

STRATEGIC HOUSING DEVELOPMENT
PLANNING APPLICATION
RESPONSE TO ABP OPINION
LANDS AT DEVOY BARRACKS, NAAS,
CO. KILDARE

BSM

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**Brady Shipman
Martin**

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CLIENT
Land Development Agency

DATE
13 April 2021

DEOVY BARRACKS SHD

Response to ABP Opinion

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1 INTRODUCTION

Brady Shipman Martin have prepared this Report in Response to the Opinion of An Bord Pleanala of 27th January 2021. 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 provides the specific information as requested by the Board.

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

2 SPECIFIC INFORMATION REQUESTED BY AN BORD PLEANALA

In its Opinion of 23rd September 2020 An Bord Pleanala set out 12 No. items of specific information that should be enclosed with the application under Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017.

2.1 Housing Quality Assessment

Item 1 of the ABP Opinion requests:

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 (December, 2020). The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. Particular regard should be had to storage facilities for the larger family sized duplex units and it should be ensured that adequate and accessible provision is made to facilitate storage of bulky items such as buggies etc.

Response:

A detailed Housing Quality Assessment is complete and is included with the planning application.

The storage provision in all dwelling units has been reviewed. The area of storage provided in all units is in accordance with the requirements of the Naas Town Development Plan Development Plan for housing and 'Sustainable Urban Housing – Design Standards for New Apartments', 2018 for duplex and apartment units. 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.

This is set out in further detail in the Architects Design Statement.

2.2 Materials & Finishes

Item 2 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. In relation to same, further justification for the proposed protruding balconies serving Unit Type K should be provided, having regard to the concerns raised at the tripartite meeting regarding the potential appearance of same.

Response:

We refer to Section 5.4 of the Architectural Design Statement, Elevations and Materials. A detailed description and justification of external finishes is provided, 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.

We refer to Verified View 1 and CGI View 6, prepared by Redline Studios, which demonstrate the visual appearance of the protruding balconies. We have reviewed the provision of recessed balconies for the K-Type units and the apartments over the creche. The protruding balconies provide sunlight and daylight for longer than recessed balconies and provide a better animation to the elevations at the site entrance and at the corner locations throughout the site. The balconies have been offset at corners to avoid overshadowing.

2.3 Car Parking Justification

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 DMURS. To this end, matters raised in the PA submission (dated 04th November 2020) should be addressed in any report/justification relating to the outlined transport issues. In addition, in so far as is applicable for the making

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of a planning application, the following is required – A Stage 1 and 2 Road Safety Audit/Assessment; a public lighting plan and a Draft Construction and Waste Management Plan.

Response:

The current layout provides a total of 235 no. car parking spaces

- 72 no. spaces shall be assigned to the houses
- 151 no. spaces shall be for the use of apartment/duplex residents and visitors
- 8 no. spaces shall be reserved for crèche staff
- 4 no. spaces shall operate as set down spaces for the crèche.

Crèche: 12 no. car parking spaces will serve the crèche; 4 no. set down spaces and 8 no. staff parking spaces. This is 60% of the maximum number of spaces allowed for in the Kildare County Development Plan 2017–2023.

Houses: The number of car parking spaces to serve the houses is 2 no. spaces per dwelling, which is in line with the requirements of the Kildare County Development Plan 2017–2023.

Duplex / Apartments: The proposed provision of car parking to serve the apartment and duplex units has been determined with reference to 'Sustainable Urban Housing: Design Standards for New Apartments 2020'. The parking provision is 0.82 spaces per unit (151 spaces for 185 duplex/apartment units)

The site is categorised as an intermediate urban location as defined in 'Sustainable Urban Housing: Design Standards for New Apartments 2018'. The site is c. 750m from the town centre, and within walking distance (c. 500m) of a number of reasonably frequent bus routes.

The guidelines state that for intermediate urban locations planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard. The policy states that for peripheral locations, a benchmark guideline for apartments of one car parking space per unit should generally be required.

The provision of 0.82 spaces per duplex / apartments is considered to meet the requirements of the national policy guidelines. It provides a balanced approach to this development site given the proximity of the development to Naas town centre, the availability of nearby public transport facilities, and national objectives to reduce reliance on the private car as the primary mode of transport.

We refer to Section 6.0 of the Traffic Impact Assessment report prepared by Cronin & Sutton Consulting Engineers, which sets out the rationale and

justification for parking provision for the development. Additionally this is addressed in the Planning Report and the Material Contravention Statement.

The Stage 1 and 2 Road Safety Audit prepared by Roadplan Consulting Ltd has been undertaken and is included with the application. The site layout has been amended to take account of items identified in the assessment.

Public Lighting Layout DEV-JVT-00-00-DR-E-60-63-S00-00 prepared by JV Tierney Consulting Engineers is included in the planning application.

A Draft Construction and Waste Management Plan prepared by Cronin & Sutton Consulting Engineers is included in the planning application.

2.4 Landscaping

Item 4 of the ABP Opinion requests:

Landscaping Proposals, including a report that provides appropriate rationale and details, and addresses the comments contained within the Planning Authority's submission on this pre-application (dated 04th November 2020, including those comments within the internal report from the Parks Section of Kildare County Council (undated) which include the requirement for the following - a Detailed Arboricultural Assessment Report; a Comprehensive Landscape Design Rational & Landscape Proposal Report; cross-section drawings of the proposed open spaces; and additional and/or revised details/drawings in relation to SUDs features/permeability/boundary treatments and play areas.

Response:

The Landscape Design Report prepared by Mitchell & Associates, updated generally, and taking on board comments from the Parks Section of Kildare County Council is included with this application.

The specific amendments to take on board comments from the local authority are:

- Landscape cross sections now included
- Finished topsoil depths clarified on typical planting details drawing 107
- Feature mounding are of a minimum gradient 1:16 included
- Tree planting proposals include root protection barriers (dwg 107)
- Compacted gravel omitted for resin bound gravel.
- PC concrete kerbing indicated on typical planting details drawing 107, no timber edging included
- All seating now indicated as stone, metal and recycled composite timber material.
- Tree planting and public lighting has been coordinated as per the landscape masterplan 100
- Details/drawings in relation to SUDs features included in Landscape Design Report

- Fibre reinforced grass has been omitted for a ritter system
- PC concrete paving slip resistance indicated in landscape outline specification- landscape design report
- Comprehensive Boundary treatment and details now provided as per drawing 104 with timber post and rail omitted
- Hardwood play grade chip omitted for safety play grass matting

Landscape Section Drawings DEV-MA-00-00-DR-LA-105 and DEV-MA-00-00-DR-LA-106, prepared by Mitchell & Associates are also included in response to An Bord Pleanála's request.

2.5 Drainage

Item 5 of the ABP Opinion requests:

Drainage details, including layouts, relevant consents and reports, such as would clearly address and respond to comments within the internal report from Water Services (dated 23rd October 2020), and having regard to the submission from Irish Water (dated 04th December 2020), 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 has sufficient capacity; additional details as relates to surface water proposals including a revised SUDs strategy; the requirement for a groundwater monitoring and additional details as relates to Flood Risk.

Response:

The details of the proposed drainage scheme is set out in the Engineering Services Report prepared by Cronin & Sutton Engineers. The report addresses the items identified above and also addresses the comments as set out by Kildare County Council.

The approach to storm water drainage and in particular Proposed Sustainable Urban Drainage System (SuDS) measures are set out in the report also.

The following SuDS features are provided:

- Low water usage sanitary appliances
- Permeable paving;
- Tree pit drainage systems
- Localised swales within landscaped areas
- Soakaways
- Trapped road gullies shall be trapped to allow for the removal of grit and other potentially harmful material entering the storm network;
- Oil Separators

The Statement of Design Acceptance from Irish Water dated 5th March 2021, and the related drawings prepared by Cronin & Sutton Consulting Engineers are included with the planning application.

2.6 Residential Amenity

Item 6 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.

Response:

These issues have been a key consideration of the permitted scheme and in the proposed alterations. These issues are addressed in the Architects Design Statement which sets out the proposed alterations and includes for additional diagrams. The architects drawing set sets out sections and elevations which consider many of the adjacencies and interactions with relevant structures.

Consideration of overshadowing is addressed in the Daylight & Sunlight Report prepared by Arc and issues relating to potential noise is addressed in the Noise Report prepared by Allegro Acoustics.

Cross section drawings DEV-COA-00-ZZ-DR-A-0516 and DEV-COA-00-ZZ-DR-A-0517 demonstrating the relationship between the existing residential properties and the proposed new buildings, are included as part of the Drawing Pack.

2.7 Scheme Visuals

Item 7 of the ABP Opinion requests:

Additional CGIs/visualisations/3D modelling.

Response:

7 no. Verified Views and 6 no. CGI's prepared by Redline Studies to reflect the current planning application, and are included as part of the planning application.

2.8 Updated Response

Item 8 of the ABP Opinion requests:

All supporting technical/environmental reports to be updated as required.

Response:

All technical and environmental reports will be included in the final planning application submission, a copy of the schedule of documents is included with the application.

2.9 Open Space Delineation

Item 9 of the ABP Opinion requests:

A plan of the proposed open spaces within the site clearly delineating public, communal and private spaces.

Response:

Proposed Open Space Layout drawing DEV-MCO-00-ZZ-DR-A-0506 is included in the application documentation. The drawing clearly identifies the areas of public open space and private open space. The min requirements for both are delivered in the development.

2.10 Taking In Charge

Item 10 of the ABP Opinion requests:

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

Response:

Taking in Charge drawing DEV-MCO-00-ZZ-DR-A-0507 is included in the planning application. All roads, paths and public open spaces are to be taken in charge by the Council, the on-street parking, home zones and communal open space will be retained and managed by the Management Company.

3 CONCLUSION

The Response set out herein outlines that the specific items requested by An Bord Pleanala to be contained within an SHD application for the site at Devoy Barracks, have been both considered and included.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines and that the proposal should be permitted by An Bord Pleanala.