

Strategic Housing Unit,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.  
D01 V902

19<sup>th</sup> December 2018

**Re: Strategic Housing Development Application for the construction of 251 residential units (167 no. houses and 84 no. apartments/duplex units), a creche (261.5 m<sup>2</sup>), diversion and undergrounding of existing 38kV overhead cable and erection of two new ESB pylons, upgrade of existing junction at corner of Shackleton Road and Old Town Road to accommodate new filter lane and crossing point; and provision of new vehicular entrance onto Shackleton Road and two new vehicular entrances onto Oldtown Road; and all associated works on Land at Shackleton Road, Oldtown, Celbridge, Co. Kildare**

Dear Sir / Madam,

We act on behalf of the applicant O'Flynn Construction Co. Unlimited Company (OFC), and wish to submit the enclosed Strategic Housing Development (SHD) planning application for the above-referenced development to An Bord Pleanála under the provisions of the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made following Pre-Application Consultation reference ABP-300968-18 and the receipt of a Notice of Pre-Application Consultation Opinion issued by An Bord Pleanála dated 17<sup>th</sup> April 2018. The appropriate fee of €34,512.80 is enclosed with the application.

In addition to this cover letter, please find enclosed 2 no. hard copies and 3 no. electronic copies of the following documentation and information, as required under articles 297 and 298 of the Planning and Development Regulations 2001 to 2017, as amended, and in accordance with the additional information sought in the Board's Notice of Pre-Application Consultation Opinion:

1. Completed SHD Application Form;
2. Press Notice;
3. Site Notice;
4. Copy of Notification Letters sent to Prescribed Bodies and Kildare County Council;
5. Letter of Consent from Kildare County Council;
6. Site Location Map 1:10,560;
7. Site Location Map 1:1,000;
8. Planning and Architecture:
  - a. Planning & Architectural Design Statement, prepared by Hogan Architecture Urban Design;
  - b. Building Lifecycle Report, prepared by Hogan Architecture Urban Design;
9. Statement of Consistency, including Statement of Housing Mix, prepared by McCutcheon Halley Planning Consultants;

[www.mhplanning.ie](http://www.mhplanning.ie)

McCutcheon Halley is a limited partnership registered under the Limited Partnerships Act, 1907, registration no. LP512. Registered in Ireland No. 326490. Registered office: 6 Joyce House, Barrack Square, Ballincollig, Co. Cork. Directors: Brian McCutcheon, BA(Econ) DipTP DipGIS MIPI (Chairman). Tom Halley, BA(Mod), MRUP BSc ARCH(Hons) Cert. Civil Eng. MIPI.

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10. Part V Proposal, prepared on behalf of O'Flynn Construction Co. Unlimited Company;
11. Environmental Impact Assessment Screening Report, prepared by McCutcheon Halley Planning Consultants;
12. Schedule of Architectural Drawings, prepared by Hogan Architecture Urban Design;
13. 174 Architectural Drawings, as per attached schedule, prepared by Hogan Architecture Urban Design;
14. Landscape Report, prepared by AECOM;
15. Schedule of Landscape Drawings prepared by AECOM;
16. 7 No. Landscape Drawings, as per attached schedule prepared by AECOM;
17. Arboricultural Assessment Report, prepared by CMK Hort + Arb;
18. Tree Survey & Constraints Drawing, prepared by CMK Hort + Arb;
19. Civil & Structural Engineering Report, prepared by DOBA Consulting Engineers, including the following correspondence:
  - a. Letters from Kildare County Council in relation to proposed surface water works at St. Patricks Park (Appendix D);
  - b. Irish Water Response to Pre-Connection Enquiry (Appendix E);
  - c. Letter from ESB in relation to undergrounding of two 38kv overhead lines;
20. Site Specific Flood Risk Assessment prepared by JBA Consulting;
21. Schedule of Engineering Drawings, prepared by DOBA Consulting Engineers;
22. 39 Engineering and Infrastructure Drawings, as per attached schedule prepared by DOBA Consulting Engineers;
23. Construction and Waste Management Plan, prepared by Hogans Architecture Urban Design;
24. Public Lighting:
  - a. Letter outlining summary design details, by Johnston Reid & Associates;
  - b. 2 No. Public Lighting Drawings; reference numbers: LTG PH1.1 and LTG PH1.2;
  - c. Veelite Lighting Specification Sheet
25. Transport Assessment, prepared by SYSTRA;
26. Road Safety Audit, prepared by Road Safety Matters;
27. Swept Path Analysis, prepared by SYSTRA;
28. Appropriate Assessment Screening Report, prepared by Ecological Consultant Tom Gittings;
29. Fisheries Assessment Report, prepared by Triturus Environmental Services;
30. Archaeological Impact Assessment, prepared by Shanarc Archaeology;

In the Board's Notice of **Pre-Application Consultation Opinion**, four issues were specifically identified relating to wastewater services, road layout, surface water management and flood risk assessment and public open space, which were to be addressed at application stage. The following provides an overview of these items and how/where these have been addressed in the submitted planning application material.

## 1 Wastewater Services

Item 1 states:

*"Further consideration of documents as they relate to foul sewer network constraints downstream of the development as indicated in the Water Services report dated 8<sup>th</sup> March, 2018 and contained in Appendix B of the Planning Authority's opinion. An outline of the necessary works to address the constraints and what parties will be responsible for the works. In addition, there should be clarity as to whether such works would be the subject of a separate consent process and or compulsory purchase process. Timelines for the delivery of any works is required relative to the delivery of the proposed development. Given the existing deficiencies in the provision of adequate sewerage infrastructure, the applicant should satisfy themselves that the proposed development would not be premature pending*

*the delivery of required infrastructural improvements. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”*

Further consultation has been undertaken with Irish Water and Kildare County Council to address the foul sewer network constraints downstream of the development. Irish Water have now confirmed that a connection to the foul sewer can be facilitated for the proposed development, pending the successful delivery of a proposal to remove surface water from the combined network at St. Patrick’s Park. Kildare County Council has endorsed this proposal and are currently finalising an agreement for the applicant to undertake the necessary works, on their behalf, under exempted development provisions of the Planning and Development Act 2000 [specifically Section 4(1) (f) and 4 (1) (g)]. The proposed surface water works are in the public road. Accordingly, no separate consent process, or compulsory purchase process is required. It is anticipated that these works will be completed within the next 3 to 6 months.

The enclosed Civil & Structural Engineering Report, and accompanying appendices, prepared by Donnachadh O’Brien & Associates Consulting Engineers, provides full details of proposals for connection to the foul sewer network, including:

- Appendix C            Surface Water Works at St Patrick’s Park, design details
- Appendix D            Letters of Consent from Kildare County Council
- Appendix E            Irish Water Response to Pre-Connection Enquiry

## 2        Road Layout

Item 2 states:

*“Further consideration of documents as they relate to the layout and configuration of the proposed development as it abuts Shackleton and Oldtown Road, including amendments to the public road and new site entrances, with specific reference to Chapter 4 Street Design of the Design Manual for Urban Roads and Streets. Shackleton and Oldtown Road lack a number of pedestrian facilities such as footpaths and crossing points. The interface between the proposed development and its interaction with the function and role of Shackleton Road should be given particular focus in terms of pedestrian and cyclists facilities. In addition, further design refinement of how the proposed development will present an appropriate urban edge to existing public roads should be given careful consideration. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”*

Following the Board’s comments during the pre-application consultation, the proposed development was redesigned to provide a stronger urban frontage to Shackleton Road and Oldtown Road. The following amendments to the pre-planning layout have been incorporated into the revised design proposals:

- The units from the main entrance on Shackleton Road, moving northwards to the junction with Oldtown Road, have been redesigned to present a stronger urban streetscape, with the access road being moved back and units being brought closer to Shackleton Road.
- Proposed semi-detached units at the junction of Shackleton Road and Oldtown Road have been redesigned to provide duplex and apartment units around an urban courtyard, with the internal access road pushed further back. The internal access road now provides access to a shared parking and communal space accessed by an archway.
- The combination of road widening at the Shackleton / Oldtown junction and the redesign of the units from semi-detached to apartments / duplex units creates a stronger urban feel at this junction, with units overlooking the pedestrian footpath and cycle path more directly.

- An additional vehicular access is proposed to the west of the development on Oldtown Road and landscaping proposals provide a balance between creating an urban streetscape and respecting the residential amenity of units immediately opposite the proposed development.
- An additional pedestrian crossing point on Shackleton Road is proposed, close to the existing bus stop. The design team had explored further pedestrian crossing points on Shackleton Road, but Kildare County Council indicated that their preference was for a single additional crossing at the bus stop area, with further pedestrian crossing facilities provided at the Shackleton Road / Oldtown Road junction.
- The proposed development includes proposals for 2m wide cycle paths and 2 m wide footpaths along the Oldtown Road and Shackleton Road.

### 3 Surface Water Management and Flood Risk Assessment

Item 3 states:

*“Further consideration of the documents as they relate to surface water management for the site. This further consideration should have regard to the requirements of the Drainage Division as indicated in their report dated 8<sup>th</sup> March, 2018 and contained in Appendix B of the Planning Authority’s Opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk. A Flood Risk Assessment should be prepared in accordance with ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’). Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”*

Chapter 2 of the enclosed Civil & Structural Engineering Report, prepared by Donnachadh O’Brien & Associates Consulting Engineers, details the proposed surface water management for the site, which have been agreed in consultation with Kildare County Council.

A site-specific Flood Risk Assessment has been prepared for the site, by JBA Consulting Engineers and is enclosed with the planning application documentation. The assessment was undertaken in accordance with ‘The Planning System and Flood Risk Management’ guidelines and is in agreement with the core principles of the guidelines.

### 4 Public Open Space

Item 4 states:

*“Further consideration should be given in relation to the design rationale/ justification outlined in the documents as it relates to the open space proposed particularly in the context of the maximisation of use of existing vegetation in the proposed layout; i.e. hedgerows and mature trees. The location of the main play space close to high voltage powerlines should be given careful consideration. Passive supervision opportunities from residential development of pedestrian connections to the wider road network should be carefully considered. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”*

Section 2 of the Landscape Architecture Report, prepared by AECOM details the response to the issues raised in two parts:

- i. Addressing the design rationale / justification in the context of maximisation of use of existing vegetation in the proposed layout. The report notes that there is approximately 1225 linear metres of existing hedgerow within the site, but that the general quality of trees and hedgerow is poor. An Arboricultural Assessment report and drawing accompanies the planning application. Approximately 142 linear metres (29%) of existing hedgerows will be retained and that there will be a net gain of 85 linear metres of hedgerows in the landscaping plan. The habitat value of replanted hedgerow is to be enhanced by planting a diverse range of species.
- ii. Addressing location of main play space close to the high voltage power lines. The report notes that play provision has now been increased in each pocket park as well as the open space adjacent to the creche having active play equipment. The proposed layout includes a ball court in the open space area close to the powerlines, which is designed for older children and will be fenced off. All play areas within the development benefit from passive surveillance as they are overlooked by residential units.

The Board's Notice of Pre-Application Consultation Opinion also required the submission of the following information as part of the application for permission:

**A. Full and complete drawings, including levels and cross sections showing the connections and interface between the proposed development and the Shackleton Road and Oldtown Road.**

Architectural, Engineering and Landscaping drawings, including levels and cross sections showing connection and interface between the proposed development and the Shackleton Road and Oldtown Road are included in the application documentation, as detailed in the accompanying drawing schedules.

**B. A detailed landscaping plan which clearly shows the proposed treatment of boundaries and retention of existing trees or hedgerow, where applicable.**

Drawing numbers 60560636-SHT-20-0000-L-101 / 102 / 103 / 2000 / 7000 & 7001 provide details of the landscaping plan, including details of the proposed treatment of boundaries and retention of existing trees or hedgerow, where applicable.

**C. The preparation of a suitably detailed tree survey and Arboricultural report.**

A tree survey and arboricultural report have been prepared by CMK Hort. + Arb and are included in the planning application documentation (CMK Drawing Ref. 101).

**D. A parking layout that reflects the most appropriate quantum of car parking provision for a suburban site and includes the details of convenient locations and facilities for bicycle parking.**

A parking layout for the proposed, prepared by Hogan Architecture & Urban Design, is included in the planning application documentation (Drawing Ref. 992.PL.008)

**E. A Construction and Demolition Waste Management Plan should be provided.**

There are no existing structures on site, therefore, there is no requirement for demolition works as part of the proposed development. A Construction and Waste Management Plan (CWMP) is included in the planning application documentation.

**F. A phasing plan for the proposed development should be provided.**

A phasing plan, prepared by Hogan Architecture & Urban Design, for the proposed development is included in the planning application documentation (Drawing Ref. 992.PL.007).

G. **A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority. Streets should be shown up to the boundaries of the site and facilitate future access.**

A site layout plan, prepared by Hogan Architecture & Urban Design, indicating what areas are to be taken in charge by the Local Authority is included as part of the planning application documentation (Drawing ref. 992.PL.009).

H. **Details of undergrounding or re-routing of any overhead ESB power lines.**

Drawing numbers Oldcel-DOB-00-SI-DR-C-0010 & 0011 provide details of re-routing and undergrounding of the two 38kV overhead ESB power lines. A letter of consent for the works from the ESB 38kV department is included in Appendix J of the Civil and Structural Engineering Report, prepared by Donnachadh O'Brien & Associates.

Furthermore, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing) Development Regulations 2017 and the Board's Notice of Pre-Application Consultation Opinion, the prospective applicant has notified the following authorities of the making of the SHD application in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. National Transport Authority (in relation to transport);
2. Inland Fisheries Ireland;
3. Irish Water.

We trust this SHD application is to the satisfaction of An Bord Pleanála. Please contact the undersigned if you require any further details.

Yours Sincerely,



Màiri Henderson  
**McCutcheon Halley**