
Section 15.8 Surface water requirements and required SUDs measures	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.

9.2 Kildare Local Area Plan 2023 - 2029

The Kildare Local Area Plan 2023 – 2029 (LAP) sits under the Development Plan and provides a framework which generates integrated development across multiple sectors, and which releases the potential of Kildare to deliver an enhanced quality of life. The LAP is committed to ensuring sustainable and compact settlement patterns with appropriately located residential development, employment, educational, community, leisure and recreational facilities in order to allow the town to become more self-sustaining.

Whilst the Kildare Development Plan 2023 – 2029 provide s a number of strategic objectives which must be complied with, the LAP provides for more spatially specific objectives, in some instances directly relating to specific areas or sites in the town. It is proposed to evaluate the development against those specific objectives, including objectives relating to housing, supporting infrastructure, zoning, transport & mobility, landscape & biodiversity and water infrastructure.

9.2.1 Housing

As already detailed in Section 9.1 of this report, the proposed development is being advanced in accordance with the Core Strategy of the Kildare County Development Plan 2023- 2029 and in compliance with Objective CSO 1.1 in the LAP. The housing target FOR Kildare town is increased in the LAP to 628 units as the period of the LAP extends to Q4 2029 and an allowance is made for 25% additional provision. The LAP notes that it will monitor the scale, type, tenure and location of

constructed and permitted developments in Kildare town during the lifetime of the Plan and apply appropriate development management standards to ensure compliance with the Core Strategy, all in accordance with Objective CSO 1.4.

Objective HCO 2.1 in the LAP requires that a good mix of housing types and sizes is provided in all new residential areas to meet the needs of the population of Kildare Town, including the provision of appropriate supported housing and longer-term residential care solutions designed for older people and/or people with disabilities. Table 1.0 in this report provides details on housing mix and this is further supplemented with information in the Architectural Design Statement. The development places emphasis on universal design in order to provide for those with specific housing needs across all units being constructed and in this regard 35 no. units have been designed to be Universal Design compliant. These consist of 20 no. 1 bed apartment units at ground floor level and 15 no. 3 bed houses.

In accordance with Objective HCO 2.4 which seeks to provide Traveller Specific Accommodation at appropriate locations close to key services in accordance with the Traveller Accommodation Programme 2019-2024, the development proposal provides for 8 no. larger 4 bed housing units which could be suitable for traveller specific accommodation.

Similarly, in accordance with Objective HCO 2.5, the provision of 42 no. 1 bed own door apartment units could be earmarked for the provision of housing for older people people to facilitate 'right sizing' and assisted living accommodation.

9.2.2 Supporting Infrastructure

Objective HCO 1.2 supports new residential development that occurs in tandem with the delivery of supporting physical and social infrastructure. In this regard a Social Infrastructure Audit has been prepared and accompanies the development proposal. In response to the need for facilities in the area, the development provides for a creche facility and recreational facilities including a natural play area and dedicated sports pitch, with looped walkways, hangout areas and seating.

9.2.3 Zoning

Objective CSO 1.10 seeks to preserve the lands identified as 'Phase 2 New Residential' from inappropriate forms of development, thereby controlling the level of piecemeal and haphazard development on these lands and safeguarding their strategic value in accommodating the orderly sequential expansion of the urban settlement beyond the current Plan period.

The objective of the zoning afforded to the site, as detailed in the LAP is *"to protect future development lands from inappropriate forms of development which would impede the sequential expansion and consolidation of the town in terms of providing for new residential development for future plans"*. However, the LAP does clarify that *"in the event that there is a significant unmet social housing demand in the Kildare Town area, proposals for social housing schemes on Phase 2 may be considered during the plan period subject to consideration of all other assessments"*. Section 4.0 of this report deals further with this issue and demonstrates the unmet social housing demand in the town which supports development on this Phase 2 land.

Having regard to the extent of unmet social housing demand in the town of Kildare, it is considered that the development proposal is in accordance with the provisions of the zoning afforded to the land and the overall objectives of the LAP.

9.2.4 Transport & Mobility

Objective MTO 1.4 seeks to ensure that all development allows for connectivity (pedestrian, and cyclist) to adjacent lands in accordance with the National Transport Authority's Permeability Best Practice Guide (2015). The development proposal is accessed via the existing housing development to the north. The proposed open space along the western site boundary adjoins existing open space provision within the adjoining Coolaghknock Residential Development, thereby facilitating connections with existing pedestrian paths in the adjoining development and providing direct access to the Coolaghknock Residential Development should the need arise in the future.

Objective MTO 1.1 supports and promotes the use of sustainable active transport modes in Kildare Town and this approach is supported in the development proposal with an emphasis on walking and cycling. The Mobility Management Plan prepared by Malone O'Regan Consulting Engineers details targets for the development and proposals to achieve a greater modal shift away from using the car.

Objectives MTO 4.1, MTO 4.2 and MTO 4.8 relating to car parking, bicycle parking and EV charging have all been complied with as detailed in Table 3.0 of this report.

9.2.5 Landscape & Biodiversity

The Melitta Road, to the north of the site, and which provides access to the site via the Connagh Road, is identified as a scenic route (Scenic route no.4) providing views of the Curragh Plains. Although the Melitta Road does provide access to the subject land, the development is located to the south of existing housing (Connagh Estate) away from direct view of those using the Melitta Road. Accordingly, there is no potential for the development proposal to impact identified views on the Melitta Road.

Objective NHO 1.2 requires, where appropriate, that planning applications for development located within the plan area and adjacent to the Curragh pNHA are accompanied by an Ecological Impact Assessment (EclA) prepared by a suitably qualified professional. In this regard a comprehensive EclA has been prepared by NM Ecology in support of the development proposal as detailed in Section 6.2 of this report. The EclA demonstrates how the development proposal is designed to minimise impacts on the biodiversity, geological, water and landscape value of the pNHA., all in accordance with Objective NHO 1.1. Site specific ecology surveys were undertaken to inform proposed development and assess and mitigate potential ecological impacts, including badger and bat surveys.

The EclA has determined, in accordance with Objective NHO 4.1, that the development proposal has secured a measurable net gain for biodiversity. The landscaping scheme for the proposed development will include a detention basin, hedgerows, street trees and orchards. These measures will compensate for the loss of baseline vegetation and will introduce some features that are not currently present at the site, resulting in a net gain in the biodiversity value of the Site.

The Landscape & Biodiversity Plan accompanying the development proposal provides for a 2 - 5m wide tree planted buffer on the eastern site boundary, to soften the visual transition between the open plains of the Curragh and the urban edge of the settlement, all in accordance with the requirements of the LAP. The Landscape and Biodiversity plan demonstrates how key green infrastructure and steppingstone habitats identified in the LAP, including existing mature hedgerows, are enhanced where possible and are integrated into the development proposal, all in accordance with Objective NHO 2.1.

In accordance with NHO 2.2 hedgerows have been retained on site insofar as possible, with circa 465m of existing hedgerow retained. The development will result in the removal of circa 214m of hedgerow which traverses the site on an east west axis, effectively subdividing the site and preventing integrated development. In mitigation of this action, it is proposed to compensate for the loss of these features through provision of additional tree, woodland and hedgerow planting on site and the provision of an Integrated Constructed Wetland with natural biodiversity features, bat boxes, hedgehog boxes, wildlife corridors and natural grassland meadows.

Extensive landscaping is proposed to enhance biodiversity on site, including a tree planting programme of native trees and pollinator friendly planting in accordance with Objectives NHO 3.1 and NHO 4.3, all in an attempt to protect the ecological and amenity value of the Curragh. Further some 3.4% (1,500sqm) of the gross site area has been planted with a native woodland mix, to include Oak trees in compliance with NHO 4.2.

9.2.6 Curragh Plains

The subject site adjoins the Curragh Plains to the east and is located within the 'Curragh Buffer Zone'. Objective HO3.1 in the LAP requires all development proposals located within the 'Curragh Buffer Zone' to include a tree planting programme of native trees to protect the ecological and amenity value of the Curragh. Whilst the stated objective in the LAP does not provide for a mandatory buffer size, text within the LAP does suggest that a 'Curragh Buffer Zone' (a 10-20m wide tree planted buffer) is proposed along the eastern boundary of the town, to soften the visual transition between the open plains of the Curragh and the urban edge of the settlement.



Figure 4.0 Extract from Landscaping Planting Scheme

The proposed development complies with Objective HO3.1 with the provision of a planted buffer along the eastern site boundary. The maximum buffer width that can be accommodated is 5m, having regard to the need to retain the existing blockwork wall; the minimum density provisions required on site and other restrictive factors including the operational sewage plant. The proposed buffer effectively provides a natural extension to the existing hedgerow located adjoining the north eastern site boundary. As per Local Area Plan requirements, the buffer will comprise Native Woodland Mix, including hawthorn,

blackthorn, elder, rowan, spindle, guelder rose, elderflower and holly, as a non exhaustive list. The mix shall include highlight trees to be located in the shrub mix and in coordination with building and structural elements.

In addition to the proposed buffer, a woodland planted area (circa 1,200sqm in area) is proposed adjoining the site to the north, on land within the control of the Council. This area is identified as slid green on the attached Figure 5.0 Landscaping Plan. The Miyawaki Method is proposed to develop the woodland, which includes provision of dense whip planting. The dense planting of juvenile trees creates competition between plants, which speeds up the development and growth of the woodland.

9.2.7 Water Infrastructure

In full compliance with Objective IO 1.2 and Objective IO 2.3 surface water discharges will be retained within the various SUDs systems up to and including the 1 in 100-year event plus 20% for climate change the proposed development.

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 drained to the infiltration basin, thereby ensuring that surface water does not discharge to the existing system. The infiltration basin is sized to cater for a 1 in 100-year storm event. The outflow from the infiltration basin is limited by a hydrobrake flow control device which restricts the flow to 8.46 litres/s. The proposed nature-based water drainage solutions align with the Kildare Town Surface Water Study as detailed in the LAP.

In compliance with Objective IO 3.1, the proposed development is accompanied by a site-specific Flood Risk Assessment, as detailed in Section 6.4. The report concludes that the site is not located near any major open watercourse and the development of the site is not anticipated to negatively affect the existing hydrological regime of the area or increase flood risk in other locations.

10.0 CONCLUSION

The proposed development has had regard to the provisions of the Kildare Development Plan 2023 – 2029 (KDP), which seeks to address many issues associated with housing in the county, including housing need, improving social mix and catering for those with particular needs. The development also complies with the zoning objectives for the land as set out in the Kildare Local Area Plan 2023 – 2029 (LAP), providing for circa 43 per cent of the unmet social housing demand in the town on 'New Residential Phase 2' land.

The proposed development accommodates 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 and Local Area 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 Kildare Development Plan 2023 – 2029.

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 Kildare town, 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, the Kildare Local Area Plan 2023 - 2029 and national guidelines, all in accordance with the proper planning and sustainable development of the area.