TETRA TECH

Climate Action & Energy Statement

Proposed Large-Scale Residential Development: Naas Racecourse Lands



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1 Introduction

Tetra Tech (formerly RPS) have been appointed to prepare this Climate Action & Energy Statement in order to demonstrate that the proposed residential development complies with relevant national climate and energy policies and practices.

This document provides an overview of how the proposed project has integrated sustainability, energy and climate as key strategies into the development's design. The report focuses on several national policies and guidelines, including the Kildare County Council Development Plan 2023–2029, the Naas Local Area Plan 2021–2027 and the Kildare Climate Action Plan 2024 – 2029.

In addition, this Statement considers the key criteria of the Building Regulations Part L – Conservation of Fuel and Energy.

The purpose of this report is to identify the climate and energy efficiency measures associated with the design, construction, ongoing management, and maintenance of the proposed development, and compliance with national and regional policy and guidelines.

2 Policy and Technical Requirements

2.1 Introduction

The Kildare County Council Development Plan 2023–2029, Naas Local Area Plan (LAP) 2021–2027, Kildare County Council Climate Action Plan (CAP) 2024-2029 and Building Regulations Technical Guidance Documents Part L have been considered in the design of the proposed development and the relevant policies and guidelines are discussed below.

2.2 Climate Policy

2.2.1 Kildare County Council Development Plan 2023–2029

Chapter 3 of the Development Plan relates to housing and states that it is the policy of the Council to:

HO P7 *Encourage the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the county.*

This is to be achieved by objectives such as:

HO O19 *Support housing design that contributes to climate resilience and climate mitigation, including innovative low carbon construction methods and the reduction of embodied energy in newly built homes, in line with Goal 3 of the Kildare County Council Climate Change Adaptation Strategy 2019 – 2024.*

While aimed at rural residential development the following objective is also relevant:

HO O50 *Require that new dwellings incorporate principles of sustainability and green principles in terms of design, services and amenities with careful consideration in the choice of materials, roof types (i.e. green roofs), taking advantage of solar gain/passive housing and the provision of low carbon and renewable energy technologies as appropriate to the scale of the development and to support microgeneration in all residential, commercial, agricultural and community development planning. Other sustainable principles could include the use of Sustainable Urban Drainage Systems (such as attenuation ponds and grass lined swales), the use of gravel or grasscrete rather than permanent paving/tarmac for driveways, landscaping and planting for biodiversity/pollinators and adequate waste segregation and storage space, as set out in Section 15.4 of Chapter 15 (Development Management standards) and the Rural House Design Guide contained in Appendix 4.*

Chapter 5, Sustainable Mobility and Transport, notes that active travel is the most sustainable mode of transport and advancing walking and cycling as alternatives to private car use will prove crucial to the sustainable development of County Kildare. The following policy is particularly relevant:

TM P2 *Prioritise and promote the development of high-quality, suitable, safe and sustainable walking and cycling pathways and facilities, both inter- county, intra-county (in consultation with all relevant stakeholders including neighbouring local authorities) and within the towns and settlements of County Kildare within a safe road/street environment that will encourage a shift to active travel that is accessible for all, regardless of age, physical mobility, or social disadvantage, subject to all relevant and cumulative environmental assessments and planning conditions. New projects (including greenways, blueways and cycleways) should first be subject to the undertaking of feasibility assessment. Where feasibility is established, a Corridor and Route Selection Process will be undertaken where appropriate, for relevant new road infrastructure in two stages", Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection.*

This is supported through the following relevant objectives:

TM O20 *Ensure new development areas are fully permeable for walking and cycling at a minimum, public transport (where appropriate) and provide for filtered permeability for private vehicle access in accordance with the NTA Permeability Best Practice Guide in order to give a competitive advantage to active travel modes for local trip making.*

TM O30 *Support action 27 of the National Sustainable Mobility Policy | Action Plan 2022-2025. In this regard, the Council will support the NTA and TII to develop and implement an active travel infrastructure programme for Naas.*

Chapter 7 on Energy & Communications states the policies of the Council include:

EC P1 *Reduce our carbon footprint in line with national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emission reductions.*

EC P14 *Require high levels of energy conservation, energy efficiency and the use of sustainable and renewable energy sources in new and existing buildings.*

These policies are delivered through a range of objectives most notably the following for the proposed development:

EC O44 *Require all new development to be designed to take account of the impacts of climate change, and that energy conservation, energy efficiency and energy renewable measures are incorporated in new and existing buildings through the appropriate design and location of new development, in accordance with relevant building regulations and guidelines*

2.2.2 Naas Local Area Plan 2021–2027

Some of the key policies and objectives in the Naas Local Area Plan (LAP) of relevance to this Statement are listed in the following paragraphs, and these are similar in nature to those listed for the Development Plan.

In terms of housing, it is an objective of the Council to:

HCO 2.5 *Promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency in traditional buildings. All new buildings will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).*

Regarding active travel, it is an objective of the Council to:

MTO 1.1 *Support and promote the use of sustainable active transport modes in Naas and seek to implement a connected network of walking and cycling infrastructure in the town as detailed in Table 5.2 and 5.3 and illustrated on Map 5.1 and 5.2. in conjunction with the National Transport Authority, other statutory agencies, and the relevant stakeholders. The final design details shall be subject to ecological assessment, where applicable, and undergo appropriate public consultation.*

In terms of managing flood risk it is a policy of the Council to:

IO 3.1 *(a) Ensure all development proposals within the areas identified as 'Flood Risk Assessment' on LUZ SFRA Map 9.1, where Justification Tests have been carried out as part of the Strategic Flood Risk Assessment and where residual flood risk remains are the subject of site-specific flood risk assessment appropriate to the nature and scale of the development being proposed.*

(b) Flood Risk Assessments for such developments must assess climate change scenarios in accordance with the allowance outlined in the OPW Flood Risk Management Climate Change Sectoral Adaptation Plan 2019.

2.2.3 Kildare County Council Climate Action Plan 2024-2029

The Climate Action Plan (CAP) outlines a comprehensive strategy to address climate change and promote sustainability within the county. The plan is designed to align with national climate objectives, aiming for a transition to net-zero greenhouse gas (GHG) emissions by 2050. Key goals include enhancing climate resilience, increasing energy efficiency, and reducing emissions across various sectors. The plan guides future growth and development and provides the overall strategy to achieve proper planning and sustainable development through a range of policies and objectives.

The key objectives in CAP for the Built Environment and Transport follow those in the Development Plan as follows:

1. To reduce GHG emissions, increase the use of renewable energy sources and increase energy efficiency throughout our housing, offices, infrastructure and transport fleet in line with national 2030 and 2050 targets.

2. Through our spatial planning policy and objectives support the Core Strategy of the County Development Plan (any and review thereof), having consideration to core objectives as they relate to sustainable development, including aspects such as Town Centre First, active travel, sustainable mobility, sustainable energy and compact development, etc.

3. Sustainable management of water resources should be included in the Local Authority planning application process and should include future impacts of climate change on water availability.

***Policy B8**: Ensure that all new residential and commercial buildings constructed within the County comply with the Nearly Zero Energy Buildings (NZEB) standards of the European Energy Performance of Buildings Directive and the Zero-Emission Building (ZEB) standard once implemented and the pending Office of Government Procurement policy on low carbon construction methods, materials and whole life-cycle analysis approaches in all publicly procured projects.*

***Policy B9:** Commit that new public housing and buildings incorporate the principles of climate action in terms of design, services and amenities with careful consideration in the choice of materials, roof types (i.e. green roofs), water conservation, taking advantage of solar gain/passive housing, the provision of low-carbon and renewable energy technologies and public transport infrastructure such as bus stops, shelters and appropriate turning tables as appropriate to the scale of the development.*

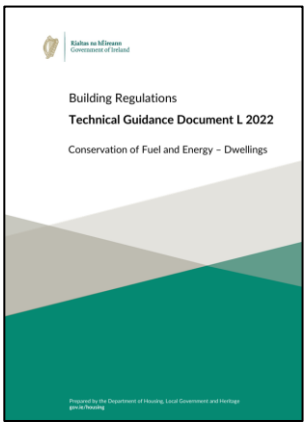
***Policy B14**: Ensure all developments including car parks are designed in such a manner as to support EV charging, promote carbon sequestration, green infrastructure, and nature-based surface water drainage solutions. Work with relevant bodies to identify optimum locations and provide suitable EV charging points for Public Transport Vehicles in town centers and key points on inter rural bus routes. Advocate and exert influence and control, as appropriate, to ensure such development promotes climate action co-benefits and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.*

***Policy B15**: Ensure all new high-human occupancy developments are located in areas whereby direct access to active travel routes and/or public transport modes and/or provide reserved space for shared cars.*

***Policy B17:** Support the National Sustainable Mobility Policy to increase provision of park and ride/share at transport interchanges and community hubs and support the development of Town Bus Services and park and ride/ share locations to maximise connectivity for the highest number of residents. Ensure such development promotes climate action co-benefits, including SuDS and nature-based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.*

Policy R9: *Implement all Area Specific Recommendations presented in the Strategic Flood Risk Assessment for the Kildare County Development Plan 2023-2029, having due regard to the need to promote nature-based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.*

2.3 Part L Conservation of Fuel and Energy



The requirement regarding conservation of fuel and energy for dwellings and the energy performance of dwellings are laid out in Part L of the Second Schedule to the Building Regulations 1997 (S.I. No. 497 of 1997) as amended, the European Union (Energy Performance of Buildings) (No. 2) Regulations 2019 (S.I. No. 292 of 2019), the European Union (Energy Performance of Buildings) Regulations 2019 (S.I. No. 183 of 2019) and the European Union (Energy Performance of Buildings) Regulations 2021 (S.I. No. 393 of 2021).

The Second Schedule for the Building Regulations relates to dwellings and provides as follows:

L1: *A building shall be designed and constructed so as to ensure that the energy performance of the building is such as to limit the amount of energy required for the operation of the building and the amount of carbon dioxide (CO_2) emissions associated with this energy use as far as is reasonably practicable.*

L2: *For existing dwellings, the requirements of L1 shall be met by: limiting heat loss and, where appropriate, availing of heat gain through the fabric of the building; (b) controlling, as appropriate, the output of the space heating and hot water systems; (c) limiting the heat loss from pipes, ducts and vessels used for the transport or storage of heated water or air; (d) providing that all oil and gas fired boilers installed as replacements in existing dwellings shall meet a minimum seasonal efficiency of 90 % where practicable.*

L2A (a): *A multi-unit building containing one, or more than one, dwelling: (i) that is new, or (ii) subject to paragraph (b), undergoing major renovation, shall have installed ducting infrastructure (consisting of conduits for electrical cables) for each car parking space, to enable the subsequent installation of recharging points for electric vehicles where the parking space is: (i) located inside the building concerned, or (ii) is within the curtilage of the building concerned. (b) The requirement of paragraph (a) shall apply to a building undergoing major renovation where: 5 (i) in a case where the car park is located inside the building, the renovations concerned include the car park or the electrical infrastructure of the building, or (ii) in a case where the car park is physically adjacent to the building, the renovations concerned include the car park or the electrical infrastructure of the car park. (c) A new building that is a dwelling, other than where the dwelling forms part of a multi-unit building, where a parking space is located within the curtilage of the dwelling, shall have installed appropriate electric vehicle recharging infrastructure to enable the subsequent installation of recharging points for electric vehicles.*

L6: *Energy performance of buildings requirements as set out in the European Union (Energy Performance of Buildings) Regulations 2019.*

The European Union (Energy Performance of Buildings) Regulations 2019 (S.I. No. 183 of 2019), as far as it relates to works relating to dwellings, provides as follows:

Regulation 8: *For new dwellings, the nearly zero energy performance requirements of this regulation shall be met by: (a) providing that the energy performance of the building is such as to limit the calculated primary energy consumption and related carbon dioxide (CO_2) to that of a nearly zero energy building within the meaning of the Directive insofar as is reasonably practicable, when both energy consumption and carbon dioxide (CO_2) emissions are calculated using the Dwelling*

Energy Assessment Procedure (DEAP) published by Sustainable Energy Authority of Ireland; (b) providing that, the nearly zero or very low amount of energy required is covered to a very significant extent by energy from renewable sources, including energy from renewable sources produced on-site or nearby; (c) limiting the heat loss and, where appropriate, availing of heat gain through the fabric of the building; (d) providing and commissioning energy efficient space and water heating systems with efficient heat sources and effective controls; (e) providing that all oil and gas fired boilers shall meet a minimum seasonal efficiency of 90 %; (f) providing to the dwelling owner sufficient information about the building, the fixed building services, controls and their maintenance requirements so that the building can be operated in such a manner as to use no more fuel and energy than is reasonable.

The European Union (Energy Performance of Buildings) Regulations 2021 (S.I. No. 393 of 2021), as far as it relates to works relating to dwellings, provides as follows:

Regulation 5 (a): *A new building shall, where technically and economically feasible, be equipped with self-regulating devices for the separate regulation of the temperature in each room or, where justified, in a designated heated zone of the building unit. (b) Where a heat generator is being replaced in an existing building, where technically and economically feasible, self-regulating devices shall also be installed.*

3 Subject Site & Proposed Development

The existing 8.6-hectare greenfield site, as illustrated in **Figure 1**, is bound to the south, west and north by existing residential estates. To the east of the subject site are the existing Naas Racecourse grounds, which are privately owned. The Gallops Avenue is located immediately to the northwest of the subject site and is located adjacent to the portion of land heading northward toward the Dublin road. To the south of the site is the existing Tipper Road. The existing levels on the subject site fall from south to north at a general grade of 1:25. The low point is located along the northeastern corner of the site, where the natural slope changes direction to fall toward the east.

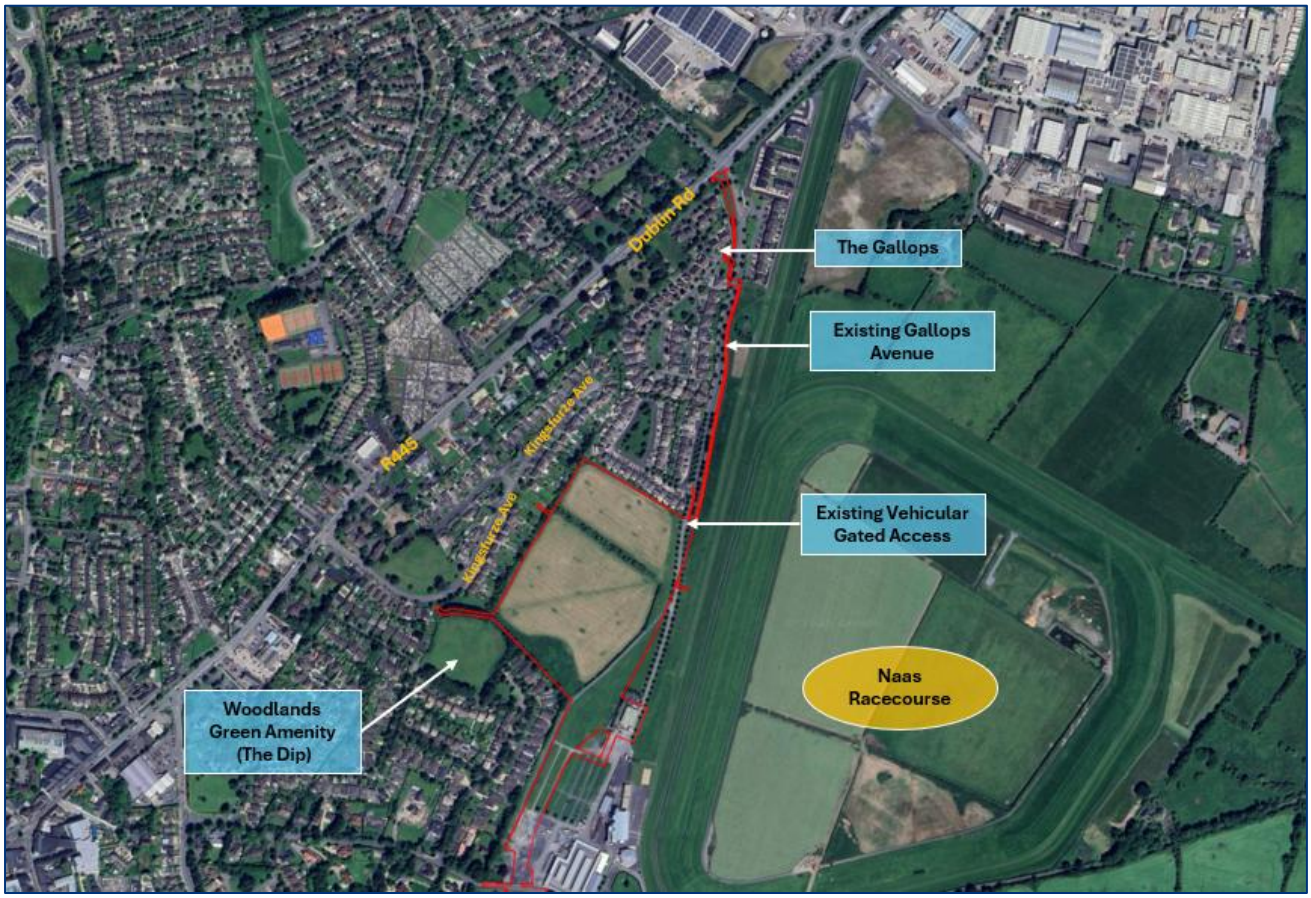


Figure 1: Subject Site & Content

The proposed development comprises a Large-scale Residential Development (LRD) on lands extending to c. 8.7 hectares located to the west of Naas Racecourse, Naas, Co. Kildare. The proposal consists of 234 no. residential units, comprising 115 no. houses, 21 no. apartments within a three-storey apartment block, 80 no. own-door apartments within duplex-type buildings and 18 no. own-door apartments within triplex-type buildings together with ancillary public, communal and private open space; landscaping and play areas; internal roads and footpaths; car and bicycle parking; refuse storage; drainage infrastructure; utilities and services (including 2 no. ESB kiosks); and all associated site and ancillary works. The proposed development also includes a childcare facility with associated outdoor play space, set-down area and parking.

Transport and connectivity infrastructure includes the construction of an extension to Gallops Avenue connecting the existing Gallops Avenue to Tipper Road, upgrades to the existing section of Gallops Avenue (including cycle infrastructure and junction improvements), junction and traffic management works at Dublin Road and Tipper Road, provision for future vehicular access connections to adjoining lands, a new pedestrian connection to Kingsfurze Avenue, and provision for a future pedestrian connection along the western boundary to Kingsfurze Avenue.

The development also includes site clearance, demolition of an existing shed, removal of sections of existing boundary treatments, undergrounding of existing overhead lines, public lighting and all associated infrastructural works.

Full details of the proposed development are set out in the statutory notices and the accompanying planning application documentation, including the Architectural Design Statement prepared by Reddy Architecture + Urbanism, the Landscape Design Report prepared by Murphy + Sheanon and the Infrastructure Design Report prepared by Donnachadh O'Brien & Associates.

4 Key Sustainable Features

The development incorporates climate change mitigation strategies, such as energy-efficient building design, sustainable drainage systems, active travel infrastructure, and just transition measures, as detailed in the following sections.

Overall, the development has shown to comply with the key land use policies as outlined in Section 2.2 of this document. The development has also shown to comply with Part L Conservation of fuel and energy as outlined in Section 2.3 of this document.

Details of the sustainable urban drainage system (SuDS) strategy and selected SuDS measures are detailed in the Infrastructure Design Report prepared by DOBA, and the associated suite of drawings.

For details of the proposal relating to active travel infrastructure, please refer to the Architectural Design Statement by RAU, the Infrastructure Design Report prepared by DOBA, and the Traffic & Transport Assessment Report and Mobility Management Plan prepared by Systra. The contents of reports are to be read in conjunction with the Site Layout Plan prepared by RAU and the road layouts prepared by DOBA. Regarding energy-efficient building design, please refer to the Life Cycle Report by Aramark and the ADS by RAU.

Full details of the proposed sustainable features are provided in the suite of reports and drawings accompanying the planning application. Notably, the following documentation:

- Architectural Design Statement and associated architectural drawings prepared by RAU;
- Landscape Design Report and associated landscape drawings prepared by M+S;
- Infrastructure Design Report, SSFRA and associated water, surface water, surface drainage, and road network drawings;
- Building Life Cycle Report by Aramark;
- Operational Waste Management Plan by AWN;
- Traffic & Transport Assessment Report and Mobility Management Plan by Systra.

These references demonstrate the development's alignment with local and national planning and climate policies, emphasising sustainability and active travel.

4.1 Energy Efficiency

The proposed project outlines several measures to promote energy efficiency within the Naas Racecourse Lands development:

- Homes are designed for long-term thermal performance and climate resilience;
- The thermal envelope complies with current regulatory standards and is optimized through shared party walls to improve heat retention and reduce energy demand;
- Dual-aspect layouts allow cross-ventilation and passive solar gain, reducing reliance on mechanical heating and cooling;
- High-performance building envelopes, low-carbon heating systems, and design strategies promote natural ventilation and daylight;
- Energy-efficient space and water heating systems with effective controls are installed; and
- Heat pumps, mechanical ventilation with heat recovery (MVHR), and LED lighting are utilized throughout the development.

These measures demonstrate the development's alignment with policy EC P14 and objective HO O19 of the Development Plan, objective HCO 2.5 of the LAP and policies B8 and B9 of the Kildare CAP.

The development has also shown to comply with criteria L1 of Part L Conservation of fuel and energy as outlined in Section 2.3 of this document.

4.2 Climate Change Mitigation

The proposed project outlines several measures to promote climate change mitigation within the Naas Racecourse Lands development:

- The development incorporates principles of mitigation to reduce energy requirements and greenhouse gas emissions;
- The layout and unit typologies are structured to maximise solar orientation, enhancing daylight and passive solar heating;
- Landscaped areas are designed to provide amenity, biodiversity, and protection from the elements while incorporating Sustainable Urban Drainage Systems (SUDS) for effective stormwater management;
- Bioretention planting beds are distributed throughout the site to manage stormwater and enhance ecological value.

As noted above, these measures demonstrate alignment with policy EC P14 and objectives HO O19, EC O44 and HC O50 of the Development Plan, objectives IO 3.1 and HCO 2.5 of the LAP and policies B8, B9 and R9 of the Kildare CAP.

The development has also shown to comply with criteria L1 of Part L Conservation of fuel and energy as outlined in Section 2.3 of this document.

4.3 Sustainability

The proposed project outlines several measures to promote sustainability within the Naas Racecourse Lands development:

- The development aligns with national climate and housing targets by transforming underutilized agricultural land into a productive, sustainable residential area;
- The design supports compact, edge-of-town growth while respecting and enhancing the local setting;
- The development promotes active travel (walking and cycling) and reduces reliance on private cars, aligning with sustainable planning principles;
- The electric vehicle (EV) charging points are required for the residential and creche development.

Electric Vehicle (EV) infrastructure:

Part L Dwellings 2022 specifies EV recharging infrastructure as follows:

For a new building (containing one, or more than one, dwelling), ducting infrastructure, consisting of conduits for electric cables, should be provided for every parking space, to enable the subsequent installation of recharging points for electric vehicles where:
• the car park is located inside the building, e.g. a basement car park; or
• the car park is physically adjacent to the building, i.e. the car park is within the curtilage of the site.

These measures demonstrate the development's alignment with climate policies B8, B9 and B14 of the Kildare CAP. The development has also shown to comply with criteria L2A(a) of Part L Conservation of fuel and energy as outlined in Section 2.3 of this document.

4.4 Active Travel

The proposed project outlines several measures to promote active travel (walking and cycling) within the Naas Racecourse Lands development:

Cycle Lanes

- Cycle tracks will be constructed along Gallops Avenue as part of its extension to connect Dublin Road and Tipper Road;
- New pedestrian and cycling links will be created within the development, integrating with existing green infrastructure and nearby cycle paths.

Pedestrian and Cyclist Connectivity

- The development will enhance local connectivity by creating new pedestrian and cycling links and public spaces;
- The internal street network is designed to prioritise permeability, legibility, and safety for pedestrians and cyclists;
- Routes align with desire lines, providing logical and easy navigation for pedestrians and cyclists;
- Shared-surface areas are designed to promote low vehicle speeds and safe conditions for walking and cycling, in compliance with the Design Manual for Urban Roads and Streets (DMURS).

Proximity to Amenities

- The site is strategically located close to Naas Town Centre, schools, and employment hubs, encouraging walking and cycling for daily activities;
- The development is close to multiple bus stops and Sallins and Naas Train Station, which provide connections to Dublin and surrounding areas.

Cycle Parking

- Secure and convenient cycle storage is provided across all unit types;
- Houses have private, rear-accessible bike stores;
- Ground-floor duplexes include storage under stairs;
- Upper duplexes have storage near entrances;
- Apartments provide external bike shelters;
- Visitor bike parking is integrated into the landscape.

Public Realm Design

- Streets are designed as vibrant, people-focused spaces rather than car-dominated areas;
- Traffic calming measures, such as varied surface treatments and build-outs, enhance pedestrian and cyclist safety.

Mobility Management Plan (MMP)

SYSTRA Ltd have been commissioned to develop a Mobility Management Plan (MMP) for the proposed development and all related infrastructure, including provision of an internal road network,

pedestrian links, cycle and car parking, public lighting, and all other associated site development works in Naas, County Kildare.

The purpose of the MMP is to:

- Provide a manual and record for the mobility manager who will be appointed to oversee the implementation and development of the measures set out in the document;
- Serve as an official record for the local authority regarding the type, scale, and number of initiatives initially proposed by the MMP;
- The MMP will seek to provide a long-term strategy for encouraging residents, creche staff and visitors to reduce their dependency on travelling by car in favour of more sustainable modes of travel.

Public transport to and from the site is considered to be a viable alternative to travelling by private car. There are numerous bus and train services within a reasonable walking/cycling distance from the site. The nearest bus stops to the site are located on R445/Dublin Road, approximately 350m from the centre of the site if the proposed active travel infrastructure comes forward. Shown in **Figure 2**, there are six main bus stops in the vicinity of the site. It should be noted that these stops represent stops on either side of the road.



Figure 2: Bus routes in the vicinity of the proposed development

Overall, it is considered that the proposed development west of Naas Racecourse is accessible by sustainable travel and has access to multiple facilities which encourage travel by sustainable modes rather than by private car. The MMP makes a concerted effort to ensure that these sustainable transport options are safe, convenient, and accessible to all, including people with disabilities, with the overarching goal to create a more connected and environmentally friendly community.

These measures demonstrate the development's alignment with policies HO P7 and TM P2 and objectives HO O19, TM O20 and TM O30 of the Development Plan, objective MTO 1.1 of the LAP and policies B9, B14, B15, and B17 of the Kildare CAP.

4.5 Climate Adaptation

The proposed development is designed for long-term thermal performance and climate resilience. The thermal envelope complies with current regulatory standards and is optimised through shared party walls, which improve heat retention and reduce energy demand. Dual-aspect layouts allow cross-ventilation and passive solar gain, lowering reliance on mechanical heating and cooling and help future-proof against rising energy costs and temperature extremes. Collectively, these features make the home future-ready, capable of adapting to changes in use or occupancy without compromising comfort, character, or regulatory compliance.

The section of the report considers the site-specific Flood Risk Assessment (FRA) for the proposed development, prepared by DOBA.

The assessment investigates potential sources of flood risk and includes for the effects of climate change. The assessment is required to examine the impact of the development and the effectiveness of the flood mitigation and management procedures proposed. It should also present the residual risks that remain after those measures are put in place.

Figure 3 shows an extract from the mapping available from the Naas Flood Relief Scheme and illustrates that the Naas Racecourse site is in Flood Zone C and is not at risk of flooding. As can be seen, there are no lands within Naas Racecourse that are subject to flooding, and the lands are therefore categorised as Flood Zone C Lands.

A site-specific Flood Risk Assessment has been carried out by DOBA, to assess the impact of flooding on the proposed overall lands, including the residential development, the proposed creche and the Gallops Avenue Extension. The report was prepared in accordance with the guidance in The Planning System and Flood Risk Management Guidelines for Planning Authorities. All existing information has been reviewed regarding the flood risk in the area to provide reliable estimates of extreme rainfall event water levels.

The proposed finished floor and road levels have been demonstrated to be substantially above the nearest predicted flood levels, and the entire proposed site is within Flood Zone C lands with negligible risk of flooding. Implementation of SUDS throughout the site for the surface water drainage network ensures that there will be no increase in pluvial flood risk as a result of the proposed development.

These measures demonstrate the development's alignment with objectives HO O19 and EC O44 of the Development Plan, objective IO 3.1 of the LAP and policies R9 of the Kildare CAP.

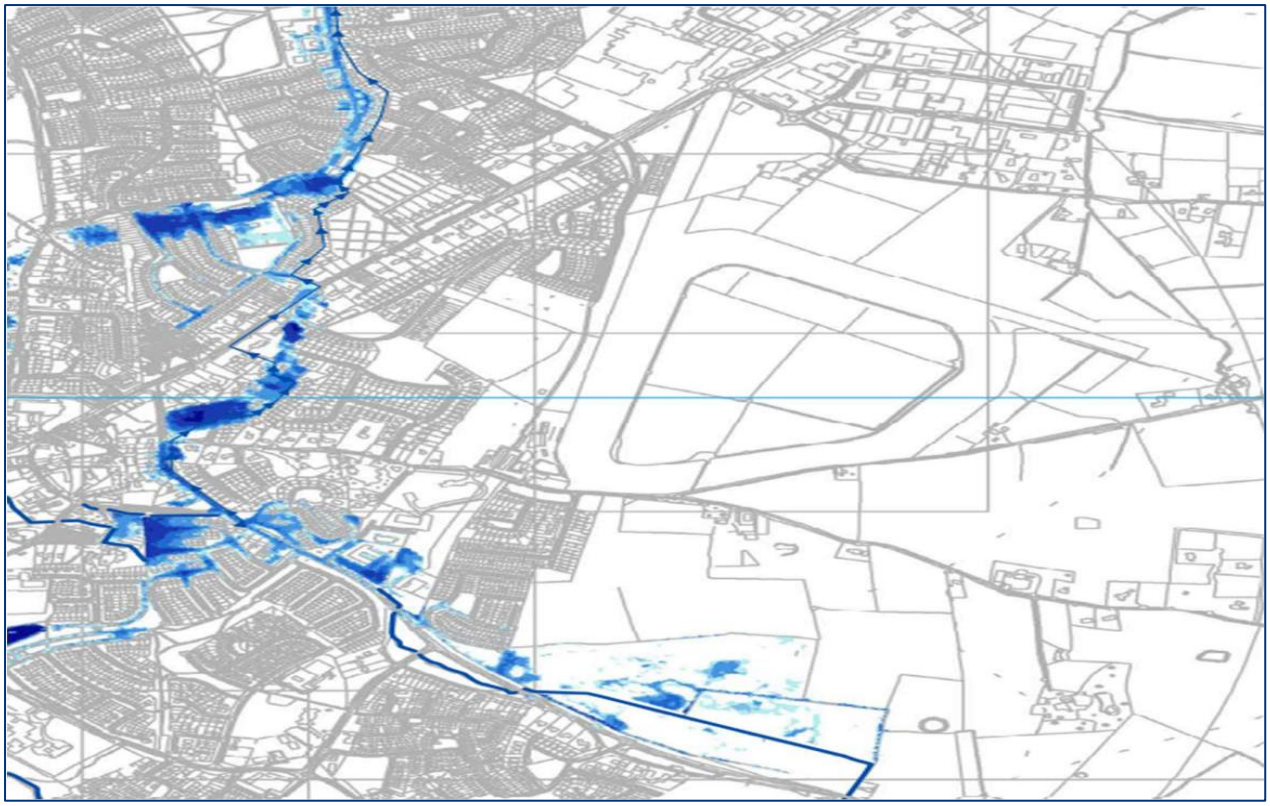


Figure 3: KCC Naas Flood extent mapping

5 Conclusions

The proposed residential development at Naas Racecourse Lands will comply with relevant climate and energy policy through detailed design, a number of sustainability and efficiency features. The design of the proposed development encourages the use of public and active transport, ensuring compliance with national and local policies.

Details of the sustainable urban drainage system (SuDS) strategy and selected SuDS measures are detailed in the Infrastructure Design Report prepared by DOBA, and the associated suite of drawings. For details of the proposal relating to active travel infrastructure, please refer to the Architectural Design Statement (RAU), Infrastructure Design Report prepared by DOBA, and the Traffic & Transport Assessment and Mobility Management Plan prepared by Systra. The contents of reports to be read in conjunction with the Site Layout Plan prepared by RAU and the road layouts prepared by DOBA. Regarding energy efficiency building design, please refer to the Life Cycle Report by Aramark, as well as the ADS by RAU.

Overall it is considered that the proposed development west of Naas Racecourse is accessible by sustainable travel and has access to multiple facilities which encourage travel by sustainable modes rather than by private car. The MMP makes a concerted effort to ensure that these sustainable transport options are safe, convenient, and accessible to all, including people with disabilities with the overarching goal to create a more connected and environmentally friendly community.

The climate vulnerability of the proposed development has been suitably mitigated through the planned construction works and final design to ensure no significant adverse climate adaptation risk. Careful consideration was needed regarding the site-specific flood risk characteristics due to the location of the development and potential impact due to a flood event.

The development provides a variety of well distributed public, communal, and private amenity spaces designed to support interaction, recreation, and well-being, supporting a Just transition.

Overall, the proposed Large-Scale Residential Development Naas Racecourse Lands will comply with Part L Conservation of fuel and energy 2022. The proposed project will also comply with all relevant energy and climate policies and objectives in the Kildare County Council Development Plan 2023–2029, Naas Local Area Plan (LAP) 2021–2027, Kildare County Council Climate Action Plan (CAP) 2024-2029.