

STRATEGIC HOUSING DEVELOPMENT
PLANNING APPLICATION
RESPONSE TO AN BORD
PLEANALA OPINION

FOR SITE AT FORMER DEVOY BARRACKS,
NAAS, CO. KILDARE

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**Brady Shipman
Martin**

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CLIENT
The Land Development Agency

DATE
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1 INTRODUCTION

Brady Shipman Martin have prepared this Report in Response to the Opinion of An Bord Pleanála of 7th January 2022. This Response has been prepared under Article 285(5) (b) of the Planning and Development (Strategic Housing Development) Regulations 2017 in association with the Applicant and Design Team and also provides the specific information as requested by the Board.

In its Opinion, An Bord Pleanála stated that having *‘considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.’*

2 SPECIFIC INFORMATION REQUESTED BY AN BORD PLEANALA

In its Opinion of 7th January 2022 ABP set out 16 no. items of specific information that should be enclosed with the application under 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017.

2.1 Compliance with Naas Local Area Plan 2021-2027 Urban Design Brief / Key Development Area

Item 1 of the ABP Opinion requests:

A report / statement demonstrating how the proposed development accords with the objectives of the Urban Design Brief / framework for this Key Development Area (KDA), including objectives relating to Connectivity / Movement. The statement should also address the access requirements of the commercial uses proposed for the eastern side of the KDA lands as part of the overall design brief.

A detailed analysis is included in the Section 7.6 of the Planning Report as well as throughout the Architects Design Statement demonstrating how the scheme responds to the Urban Design Brief/Framework as defined in the Naas Local Area Plan 2021-2027 for the Devoy Barracks Key Development Area.

In respect of *‘access requirements of the commercial uses proposed for the eastern side of the KDA lands as part of the overall design brief’* it is considered that access to the eastern side of the KDA lands is provided through the existing access from John Devoy Rd and through the Kildare County Council car park, as is the arrangement for the recently constructed MERITS Building. No requirement for vehicular access is provided through the Devoy Barracks residential scheme, nor has it ever been requested by Kildare County Council.

While the Urban Design Brief, Figure 10.22, in the Local Area Plan identified routes/streets it does not define if these are to be vehicular or pedestrian/cycle. The proposed scheme provides for pedestrian/cycle access through the Devroy Barracks site to the eastern side of the KDA lands and includes for the west half of the new north-south route which will be completed by the future build out of the eastern lands.

2.2 Housing Quality Assessment

Item 2 of the ABP Opinion requests:

A Housing Quality Assessment (HQA) which provides the specific information regarding the proposed apartments/duplex units as required by the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020). The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements and the floor areas and standards set out in Appendix 1.

A Housing Quality (HQA) has been prepared by Coady Architects in compliance with the standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020).

The storage provision in all dwelling units has been reviewed. The area of storage provided in housing units is in accordance with the requirements of the Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes, Sustaining Communities (2007) and Kildare County Development Plan 2017-2023, and duplex and apartment units are in accordance with the requirements of the 'Sustainable Urban Housing – Design Standards for New Apartments', 2020.

The area of storage provision for each dwelling is set out in the Housing Quality Assessment document. Where possible storage for bulky items in larger dwellings is provided at the entry level. In the A-type and B-type duplex units, the storage for bulky items is at the first-floor level, the main habitable level.

2.3 Car Parking Provision

Item 3 of the ABP Opinion requests:

Justification, and where appropriate amendment, to demonstrate that car parking quantity and location, road layout, including design and materiality of the different street types within the street hierarchy (e.g. proposed homezones, etc.) complies with the provisions of the Design Manual for Urban Roads and Streets (DMURS) and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020). The application should demonstrate that car parking provision should be convenient and accessible to residents.

The National Planning Framework and the Urban Development and Building Height Guidelines seek to minimise car-parking in accessible locations and to maximise a modal shift to public transport due to proximity to public transport routes. It is also noted that objective MTO 4.1 of the Naas Local Area Plan 2021-2027 states that the Council intends to:

“Apply the parking standards in the Kildare County Development Plan, and relevant Section 28 Guidelines, to all applications for planning permission in Naas.”

Accordingly, the subject development’s proposed car parking provision has been assessed as follows:

- car parking for houses within the development, as well as the proposed crèche, has been assessed against the Kildare County Development Plan 2017–2023 and
- car parking for apartments and duplex units within the development has been assessed against the 2020 policy document Sustainable Urban Housing: Design Standards for New Apartments (Guidelines for Planning Authorities).

Justification for the level of parking proposed is set out in the following documents:

- Planning Report – Section 7.9
- Material Contravention Statement
- Traffic Impact Assessment Report- Section 6.0
- Residential Travel Plan

Proposed Parking Allocation Plan, DEV-MCO-00-ZZ-DR-A-0510, prepared by Coady Architects and McCrossan O’Rourke Manning Architects accompanies this application. The topic of parking management is covered in this report, Architectural Design Statement in Sections 6.12 and 6.13.

2.4 Transportation Considerations

Item 4 of the ABP Opinion requests:

The application should have regard to the detailed requirements set out in the report of the Kildare County Council Roads, Transportation and Public Safety Department dated 27th October 2021, and should be accompanied by the following:

- (i) A detailed Traffic and Transport Assessment (TTA).*
- (ii) A Mobility Management Plan and a Parking Management Strategy.*
- (iii) An operational service plan including a detailed swept path analysis. The service plan should also consider the management of car parking and drop-off requirements of the proposed creche*
- (iv) A Quality Audit in accordance with Annex 4 of DMURS, including a Road Safety Audit. The audit should consider, inter alia, the design and layout of parking within the development.*
- (v) A construction traffic management plan.*

The request for a detailed Traffic & Transport Assessment has been addressed through the inclusion of a Traffic Impact Assessment Report prepared by Cronin & Sutton Consulting, in the planning application documentation.

The request for a Mobility Management Plan and a Parking Management Strategy has been addressed through the inclusion of both the Residential Travel Plan and the Traffic Impact Assessment Report prepared by Cronin & Sutton Consulting, in the planning application documentation.

The request for an operational service plan (including consideration of the management of car parking and drop-off requirements of the proposed crèche) including a detailed swept path analysis has been address in the Traffic Impact Assessment Report and accompanying traffic drawings prepared by Cronin & Sutton Consulting, in the planning application documentation.

The request for a Quality Audit has been addressed by the inclusion of a Quality Audit prepared by Roadplan, in the planning application documentation.

The request for a Construction Traffic Management Plan has been addressed through the inclusion of a Construction Management Plan prepared by Cronin & Sutton Consulting, in the planning application documentation.

2.5 Public Lighting & Construction and Waste Management Plan

Item 5 of the ABP Opinion requests:

A public lighting plan and a Draft Construction and Waste Management Plan.

A public lighting plan has been prepared by JV Tierney, and a Construction Management Plan has been prepared by Cronin & Sutton Consulting.

2.6 Social & Community Infrastructure Audit

Item 6 of the ABP Opinion requests:

A Social & Community Infrastructure Audit having regard to the provisions of the Naas LAP 2021 - 2027.

A Social & Community Infrastructure Audit has been prepared by Brady Shipman Martin.

2.7 Landscaping

Item 7 of the ABP Opinion requests:

Detailed landscaping proposals which should address the matters raised in the report of Kildare County Council Parks Section, including inter alia details of measures for the retention and protection of existing trees and hedgerows along the boundaries of the site and integration with the existing public open space to the west, serving the Arconagh estate.

The matters raised in the report of Kildare County Council Parks Section, including inter alia details of measures for the retention and protection of existing trees and hedgerows along the boundaries of the site is addressed in both the Landscape Design Report prepared by Mitchells & Associates and in the Arboricultural Report prepared by Charles McCorkell.

In respect of integration with the existing public open space to the west, serving the Arconagh estate as is set out throughout the documentation, the existing public open space in Arconagh is not under the control of the applicant and as such connection to it cannot be provided for in this application. The scheme has been designed however to allow for seamless integration and connection should the lands be opened up to the site in the future.

2.8 Water Services

Item 8 of the ABP Opinion requests:

The application should address the following:

- (i) The matters raised in the report of Kildare County Council Water Services Section dated 2nd November 2021, including inter alia, revisions to the design of the surface water management system, including a revised SUDs strategy and revisions to Site Specific Flood Risk Assessment.*
- (ii) The matters raised in the submission from Irish Water dated 28th October 2021, namely the requirement to ensure that the relevant consents to connect to 3rd party foul water infrastructure are in place and that such infrastructure is of sufficient standard and capacity to accommodate the proposed development.*

An Engineering Services Report has been prepared by Cronin & Sutton Consulting. Section 7 of which provides a detailed response to the issues raised in the Kildare County Council Report of 2nd November 2021. Engagement with KCC has taken place post Tri-Partite meeting in this regards.

In respect of the Irish Water submission dated 28th October which states:

The proposed water and wastewater connections for this development connect to the Irish Water network via infrastructure that has not been taken in charge by Irish Water (Third Party Infrastructure). Please be advised that at connection application stage and prior to the commencement of any Self-Lay Works, you have to:

- identify and procure transfer to Irish Water of the arterial water and wastewater Infrastructure within the Third Party Infrastructure*
- demonstrate that the arterial infrastructure are in compliance with requirements of Irish Water Code of Practice and Standard Details and inadequate condition and capacity to cater for additional load from the Development*

It is confirmed that this is noted and will be agreed with Irish Water at connection application stage and prior to the commencement of any Self-Lay Works as requested.

2.9 Residential Amenity

Item 9 of the ABP Opinion requests:

“A report that addresses issues of residential amenity (both existing residents of nearby development and future occupants), specifically with regards to daylight/sunlight analysis, overlooking, overshadowing, visual impact and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and nearby residential development.”

A Daylight and Sunlight Assessment prepared by ARC Consulting accompanies this Application as well as an Acoustic Report prepared by Allegro Acoustic accompanies this application. Section 5.11 of the Architects Design Statement addresses impact on existing residential amenity.

Cross section drawings DEV-COA-00-ZZ-DR-A-0517, DEV-COA-00-ZZ-DR-A-0518 and DEV-COA-00-ZZ-DR-A-0519 demonstrating the relationship between the existing residential properties and the proposed new buildings, are included in the application.

2.10 Daylight & Sunlight Assessment

Item 10 of the ABP Opinion requests:

A comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.

The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision, including accommodation at ground and first floor levels. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and their effect appropriately described and / or quantified.

An Assessment of Sunlight and Daylight Access within the proposed development, prepared by ARC Consulting accompanies this application.

2.11 Additional CGIs/ Visualisations/ 3D Modelling

Item 11 of the ABP Opinion requests:

Additional CGIs/visualisations/3D modelling, particularly from the Sean Devoy Road and the open space of Arconagh estate to the west.

7 no. Verified Views, 6 no. CGI's and 4 no. aerial views are prepared by Redline Studios to reflect the current planning application accompany this application.

2.12 Taking In Charge

Item 12 of the ABP Opinion requests:

A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

Refer to Taking in Charge drawing DEV-MCO-00-ZZ-DR-A-0507, which accompanies this application.

All roads, path and public open spaces are to be taken in charge by Kildare County Council, the on-street parking, home zones and communal open space will be retained and managed by the applicant, the Land Development Agency or an OMC.

2.13 Materials & Finishes

Item 13 of the ABP Opinion requests:

A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of external finishes, the treatment of balconies and boundary treatments. This should include details on materials and finishes for the ground floor terrace areas serving the duplex units. Particular regard should be had to the requirement to provide high quality and durable finishes and materials which have regard to the surrounding context of the site.

A detailed description and justification of external finishes is provided Section 7.4 of the Architectural Design Statement, including the treatment of balconies and boundaries.

We refer to drawing DEV-MA-00-00-DR-LA-104 Boundary Treatments prepared by Mitchell & Associates landscape consultants, providing proposed details of all boundaries.

Project verified views and CGI's, prepared by Redline Studios, accompany this application.

2.14 Building Lifecycle Report

Item 14 of the ABP Opinion requests:

A Building Lifecycle Report in accordance with section 6.13 of the guidelines should also be submitted and shall detail the appropriate use of external materials on all elevations. The plan shall also address the management and maintenance of public spaces and access to the development.

A Life Cycle Report, prepared by Coady Architects, accompanies this application. Section 2 of the Life Cycle Report, sets out the proposed management of public spaces and access to the proposed development.

2.15 Universal Design

Item 15 of the ABP Opinion requests:

A statement as to how the proposed Strategic Housing Development has sought to comply with the principles of Universal Design

A detailed analysis is included in the Architectural Design Statement demonstrating how the scheme complies with the principles of Universal Design.

Section 2.0 of the Life Cycle Report, reaffirms that all units of the proposed development will comply with the requirements of Part M and Part K.

2.16 EIA Screening

Item 16 of the ABP Opinion requests:

The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

An EIA Screening Report has been prepared by Brady Shipman Martin. This Report includes, Appendix 5: Statement Pursuant to Article 299B(1)(b)(ii)(II)(C), addressing the above requirement.