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Supporting Planning Statement

Proposed Development of 74 no. units at Craddockstown Road,
Craddockstown Demesne, Naas, Co. Kildare


Kildare County Council



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Appendix 2 Letter of consent in Relation to Services

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Title:	SHB1-CRA-PL-HRA-RP- Planning Report	
Project:	Proposed Development of 74 no. units at Craddockstown Road, Craddockstown Demesne, Naas, Co. Kildare	
Prepared by:		
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1.0 INTRODUCTION

1.1 Introduction

The Government's Social Housing Strategy 2020 includes a programme for delivery of approximately 1,500 new social housing units nationally via an 'availability based' Public Private Partnership (PPP) model. The proposed development is part of the first bundle of sites to be developed under this programme.

The subject site, located on Craddockstown Road, Naas is included in Bundle 1 and has been identified to deliver 74 no. social housing units. The other sites identified in Bundle 1 include sites in Dublin City, South Dublin, Wicklow and Louth.

1.2 Public Private Partnership Model

The units are to be delivered using, an 'availability-based PPP model'. Under this model a consortium designs (in accordance with the grant of planning permission), builds, finances and maintains the social housing units. 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. No private housing units are developed on the site as part of the PPP project. 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 allocating tenants from the local authority social housing waiting list, based on the local authority's allocation scheme.

This model has previously been used successfully in Ireland to build a number of roads, schools and courts projects with a primary care centre project currently under construction. Although new to social housing in Ireland, the model has been used successfully in other countries for such projects.

2.0 CONTEXT & PLANNING HISTORY

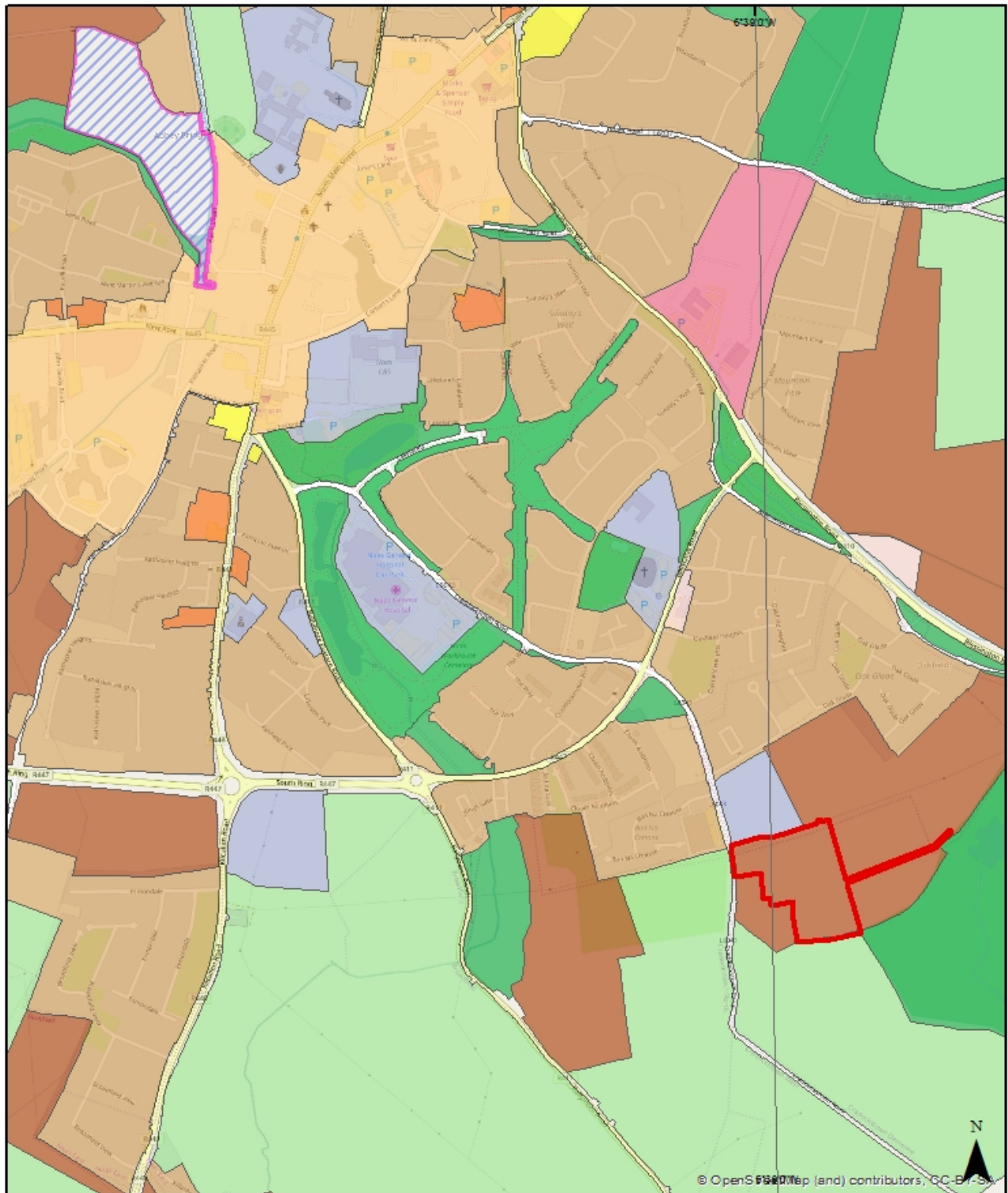
2.1 Site Location & Context

The application site and adjoining lands to the east are currently in the ownership of the Housing Agency although it is understood that the application site is to be transferred to Kildare County Council. A letter of consent from the Housing Agency has been appended to this document, consenting to the making of this application. The total site area of the application site is 3.58 hectares. Some 3.4 hectares falls within the ownership of the Housing Agency with the remaining 0.18 hectares made up of drainage connection areas and the public road fronting the site where improvement works are proposed.

The site is located in a suburban residential area defining the outer edge of the urban rural transition in Naas. Positioned south east of the town centre, the site is accessed via Local Road L-6043, which feeds directly on to the Naas Southern Distributor Road. Naas Community National School (currently used by Naas Community College whilst they await construction of their new facility in Millenium Park) separates the subject site from Oak Glade, the closest residential development, north of the site on the eastern side of the Craddockstown Road whilst Ban na Greinne residential development is located across the road to the north west.

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- Legend**
- Cragdoonstown, Naas, Co. Kildare
 - Naas Local Area Plan Zoning**
 - A_Town Centre
 - E_Existing / Infill Residential
 - C New Residential
 - E_Community and Education
 - F_Open Space and Amenity
 - L_Agricultural
 - K_Commercial/ Retail
 - Lands zoned for future LAP
 - N_Neighbourhood Centre
 - Q_Enterprises and Employment
 - R_Retail/ Commercial

0 125 250 500 Meters



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Figure 1.0 Landuse Zoning Map

An existing residential property fronting onto the Craddockstown Road defines the south-western corner boundary of the site whilst the remainder of the site is defined by mature hedgerows and trees. A 38kv overhead power line traverses the northern boundary of the site. The permitted development on adjoining lands to the north and east) is proposing to underground this service and this undergrounding shall be continued as part of this development proposal. Craddockstown Golf Course dominates the surrounding landuse south east of the site with extensive undeveloped, residential zoned land located to the east and north east. The adjoining site at the south west corner of the subject lands, fronting onto the Craddockstown Road will be subject to a future application by KARE for the provision of 3 no. specialised residential care homes.

The subject site is located within the Naas Urban Electoral District and includes the main urban areas of Naas, Oldtown to the north of the town centre and the remaining rural lands to the west, south and east of the town centre. The town centre comprises one main elongated street which comprises two and three storey buildings mostly in commercial and to a lesser extent residential use.

Naas is identified as a Large Growth Town in the Kildare County Development Plan 2017 - 2023, designated to act as an important self-sustaining regional economy intended to accommodate significant new investment in transport, housing, economic and commercial activity, while capitalising on international connectivity and high quality connections to Dublin City centre.

Overall, Naas is a well serviced town with a growing residential and employment base. The Naas Town Development Plan (TDP) strategically plans for the future growth of the town in accordance with the proper planning and sustainable development of the area and considers that the town is well placed to accommodate increased residential supply.

2.2 Planning History

There have been a number of significant planning permissions granted in the immediate surrounding area recently, for residential development and community and educational facilities.

Planning permission was granted in 2016 for a significant private residential scheme on land adjoining the subject site to the north east, comprising 285 no. residential units on 10.6 hectares of land under planning permission P15/176. The land identified as C10 on the landuse zoning map within the TDP was granted planning permission by Kildare County Council on the condition that it be implemented in two distinct phases. This decision was upheld following a third party appeal to An Bord Pleanála.

Planning permission was granted for 395 residential units on a 21.85 hectare site north west of the subject site on the Blessington Road, planning reference 151060. The decision, appealed by a third party, is currently under consideration by An Bord Pleanála.

An application for 52 no. apartments, 234 no. houses and 3 no. retail units was withdrawn on the subject site and immediate adjoining land under planning reference 15000012.

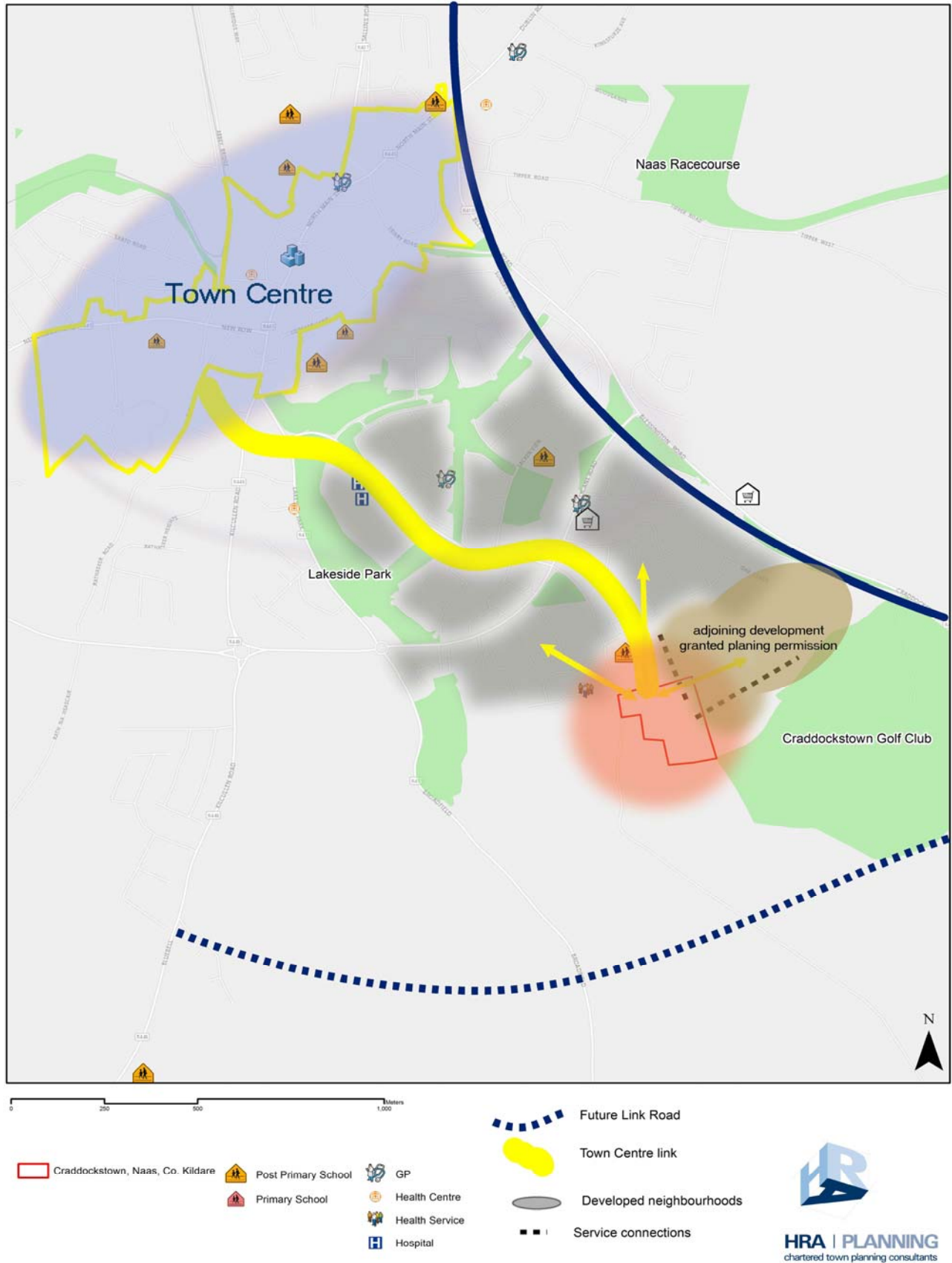


Figure 2.0 Spatial Site Context

3.0 SITE SELECTION & CONSIDERATION OF ALTERNATIVES

3.1 Site Selection

The subject land is in the ownership of the Housing Authority and therefore can be efficiently utilised to meet some of the demand for social housing arising in the town of Naas and the surrounding area. Much of the undeveloped zoned residential land is located south of the town centre, focused around community services and commercial facilities. Site selection was restricted to consideration of that land in the ownership of the Council / Housing Authority and which could be adequately serviced and integrated to provide much needed social housing.

Site selection has taken a plan led approach to development having regard to the residential zoning provisions in the TDP. The subject land is zoned for residential use and has been identified as part of an overall area of residential growth (C10) where it is an objective of the plan to provide for new residential development and other services incidental to residential development. A significant proportion of the overall C10 parcel of land has already received planning permission for 285 no. private residential units. The proposed development of social housing units seeks to complete development on the C10 identified land thereby ensuring an adequate mix of social and private housing in Craddockstown, south east of the town centre.

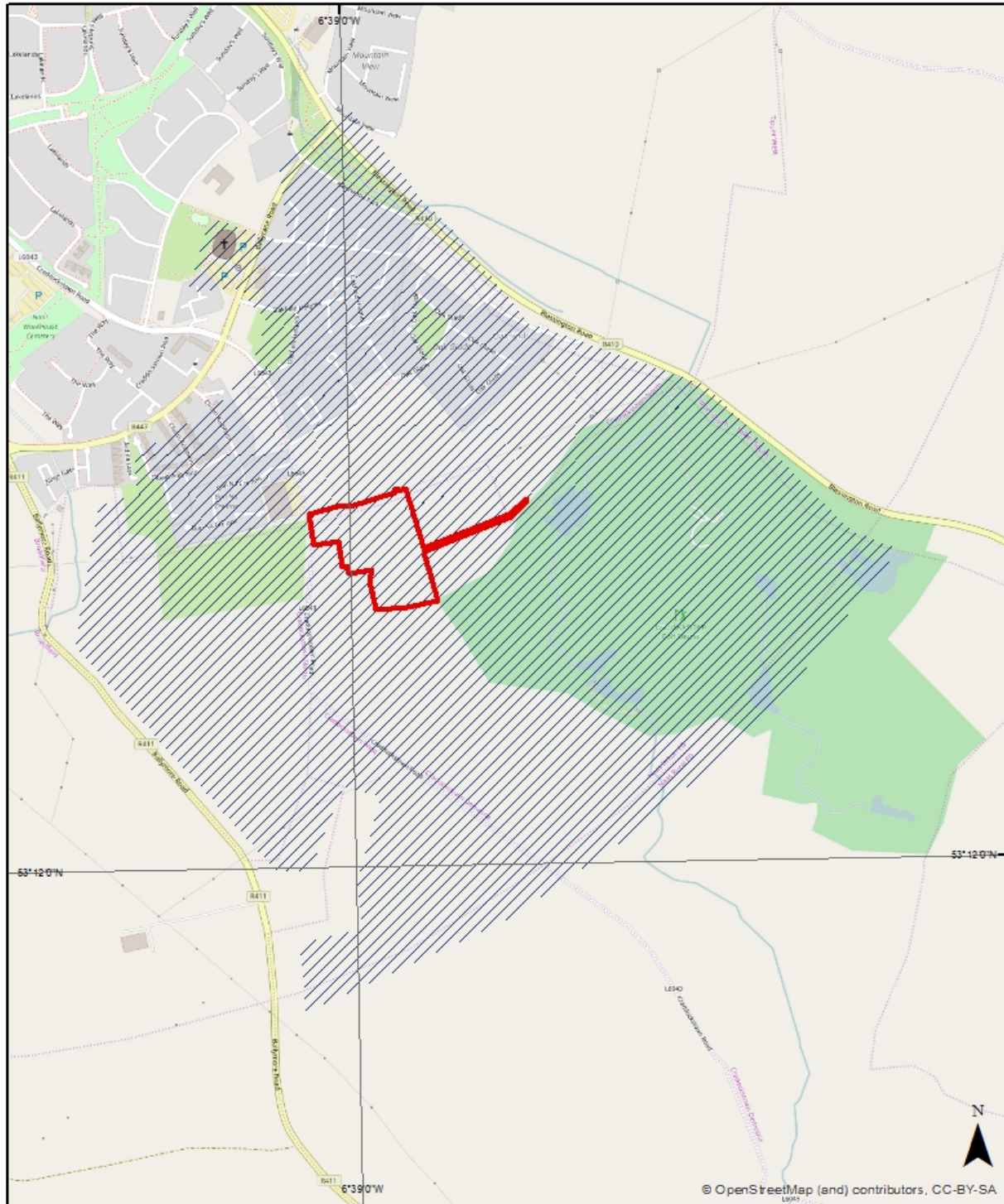
The subject site is also well positioned in the context of existing and recently permitted development in the town. The adjoining Naas Community National School, which was recently constructed has significant pupil capacity and is well positioned to service and integrate with the proposed development.

3.2 Consideration of Housing Tenure & Type

The provision of social housing units on this site, in contrast to other undeveloped zoned residential sites throughout the urban area, will facilitate diversity in tenure and facilitate housing mix in the south eastern quadrant of the town and in an area that is dominated by private housing.

The Census of Population 2011 confirms that 93 per cent of the total housing stock in Naas ED (6,950 units) is privately owned or rented. Only 5.5 per cent comprise social housing, either rented from the local authority or a voluntary housing body. The proposed addition of 74 no. social housing units only increases the total provision to 6.5 per cent in the town.

If one looks closer to the area surrounding the subject site, including all those lands south west of the Ballycane Road, as hatched in Figure 3.0, the situation is not dissimilar. According to the Census of Population 2011, there are 587 no. housing units within the defined area comprising 96 per cent of units in private ownership and only 3 per cent of units rented from the local authority and / or voluntary body. Including the proposed development within the overall housing statistics will increase the provision of social housing from 3 per cent to just under 14 per cent within the area identified in Figure 3.0. This ratio of private to social housing mix is considered appropriate to the area and provides for balanced and integrated housing tenure in this area of the town.



Legend

- ⊠ ED Area
- Development Area

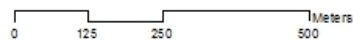


Figure 3.0 Housing Type Analysis Study Area

3.3 Consideration of Design

Much consideration has been given to the layout and design of the scheme with particular consideration given to existing adjoining residential development and associated boundary treatment. The presence of significant hedgerows and mature vegetation on the site has informed the overall design approach with the findings of a Tree Survey and Arborist Impact Assessment informing the overall treatment and retention of trees and hedgerows throughout the site.

Other influential elements on site include overhead powerlines, which are to be undergrounded and which have influenced the position of the main access route into the site. Future connectivity with the adjoining permitted residential scheme has also been incorporated and influenced the layout of the development thereby ensuring integration and facilitating permeability throughout the identified land C10.

The client requirement and project brief was to accommodate 75 no. units on an 8 hectare site comprising 8 no. 1 bed units; 21 no. 2 bed units; 40 no. 3 bed units; and 6 no. 4 bed units. Following consideration of the design approach and having regard to relevant standards and development policies in the TDP, the site was substantially reduced to 3.58 hectares to accommodate 74 no. units. The mix of units required to accommodate housing need in the area is generally as per the original client requirements. The much-reduced site area makes the most efficient use of zoned, urban land whilst also seeking to integrate with and consolidate existing and permitted development in the area. Furthermore, the site layout allows for the further development of the overall lands as part of future phasing of dwellings.

4.0 NEED FOR DEVELOPMENT

The Summary of Social Housing Assessments 2016 Report prepared by the Housing Agency counts the total number of households qualified for social housing support across the country on September 21st 2016. There was a 1.9 per cent increase in the total number of households qualifying for social housing support and whose social housing need is not being met between 2013 and 2016, with a total of 91,600 qualified households in 2016. Almost half (47%) of households have been qualified for social housing support for more than four years. One-fifth (21%) have been qualified for more than seven years. These national figures demonstrate the need for action and the supply of social housing right across the country.

Within the administrative area of Kildare County Council the number of households qualified for social housing support and whose social housing need is not being met, increased by 2.2 per cent between 2013 and 2016 from 5,454 households to 5,572 households. Of the qualified households, some 40.7 per cent comprised of single person households, 28 per cent comprised a single person with child / children and 30 per cent comprise a couple with/without children.

Focusing specifically on the town of Naas, the situation is just as critical with 1,972 households generating a housing need. This means that 28 per cent of all households in the town have a housing need requirement. The housing need can be further broken into house type with 36 per cent (716) requiring a 1 bed house; 34 per cent (669) requiring a 2 bed house; 27 per cent (530) requiring a 3 bed house; and almost 3 per cent (57) requiring a 4 bed house.

The proposed development will only accommodate 3.7 per cent of households that have a housing need in the town. An additional 25 no. residential development proposals similar to the scale of development proposed in this instance is required, if the full demand for social housing was to be met

in the town. Given the critical housing situation nationwide and in the town of Naas, the proposed development is urgently required to address what is only a small proportion of the social housing need in the town.

5.0 PRE PLANNING CONSULTATION

The proposed scheme has been designed in consultation with Kildare County Council. As well as more informal communication with individual departments, two pre-planning meetings have been held with the planning authority and the Roads and Transportation Section.

6.0 DEVELOPMENT PROPOSAL

The public notices state that the proposed development seeks to provide for:

(a) 74 no. residential units comprising (i) 6 no. 4 bed units, (ii) 40 no. 3 bed units, (iii) 22 no. 2 bed units; and (iv) 6 no. 1 bed units; and (v) renewable energy design measures; and (b) supporting development works including (i) improvements to the Craddockstown Road adjoining and fronting the site; (ii) underground surface water attenuation; (iii) ESB substation; (iv) temporary construction signage; (v) estate signage; (vi) varied site boundary treatment comprising walls and fencing; and (vii) all associated site works.

6.1 Residential Units

The nature and extent of development has been influenced by the type and size of households on the waiting list for social housing units and the overall demand arising in Naas town. The unit sizes have been designed in accordance with the minimum standards set out in Table 13.3 of the TDP and the private open space provision to the rear of each unit has been designed in accordance with the minimum standards set out in Table 13.4 of the TDP. A Housing Mix Statement providing a schedule and breakdown of each room within the residential units is included within the Architectural Design Statement prepared by Coady Architects. The design statement has been prepared in compliance with Policy HP10 of the TDP which requires the submission of design statements for residential developments in excess of 50 units.

The plans accompanying the development proposal detail the provision of solar panels at roof level on every residential unit, capable of achieving a Building Energy Rating in accordance with the provisions S.I.No. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations 2006. The solar panels have been provided in accordance with best practice and to satisfy the objective of the Kildare Development Plan in relation to Energy Performance of Buildings. Although the solar panels are identified on the plans, it may be a case that the form and type of sustainable energy technology provided on site may change during construction, such that any alternative is at a minimum equal to the Building Energy Rating achieved by the solar panels and the proposal would not adversely impact or materially alter the external appearance of the buildings. This flexibility is necessary to facilitate construction of the development by a PPP Company and which could bring added value to the project by providing for better rated and more innovative energy technologies.

6.2 Open Space Provision

In excess of the development plan standards, the proposed development accommodates 25 per cent of public open space, strategically located and naturally overlooked in so far as possible. The location, layout and usability of the public open space areas are of the highest quality and will contribute positively

to the residential amenity of future residents. The open space provision was heavily influenced by the location of existing mature trees and vegetation on site and the desire to maintain these natural features. Such an approach has contributed to the uniqueness of the scheme and has facilitated a high degree of amenity on site for future residents.

Of significance, and unique to this development proposal, is the ongoing maintenance requirement demanded of the PPP Company for the next 25 years. This maintenance approach will ensure that residents continue to enjoy a high quality and maintained public realm for a substantial period of time, whilst also ensuring that the grounds of the development mature and evolve appropriately in accordance with the submitted plans and particulars, including the Landscaping Plan.

6.3 Boundary Treatment

The proposed development comprises a mixture of boundary treatments around the perimeter of the site and Drawing no. 2209-0503 details the different approaches taken to address specific site features and constraints.

In accordance with the requirements of Section 13.3.3 of the TDP, the boundary between the rear of the existing dwelling fronting the Craddockstown Road and the proposed development site shall comprise a 2m rendered block work wall with brick work piers every 2m. This boundary shall also benefit from supplementary planting. A 2m high railing is proposed in areas around the perimeter of the site, in particularly on the eastern boundary, where the site connects to the adjoining land and these areas could provide for future linkages and connectivity to adjoining residential development. In all other perimeter areas to the rear of proposed housing, the boundary treatment shall comprise a 2m rendered block wall.

6.4 Access & Car Parking

The access strategy for the site has been influenced and designed in accordance with the requirements of the Design Manual for Urban Roads and Streets (DMURS). Access to the development has been taken from the Craddockstown Road fronting the site to the west. It is proposed to extend the existing footpath and cycle arrangement from the front of the adjoining post primary school to the location of the proposed site entrance. A Traffic & Transportation Assessment has been prepared by Malone O' Regan Engineers and forms part of the plans and particulars supporting the proposed development. Indeed it is noted that the Craddockstown Road is identified in Table 6.1 of the Kildare Development Plan as a Priority Roads & Bridge Project. Furthermore, policy RWO5 in the NDP seeks to realign and widen roads at a number of locations including the Craddockstown Road.

Internally, the primary access road runs along the northern boundary of the site and is strategically designed to accommodate future potential residential development on lands to the east. All junctions have been designed to accommodate the adequate and safe manoeuvring of vehicles including waste collection vehicles. In terms of pedestrian connectivity provision has been made for future pedestrian access to lands to the north and which have the benefit of planning permission but has not yet been constructed.

In accordance with the requirements of Table 13.8 of the NDP, the proposed development provides for a total of 148 no. car parking spaces, resulting in the provision of 2 no. spaces per unit.

6.5 Water Infrastructure

The proposed development provides for both foul and surface water gravity connections into adjoining lands to the east and which comprises Phase II of a permitted residential development by Ballymore. A

water connection is provided in to adjoining lands to the north and which comprises Phase I of the permitted residential development.

It should be noted that in reports attached to the permitted development on adjoining lands, planning reference 151060, locations are identified where services and physical linkages between the permitted development and the subject site are to be provided, thereby facilitating the overall integrated development of C10 lands. The Planning Report on file pertaining to the adjoining development, confirms that foul and surface drainage pipes within the adjoining permitted development have been sized to accommodate future flows from the subject land and that stubs will be laid in the wayleaves to facilitate future connections. A copy of this correspondence is appended to this report and provides consent from the adjoining landowner to facilitate the stated connections.

6.6 Construction Management Strategy

It is envisaged that the development of the lands will occur over a three year period. A Construction Management Plan (CTMP) and C&D Waste Management Plan will be prepared by the Contractor and agreed with the planning authority prior to commencement of development. The underlying objective of the CTMP will be to inform contractors about the overall programme of works and the obligatory minimum standards of behaviour to ensure a safe workplace, to ensure that work practices are tailored to a shared site campus, and to ensure that construction activities are planned and executed to maximum effectiveness and efficiencies.

It is envisaged that development will commence on site in Q2/Q3 2018 and that the development will take up to 22 months to complete. Units will be made available for letting by the local authority immediately upon completion.

7.0 DEVELOPMENT STRATEGY

The overriding design intention has been to create an inclusive and coherent new community based on best practice urban planning principles, giving residents a sense of place, ownership and identity. Extensive reference has been made to the best practice criteria and guidelines contained in the Urban Design Manual – Sustainable Residential Development in Urban Areas published by the Department of Environment Community & Local Government and to the Design Manual for Urban Roads and Streets (DMURS).

The Urban Design Manual is based around 12 criteria that have been drawn up to encapsulate the range of design considerations for residential development based on a distillation of current policy and guidance and tried and tested principles of design. A response to each of these indicators is proposed to demonstrate the proper planning and sustainable development considerations adopted within the development and to highlight the development of a socially integrated scheme within the town of Naas.

7.1 Context: How does the development respond to its surroundings?

Development on the subject site follows a plan led approach and is proposed on land that is appropriately zoned for residential use. The site layout presents a solution for building design, orientation and scale of development that has regard to the location of and proximity to adjoining services and facilities, including the adjoining post primary school and other recently permitted residential development. Situated in the outer edge of the town in an urban rural transition area, the site is positioned to benefit from surrounding services and facilities with good connectivity to the town centre and local neighbourhood centres. The extent of services and facilities within the area is analysed and assessed separately in a Social Infrastructure Audit.

7.2 Connections: How well is the new development / site / neighbourhood connected?

The site is accessed via Local Road L-6043, which provides access on to the Naas Southern Distributor Road thereby ensuring good transport connectivity. This is complimented with footpaths and a cycleway on the Craddockstown Road and extended to the subject site. Naas is a well serviced town with a growing residential and employment base. Naas Community National School (currently used by Naas Community College whilst they await construction of their new facility in Millenium Park) separates the subject site from Oak Glade, the closest residential development, north of the site on the eastern side of the Craddockstown Road whilst Ban na Greinne residential development is located across the road to the north west. There are two neighbourhood centres in proximity to the site and 2 no. playgrounds within a 5 minute walking distance. Overall, the site is adequately connected to facilitate integration of a new, relatively small residential scheme.

7.3 Inclusivity: How easily can people use and access the development?

The proposed development comprises a mix of house types and sizes including 7 no. different unit types thereby facilitating a variety of families and persons within the development. The development has also been designed in compliance with the requirements of Part M of the Building Regulations – Access for People with Disabilities. The site has one main access route serving the proposed development and future undeveloped zoned residential lands to the east. Pedestrian connectivity is also facilitated between the proposed development and the permitted residential development also located on C10 zoned land to the north and further to the east.

7.4 Variety: How does the development promote a good mix of activities?

The subject land is zoned for residential purposes only and accordingly only residential and / or ancillary uses are permitted on the site. The development contains significant open space provision (25% of overall site area) in excess of the requirements in the TDP, and retains a number of mature trees and hedgerows to contribute to the quality of development on the site.

The Social Infrastructure Audit undertaken in respect of the proposed development in the context of existing services and facilities details the nature and extent of neighbouring social infrastructure which is capable of supporting the proposed development. Notwithstanding the sub-threshold nature of the development proposal (under 75 no. units) a Childcare Assessment was undertaken to ascertain the need for additional childcare facilities in the area. The report, which accompanies the application, confirms that there is adequate capacity in the area to serve the proposed development.

7.5 Efficiency: How does the development make appropriate use of resources, including land?

The subject site is located on a greenfied site. Table 4.2 of the TDP sets out the indicative residential densities in respect of lands within Naas. The subject site is located at the outer edge of the urban-rural transition with a density range of 20 – 30 dwellings per hectare. The density of the proposed development at 30 units per hectare takes into account the overall site constraints which include the existing boundaries, retention of mature trees and hedgerows and service infrastructure requirements.

7.6 Distinctiveness: How do the proposals create a sense of place?

The Site Layout Plan has been devised to provide a legible, permeable layout with a range of dwelling types which, together with a varied use of materials and finishes engender a definitive sense of place in a new residential community. Retention of trees and hedgerows on site along with additional landscaping proposals ensures that the landscape integrates with the design of the new residential site and forms a strong and positive identity for the area.

7.7 Layout: How does the proposal create people-friendly streets and spaces?

The proposed development provides for a permeable interconnected series of routes that are easy and logical to navigate around, active street frontages with front doors directly serving the street, traffic speeds controlled by design and careful location of public and communal open spaces.

The internal layout has been designed with traffic safety a key priority. Reduction of vehicle speed is a fundamental principle behind the layout. In general, all roads are designed for maximum vehicle speeds of 30km/h or 20mph. Traffic calming features have also been designed into the development – all in accordance with best practice and DMURS.

7.8 Public realm: How safe, secure and enjoyable are the public areas?

The public areas are overlooked and have natural surveillance thereby ensuring that they are safe and secure. The open space has been adequately sized to accommodate both active and passive recreational uses and the retention of natural features within the site, including trees and hedgerows, ensures that the open space is enjoyable and attractive to users.

7.9 Adaptability: How will the buildings cope with change?

The proposed development incorporates renewable energy design measures thereby ensuring energy efficient homes. An Energy Efficiency Statement accommodates this submission and highlights the key elements of the development necessary to ensure the units are adaptable to the challenges anticipated from a changing climate.

The mix of unit sizes provided on site ensures that the overall development can adapt to changing household needs and sizes through the rehousing of families within the development as their needs change over time. The proposed floor areas exceed social housing and development plan standards and requirements allowing for larger units and greater flexibility.

7.10 Privacy / amenity: How do the buildings provide a high quality amenity?

The houses have been designed in accordance with the specific requirements of Table 13.3 of the TDP in relation to unit size and storage requirements thereby ensuring a high quality residential unit. Each unit has private amenity open space to the rear of the property thereby providing ownership of recreational space and facilitating individual use.

7.11 Parking: How will the parking be secure and attractive?

A total of 148 car parking spaces is provided on site at a rate of 2 no. spaces per unit, in accordance with the requirements of the TDP. Car parking for each residential unit is provided on street and within easy reach of front doors.

7.12 Detailed design: How well thought through is the building and landscape design?

The Architectural Design Statement prepared by Coady Architects responds to this criterion and highlights the overall design approach and rationale to the proposed development. It is recognised that the finished quality of a scheme can have a significant effect on a development's character, sense of place and legibility and that the quality is in the detail of the architecture and landscaped design. It should also be noted that the PPP Co. will maintain the development for a period of 25 years thereby ensuring a continued quality scheme into the future, particularly with regard to the maintenance of public open space.

8.0 ENVIRONMENTAL CONSIDERATIONS

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

8.1 Landscape Character

The site is located within a landscape character area, described as the Northern Lowlands – Class 1 Low Sensitivity. Table 14.2 of Kildare County Development Plan describes the character area as an “*area with the capacity to generally accommodate a wide range of uses without significant adverse effects on the appearance or character of the area*”. Accordingly, it is considered that the subject site has capacity to accommodate well planned development and that such development will be capable of satisfactory assimilation into the existing landscape.

8.2 Flooding

The eastern half of the overall landholding falls within an area identified within Map 8.1 of the TDP, Strategic Flood Risk Assessment of the TDP which identifies areas which could be subject to flooding in the future. However, it should be noted that the extent of lands subject to this development proposal are not located within any identified flooding area.

The project engineers, Malone O’Regan have undertaken a Site Specific Flood Risk Assessment. The assessment demonstrates that the entirety of the site is not at risk from flooding from either a 1 in 100yr or a 1 in 1000yr storm event. The FRA maps contained within the CFRAM Study show that there is no realistic risk of flooding on the site. After assessing the flooding risk, the report concludes that the proposed residential development is considered to be appropriate in this location.

8.3 Biodiversity

The main habitats within the proposed development site are improved agricultural grassland, dry meadows, hedgerows, treelines and scrub. Most of these habitats and flora are common and widespread in Ireland, but some of the mature hedgerows and treelines are considered to be of local ecological value. It is noted that Policy NH9 of the Kildare County Development Plan seeks to ensure that existing biodiversity features are appropriately incorporated into the design of new developments.

In response to this policy, a comprehensive tree survey was undertaken on site by The Tree File Consultant Arborists and is included in the plans and particulars submitted with the application. An Arboricultural Implication Assessment was also undertaken which has reviewed the proposed development and provides an assessment of the potential for tree retention within the new context. The objective has been to retain all healthy trees and hedgerows on site and which are considered to be of local value and contributing to the landscape setting. Unfortunately, upon investigation it was noted that a significant number of trees and hedgerows were in either poor condition or of low ecological and amenity value and accordingly are being removed as part of the development proposal. Other trees, deemed to be of significant value, have been retained and comprise an integral element of the design proposal and concept along with supplementary planting.

Scheduling of the initial site clearance work and removal of trees and hedgerows will occur outside of the bird breeding season, October – February.

8.4 Archaeology

An Archaeological Impact Assessment has been undertaken on the site by John Purcell Archaeological Consultancy and is included with the plans and particulars accompanying this application. No

archaeological monuments were recorded on the site and no archaeological finds or features were uncovered as a result of field walking. A number of archaeological monuments have been recorded in the immediate environs of the development site, including a number of fulachta fiadh and a cist over 100m north east of the site. In order to identify any sub surface remains during the development archaeological monitoring has been recommended.

8.5 AA Screening

An Appropriate Assessment Screening Report has been prepared and is included with the plans and particulars accompanying this application. The report confirms that there are no designated sites within 1km of the proposed development and no pathways for indirect impacts on any distant sites, so the risk of direct or indirect impacts on any designated sites is considered to be negligible.

8.6 EIS Screening

An Environmental Impact Statement (EIS) is required to accompany a planning application for development of a class set out in Schedule 5 of the Planning and Development Regulations 2001-2016 which exceeds a limit, quantity or threshold set for that class of development. In the case of residential development an EIS is required for the construction of more than 500 units. An EIS will also be required by the planning authority in respect of sub-threshold development where the authority considers that the development would be likely to have significant effects on the environment (Article 103).

The proposed development does not exceed the quantity of residential units requiring the submission of an EIS as set out in Schedule 5 of the Planning and Development Regulations 2001-2011. Accordingly, the preparation of an EIS is not warranted in this instance.

9.0 PLANNING POLICY APPRAISAL

Of critical importance in consideration of the proposed development is compliance with relevant statutory policy and national guidance and in particular, compliance with the relevant development plan for the area, namely the Naas Town Development Plan 2011 – 2017.

9.1 National & Regional Planning Context

Both National and Regional Planning Guidance seek the location of new residential development in designated towns within the hierarchy of settlements contained in the National Spatial Strategy (NSS) and the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 (RPG's).

The NSS has designated Naas, along with the nearby towns of Newbridge and Kilcullen, as a 'Primary Development Centre' within the Greater Dublin Area. These areas need to aim at a population level that supports self-sustaining growth, but which does not undermine the promotion of critical mass in other regions.

Within the RPGs settlement typology and hierarchy, Naas is identified as a 'Large Growth Town 1', as a 'primary growth town' and as part of an economic cluster with the adjoining towns of Newbridge and Kilcullen. Section 3.4.1 of the Kildare County Development Plan states that Large Growth Towns I are designated to act as important self-sustaining regional economic drivers, accommodating significant new investment in transport, housing, economic and commercial activity.

9.2 Naas Town Development Plan 2011 – 2017 (TDP)

The TDP seeks to promote a more consolidated and compact urban form; to maintain and improve a sustainable economic base to create new employment opportunities; and to create sustainable and integrated communities together with the balancing of the natural environment with sustainable and appropriate development.

9.2.1 Core Strategy

The Plan sets a population target of 27,933 persons in the town by 2017 and a target of 3,610 new dwellings between 2011 and 2017. The Kildare County Development Plan confirms this growth strategy as it sets a target of 4,768 new dwellings between 2011 - 2023. The proposed development of 74 no. units sits within the overall housing output target for the town and when considered cumulatively with other permitted development in the town, sits comfortably within the growth targets identified in the Core Strategy of the TDP.

9.2.2 Zoning

The subject site is zoned C10 New Residential where the objective is *to provide for new residential development*. Chapter 14 of the TDP notes that the overall zoning strategy has had regard to the need to promote sustainable development in accordance with inter alia national, regional and local policy, as well as the need to provide sufficient land in appropriate locations.

9.2.3 Sustainable Neighbourhoods

Section 4.5 of the TDP seeks to provide and facilitate development of quality homes, mixed tenure neighbourhoods, catering for a wide range of families. The proposed development must be considered in the context of existing surrounding and permitted development as highlighted in Figure 2.0 of this report. The development must also be considered having regard to the Social Infrastructure Audit (SIA) which has been prepared and submitted with the plans and particulars accompanying the application, in compliance with Policy CO2 of the Kildare County Development Plan relevant to a scheme in excess of 50 no. units.

The SIA confirms that the proposed development will give rise to demand for existing services and facilities but the demand will be minimal. The audit has confirmed that there is adequate public open space and recreational facilities in the area to serve existing and future population growth. There is also adequate educational capacity with a new post primary school constructed on the adjoining site to the north. It acknowledges that the Naas Town Development Plan seeks to coordinate the future development of the area and the proposed development conforms with the overall requirements of the TDP.

In addition to the SIA and to address the potential for childcare provision on the site, a Childcare Capacity Assessment has been undertaken and submitted with the plans and particulars accompanying this application, in compliance with policy HP22 of the TDP. The report confirms that there is likely to be sufficient capacity and availability within the town of Naas to accommodate the childcare going age generated by the proposed development particularly having regard to existing crèche vacancy rates and the proposed new sessional childcare facility in the vacant St. Davis's National School on the Dublin Road.

Appendix 2 Letter of consent in Relation to Services

HRA | Planning chartered town planning & environmental consultants

9.2.4 Design of Residential Areas

The Plan seeks to promote high design and construction standards that result in a visually and functionally pleasing environment. Section 4.5 of the TDP details a number of criteria against which new housing developments will be considered in the assessment of proposals.

TDP Criteria	Assessment
The need for land to be used economically	Located on a zoned greenfield site, the density of the development at 30 units per hectare complies with the density requirements stipulated in the TDP and the CDP for the town.
The capacity of the infrastructure to cater for future population	There is sufficient capacity in the Osberstown Sewerage Treatment Plant to cater for the proposed development following recent upgrade works. A Traffic Impact Analysis prepared by Malone O'Regan Consulting Engineers states that there is ample capacity within the road network to cater for the proposed development subject to minor upgrades of some nearby junctions required under permitted development P15/176.
The adequacy of community facilities	The SIA and Childcare Capacity Assessment confirm adequacy of community facilities. The TDP states that there are 56 hectares of land zoned for community and education use in Naas of which 23 hectares remains undeveloped. The Plan considers that there is sufficient land zoned to cater for the projected demands over the period of the Plan and it will be a policy of the Council to facilitate the provision of adequate, quality infrastructure for education and training, accessible to all members of the community
Appropriate density, high standards of design and appropriate mix of housing	An adequate mix of housing is provided on site comprising 8% 4 bed units; 54% 3 bed units; 30% 2 bed units; and 8% 4 bed units. There is also variety in building form with a number of single storey units.
Adequate privacy for individual houses, apartments and the protection of existing residential amenity	Private back gardens with a minimum depth of 11m ensures adequate separation and privacy between back to back housing. The residential amenity of the existing house fronting onto Craddockstown Road and adjoining the site is protected with the provision of a 2m rendered block wall separating both developments. Furthermore, the housing immediately to the rear of the adjoining site is gable ended whilst a substantial area of open space is positioned immediately bounding the adjoining site.
The safety and permeability of proposed layouts	The overall layout has been heavily influenced by and designed in accordance with the Design Manual for Urban Roads and Streets (DMURS) thereby ensuring safety and permeability. Provision has also been made for a pedestrian connection to the permitted development adjoining the site to the north east.

Appropriate provision is made for amenity and public open space as an integral part of new development proposals	The development accommodates significant areas of high quality public open space with the retention of many natural features on site. At 25% of the total site devoted to public open space adequate provision has been made for amenity.
The need to provide a choice of housing, suitable to all age groups and persons at different stages of the life cycle	The overall development provides a wide range of unit types in a sustainable mix which will ensure a wide variety of tenures for a cross section of society.
The need to cater for special needs groups such as the elderly, travellers and disabled and the marketability of different types of housing	Provision has been made for 6 no. single storey units which can cater for special need groups.

9.2.5 Transport

The TDP seeks to improve the safety, capacity and efficiency of an integrated transport infrastructure in Naas and recognises the shift towards public transportation, walking and cycling. Policy GT5 of the Plan seeks to provide a road network which is safe and efficient for all road users while being cognisant of the requirements of all traffic, including motorised vehicles, pedestrians and cyclists whilst policy WC4 seeks to facilitate and encourage cycling as a more convenient and safe method of transport through an integrated network of safe and convenient cycle and pedestrian routes.

Of significance are the road improvements proposed to the Craddockstown Road fronting the site and the continuation of the footpath and cycle-path alignment already provided in front of the new school. The continuation of the footpath and cycle-path to the subject site is intended to facilitate walking and cycling thereby complying with stated policies in the TDP.

9.2.6 Appraisal Conclusions

The development proposal has adopted a plan led approach to development and accordingly is considered to be in compliance with pertinent policies and objectives in the TDP, in accordance with the proper planning and sustainable development of the town of Naas..

9.3 Relevant National Guidelines

In addition to statutory planning documents there are other guidance documents and guidelines which are intended to influence quality development and which have been complied with in advancing the development proposal for 74 no. residential units. These include:

- Quality Housing for Sustainable Communities Best Practice Guidelines, Department of Environment 2007
- Urban Design Manual – A Best Practice Guide, published by the Department of the Environment Heritage and Local Government 2009
- The DoEHLG Guidelines on ‘Sustainable Residential Development in Urban Areas’ (2009)
- The Planning System and Flood Risk Management: Guidelines for Planning Authorities , Department of Environment 2009
- Design Manual for Urban Roads and Streets, Department of Environment, 2013
- Childcare Guidelines for Planning Authorities, Department of Environment, 2001

The principle objectives and aims of these guidance documents have been incorporated into and will be delivered throughout the development.

10.0 COMPLIANCE WITH STANDARDS OF NAAS TOWN DEVELOPMENT PLAN (TDP)

Whilst an innovative and bespoke design approach has been advanced for the site, the proposed development and housing units, have been carefully conceived in accordance with the quantitative standards set out in the Naas Town Development Plan (TDP). Notwithstanding compliance with the development management standards set out in the TDP, the creation of a new residential area with a sense of place has been a priority. The following sections detail where compliance has been achieved having regard to key assessment criteria.

10.1 Site Coverage

The proposed development has a site coverage of 15 per cent well below the maximum 50% site coverage identified for residential development in the TDP.

10.2 Plot Ratio

The proposed development has a calculated plot ratio of 0.3. This is within the mid range of standards for sites in outer urban areas which are guided between 0.25 and 0.35. However, it must be recognised that the site has a number of environmental constraints in the form of mature trees and which need to be maintained on site and incorporated into the overall development.

10.3 Overlooking and Overshadowing

The proposed development is of traditional form comprising 2 storey semi-detached and residential units. All of the units maintain a minimum separation distance of 22m between opposing first floor windows, both from proposed and existing houses. Given that the houses are standard two storey units with a low site coverage, on a greenfield site, the issue of overshadowing does not arise.

10.4 Density

The proposed development has a density of 30 units per hectare in accordance with Section 4.4.4 of the TDP and Table 4.2 of the Kildare County Development Plan. The TDP advocates densities of between 20 – 35 units per hectare, whilst the Kildare Development Plan recommends densities of 30 – 50 units per hectare. Although there is a conflict in the density standards recommended in both plans, it is noted that the proposed development has achieved compliance to satisfy both documents.

10.5 Housing Mix & Size

A detailed schedule of house and apartment sizes is attached to the Architectural Design Statement. The unit sizes have been designed in accordance with the minimum standards set out in Table 13.3 of the TDP. The CDP minimum house size requirements are also detailed for reference purposes as they conflict with those in the TDP. In any case, the proposed units exceed the minimum requirements set out in the TDP and the CDP with the 2, 3 and 4 bed units particularly generous in comparison to the minimum standards. The unit sizes are detailed in Table 10.1 below.

Unit Type	TDP Area Requirement	CDP Area Requirement	Area of Proposed Unit
1 bed	55sqm	55sqm	55sqm - 56sqm
2 bed	75sqm	85sqm	94sqm
3 bed	90sqm	100sqm	107sqm
4 bed	110sqm	110sqm	129sqm

Table 10.1 Size of Proposed Unit

10.6 Private Open Space Provision

A detailed schedule of private open space provision for the houses and apartments is attached to the Architectural Design Statement. The private open space has been provided in general accordance with the development plan standards detailed in Table 13.4 of the TDP. In most instances, the area of private open space significantly exceeds the minimum requirements.

Unit Type	TDP OS Requirement	Range of OS Area Provided
1 bed	48sqm	93 - 108sqm
2 bed	55sqm	55 – 165sqm
3 bed	60sqm	60 – 108sqm
4 bed	75sqm	76 – 157sqm

Table 10.2 Private Open Space Requirement

11.0 CONCLUSION

The proposed development, on zoned and serviced lands, immediately adjacent to a new school and within convenient walking distance of a neighbourhood centre on the Ballycane Road is entirely consistent with the policies and objectives of the Naas Town Development Plan 2011 – 2017, with regional and national planning policy and the proper planning and sustainable development of the area.

The proposed development provides a suitable mix of housing, separation distance and car parking together with the quantitative requirements for private and public open space. 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 greenfield site having regard to the pattern of both permitted and adjoining development and the topography of the site.

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 in the Naas area, providing much needed accommodation for those on the Housing Waiting List.

The ‘Do Nothing’ scenario in this instance is not an option as the Government’s priority is to deliver housing under the ‘Rebuilding Ireland Action Plan for Housing and Homelessness. The land is in public ownership, is appropriately zoned for residential use, and social housing can be delivered using private finance which is separate and additional to Exchequer funding. The PPP format allows more social housing to be built in the context of constrained State resources and in a time of chronic need.

A plan led approach to development has been adopted on the site and the proposed development is deemed to be in accordance with the proper planning and sustainable development of the area. The proposed development comprises the sustainable use of zoned residential lands, situated relatively close to the town centre and within a range of community, educational and commercial services including employment opportunities.

APPENDIX 1 Letter of Consent from Landowner

Gníomhaireacht Tithíochta · Housing Agency
53 Sráid an Mhóta Uachtarach · 53 Mount Street Upper
Baile Átha Cliath, D02 KT73 · Dublin, D02 KT73
T: 01 656 4100 · info@housing.ie
ag cothú pobal inbhuanaithe · promoting sustainable communities



**Planning Department
Kildare County Council,
Áras Chill Dara,
Devoy Park,
Naas, Co Kildare.
W91 X77F**

22nd February 2017

**Re: Proposed Housing Development by Kildare County Council at lands at
Craddockstown, Naas, County Kildare (Folio KE4799)**

Whom it May Concern,

We confirm that the Housing and Sustainable Communities Agency (Housing Agency) is the legal, registered owners of the above land, subject to this development proposal. We hereby consent to the making of this application by Kildare County Council.

Yours faithfully,



Jim Baneham

Senior Executive

Housing Agency

APPENDIX 2 Letter of consent in Relation to Services



DBFL Consulting Engineers
CORPUS OFFICE Herbert House, Harmony Row, Dublin 2, Ireland.
PHONE +353 1 400 4000 FAX +353 1 400 4050
EMAIL info@dbfl.ie OR www.dbfl.ie

Memo

To: Kieran Rush - Ballymore From: John Keogh
CC: Date: 18th June 2015
Re: Craddockstown - C10 Housing Agency Lands Job No: 143086

Urgent For Review Please Comment Please Reply Please Recycle

The Housing Agency (C10) lands are located to the south-west of the proposed housing development at Craddockstown, Co. Kildare. The C10 lands are approximately 8 hectares in area and the existing lands slope from south-west to north-east towards the border with the Craddockstown development.

Currently the C10 lands are not serviced but provision will be made in the Craddockstown development to allow connections from the Housing Agency lands, and the proposed services are sized accordingly. In addition, invert levels will be designed to allow gravity connections from the Housing Agency lands.

The details of these connections are as follows:-

Eastern connections (point A):-

Foul Sewer:- A 225mm diameter foul sewer spur will be provided from the proposed development at Craddockstown to allow connection for 300 housing units from the Housing Agency lands.

Surface Water:- A 225mm diameter surface water sewer spur will be provided from the proposed development at Craddockstown to allow connection for attenuated flows from the Housing Agency lands @3.7 l/s/hectare (total 29.6 l/s).

Watermain:- A 150mm diameter watermain spur will be provided from the proposed development at Craddockstown to allow connection for up to 150 housing units from the Housing Agency lands.

Northern Connection (point B):-

Watermain:- A 150mm diameter watermain spur will be provided from the proposed development at Craddockstown to allow connection for up to 150 housing units from the Housing Agency lands.

The eastern and northern connection points will allow possible pedestrian and cycleway links in both areas.

Signed:-

Dated:-

18/6/15



