



Planning Report

Proposed Large-Scale Residential Development: Naas
Racecourse Lands

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Planning Report

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1 Introduction

Tetra Tech (formerly RPS) has been instructed by Ballymore Development Limited (the Applicant) to prepare this Planning Report to accompany a planning application to Kildare County Council (KCC) for a Large-scale Residential Development (LRD) for 234 residential units on lands to the west of Naas Racecourse, Kingsfurze, Naas, County Kildare. This application is submitted under section 34 of the Planning and Development Act 2000, as amended (the Planning Act), and the Planning and Development Regulations 2001, as amended (the Planning Regulations), via the national planning portal.

1.1 Overview of the Proposed Development

This LRD planning application seeks permission for a residential scheme with associated infrastructure on lands to the west of Naas Racecourse, which will support the sequential, sustainable and compact growth of Naas and will provide new homes with residential amenities, infrastructure and community facilities for future and existing residents. A site location map is included with the submitted materials. See Drawing No. NRC-02-SW-XXX-DR-AR-RAU-1000 prepared by Reddy Architecture + Urbanism (RAU). **Figure 1-1** below shows the full extent of the subject site.

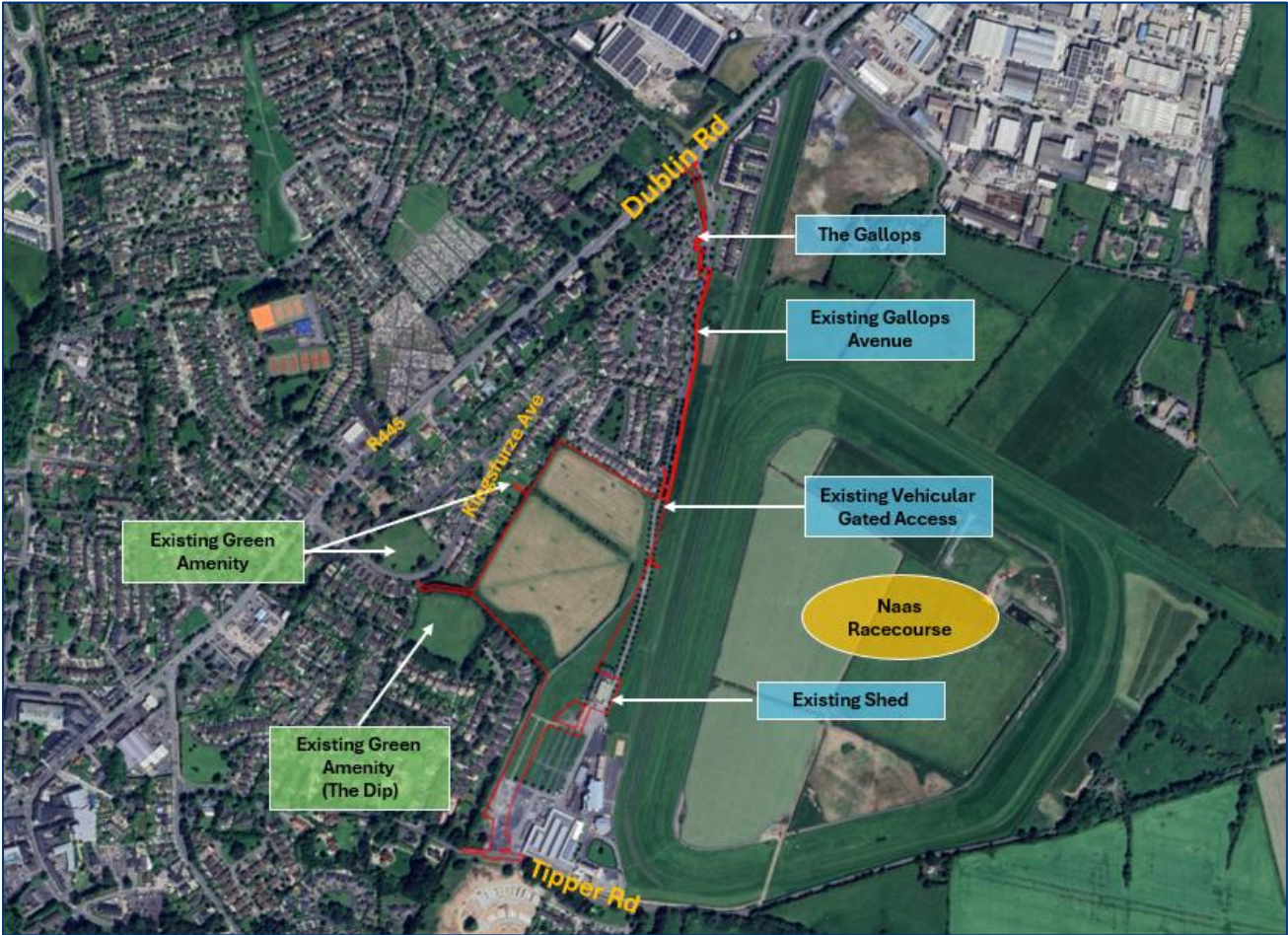


Figure 1-1: Subject Site (Indicative outline in Red)

Source: Google Maps; edited by Tetra Tech

The proposed development comprises the construction of 234 no. residential units (a mix of houses and apartments), together with supporting facilities including open space, landscaping, an internal street network, parking, refuse storage and electrical kiosks. The scheme also provides a childcare facility with an associated external play area, drop-off area and parking. Transport and connectivity

works include the construction of a new section of Gallops Avenue connecting the existing Gallops Avenue to Tipper Road, upgrades to the existing Gallops Avenue (including cycle tracks provision and junction improvements), junction and traffic management works at Tipper Road and Dublin Road, a new pedestrian connection to Kingsfurze Avenue and provisions for future access points. All other associated site and ancillary works are included, such as site clearance, demolition of an existing shed, removal of sections of fencing, provision of boundary treatments, undergrounding of existing ESB overhead lines, provision of drainage infrastructure and public lighting.

Further details of the proposed development are provided in the statutory notices, as well as in **Section 5** of this Report and the suite of documentation enclosed with the planning application, particularly the Architectural Design Statement prepared by Reddy Architecture + Urbanism (RAU), the Landscape Design Report prepared by Murphy + Sheanon Horticulture and Landscape Architects (M+S) and the Infrastructure Design Report prepared by Donnachadh O'Brien & Associates (DOBA).

As detailed in **Section 7.2.1** of this Report, the subject is appropriately zoned for residential development. For further details of relevant zoning objectives and compliance, please refer to **Section 7.2.1** of this Report.

1.2 The Applicant

The Applicant is Ballymore Development Limited.

During earlier pre-application consultations under section 247 of the Planning Act, the prospective Applicant was identified as Mill Road Estates Limited (a company within the Ballymore Group); however, Ballymore Development Limited was subsequently designated to advance the formal submission of the LRD application. This administrative change does not affect the proposed development or continuity of the consent provided.

Letters of consent for lands outside the Applicant's control have been provided by KCC and Naas Racecourse (refer to the planning application materials).

1.3 Planning Application Particulars

This proposal meets the requirements of section 32A of the Planning Act to be considered an LRD, comprising the development of 234 no. residential units, exceeding the 100-unit threshold, in lands with land-use zoning that facilitates the proposed development (C: New Residential; F: Open Space & Amenity; and L: Leisure & Amenity).

The planning application is accompanied by a Statement of Response to the LRD Opinion, prepared by Tetra Tech, confirming that all specific information requests made by KCC have been addressed.

The application package has been prepared in accordance with articles 22, 23 and 23A of the Planning Regulations and includes, inter alia:

- a completed LRD application form (Form 19) and the appropriate fee;
- letters of consent for lands not under the Applicant's control;
- statutory site and newspaper notices;
- location and site plans, elevations and floor plans (screened where required);
- a Confirmation of Feasibility from Uisce Éireann (UÉ) confirming servicing capacity and Statement of Design Acceptable from UÉ (see Infrastructure Design Report prepared by DOBA); and
- the suite of supporting reports and drawings listed in the List of Enclosures appended to the Cover Letter to KCC.

Compliance with LRD procedural requirements (including section 247 pre-application consultations and receiving an LRD Opinion under section 32D of the Planning Act) has been satisfied (refer to **Section 4** of this Report).

Finally, the Applicant confirms that the residential element of the scheme will account for 100% of the gross floor space, consistent with the LRD definition. Details are provided in the LRD Application Form (Form 19) enclosed with the planning application materials.

1.4 Purpose, Content & Structure of this Report

This Report has been prepared in support of the planning application and should be read alongside the supporting documentation prepared by the project team (see **Table 1-1**). It provides a concise description of the subject site, the proposed development and its context, together with a review of planning history and an assessment of planning policy and environmental considerations.

It is noted that **Sections 6** and **7** sets out statements of consistency demonstrating how the proposed development has regard for and aligns with the Kildare County Development Plan 2023–2029 (KCDP), the Naas Local Area Plan 2021–2027 (Naas LAP), the National Planning Framework (First Revision) (NPF), the Eastern & Midland Regional Spatial and Economic Strategy 2019–2031 (RSES) and relevant Ministerial Guidelines.

This Report is structured as follows:

- **Section 1:** Introduction
- **Section 2:** Subject Site - Location & Description
- **Section 3:** Planning History Review
- **Section 4:** Summary of Pre-Planning Engagement
- **Section 5:** Description of the Proposed Development
- **Section 6:** Statements of Consistency with National and Regional Planning Policy
- **Section 7:** Statement of Consistency with Local Planning Policy
- **Section 8:** Environmental Considerations
- **Section 9:** Conclusion.

1.5 Project Team and Consultants

Table 1-1: Project Team and Consultants

Consultant Name	Acronym	Main Disciplines
Tetra Tech (formerly RPS)	Tetra Tech	Planning, Ecology and Environment
Reddy Architecture + Urbanism	RAU	Urban Design and Architecture
Murphy + Sheanon Horticulture and Landscape Architects	M+S	Landscape Architecture
Charles McCorkell Arboricultural Consultancy	CMAC	Arboriculture
Donnachadh O'Brien & Associates	DOBA	Civil, Structural and Traffic
SYSTRA Ireland	Systra	Traffic and Transportation
Traffico – Traffic & Transportation Engineers	Traffico	Road Safety
SABRE Electrical Services Ltd.	Sabre	Lighting

Consultant Name	Acronym	Main Disciplines
JAK Engineering Consultants	JAK	Utilities
3D Design Bureau	3DDB	Sunlight, Daylight, and Shadow; and, Visualisation
ACSU	ACSU	Cultural Heritage
Aramark	Aramark	Property Management, and Buildings' Life-cycle
AWN Consulting Ltd	AWN	Construction, Waste Management, and Acoustics.

2 Subject Site: Location & Description

2.1 Site Location

The site is predominantly greenfield and is located immediately west of Naas Racecourse, c. 700 m northeast of Naas town centre and c. 1.5 km northeast of Naas General Hospital (all distances are approximate, measured as the crow flies). See **Figure 1-1** in **Section 1** of this Report.

The subject site extends to c. 8.7 hectares and comprises the land required to accommodate the proposed residential development, together with the areas necessary for supporting infrastructure and works, including the Gallops Avenue extension, the childcare facility and associated drainage works and connections

Residential estates bound the site to the north (Kings Court estate), west (Kingsfurze Avenue estate), and south (the Woodlands estate).

A public green area lies to the south-west, known as The Dip, adjacent to the Woodlands residential estate. A small playground is also located in an existing public green area to the west, adjoining Kingsfurze Avenue.

Existing on-site physical features include a shed-type building with ancillary external structures, boundary fencing and internal private roads and pathways. The natural features of the site include grassland, hedgerow boundaries and trees, with further detail provided within the Ecological Impact Assessment Report prepared by Tetra Tech and enclosed with the planning application materials.

2.2 Accessibility and Connections

2.2.1 Pedestrian Access

At present, the site has no formal pedestrian access. Adjoining existing pedestrian infrastructure is illustrated in **Figure 2-1**.

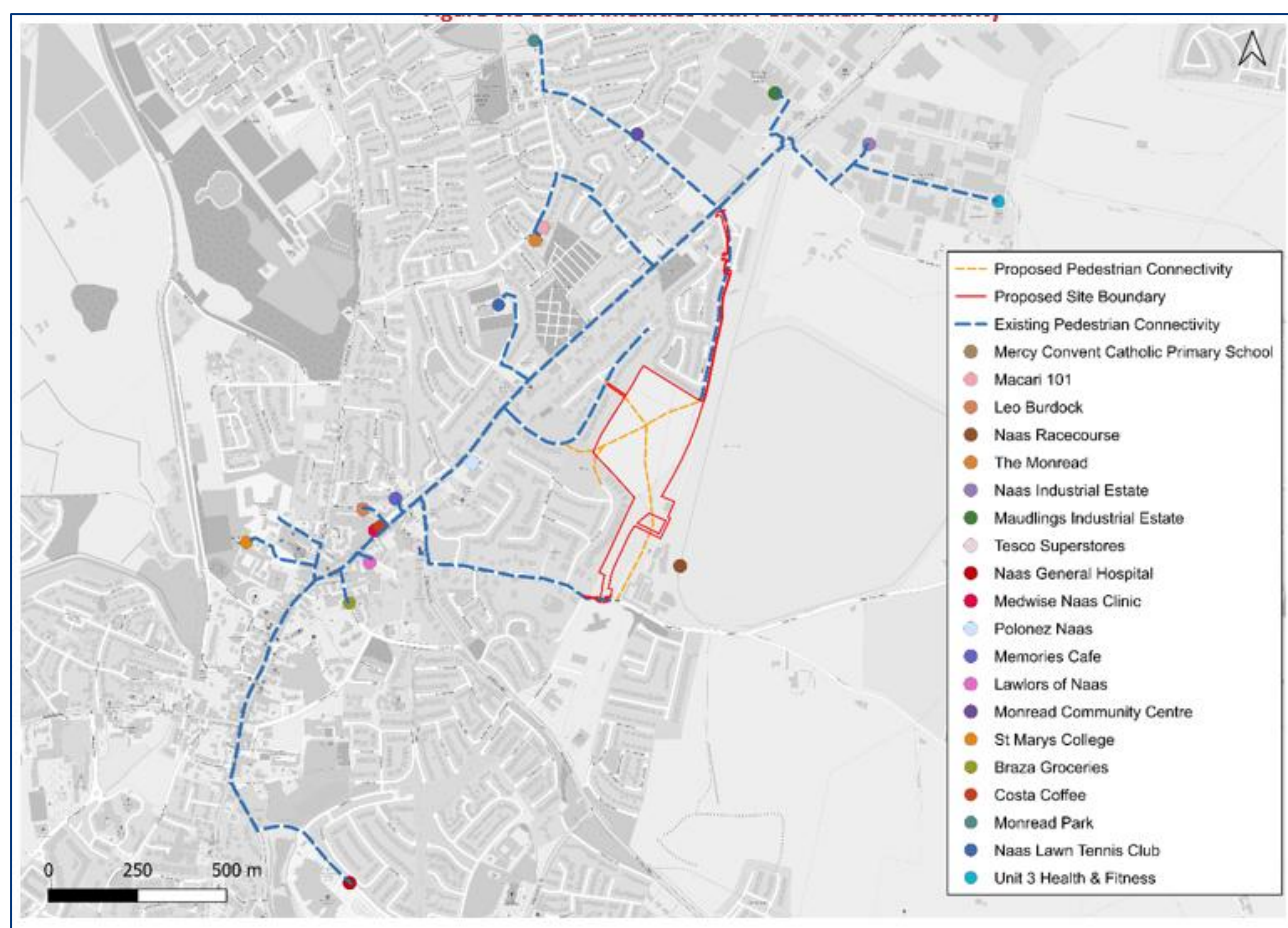


Figure 2-1: Subject Site & Pedestrian Connectivity (Indicative outline in Red)

Source: Systra (Traffic & Transport Assessment Report)

2.2.2 Vehicular & Cycle Access

The subject site includes a section of the existing Gallops Avenue, which is open to public vehicular access and Taken in Charge by KCC. However, this access terminates at the residential element of the proposed development and is currently accessed via a private gated road off the end of Gallops Avenue and through an existing gateway on Tipper Road to the south.

As further detailed in **Section 5** of this Report, the proposed development includes a range of transport and connectivity infrastructure which will open up the lands allowing for vehicular, cyclist and pedestrian mobility, including inter alia, extending the Gallops Avenue to connect with Tipper Road, upgrades to the existing Gallops Avenue section, or the provision of a link to Kingsfurze Avenue. Detailed access arrangements are set out in the Architectural Design Statement prepared by RAU, along with associated architectural drawings, and the Infrastructure Design Report prepared by DOBA, along with associated engineering drawings.

2.2.3 Public Transport

Naas is served by intercity and commuter rail (Sallins & Naas station) and a number of inter-urban and local bus services. Full details of public transport accessibility, routes, and frequencies are provided in the Traffic & Transport Assessment Report prepared by Systra and submitted with the planning application materials.

2.3 Facilities & Services

The site is located within the catchment area of a range of town-centre functions typical of a town of this nature and scale. A Social and Community Infrastructure Audit (SCIA) is included in the documentation submitted with the application and provides details of local services accessible to the site.

2.4 Utilities

The proposed development will connect to the existing water, drainage, power and communication utility provision serving Naas. Utility capacity and connections are addressed in the engineering and utilities reports submitted with the application (see List of Enclosures appended to the Cover Letter).

3 Planning History Review

A desktop review of the KCC and An Coimisiún Pleanála (ACP) online planning databases was undertaken in **April 2026** to identify relevant planning history for the subject site and surrounding lands over the preceding ten years. Tetra Tech also reviewed recent planning activity on adjacent properties. The key findings are summarised below.

It is also noted that the Applicant is aware of pre-planning meetings held between Naas Racecourse and KCC in relation to a proposed redevelopment of the racecourse entrance turnstiles. In this, it is noted that full coordination of the proposed Naas Racecourse's design and this proposed development has been carried out, specifically regarding the proposed vehicle access from the racecourse's car park to the proposed Gallops Avenue extension, and the road alignment to provide access to the proposed childcare facility, as part of this planning application.

3.1 Subject Site

- **KCC Ref. 16/217** (partially within the subject site) and Extension of Duration **KCC Ref. 21/481**

On 8 March 2016, Naas Racecourse PLC was granted permission for a package of works, including demolition of existing structures; construction of a two-storey pavilion/bar and restaurant with a viewing terrace; change of use and renovation of offices and a childcare centre; installation of solar panels; landscaping improvements; and associated site works. Permission was granted on 10 August 2016.

An application to extend the duration of this permission was submitted on 12 April 2021 and granted on 1 June 2021; the permission is now due to expire on 8 August 2026.

The red line under KCC Ref. 16/217 overlaps part of the lands included in the current LRD planning application (see **Figure 3-1**). No works are proposed by the current application within the extent of the permitted development under Ref. 16/217; accordingly, the permitted development is not expected to prevent or materially impede the development.

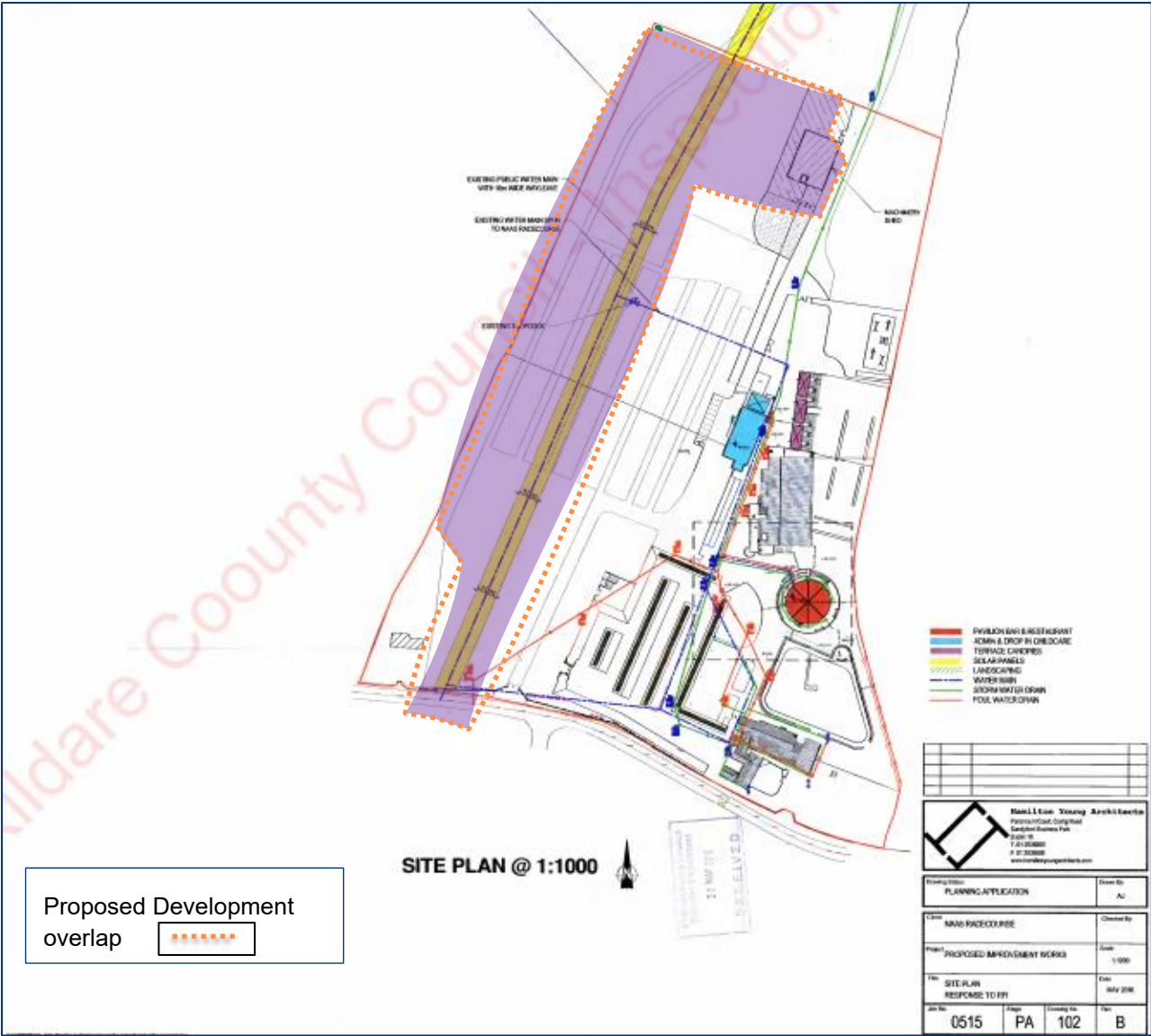


Figure 3-1: Site Layout Plan KCC Ref. 16/217

Source: KCC

On 1 July 2021, KCC issued a decision to extend the appropriate period of the planning permission granted under KCC Ref. 16/217 by an additional 5 years. The permission will expire on 8 August 2026.

• **KCC Ref. 19/528** (partially within the subject site)

On 14 August 2019, Naas Racecourse PLC was granted permission for the extension of the gable end of a single-storey canteen structure by 3.3m for use as a canteen, the addition of a second-floor balcony to the gable end of the existing grandstand, and associated site works.

The red line under KCC Ref. 19/528 overlaps part of the lands included in the current LRD application (see **Figure 3.2**); however, the works proposed under KCC Ref. 19/528 do not conflict with, or materially affect, the implementation of the proposed development, and vice versa

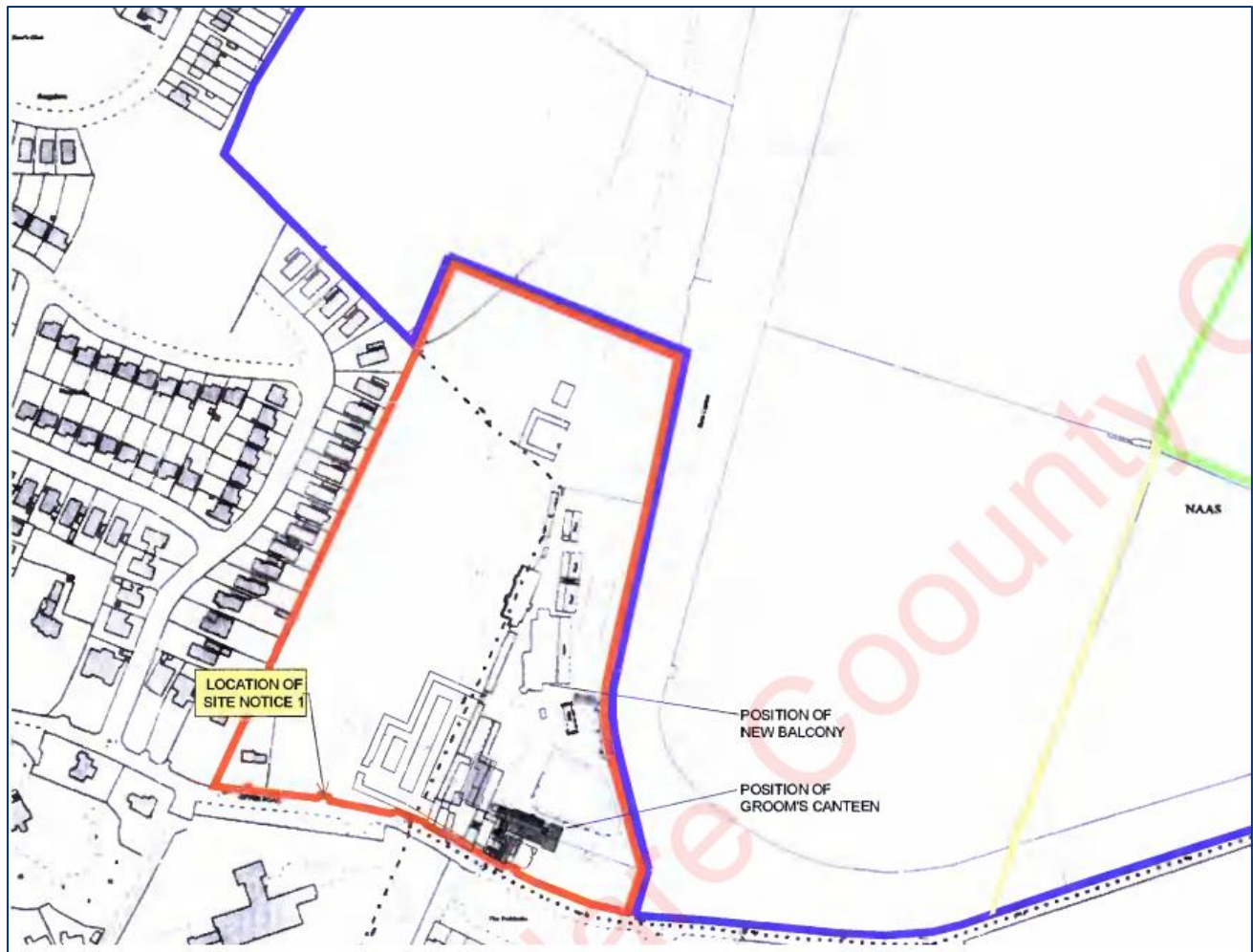


Figure 3-2: Site Location Map KCC Ref. 19/528

Source: KCC

3.2 Surrounding Lands

Planning activity on lands adjacent to, but outside, the subject site boundary, predominantly comprises of small-scale residential alterations and modest new housing schemes, together with some infrastructure-related applications. This pattern of activity is consistent with the suburban character of the locality. Representative recent examples include:

- **KCC Ref. 20/593:** Permission granted on 7 September 2020 for a single-storey kitchen/utility room extension to the side of a house, including ancillary ground works.
- **KCC Ref. 20/1414:** Permission granted on 12 May 2021 for retention of a change of use from a domestic extension to a family apartment, including retention of three roof lights and replacement of brick finish with smooth render on the northwest elevation.
- **KCC Ref. 21/575:** Permission granted on 3 March 2022 for the construction of 24 dwellings comprising a mix of three, four, and five-bedroom houses, with associated site works.
- **KCC Ref. 23/60218:** Permission granted on 31 October 2024 for conversion of the attic of an existing two-storey house into a habitable bedroom and ensuite, including a new dormer window and Velux roof light.
- **KCC Ref. 24/60600:** Permission granted on 29 September 2024 for retention of an ancillary accommodation unit for use as a home office/garden room.

- **KCC Ref. 23/749:** Permission granted on 8 November 2024 for a residential development including 49 no. houses and ancillary supporting infrastructure.
- **KCC Ref. 24/61273:** Permission granted 6 May 2025 for the construction of a childcare facility and ancillary supporting facilities to replace a permitted housing unit under KCC Ref. 23/750.
- **KCC Ref. 24/395:** Permission granted on 9 April 2025 for retention of a single-storey conservatory and planning permission for a single-storey extension to the side of a property.
- **KCC Ref. 25/60763:** Permission granted 7 October 2025 for the construction of a single electrical substation, including associated infrastructure.

4 Summary of Pre-Planning Engagement

This section summarises the pre-planning engagement undertaken by the Applicant with KCC in accordance with the LRD process.

For clarity, the LRD process comprises:

- **Stage 1** — Pre-planning consultation with the local authority under section 247 of the Planning Act;
- **Stage 2** — Formal consultation request with the local authority under section 32B of the Planning Act;
- **Stage 3** — Local Authority Opinion pursuant to section 32D of the Planning Act; and
- **Stage 4** — Submission of the planning application.

4.1 Stage 1 — Section 247 Pre-planning Consultations

Two section 247 pre-planning consultations (ref. PP6071) were held with KCC via Teams on 17 April 2025 and 15 July 2025. Copies of the consultation records issued by KCC are appended to this Report (**Appendix A**).

In addition to the formal meetings mentioned above, separate technical engagements took place between project team members and relevant KCC officers to discuss project-specific details. Details are provided within the relevant project team's reports.

Having regard to the feedback received during the pre-planning engagement at the LRD Stage 1, the Applicant and the project team reviewed the points raised, revised the design where appropriate, and prepared additional technical information which formed part of the LRD Stage 2 submission.

The key matters discussed and feedback provided by KCC during the LRD Stage 1 consultations are summarised below, including commentary on the Applicant's actions on the design.

- **Principle of development:** KCC confirmed the proposed residential development is acceptable in principle, having regard to the Naas LAP zoning. The documentation submitted with the final planning application package demonstrates regard for, and alignment with, relevant policies and objectives of the KCDP and the Naas LAP. (See **Section 6** of this Report).
- **Site layout and urban design:** KCC requested a demonstration of how the site layout responds to context, adjoining development, desire lines and linkages and that urban design principles have been applied. The Applicant submitted a site appraisal following the first meeting, which explained how the site's context and physical characteristics informed the layout. This appraisal and subsequent layout iterations were generally welcomed. Detailed design points were incorporated into the final layout and are explained in the Architectural Design Statement (RAU) and the supporting architectural drawings submitted with the final planning application package.
- **Childcare facility:** KCC advised that a childcare facility should form part of the LRD proposal. In response, a childcare facility is included in the scheme; architectural details are provided in the RAU documentation enclosed with the final planning application package.
- **Extension and improvement of Gallops Avenue / active travel:** KCC welcomed delivery of the Gallops Avenue objective but requested detailed design information on street layout, frontage treatment, crossings, linkages and compliance with relevant KCDP and Naas LAP policies. Following the initial pre-planning meeting, the design team prepared updated street design proposals showing the interaction between the new street, the housing and the childcare facility; these proposals were welcomed. Details of the proposal for the extension and

improvements are provided in the documentation prepared by RAU, M+S, Systra and DOBA, which is enclosed with the final planning application package.

- **Traffic, road safety and construction management:** KCC requested that the final planning application package include a detailed Traffic & Transport Assessment, a Stage 1 Road Safety Audit, an Acoustic Design Statement and a Construction Management Plan.

The above-mentioned reports have been prepared and are included in the final planning application package.

- **Stormwater drainage and SuDS:** KCC referred the Applicant to local SuDS guidance and requested a SuDS maintenance plan, a site-specific flood risk assessment and a CCTV survey of existing surface water infrastructure.

The requested information has been included in the final planning application package.

- **Landscape, open space and biodiversity:** The KCC Parks & Landscaping Section set out requirements for linkages with adjoining open spaces, desire lines, boundary treatments, tree and hedgerow protection, hard and soft landscaping, street tree provision, bioretention, natural play and integration of SuDS into landscape proposals. Before the LRD Stage 2, the design team refined the landscape proposals in response, which were further refined following the LRD Opinion (LRD Stage 3). For details, please see the *Landscape Design Report* and associated drawings (M+S), as well as the Ecological Impact Assessment Report and *Hedgerow and Biodiversity Management Plan* prepared by Tetra Tech and enclosed with the final planning application package.
- **Water supply and wastewater (Uisce Éireann):** KCC noted that a Confirmation of Feasibility (CoF) is required. A CoF was issued in August 2024 following pre-connection engagement, and an updated CoF is included in DOBA's Infrastructure Design Report as part of the final planning application package.

4.2 Stage 2 — Formal LRD Request and Stage 3 — LRD Opinion

Following the LRD Stage 1 consultations and further advancement on the scheme design, the Applicant submitted a formal LRD meeting request under section 32B to KCC on 11 September 2025 (Stage 2). The required LRD documentation, alongside supporting updated documentation, accompanied this

A meeting facilitated by KCC was held on 2 October 2025 to review the latest iteration of the proposals. On 30 October 2025, KCC issued a formal LRD Opinion pursuant to section 32D; a copy of the LRD Opinion (ref. LRD2025006) is appended to this Report (see **Appendix A** of this Report).

The LRD Opinion sets out KCC's assessment of whether the documentation then submitted constituted a reasonable basis for lodging an LRD application and identifies matters requiring further information or clarification, or the preparation of additional reports.

In summary, the LRD Opinion concluded that, as submitted, the materials did not yet constitute a reasonable basis for an application and specified four principal areas of concern. However, the LRD Opinion also confirmed that if the identified issues in the LRD Opinion document are addressed, the documentation could provide a reasonable basis for an application pursuant to section 32D(2)(b) of the Planning Act.

4.3 Stage 4 – Planning Application Submission

In response to the matters set out in the LRD Opinion, the Applicant and the project team further refined the design and prepared additional materials (i.e., technical reports, drawings and statements) to address the issues raised by KCC in the LRD Opinion. In this regard, we kindly refer KCC to the suite of materials enclosed with the planning application. The application is supported by a Statement of Response to the LRD Opinion prepared by Tetra Tech, which identifies how each

matter and issue in the LRD Opinion has been addressed and cross-references the relevant materials within the application documentation where details are provided. In this regard, it is essential to emphasise that the planning application package includes the updated design materials, such as architectural, landscape, or engineering design reports and drawings, as well as additional reports, statements, and details, as requested under the LRD Opinion. For details, see the List of Enclosures attached to the Cover Letter accompanying this final planning application package.

On the basis of the above and the information and documentation submitted to KCC as part of this planning application, the Applicant considers that the revised and additional information provides an appropriate and reasoned basis for the submission of an LRD planning application (LRD Stage 4) for the proposed development.

5 Description of the Proposed Development

The proposed development has been informed by a comprehensive, iterative and site-responsive design process, underpinned by baseline studies, site analysis and technical assessments. See the Architectural Design Statement prepared by RAU.

From the outset, the Applicant and design team have sought to respond positively to the site's strategic location on lands between Naas Racecourse and Naas Town Centre, its relationship with surrounding residential communities, the existing landscape structure, including hedgerows, topography and levels, and the opportunity to significantly improve accessibility and connectivity in this part of Naas.

The layout and design of the scheme have been shaped by a robust evidence base, including ecological, arboricultural, hedgerow, drainage, transport and access assessments, together with an appraisal of movement patterns, the surrounding urban structure and opportunities for future permeability. This has ensured that the scheme responds positively to the site's physical and environmental characteristics while harnessing its natural assets to create a high-quality residential environment with a strong sense of place.

The scheme also reflects a policy-led approach, having due regard to the relevant provisions of the national, regional and local planning policy framework, as demonstrated in **Sections 6 and 7** of this Report. It has been carefully developed to support compact growth, the efficient use of serviced and zoned lands, sustainable mobility, high-quality placemaking and the delivery of a consolidated urban structure.

Importantly, the design has evolved through constructive engagement with KCC during the LRD process. Full regard has been had to feedback received during pre-application engagement and to the matters raised in the LRD Opinion, which have informed the refinement of the scheme and, where relevant, have been addressed through the design evolution and in the accompanying Statement of Response to the LRD Opinion prepared by Tetra Tech.

As a result, the development delivers a coherent and legible urban structure that responds sensitively to the site's context while creating a distinctive new residential neighbourhood. The layout has been designed to integrate existing hedgerows and landscape features where feasible, strengthen green infrastructure, and provide a network of high-quality public, communal and private open spaces that are well related to homes and movement routes.

The development promotes walkability and cycle permeability through an interconnected network of streets, green links and pedestrian and cycle routes, including the delivery of Gallops Avenue extension and linkages to adjoining lands. The built form has been carefully considered to create an attractive and varied urban grain. Block forms and orientations have been refined through the design process, with longer building runs broken down into smaller elements and footprints adjusted to avoid visual monotony. Building heights, massing, and frontage treatments have been designed to provide appropriate enclosure, rhythm and human scale, while positively addressing corners, streets and key nodes. This approach will support passive surveillance, foster a strong sense of place and create a safe and attractive living environment.

The development will deliver 234 new homes, together with a high-quality childcare facility, significant public open space provision and critical supporting infrastructure. In addition to addressing housing needs in a sustainable location, the scheme will deliver wider strategic benefits through enhanced connectivity, improved pedestrian and cyclist access, and the opening up of these lands for the benefit of existing and future communities.

Overall, the proposed development represents a sustainable and well-considered residential scheme that makes efficient use of strategically located lands in accordance with the relevant planning policy framework. It will make a positive contribution to the planned growth of Naas through the delivery of high-quality homes, supporting infrastructure, enhanced connectivity and a distinctive, landscape-led urban environment.

5.1 Development Description

A detailed description of the proposed development is provided in the statutory notices, to be read in conjunction with the suite of documentation enclosed with the planning application, particularly the Architectural Design Statement prepared by RAU, the Landscape Design Report prepared by M+S, and the Infrastructure Design Report prepared by DOBA.

The proposed development consists of:

- a) The construction of a residential development comprising 234 no. residential units, including:
 - i) 115 no. 2 and 2.5-storey houses (48 no. 3-bed, 65 no. 4-bed and 2 no. 5-bed units);
 - ii) 21 no. apartments (19 no. 1-bed and 2 no. 2-bed units) within a 3-storey apartment block (maximum height c. 12.4m);
 - iii) 80 no. own-door apartments (36 no. 2-bed and 44 no. 3-bed units) distributed across 40 no. 3-storey duplex-type buildings (comprising 1 no. ground floor and 1 no. upper floor unit); and
 - iv) 18 no. own-door apartments (all 1-bed units) within 6 no. 3-storey triplex-type buildings (comprising 1 no. ground floor and 2 no. upper floor units);
- b) The provision of open spaces to serve the proposed residential units, including public open space, communal open spaces and private open spaces in the form of rear gardens, balconies and/or terraces, together with associated landscaping, tree planting and play areas;
- c) The provision of ancillary car and bicycle parking for residential units and visitors;
- d) The provision of a childcare facility c. 470.8sqm (1-storey, height c. 5.8m) with associated outdoor play area, car and cycle parking, and set-down area;
- e) The provision of transport and connectivity infrastructure, including:
 - i) the construction of an extension to Gallops Avenue (c. 626m) connecting the existing Gallops Avenue to Tipper Road, including carriageway, footpaths, cycle track, pedestrian crossings, associated junctions, and an access road serving the proposed childcare facility;
 - ii) the provision for 3 no. potential future vehicular access connections from the proposed Gallops Avenue extension to adjoining lands;
 - iii) upgrades to the existing section of Gallops Avenue, including cycle infrastructure, junction improvements, boundary treatments and relocation of existing fencing;
 - iv) junction improvements and traffic management measures at Dublin Road and Tipper Road;
 - v) the provision of 1 no. new pedestrian connection at the south-western boundary of the site linking to Kingsfurze Avenue;
 - vi) the provision for a potential future pedestrian connection along the western boundary to connect to Kingsfurze Avenue;
- f) The provision of boundary treatments, internal roads and footpaths, public lighting, drainage infrastructure, utilities and services (including the undergrounding of existing overhead lines and the provision of 2 no. ESB substation kiosks), refuse storage for all residential units and the childcare facility, and all ancillary works; and
- g) All associated site development and infrastructural works to facilitate the development, including site clearance, demolition of an existing structure (c. 488.5sqm) and removal of existing gates and sections of railings and boundary walls.

The following sections provide a summarised description of the main components and works proposed as part of the development. KCC is kindly referred to the suite of reports, schedules, and drawings for detailed information submitted with this application for permission for development.

5.2 Site Layout

The Architectural Design Statement describes the design approach and rationale for the proposed layout as illustrated in the overall site layout plan presented in Drawing No. NRC-02-SW-XXX-DR-RAU-AR-1006 prepared by RAU.

Given the extent of the site, Drawing Nos. NRC-02-SW-XXX-DR-RAU-AR-1007 to 1009, also prepared by RAU and enclosed with the planning application, provide detailed site layout plans at 1:500 (appropriate scale).

In summary, the layout adopts a considered, site-responsive approach that creates a strong sense of place and a high-quality neighbourhood, integrating principles of urban design to maximise connectivity, orientation, and residential amenity.

The childcare facility and terrace of triplex and duplex-type buildings are strategically located to mark a gateway into the site, serving as focal points that enhance legibility and the arrival experience. Similarly, a proposed open space and an arrival plaza serve as a gateway on the northern part of the site. Residential units are arranged along the extended Gallops Avenue to create a strong and active street frontage. This layout supports clear wayfinding and orientation, with materials and finishes chosen to add visual interest and reinforce the character of the new street.

The proposed houses and own-door apartment units (i.e., duplexes and triplexes) provide a variety of dwelling types and sizes, with generous private open spaces and dual-aspect focused designs to maximise natural light and ventilation.

The layout promotes a permeable street network with clear desire lines, facilitating pedestrian and cyclist movement throughout the site and within the network of proposed open spaces, linking to existing external routes and open spaces in the area.

Open spaces are thoughtfully distributed throughout the site, including public open spaces, communal areas, and private open spaces for houses and apartments. These spaces provide opportunities for formal and informal play, passive recreation, and community interaction, all designed with safety, accessibility, and amenity in mind. The layout also integrates natural and ecological features, including on-site hedgerows.

Separation distances between buildings have been carefully considered to ensure privacy and residential amenity. Spatial separation between buildings adheres to best practice guidance, including the Compact Settlement Guidelines and the New Apartments Guidelines, and ensures the proposed residential units enjoy adequate levels of daylight and sunlight. Please refer to the documents titled Verified Views, CGIs, Aerials, and the Sunlight and Daylight Assessment Report, all prepared by 3DDB.

Shared-surface environments (also known as homezones) and traffic-calming measures are incorporated to encourage low vehicle speeds and promote social interaction, adopting the principles set out in guidance on street and road design in urban areas.

Overall, the layout strikes a balance between density and quality of life, offering a diverse housing mix within an attractive and well-connected environment that responds sensitively to the local context.

5.3 Housing Unit Mix

The proposed housing mix has been informed by the Housing Need and Demand Assessment (HNDA) accompanying the KCDP, with particular regard to Naas Municipal District's role as a key growth area within the County. The HNDA identifies continued demand for family-sized housing in suburban locations such as Naas, alongside an increasing need for smaller units due to declining household sizes, changing household composition, and an ageing population.

In total, 234 no. residential units are proposed to be distributed as follows:

- **Houses** (115 no. units; 49% of the total)
- **Apartments** (119 no. units; 51% of the total), comprising:
 - 21 no. apartments within an apartment block
 - 80 no. own-door apartments distributed across 40 no. duplex-type buildings (i.e., 1 no. unit at ground floor + 1 no. unit at upper floor)
 - 18 no. own door apartments across 6 no. triplex-type buildings (i.e., 1 no. unit at ground floor + 1 no. unit at first floor + 1 no. unit at second floor)

Tables 5-1 and 5-2 below detail the types and sizes of units. The information presented has been extracted from RAU's Development Schedules and Housing Quality Assessment enclosed with the submission materials.

Table 5-1: Housing Mix (by Unit Type and Size)

Unit Type	1-Bed (2P)	2-Bed (4P)	3-Bed (5P)	3-Bed	4-Bed	5-Bed	Total	%
Houses	–	–	–	48	65	2	115	49%
Own-door Apartments (Duplex-type buildings)	–	36	44	–	–	–	80	34%
Own-door Apartments (Triplex-type buildings)	18	–	–	–	–	–	18	8%
Apartment Block	19	2	–	–	–	–	21	9%
Total	37	38	44	48	65	2	234	100%
%	16%	16%	19%	20%	28%	1%	100%	

Source: Based on contents presented in RAU enclosures (i.e., Development Schedules and Housing Quality Assessment)

Table 5-2: Housing Typology Schedule

Form	Type	Bedrooms	Storey	Total Quantity of Units
House	HT-01	5-bed	3 storey	2
House	HT-02	4-bed	2.5 storey	20
House	HT-03	4-bed	2 storey	29
House	HT-04	3-bed	2 storey	37
House	HT-08	4-bed	2 storey	16
House	HT-09	3-bed	2 storey	2
House	HT-11	3-bed	2 storey	9
Duplex (Own-door apartments)	HT-05	2-bed ground-floor unit 3-bed upper-floor unit	3 storey	48
Duplex (Own-door apartments)	HT-06	2-bed ground-floor unit 3-bed upper-floor unit	3 storey	12
Duplex (Own-door apartments)	HT-07	3-bed ground-floor unit 3-bed upper-floor unit	3 storey	8

Form	Type	Bedrooms	Storey	Total Quantity of Units
Duplex (Own-door apartments)	HT-13	2-bed ground-floor unit 3-bed upper-floor unit	3 storey	12
Triplex (Own-door apartments)	HT-10	1-bed ground-floor unit 1-bed upper-floor unit 1-bed upper-floor unit	3 storey	9
Triplex (Own-door apartments)	HT-12	1-bed ground-floor unit 1-bed upper-floor unit 1-bed upper-floor unit	3 storey	9
Apartment Block	APT-01	1–2 bed mix	3 storey	21

Source: Based on contents presented in RAU enclosures (i.e., Development Schedules and Housing Quality Assessment)

For further details regarding the proposed residential units, including descriptions of internal areas, layouts, and sizes, please refer to the Architectural Design Statement, Housing Quality Assessment, Development Schedules and full-scale house-type drawings prepared by RAU, which accompany the submission materials.

Having regard for the above, it is noted that the proposed development delivers a broad and balanced mix of housing types, providing both traditional family housing and more compact units. The near-even split between houses and apartments introduces greater typological diversity in an area historically characterised by lower-density housing, while also aligning with national and local policy objectives that promote compact growth and efficient use of serviced land.

The inclusion of own-door apartment units within duplex and triplex-type buildings provides an intermediate housing typology between standard houses and apartments within the apartment block (block 1), increasing choice and supporting a varied urban form across the site. A Statement of Housing Mix is provided in **Appendix B** of this Report.

5.4 Childcare Facility

The proposed development includes the construction of a childcare facility (c. 470.8 sqm) with a capacity for 97 no. children, with a dedicated external play area (c. 229 sqm).

The childcare facility will be supported by parking provision as follows:

- 5 no. car parking spaces for staff;
- 3 no. drop-off parking spaces for visitors;
- 1 no. dedicated universal access parking bay;
- 10 no. cycle parking spaces for staff in an internal secure store within the childcare facility;
- 12 no. external cycle parking spaces (i.e., 6 no. sheffield stands) and
- 2 no. cargo bicycle parking spaces in proximity to the facility.

For details on the proposed childcare facility and its associated facilities and services, please refer to the Architectural Design Statement and accompanying architectural drawings prepared by RAU, which illustrate the building's floor plans and elevations.

Furthermore, the Landscape Design Report and accompanying landscape drawings prepared by M+S provide details of the proposed landscaping, boundary treatments, and play areas adjacent to the childcare facility.

5.5 Heights

The proposed development incorporates a variety of building heights designed to respond appropriately to the site context and accommodate the different residential unit types and supporting facilities. Details of proposed building heights across the residential units are illustrated in **Table 5-2** above.

The childcare facility is a single-storey building featuring a pitched roof, designed to complement the scale and character of the surrounding development.

The Architectural Design Statement prepared by RAU also provides details of the height rationale from an urban design perspective. Detailed plans and elevations for each unit type are provided in a suite of architectural drawings prepared by RAU, along with site elevations and cross-sections, which accompany the planning application materials.

Moreover, the documents titled Verified Views, CGIs, Aerials, and Sunlight and Daylight Assessment Report, both prepared by 3DDB, demonstrate that the proposed development, including the proposed heights, will integrate with the receiving environment and provide an adequate level of amenity for future residents.

5.6 Density

The proposed development will provide a net density of 37.7 residential units per hectare.

For further information on density and calculations, please refer to the Architectural Design Statement, the Development Schedules, and the Housing Quality Assessment prepared by RAU, which accompany the planning application materials.

5.7 Site Coverage and Plot Ratio

The development proposes a site coverage of 0.23 and a plot ratio of 0.44 within the application boundary.

Please refer to the Architectural Design Statement and the Development Schedules prepared by RAU, which accompany the planning application materials, for further details on the proposed site coverage and plot ratio, including calculations.

5.8 Landscape, Open Space and Play Areas

The landscape strategy, along with the provision of open space and play areas within the development, is detailed in the accompanying Landscape Design Report and associated landscape drawings prepared by M+S, to be read in conjunction with the Architectural Design Statement prepared by RAU. These documents provide comprehensive information relevant to the landscape and open spaces strategies proposed within the development.

An extract of the overall landscape plan, as presented in the Landscape Design Report by M+S, is shown below. The landscape package prepared by M+S also includes a suite of landscape plans at an appropriate scale, showing key details of the proposed landscape strategy, such as planting, details of key areas, play equipment, exercise equipment, etc.

The landscape design for this project builds on the site's existing character, integrating retained hedgerows, generous open spaces, and a multifunctional network of green infrastructure. The proposal creates an attractive, accessible, and sustainable public realm that encourages play, active travel, and community interaction while supporting biodiversity and the site's SuDS strategy.

5.8.1 Private Open Space

All 234 no. residential units, including houses and apartment units (both within the apartment block and own-door access apartments) are provided with private open space, e.g., in the form of balconies, terraces, and/or rear gardens.

For details of quantitative provision for each unit, please refer to the Housing Quality Assessment prepared by RAU, as well as detailed floor plans for each of the units, also prepared by RAU and enclosed with the application materials. The Landscape Design Report and associated landscape drawings prepared by M+S provide details of the different boundary treatment proposals for the private open spaces.

5.8.2 Communal Open Space

The proposed development includes c. 485 sqm of communal open space, distributed in two separate spaces. The locations of the proposed communal open spaces are shown in the site layout plans under Drawing Nos. NRC-02-SW-XXX-DR-AR-RAU-1007, 1008 and 1009 prepared by RAU.

Details of the landscape proposals for these spaces are provided in the Landscape Design Report and the associated suite of landscape drawings prepared by M+S.

5.8.3 Public Open Space & Play Areas

The development includes c. 10,007 sqm (c. 16% of the net site area, c. 6.2 ha) of public open space distributed across the site. These public open spaces are designed to support a variety of uses, including formal and informal play, passive recreation, and community interaction.

Each landscape character area offers a range of play opportunities and recreational spaces, carefully positioned for safety, accessibility, and passive surveillance.

Key landscape-character open spaces include a Linear Park, Hedgerow Walk and Arrival Park (i.e., a large open space with a welcome plaza). These are described in detail in the Landscape Design Report and the associated landscape drawings prepared by M+S. **Figure 5-1** shows the location of these landscape areas within the proposed development.



Figure 5-1: Key Open Space Areas

Source: M+S (Landscape Design Report)

As shown in the figure above, the landscape proposal also includes retaining mature hedgerows. The existing hedgerow running across the site west to east is retained and incorporated into the public open space as a defining feature that provides ecological value, seasonal interest, and a natural framework for paths and play areas. It will be supplemented with appropriate planting to enhance biodiversity and visual amenity while preserving the site's character.

The three main open spaces (the Linear Park, the Hedgerow Walk, and the Arrival Park) will all offer opportunities for formal and informal play, enjoying appropriate levels of passive surveillance. This will include, inter alia:

- Two large public kickabout spaces are proposed within the Linear Park. Two kickabout spaces (c. 315 sqm with half basketball court, and 255 sqm) are located in the Linear Park, and a large informal lawn (c. 889 sqm) supports informal recreation and community use at the Arrival Park. These open lawn areas support intergenerational play, informal sports, and social interaction.
- The Linear Park and the Arrival Park also include several areas for informal play as well as fitness equipment.
- Natural play features, such as basins, embankment slides, natural logs, and climbing boulders, are incorporated into the Linear Park to create varied and engaging play experiences that blend formal and natural topographical elements.

- Moreover, informal play and outdoor fitness equipment are proposed in the external open spaces adjacent to the childcare facility.

All play equipment is designed to be robust, durable, and low-maintenance, promoting both formal and spontaneous play. Safety measures include the use of appropriate surfacing, separation from roads, and effective passive surveillance.

Seating and age-friendly furniture will be distributed throughout the open spaces to encourage rest, social interaction, and inclusivity for users of all ages. Moreover, informal play and outdoor fitness equipment are proposed in the external open spaces adjacent to the childcare facility.

For further details on the open space provision and play areas, please refer to the Landscape Design Report and associated landscape drawings prepared by M+S, which accompany the planning application materials.

5.8.4 Tree Planting & Boundary Treatments

The landscape strategy incorporates extensive tree planting to enhance biodiversity, provide year-round interest, and contribute to the development's character. A diverse palette of planting is proposed to enhance biodiversity. As per the Landscape Design Report prepared by M+S, the planting strategy comprises:

- 20 tree species (17 native, 3 non-native), selected for longevity, adaptability, and ecological value.
- Semi-mature specimens and ornamental multi-stem trees to provide immediate impact and habitat diversity. Pollinator-friendly shrubs and perennials, aligned with the All-Ireland Pollinator Plan, to support bees, butterflies, and other wildlife.

Tree planting will be coordinated to avoid conflicts with services and lighting, with root barriers employed where necessary. Prohibited species such as Cherry Laurel, Leyland Cypress, and Ash are excluded in accordance with BS 8545:2014.

Existing hedgerows and trees will be retained and protected wherever feasible, in accordance with recognised standards and recommendations. Compensatory planting is incorporated elsewhere on site to maintain ecological value and achieve a net biodiversity gain.

Regarding boundary treatment strategy, this is discussed in detail in the Landscape Design Report. It aims to provide a balanced approach which delivers visual screening and a sense of enclosure. The planting and boundary treatment strategy will work to create a cohesive landscape framework that balances ecological function, resident amenity, and sustainable water management.

For further details on the tree-planting strategy and boundary treatments, please refer to the Landscape Design Report and the associated landscape drawings prepared by M+S, which accompany this planning application.

The planning application materials also include an Arboricultural Report (inc. method statement and tree impact assessment) supported by associated tree plans (survey, tree protection, tree removals) prepared by CMAC, as well as a Biodiversity and Hedgerow Management Plan prepared by Tetra Tech, which also provides details of proposed tree removals, hedgerow survey and proposed biodiversity and hedgerow management strategy.

5.8.5 Links to Adjacent Open Spaces

The proposed development is designed to integrate with existing communities and green infrastructure by providing clear, accessible connections to neighbouring open spaces. Thus, the proposed development includes:

- a new pedestrian/cyclist connection at the south-western boundary of the site, which will provide a connection between the site and Kingsfurze Avenue via the existing green amenity space known as The Dip; and
- provision for a future connection along the western boundary, where an existing playground is located.

These routes will be well-overlooked, ensuring safety and encouraging active travel, and enhancing recreational opportunities for residents, linking the new development seamlessly to the broader landscape and community amenities.

Details of the links are shown in the suite of drawings prepared by RAU and M+S, and further information is presented in the Architectural Design Statement and Landscape Design Report.

5.9 Access & Movement

5.9.1 Gallops Avenue Extension

The proposed development includes the construction of an extension to the existing Gallops Avenue, which currently runs from its junction with Dublin Road southwards to the boundary of the subject site. For details, please refer to the Infrastructure Design Report and Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 to 0503 prepared by DOBA.

The proposed extension of Gallops Avenue will continue this route further south to connect with Tipper Road, providing vehicular, cycling, and pedestrian mobility.

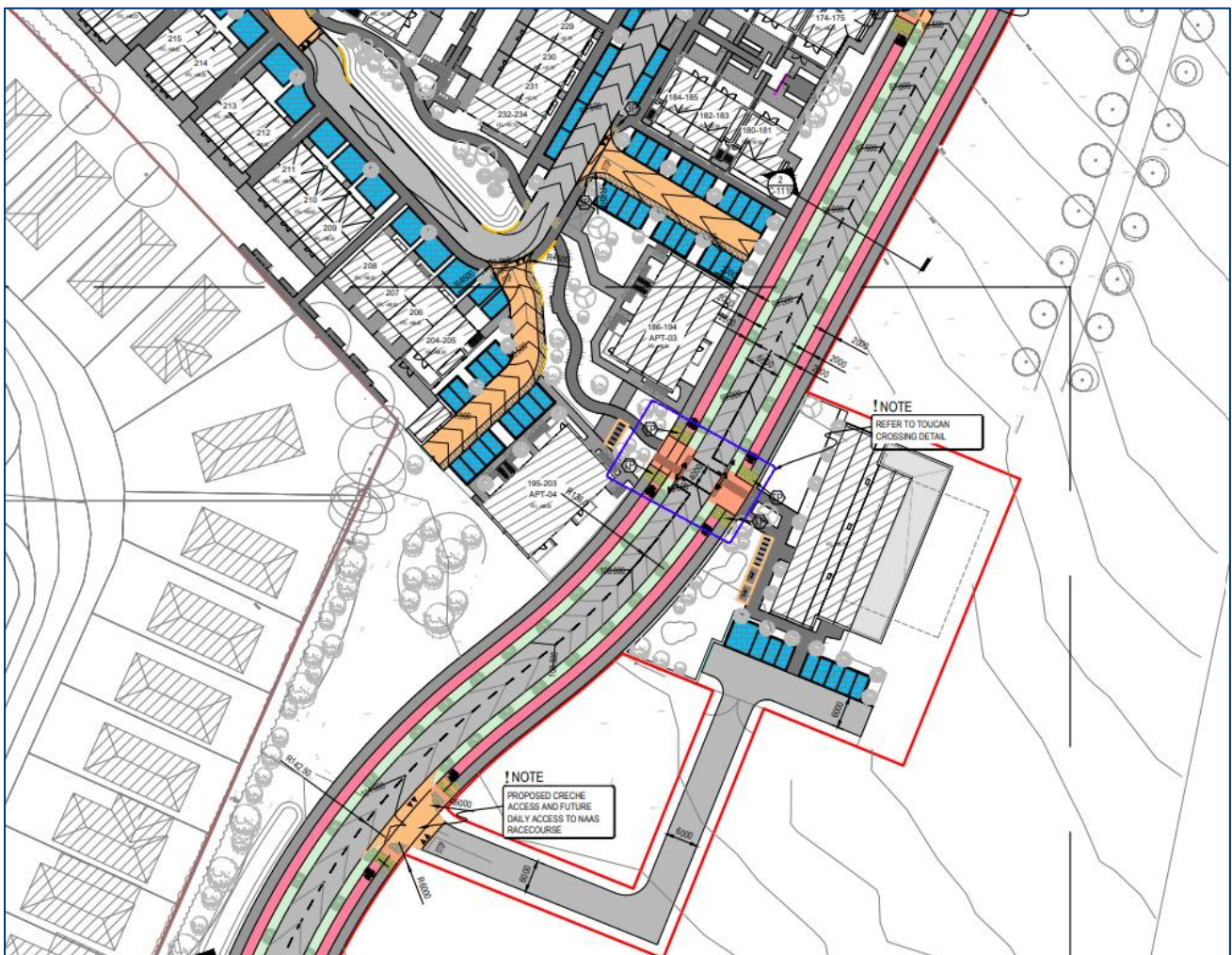


Figure 5-2: Detail of the Proposed Gallops Avenue Extension

Source: DOBA (full-scale drawing enclosed with the planning application)

This extension will feature dedicated footpaths, cycle tracks, and tree-lined verges. Approaching the junction with Tipper Road, the cycle tracks will transition to road-level cycle lanes.

Along the existing Gallops Avenue, the proposal includes two-way cycle tracks that connect with those in the new extension and link to Dublin Road. Pedestrian and cyclist crossings will be revised and/or improved at key junctions, including Tipper Road, Dublin Road, and The Gallops, to enhance safety and connectivity.

Along the proposed extension, 2 no. vehicular access points, as well as cyclist and pedestrian access, will connect to the residential element of the proposed development situated to the west of the newly extended avenue. Additionally, vehicular access to the proposed childcare facility will be facilitated by an off-road link connecting to the new avenue, alongside pedestrian access via a crossing near the facility's entrance (see **Figure 5-2**).

As part of the proposed extension to Gallops Avenue, the proposal includes the provision for three potential future access points (two to the Naas Racecourse lands and to adjoining lands southwest).

As noted previously, DOBA's Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 to 0503 includes full details of the proposed access, movement strategy and road hierarchy, which should be read in conjunction with the Infrastructure Design Report prepared by DOBA. Moreover, the proposal is supported by:

- Traffic & Transport Assessment Report prepared by Systra, which provides a comprehensive evaluation of the development's impact on the surrounding transport network and confirms that the proposed access arrangements, including improved cycle and pedestrian connectivity, will support sustainable travel and maintain road safety.
- Stage 1 Road Safety Audit (inc. Designer's Response) prepared by Traffico.
- Urban Design Report - DMURS Statement of Compliance prepared by DOBA, which confirms that the street network has been designed in accordance with the principles and guidance set out in DMURS.
- Inward Noise Impact Assessment prepared by AWN.

5.9.2 Internal Road Layout and Homezones

An internal road network will serve the residential element of the proposed development. This is designed in accordance with the Design Manual for Urban Roads and Streets (DMURS), employing a clear road hierarchy that prioritises the safety of all users, particularly vulnerable road users. For further details, please refer to the Urban Design Report - DMURS Statement of Compliance prepared by DOBA enclosed with the application materials. See **Figure 5-3** for details of the internal street and road hierarchy.



Figure 5-3: Internal Street & Road Hierarchy

Source: DOBA (full-scale drawing enclosed with the planning application)

Homezones—shared surface streets with raised tables and traffic calming features—are incorporated. These homezones will promote low vehicle speeds and encourage pedestrian activity and social interaction.

Footpaths are provided throughout, with seamless connections to existing external pedestrian routes, including along the northern boundary of the site.

As noted in **Section 5.8.5** of this Report, links to existing communities are also provided along the western boundary, connecting with Kingsfurze Avenue, thereby enhancing permeability and encouraging active travel.

For further details on the proposed internal network and homezones, please refer to the Infrastructure Design Report and associated drawings prepared by DOBA, i.e., Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 to 0503 and Drawing Nos. 2431-DOB-XX-SI-DR-C-0600 to 0603 prepared by DOBA.

5.9.3 Emergency and Refuse Access

The proposed internal road network is designed to accommodate emergency vehicle access throughout the development, with appropriate turning areas and clear routes to all residential units. Refuse collection points are strategically located to ensure efficient servicing without obstructing

traffic flow. All access arrangements will comply with relevant standards and guidelines to facilitate safe and effective emergency and waste management operations.

For further details on the proposed emergency and refuse access strategy, please refer to the Infrastructure Design Report and associated drawings, i.e., Drawing Nos. 2431-DOB-XX-SI-DR-C-0700 to 0702, 0710 to 0712 and 0720 to 0722 prepared by DOBA.

5.9.4 Lighting and Safety

Street lighting is provided along all primary and secondary roads, pedestrian routes, and cycle tracks to ensure safe movement at night. The lighting design will provide good visibility while minimising light pollution. Pedestrian and cyclist routes, including homezones and crossings, are designed with passive surveillance to enhance safety and security for all users.

For further details on the proposed public lighting strategy, please refer to the outdoor lighting reports and associated lighting plans prepared by Sabre and enclosed with the planning application materials.

5.10 Parking

The proposed parking strategy for the development will provide parking for cars and bicycles for residents and visitors. Full details of the parking provision are provided in the Architectural Design Statement and the Development Schedules prepared by RAU. The location of the parking provision is shown on the layout plans prepared by RAU.

This car parking strategy strikes a balance between accommodating vehicles and promoting active travel, while creating an attractive and safe residential environment. The scheme adopts a hybrid approach that combines in-curtilage and on-street parking near the relevant residential units. All parking spaces are designed in accordance with DMURS guidelines and have been integrated into the scheme, including tree planting proposals, to reduce visual dominance and enhance safety.

A total of 316 no. car parking spaces is provided across the scheme:

- 277 no. spaces for residents of the proposed 234 no. residential units; and
- 30 no. spaces for visitors of the residential units, integrated into the streetscape to provide convenient access without dominating the public realm.
- 9 no. spaces to support the childcare facility's parking needs (see **Section 5.4** for breakdown details).

Of the 316 no. car parking spaces, 39 no. spaces will be fully designated for electric vehicles (EVs). Please refer to Drawing Nos. NRC-JAK-SW-ZZ-DR-E-62001 and 62002 prepared by JAK and enclosed with the application materials for details of the proposed EV parking and infrastructure.

Refuse collection points and servicing areas are strategically located to ensure efficient access without impeding traffic flow or pedestrian movement. These are illustrated in site layout plans prepared by RAU.

Regarding bicycle parking, the following provision is proposed:

- Two standalone bicycle stores. See RAU Drawing No. NRC-02-SW-XXX-DR-AR-RAU-1008 for the location of the stores, and RAU Drawing No. NRC-02-XX-XXX-DR-AR-RAU-1140 for plans and elevations of the bicycle stores. This will provide a total of 62 no. spaces, and 5 no. cargo bicycle spaces.
- For residential units with separate access to their relevant private open space, i.e., rear gardens accessed via alleys, provision is made for residents to install bicycle storage in those areas.
- For the rest of residential units (e.g., houses and/or apartment units other than those on the apartment block that do not have a ground-level rear garden nor are accessible from a separate

access), dedicated bicycle storage is provided to the front of the units or adjacent to the rear gardens, totalling 135 no. spaces.

- 50 no. bicycle spaces are provided throughout the scheme for visitors.

5.11 Water Management

The proposed water management strategy is detailed in the accompanying *Infrastructure Design Report*, prepared by DOBA, along with associated drawings.

5.11.1 Water Supply

The development will be served by a new potable water connection to the existing public water network. This connection is designed to accommodate the anticipated demand from the residential units, childcare facility, and associated facilities, ensuring a reliable and sufficient supply. The new watermain infrastructure will be designed in accordance with UÉ's standards and codes of practice.

Details of the proposed water supply infrastructure are shown in DOBA's Drawing No. 2431-DOB-XX-SI-DR-C-0400 and further discussed in Section 5 of DOBA's Infrastructure Design Report enclosed with the planning application materials.

A Confirmation of Feasibility (CoF) and Statement of Design Acceptance (SODA) have been issued by UÉ and are appended to the *Infrastructure Design Report* prepared by DOBA and enclosed with the planning application materials.

5.11.2 Wastewater Drainage

Wastewater from the proposed development will be collected via a new wastewater network and discharged into the existing foul sewer network through a new connection. The design complies with relevant UÉ standards and codes of practice and includes provisions for adequate capacity and maintenance access to support the development's needs.

Further technical details about the proposed wastewater drainage network and connections are provided in Section 4 of DOBA's Infrastructure Design Report and supporting Drawing No. 2431-DOB-XX-SI-DR-C-0300, prepared by DOBA and enclosed with the planning application materials.

As noted in **Section 5.11.1**, a CoF and SODA have been issued by UÉ and are appended to the *Infrastructure Design Report* prepared by DOBA and enclosed with the planning application materials.

5.11.3 Surface Water Drainage and Piped Network

Surface water runoff will be managed through a comprehensive drainage system designed to attenuate flows, protect against flooding, and promote sustainable water management. The strategy incorporates SuDS measures, as indicated in Section 3.5 and Table 3 in the DOBA's Infrastructure Design Report and supporting Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 to 0203, 0255 to 0257, and 0260 to 0263 and enclosed with the planning application materials.

Proposed SuDS measures include, inter alia, biorientation areas, bioswales, tree pits, infiltration drains and trenches, detention basin and other green infrastructure elements to enhance infiltration and biodiversity. Please refer to the above-mentioned enclosures for further technical details.

5.11.4 Flood Risk

A Site-Specific Flood Risk Assessment (SSFRA) has been undertaken by DOBA and is submitted as part of the planning application documentation. This has evaluated the potential for flooding at the subject site and informed the design of the proposed development accordingly.

The assessment concludes that the 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 the proposed SuDS strategy, as detailed in DOBA's *Infrastructure Design Report*, throughout the site for surface water drainage network ensures that there will be no increase in pluvial flood risk as a result of the proposed development.

5.12 Overhead Lines & ESB Kiosks

The proposed development includes the removal of existing overhead powerlines that currently traverse the subject site. These overhead lines, along with associated ancillary equipment such as poles, will be removed and replaced by underground cabling as part of the development works. This ensures that the power infrastructure is safely integrated within the site without impacting the layout or future operations.

The location of the existing overhead powerlines is shown in Drawing No. NRC-02-SW-XXX-DR RAU-AR-1001, prepared by RAU, as well as Drawing No. NRC-JAK-SW-ZZ-DR-E-61001 prepared by JAK.

Moreover, the proposed development includes the provision of 2 no. ESB electrical kiosks to support the needs arising from the proposal. For further details, please refer to Drawing Nos. NRC-JAK-SW-ZZ-DR-E-63001 and 63002, as well as the M&E Utility Services Report prepared by JAK.

5.13 Part V

The proposed development includes the provision of 53 no. units for social and affordable housing in accordance with requirements set out in Part V of the Planning Act. This consists of a mix of one-, two-, and three-bedroom units.

For details of proposed units to satisfy Part V of the Planning Act, please refer to Drawing No. NRC-02-SW-XXX-DR-RAU-AR-1012 prepared by RAU and enclosed with the submission materials. The planning application is also accompanied by a Part V Package prepared by the Applicant.

5.14 Waste Management & Internal Storage

All residential units will be provided with dedicated bin storage facilities. A summary is provided as follows:

- For the apartment block, 1 no. designated internal waste storage area is provided on the ground floor of the building to accommodate the needs of 21 no. residential units within this building.
- Houses, own-access apartment units within duplex and triplex-type buildings, will have their own individual refuse storage where rear access to private open space is available.
- For the rest of the units, bins will be stored at the dedicated refuse storage spaces at the front or near the property, with suitable screening ensuring these are open and visible.
- For the childcare facility, 1 no. designated internal waste storage area is provided within the building.

Further details of the waste management strategy are outlined in the supporting documents. An Operational Waste Management Plan has been prepared by AWN and is submitted as part of the full planning application materials. The architectural drawings prepared by RAU include site layout plans and floor plans, clearly showing the locations of the waste storage areas and designated waste collection points.

Internal storage spaces are also provided for all residential units. The Housing Quality Assessment, prepared by RAU, details the amount of storage space allocated to each proposed unit type. The

architectural drawings prepared by RAU include floor plans for each unit type, clearly showing the locations of the internal storage provided.

5.15 Demolition & Removal of Existing Structures

Together with the removal and undergrounding of existing overhead lines, as briefly described in Section 5.12 of this Report, the proposed development comprises:

- The demolition of an existing shed on-site (c. 488.5 sqm); and,
- The removal of sections of existing walls and the existing access gate.

All of the above are ancillary development works intended to facilitate the proposed development. For details of the extent of proposed demolition and removal of existing structures, please see RAU Drawing Nos. NRC-02-SW-XXX-DR-RAU-AR-1002 to 1004.

The planning application is supported by a Resource and Waste Management Plan, prepared by AWN, which includes information to ensure that the management of construction and demolition waste at the site is carried out in accordance with industry standards and relevant regulations.

5.16 Construction & Phasing

The planning application is supported by a draft Construction Environmental Management Plan that includes details of the construction phases for the proposed development. The construction phasing is divided into two phases, as discussed in the mentioned report.

In connection with the above, the Applicant has also prepared a phasing plan (see Drawing No. NRC-02-SW-XXX-DR-RAU-AR-1011 prepared by RAU) showing how public realm and amenity spaces will be delivered in parallel with residential units, ensuring timely access for occupants. It is noted that the proposed childcare facility is to be delivered as part of the designated Phase 2.

As noted in **Section 5.15** of this Report, a Resource and Waste Management Plan, prepared by AWN, is also enclosed with the application materials.

6 Statements of Consistency with National & Regional Planning Policy

This section outlines the relevant national and regional policies, objectives, and requirements set out in the NPF, RSES, and other key Ministerial Guidelines. Detailed assessments (i.e., statements of consistency) demonstrating how the proposed development has had regard to and is consistent with these policy documents and guidelines are provided throughout the following subsections.

6.1 National Planning Framework - First Revision (2025)

The NPF is the Government's long-term strategic plan to accommodate an additional one million people, two-thirds of a million more workers, and half a million new homes in Ireland by 2040. The first revision, adopted in April 2025, increases the housing delivery target to 50,000 units annually and provides revised, phased national, regional, and city-level population growth targets for 2030 and 2040.

The NPF's first revision places greater emphasis on transit-oriented development while maintaining a focus on compact growth within existing urban areas. It provides the strategic framework for Ireland's physical, economic, social, and environmental development within a national, European, and global context.

Significant population growth is projected in the Eastern and Midland Region (EMR), with an increase of approximately 470,000 people between 2022 and 2040, bringing the population close to three million. This growth highlights the need for sustainable urban growth and infrastructure investment.

The NPF identifies **Compact Growth** as a National Strategic Outcome (**NSO 1**), promoting efficient use of existing urban land and infrastructure through development within established urban areas. This supports sustainable, connected, and liveable communities.

Key National Policy Objectives (NPOs) relevant to the proposed development include:

NPO 3: "(...) Eastern and Midland Region: approximately 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million."

NPO 7: "Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth."

NPO 9: "Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth."

NPO 10: "Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth."

NPO 12: "Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."

NPO 20: "In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."

NPO 22: "In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth."

The NPF requires planning authorities, including the EMR, to review and update core strategies and land zoning in response to higher-than-anticipated population growth, focusing on delivering increased housing densities within existing urban footprints in the short term. Revised guidance on the implementation of the NPF was published in July 2025 in the NPF Implementation: Housing Growth Requirements - Guidelines for Planning Authorities (2025), which constitute section 28 Ministerial Guidelines in accordance with the Planning Act 2000. These guidelines translate projections and requirements contained in the First Revision to annual housing growth requirements for each county to 2040. This review and update process is underway.

6.1.1 Statement of Consistency with the NPF

The proposed development is fully consistent with the NPF, specifically supporting **NPOs 3, 7, 9, 10, 12, 20, and 22**, and **NSO 1**. It will deliver compact, sequential growth within the built-up area of Naas, contributing to the increased housing supply required to meet the projected population growth outlined in the NPF.

The design and layout of the development will facilitate transit-oriented development through improved connectivity and new infrastructure, while providing high-quality, well-designed residential accommodation and community facilities that integrate with the receiving environment.

By aligning with these NPOs and NSO, the proposed development supports the NPF's vision for balanced regional development, sustainable urban growth, and enhanced quality of life.

6.2 Sustainable Residential Development and Compact Settlements Guidelines (2024)

The Compact Settlements Guidelines were issued under section 28 of the Planning Act, aiming to promote more compact, sustainable residential development across Ireland.

The Compact Settlements Guidelines support increased compact development by outlining a process for setting density targets for local authorities based on the existing built environment and proximity to public transport nodes. They provide varied density ranges responding to settlement size and location, greater flexibility in residential design standards, and encourage innovation in housing types. This includes promoting a broader range of house types and more compact own-door housing as an alternative to apartment development, supporting higher densities for own-door housing schemes.

6.2.1 Statement of Consistency with SPPRs

The Compact Settlements Guidelines include four Specific Planning Policy Requirements (SPPRs), which planning authorities are required to have regard to under section 34 of the Planning Act. These SPPRs take precedence over any conflicting statements in development plans or local area plans.

The proposed development fully complies with the Compact Settlements Guidelines' SPPRs as follows.

SPPR 1 – Separation Distances

“(...) statutory development plans shall not include objectives requiring minimum separation distances exceeding 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units, or apartments above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation

distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.”

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy. (...)

(Emphasis by Tetra Tech)

Appropriate separation distances have been provided throughout the scheme, in accordance with the flexible standards set out in the Compact Settlements Guidelines.

As confirmed by the Housing Quality Assessment prepared by RAU, the proposed layout provides separation distances that ensure a minimum of 16 m between the opposing windows serving habitable rooms at the rear or side of units. The Sunlight and Daylight Assessment Report, prepared by 3DDB, is enclosed with the application materials and demonstrates that the residents will enjoy adequate sunlight and daylight access.

The suite of architectural site layout plans prepared by RAU, i.e., Drawing Nos. NRC-02-SW-XXX-DR-RAU-AR-1007 to 1009, also details of the proposed separation distances between the proposed units and nearby existing residential units, demonstrating that a high standard of privacy and amenity is provided for future occupiers and existing neighbouring properties, and that compliance is achieved with SPPR 1 of the Compact Settlement Guidelines.

SPPR 2 – Minimum Private Open Space Standards for Houses

“New houses must provide minimum private open space standards: 20 sq.m for 1-bed, 30 sq.m for 2-bed, 40 sq.m for 3-bed, and 50 sq.m for 4-bed or larger houses.

(...)

Apartments and duplex units must meet private and semi-private open space requirements as set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2023) and subsequent updates.”

(Emphasis by Tetra Tech)

All proposed houses benefit from private open spaces and meet the minimum standards set out in SPPR 2. For details, please refer to Appendix A of the Housing Quality Assessment and the detailed drawings for unit types prepared by RAU.

Compliance with private open space standards for the rest of residential units (i.e., apartments within the apartment block and own-door apartments) is discussed in **Section 6.1.4** of this Report.

SPPR 3 – Car Parking

*“(...) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the **maximum** rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be **2 no. spaces per dwelling** (...)*

(Emphasis by Tetra Tech)

According to Table 3.8 of the Compact Settlements Guidelines, the subject site is to be classified as ‘peripheral’, i.e., due to its relative distance from high-frequency public transport. A maximum car parking provision permitted is 2 no. spaces per dwelling.

As summarised in **Section 5.10** of this Report, the proposed development includes a total of 316 no. car parking spaces. Of these, 277 no. car parking spaces are proposed to accommodate the

parking needs of the 234 no. residential units and 30 no. car parking spaces for visitors of the residential units. This provision is below the set maximum car parking rates and therefore accords with **SPPR 3**.

As shown in Drawing No. NRC-02-SW-XXX-DR-RAU-AR-1008 by RAU, the proposed parking strategy strikes a balance between accommodating vehicles and promoting active travel, while creating an attractive and safe residential environment. For detailed information on the car parking strategy, please also see the Architectural Design Statement prepared by RAU.

SPPR 4 – Cycle Parking and Storage

*“(i) (...) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general **minimum standard of 1 cycle storage space** per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*

*“(ii) Design – **cycle storage facilities should be provided in a dedicated facility of permanent construction**, within the building footprint or, **where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction**. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”*

(Emphasis by Tetra Tech)

Section 5.10 of this Report provides a summary of the bicycle parking provision, including:

- 66 no. spaces distributed in two secure exterior bicycle stores to support the bicycle parking needs of the four apartment blocks.
- 135 no. spaces distributed in dedicated bicycle storage to the front of or adjacent to the rear gardens of those residential units that have no separate access to rear gardens.
- The rest of the residential units with separate access to their relevant private open space, i.e., rear gardens accessed directly via alleys, provision is made for residents to install bicycle storage in those areas.
- 50 no. bicycle spaces are provided throughout the scheme for visitors.

Having regard for the above, it is considered that the proposal accords with the requirements set out in **SPPR 4** of the Compact Settlement Guidelines.

Drawing No. NRC-02-SW-XXX-DR-RAU-AR-1008 by RAU shows the location of the proposed bicycle parking storage for residents and visitors. For detailed information on the bicycle parking strategy, please also see the Housing Quality Assessment and Architectural Design Statement prepared by RAU.

6.2.2 Statement of Consistency with Development Standards and Design Guidance

In addition to the SPPRS, the Compact Settlements Guidelines also specify development standards and design guidance. The proposed development fully complies with these as follows.

Density (Section 3)

Naas is identified as a Key Town within the RSES for the EMR. According to Table 3.5 of the Compact Settlements Guidelines, two categories, each providing a density range, are of relevance to Naas.

*“Key Town / Large Town - Centre and Urban Neighbourhood The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that **residential densities in the range 40 dph-100 dph (net) shall generally be applied** in the centres and urban neighbourhoods.”*

*“Key Town / Large Town - Suburban/Urban Extension Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that **residential densities in the range 30 dph to 50 dph (net) shall generally be applied** at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at ‘accessible’ suburban / urban extension locations (as defined in Table 3.8).”*

(Emphasis by Tetra Tech)

With regard to the above, the subject site falls within the ‘Key Town / Large Town – Suburban/Urban Extension’ category. The proposal will deliver a net density of 37.7 residential units per hectare in accordance with the Compact Settlements Guidelines’ recommended range for suburban/urban extension areas of Key Towns.

Public Open Space (Section 5.3)

*“The requirement in the development plan shall be for **public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area** save in exceptional circumstances*

(...)

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.”

(Emphasis by Tetra Tech)

A summary of the proposed landscape and open strategy is provided in **Section 5.8** of this Report, with detailed information on landscaping and public open spaces set out in the Landscape Design Report prepared by M+S, along with associated landscape drawings. See also the Arboricultural Report prepared by CMAC, and the suite of ecological reports prepared by Tetra Tech.

As confirmed in the Housing Quality Assessment by RAU, the proposed development includes c. 10,007 sqm (c. 16% of the net site area, c. 6.2 ha) generally in line with the Compact Settlement Guidelines’ development standard for public open space. While the provision is slightly above the 10-15% range, it is important to note that the proposed landscape and open strategy has ensured the integration of the large existing hedgerow that traverses the site, following KCC’s feedback during pre-planning consultations. This will contribute to the protection of existing biodiversity while providing a wider range of amenities for future residents and local communities.

Design Checklist (Appendix D)

Compact Settlements Guidelines are supported by Appendix D: Design Checklist – Key Indicators of Quality Urban Design and Placemaking. The checklist assists in reviewing plans and planning applications, focusing on street layout, building orientation, landscaping, and public realm quality.

The key indicators of quality urban design and placemaking, as set out in Appendix D of the Compact Settlements Guidelines, have been fully considered in the design of the proposal, as

demonstrated in the contents and rationales contained in the Architectural Design Statement and Housing Quality Assessment prepared by RAU. This document should be read in conjunction with the Landscape Design Report prepared by M+S, the documents titled Verified Views, CGIs, Aerials and the Sunlight and Daylight Assessment Report, both prepared by 3DDB, and other supporting application materials.

Overall, by virtue of its appropriate density, high-quality design, and comprehensive range of amenities, the proposed development accords with the aims and requirements of the Compact Settlements Guidelines and will deliver a sustainable, high-quality, and compact residential development in Naas.

6.3 Planning Design Standards for Apartments Guidelines for Planning Authorities (2025)

The New Apartments Guidelines, originally published in 2018 and subsequently updated in 2023 and 2025, provide for updated policy and guidance on apartment developments.

The following subsections demonstrate how the proposed development has been designed with regard to and to comply with the New Apartments Guidelines' SPPRS and design standards, where required.

6.3.1 Statement of Consistency with SPPRs

The proposed development fully complies with the SPPRs set out in the New Apartments Guidelines. The following should be read in conjunction with the Architectural Design Statement and Housing Quality Assessment prepared by RAU and enclosed with the planning application materials.

SPPR 1 (Apartment Unit Mix)

It is noted that **SPPR 1** states that, other than in limited cases, i.e., social/affordable housing under Part V, or specific schemes for older persons guided by a Housing Need and Demand Assessment (HNDA), there shall be no restriction in statutory plans on the mix of unit sizes or types in apartment developments.

The proposed development is in accordance with **SPPR 1**. As shown in **Section 5.3** and **Appendix B** (Statement of Housing Mix) of this Report, the proposed housing mix comprises a variety of housing types, i.e., houses, apartments within an apartment block, and apartments with own-door access within duplex and triplex-type of buildings, offering a balanced distribution of one-, two-, three-, four and five-bedroom units. This mix caters to a broad spectrum of household types and life stages, from singles and couples to families and older persons.

This approach aligns with the findings of the KCC HNDA, which identifies a growing demand for varied housing types. The assessment highlights an increasing proportion of households in the 25-34 age cohort, indicating demand for 1 and 2-bedroom units, alongside a significant need for family-sized accommodation to support expanding households. The proposed mix responds directly to these demographic trends and housing needs and also enables households to remain in this area throughout their lifecycle as their household size changes.

SPPR 2 (Minimum Apartment Floor Areas)

SPPR 2 requires that apartment units meet or exceed minimum floor areas. It is required that at least 25% of the proposed units exceed the minimum sizes set out in **SPPR 2** by 10%.

The proposed development is fully consistent with **SPPR 2**, with all apartment units meeting the minimum gross floor area and exceeding it by at least 10%. This is confirmed in the Housing Quality Assessment prepared by RAU and enclosed with the planning application materials.

SPPR 3 (Dual Aspect Requirements)

SPPR 3 requires that a minimum of 25% of apartments in any single development be dual aspect.

The proposed development is fully consistent with **SPPR 3**, as follows:

- Of the 119 no. apartment units, 110 no. are dual aspect (c. 92.4% across the apartment units). None of the single-aspect apartment units is north-facing.
- It is noted that all house units are dual aspect.

For details on dual-aspect units, please refer to the Architectural Design Statement and the Housing Quality Assessment prepared by RAU.

A Sunlight and Daylight Assessment Report, as well as the document titled Verified Views, CGIs, Aerials, both prepared by 3DDB, demonstrate that the appropriate level of access to sunlight and daylight is provided for future residents of the apartment units, as well as the proposed heights will integrate within the receiving environment.

SPPR 4 (Floor-to-Ceiling Heights)

SPPR 4 requires that all ground-level apartments achieve a minimum floor-to-ceiling height of 2.7m.

The proposed development is fully consistent with **SPPR 4**. As confirmed in the Architectural Design Statement and the Housing Quality Assessment, all proposed apartment units are designed to meet or exceed the 2.7 m requirement.

SPPR 5 (Units per Floor Core)

SPPR 5 sets out that there shall not be a minimum requirement of units per floor core in statutory plans or within individual schemes.

The proposed development is fully consistent with **SPPR 5**. Details of units per floor core for the proposed apartment block are provided in the Architectural Design Statement and the Housing Quality Assessment, as well as the floor plans for the apartment block prepared by RAU and enclosed with the planning application materials.

SPPR 6 (Communal, Community and Cultural Facilities)

SPPR 6 states that the provision of communal, community, and cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan, and shall not be applied as a blanket requirement across all developments.

In relation to the above, the proposed development will provide well-designed, high-quality public, communal, and private open spaces, together with play areas. The proposal also includes a childcare facility, new connections to adjoining communities, and transport infrastructure improvements, including the extension of the existing Gallops Avenue with dedicated pedestrian and cyclist paths, and the provision of a cycling lane within the existing section of Gallops Avenue. Together, they will allow the integration of the proposed development, supporting future residents' amenities rather than responding to any threshold-based requirement for communal, community, or cultural facilities.

It is also noted that the planning application is supported by a SCIA prepared by Tetra Tech, which demonstrates that the combination of existing and proposed social and community facilities within the scheme will adequately support both future residents and existing communities. Moreover, it confirms that the proposed childcare facility's capacity is appropriate to meet the needs of future residents.

SPPR 7 (Purpose-Built Student Accommodation)

SPPR 7 relates to purpose-built student accommodation and is therefore not relevant to the proposed development.

6.3.2 Statement of Consistency with Development Standards

In addition to the SPPRs, the New Apartments Guidelines also set out a number of development standards and design guidance, compliance with which is demonstrated below.

Internal Storage (Appendix 1)

The New Apartments Guidelines set out specific standards for internal storage in Appendix 1.

The Housing Quality Assessment, along with the floor plans for apartment units prepared by RAU and enclosed with the planning application materials, demonstrates that the internal storage meets or exceeds the minimum requirements set out in Appendix 1 of the New Apartments Guidelines.

Private Amenity Space (Section 3.8 and Appendix 1)

The New Apartments Guidelines set specific standards for private amenity space in Appendix 1.

The Housing Quality Assessment, along with the floor plans for apartment units prepared by RAU and enclosed with the planning application materials, demonstrates that private amenity space meets or exceeds the minimum requirements specified in Appendix 1 of the New Apartments Guidelines.

As noted in **Section 5.8.1** of this Report, private open space is provided in the form of balconies, terraces, and/or rear gardens.

Communal Amenity Space (Section 4.3 and Appendix 1)

The New Apartments Guidelines set out specific standards for communal amenity space in Appendix 1.

The Housing Quality Assessment, along with the site layout plans prepared by RAU and enclosed with the planning application materials, demonstrates that the proposed communal open space meets or exceeds the minimum requirements set out in Appendix 1 of the New Apartments Guidelines.

As noted in **Section 5.8.2** of this Report, the proposed development includes c. 485 sqm of communal open space.

Children's Play (Section 4.4)

The New Apartments Guidelines require dedicated play provision in schemes of 25+ apartments with two or more bedrooms, and larger play areas in schemes of 100+ apartments with two or more bedrooms.

With regard to the above, we refer to the Architectural Design Statement and Landscape Design Report and associated drawings, which identify and provide details of the proposed children's play spaces provided within the proposed development, a summary of which is provided in **Section 5.8.3** of this Report. All play areas have been designed to benefit from active and passive surveillance.

Bicycle Parking and Storage (Section 4.5)

With regard to bicycle parking, the New Apartments Guidelines require that cycle storage facilities be secure and directly accessible from the public road or a shared private area, with safe, convenient access routes that avoid long or hazardous paths.

The New Apartments Guidelines confirm that the requirements for the quantity and design of bicycle parking are set out in Section 5.25 (including SPPR 4) of the SRDCSGs. Additionally, apartment developments must implement a management plan to ensure the effective operation and

maintenance of cycle parking, preventing lockers from being locked and unused. Maintenance regimes should keep facilities clean, well-lit, graffiti-free, and in good repair. Cycle parking should be low-maintenance, easy, and attractive for residents to use.

The New Apartments Guidelines also notes that further guidance on cycle storage design and provision is available in the Cycle Design Manual (National Transport Authority, 2023) and Bike Parking Infrastructure Guidance (Dublin Cycling Campaign, 2017).

Section 5.10 of this Report provides a summary of the bicycle parking provision, with full details provided in the Architectural Design Statement, Development Schedules, and the Housing Quality Assessment prepared by RAU. These demonstrate that appropriate bicycle storage is being proposed for all units.

Moreover, a Property Management Strategy Report prepared by Aramark is enclosed with the planning application materials. This report provides details on the future management of the development by an owner management company, which will oversee dedicated cycle storage for residents of the apartment building and cycle parking for visitors in the open spaces.

Car Parking (Section 4.6)

With regard to car parking, the New Apartments Guidelines note that parking provision should be minimised or eliminated in locations with good access to urban services and public transport. Where parking is reduced or removed, appropriate provision, where possible, must be made for drop-off points, visitor and service parking, and spaces for mobility-impaired users. Alternative mobility solutions, such as car-sharing facilities, should also be included.

The New Apartments Guidelines also state that *‘Maximum car parking rates are set out in Section 5.25 (SPPR 3) of the SRDCSGs’*.

As summarised in **Section 5.10** of this Report, the proposed development includes a total of 316 no. car parking spaces. Of these, 277 no. car parking spaces are proposed to accommodate the parking needs of the 234 no. residential units and 30 no. car parking spaces for visitors of the residential units. This provision is below the maximum car parking rates set out in the Compact Settlements Guidelines and therefore accords with **SPPR 3** of the Compact Settlement Guidelines.

Waste Management (Section 4.2)

The New Apartments Guidelines state that provision shall be made for the storage and collection of waste materials in apartment schemes, including temporary storage within individual apartment units prior to deposition in communal waste storage areas.

The Guidelines also refer to Section 5.3.6 and Appendix C of the Compact Settlements Guidelines regarding the location of refuse storage areas and the preparation of operational waste management plans.

With regard to the above, details of proposed waste management and refuse storage have been summarised in **Section 5.14** of this Report, noting that all units will have access to refuse storage.

The architectural drawings prepared by RAU include site layouts and floor plans for each unit type, and the proposed apartment block and the childcare facility, clearly showing the locations of the designated internal waste storage areas for Block 1 and the childcare facility, as well as the individual waste storage areas for the rest of the residential units.

Moreover, as noted in **Section 5.14** of this Report, the planning application is accompanied by an Operational Waste Management Plan prepared by AWN.

Content of Planning Applications (Section 6.1)

In accordance with the contents and requirements in Section 6.1 of the New Apartments Guidelines, the following documentation has been prepared and is included with the planning application materials submitted to KCC:

- Housing Quality Assessment by RAU, including details of floor areas, private amenity spaces, etc.
- *Building Life-cycle Report* by Aramark
- Verified Views, CGIs, Aerials, and the Sunlight and Daylight Assessment Report, by 3DDB

Operation and Management of Apartment Developments (Section 6.2)

In accordance with the contents and requirements in Section 6.1 of the New Apartments Guidelines, a Property Management Strategy Report prepared by Aramark is enclosed with the planning application materials.

6.4 Urban Development and Building Heights Guidelines for Planning Authorities (2018)

The *Urban Development and Building Heights – Guidelines for Planning Authorities* (2018) (hereinafter referred to as the Building Heights Guidelines) set out a national policy framework to facilitate increased building heights and densities in appropriate urban locations, in line with the objectives of compact growth and sustainable urban development.

The Guidelines recognise that well-designed increased building heights are essential to make the most efficient use of urban land, supporting sustainable transport, and delivering vibrant, attractive places to live. The Guidelines emphasise that planning authorities should move away from blanket height restrictions and instead assess proposals on their merits, having regard to site context, urban design quality, and the need for transition in scale.

Key principles promoted by the Building Heights Guidelines include:

- **Appropriate scale and massing:** Ensuring new developments respond positively to its context, with building heights that are appropriate to the character of the area.
- **Integration with existing urban grain:** New buildings should respect and enhance the existing urban grain.
- **Transition in height:** Taller buildings should be carefully integrated, with a clear transition in scale from existing development, particularly at the edges of sites.
- **Increased height in suitable locations:** Encouraging greater building heights in urban cores and areas with good public transport accessibility, while ensuring that increased height is not delivered in isolation but as part of a coherent urban structure.

The Guidelines include a number of SPPRs, of which **SPPR 4** is considered relevant to the proposed development.

SPPR 4: *“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.”*

6.4.1 Statement of Consistency with the Building Heights Guidelines

The proposed development has been designed with regard to the Building Heights Guidelines and is consistent with the guidance and objectives of the guidelines in general, and with **SPPR 4**, as follows:

- **Mix of Building Heights and Typologies:** The scheme provides a varied building height profile, ranging from 2 to 3 storeys, which reflects the existing context while allowing for a sensitive transition in scale. This approach avoids uniformity and ensures that the development integrates seamlessly with the established urban grain, while also delivering increased density and rhythm to the streetscapes.
- **Transition and Integration:** Building heights have been strategically selected to ensure a sensible and gradual transition from existing lower-rise development at the site boundaries to higher elements within the site, i.e., towards the new extended Gallops Avenue, open spaces and main gateways to the scheme. Thereby respecting the character of adjoining areas and minimising visual impact. This graduated approach supports the creation of a coherent and legible urban structure.
- **Avoidance of Mono-type Typologies:** The proposed development includes a range of residential typologies, including houses and apartment-type units, thereby avoiding a mono-type approach and providing for a diverse and sustainable community. This mix supports social and demographic diversity and responds to a variety of housing needs.
- **Compliance with Density Requirements:** The proposed net residential density is consistent with the minimum densities set out in the relevant Section 28 guidelines, supporting the efficient use of serviced land and the creation of a compact, sustainable urban form.
- **Design Quality and Urban Structure:** The Architectural Design Statement and the site layout plans presented under Drawing Nos. NRC-02-SW-XXX-DR-RAU-AR-1007 to 1009, prepared by RAU, demonstrate that the proposed building heights are justified by the site's context, accessibility, and the need to deliver high-quality urban design. The scheme is supported by robust landscaping and public realm proposals, as outlined in M+S's Landscape Design Report, ensuring that the increased height contributes positively to placemaking and local identity.

For further details on the site layout's design rationale and the proposed height strategy, please refer to RAU's Architectural Design Statement. We also refer to the documents prepared by 3DDB, i.e., Verified Views, CGIs, Aerials, and the Sunlight and Daylight Assessment Report, which demonstrates the integration within the receiving environment and that the proposed height strategy will still deliver appropriate amenity.

As noted above and based on the planning application materials, it is considered that the proposed development is fully consistent with the Building Heights Guidelines, delivering an appropriate mix of building heights and typologies, ensuring a sensitive transition in scale, and supporting the delivery of compact, sustainable residential development.

6.5 Climate Action Plan 2025

The Government's Climate Action Plan 2025 (hereafter referred to as CAP25) sets out Ireland's statutory pathway to reducing greenhouse gas emissions by 51% by 2030 (relative to 2018) and achieving a climate-neutral economy by 2050. The Plan emphasises decarbonising transport, improving energy efficiency in buildings, expanding renewable energy, embedding compact growth and sustainable land-use patterns, and promoting active travel and public transport.

The planning application is supported by a Climate Action and Energy Statement prepared by Tetra Tech, which demonstrates how the proposed development aligns with CAP25's core principles and objectives.

6.5.1 Statement of Consistency with CAP25

The proposed development aligns with CAP25 through the following:

Compact, sequential growth

The scheme is located on zoned and serviced lands within the built-up area of Naas, supporting sequential land release, reducing urban sprawl, and minimising transport emissions in line with CAP25's "avoid–shift–improve" strategy.

Active travel and sustainable transport

The proposed development includes a permeable street network that prioritises walking and cycling, with dedicated green corridors and new links to allow for more direct access to public transport services and key local amenities. This reduces reliance on private cars and contributes to lower transport emissions. It is also noted that the proposed extension of Gallops Avenue, including active travel infrastructure, will promote a shift towards sustainable mobility and improve permeability and connectivity for existing communities. The proposed development will also deliver a link to Kingsfurze Avenue and the Woodlands residential estate, increasing permeability and connectivity for pedestrians and cyclists.

Efficient residential density

The development's density supports a compact urban form that respects and integrates with the receiving environment, enabling efficient use of land, services, and infrastructure, consistent with CAP25's objectives for low-carbon settlement patterns.

Housing choice and accessibility

A broad mix of housing types, including apartments, duplexes, and houses, is proposed, which in turn will support a diverse community and reduce commuting pressures by providing housing locally across a range of household needs.

Energy efficiency and renewable integration

The proposed scheme's design will be delivered to the Nearly Zero Energy Building (NZEB) standards, aligning with CAP25's targets to reduce emissions from the built environment.

In summary, the proposed development accords with the CAP25. It aligns with CAP25's objectives by delivering compact, sequential growth within the built-up area of Naas, promoting sustainable transport and active travel, achieving efficient residential density, providing diverse and accessible housing, and incorporating energy-efficient design and renewable technologies. Collectively, these measures contribute to Ireland's statutory climate targets and support the transition to a low-carbon, climate-resilient future.

6.6 Part V of the Planning and Development Act 2000: Guidelines for Planning Authorities (2017)

Section 96, Part V of the Planning Act sets out requirements for social and affordable housing provision within residential developments.

6.6.1 Statement of Consistency with Part V of the Planning Act

The proposed development fulfils the Part V obligations in accordance with section 96 of the Planning Act, by delivering 53 no. units for social and affordable housing.

For details of proposed units to satisfy Part V of the Planning Act, please refer to Drawing No. NRC-02-SW-XXX-DR-RAU-AR-1012, prepared by RAU and enclosed with the submission materials. The planning application is also accompanied by a Part V Package prepared by the Applicant.

6.7 Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031

The RSES for the EMR was adopted in June 2019. It provides a long-term regional planning and economic framework to implement the NPF at the regional level, guiding sustainable growth, economic development, and infrastructure investment across the region.

Naas is located within the 'Core Region' of the EMR, an area identified in the RSES as having significant growth potential. Within this Core Region, Naas is designated as a 'Key Town' in the RSES. Key Towns are defined as large, economically active service and/or county towns that provide employment for their surrounding areas, possess high-quality transport links, and have the capacity to act as growth drivers complementing the Regional Growth Centres.

The RSES identifies a preferred spatial strategy that consolidates Dublin and the Regional Growth Centres of Athlone, Dundalk, and Drogheda, supported by planned, focused growth in a limited number of self-sustaining settlements, including Key Towns such as Naas.

The RSES promotes sustainable, compact, and sequential growth and urban regeneration in the identified Key Towns.

The RSES recognises an acute need to increase housing supply across the region, particularly within cities and defined settlements such as Naas. Growth enablers for the Core Region include a network of Key Towns with the capacity to deliver sustainable compact growth and employment opportunities, supported by enabling public transport, infrastructure, and services.

The RSES includes a number of regional strategic outcomes (RSO) and policy objectives (RPO). The following are deemed relevant in the context of the proposed development:

RSO 2 Compact Growth and Urban Regeneration: *"Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens."*

RSO 4 Healthy Communities: *"Protect and enhance the quality of our built and natural environment to support active lifestyles, including walking and cycling, ensure clean air and water for all and quality healthcare and services that support human health. (NSO 10)"*

RSO 6 Integrated Transport and Land Use: *"Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8, 9)"*

RSO 9 Support the Transition to Low Carbon and Clean Energy: *"Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. (NSO 8, 9)"*

RSO 10 Enhanced Green Infrastructure: *"Identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as our coastlines, farmlands, peatlands, uplands woodlands and wetlands. (NSO 8, 9)"*

RPO 3.2: *"Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or*

contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.”

RPO 3.3: *“Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for new Apartments Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”*

RPO 4.48: *“Promote the improvement of the transport network within and serving Naas town, including delivery of a robust and efficient walking, cycling and bus network with strong links to Sallins Railway Station, key destinations within the town and to the North West Quadrant and town centre area.”*

RPO 4.50: *“Regeneration and consolidation of the historic centre to improve the retail and commercial functions of the town core, with enhanced permeability and sustainable mobility within the town centre and improved links between the core and surrounding residential and employment areas through the further development of walking and cycling routes and improved public transport.”*

RPO 4.52: *“Support the delivery of new and enhanced public transport infrastructure in Naas and Sallins, including Park and Ride and interchange facilities as identified by the NTA and Kildare County Council.”*

RPO 4.53: *“Support an enhanced role and function of Naas as the County town of Kildare, particularly as a hub for high quality employment, residential and amenities.”*

A review of the RSES for the EMR has commenced. This will build on the progress made under the first RSES, which was made in 2019, and is inviting submissions to help it set a new vision for its initial pre-draft consultation. The consultation period for the pre-draft will conclude in May 2026.

6.7.1 Statement of Consistency with the RSES

The proposed development aligns fully with the RSES for the EMR, supporting and/or aligning with its key RPOs and RSOs.

By delivering 234 no. residential units within the existing built-up area of Naas, a designated Key Town in the Core Region, the development promotes compact growth and urban regeneration (**RSO 2**) through efficient use of under-utilised land within the existing urban footprint.

The proposed development includes new transport and access infrastructure, such as walking and cycling routes, bicycle parking, and improved links to existing communities. This supports integrated transport and land use (**RSO 6**) and aligns with **RPO 4.48** by enhancing sustainable travel options and connectivity. The proposed development’s layout, together with proposed links to existing communities and extension to Gallops Avenue, will also improve access to Sallins Railway Station and amenities in Naas town centre.

Supporting amenity and community facilities, including a childcare facility, public open spaces, playgrounds, and public bicycle parking, will contribute to healthy, livable communities (**RSO 4**), improving quality of life and social well-being.

The proposed development will also support the region’s transition to a low-carbon economy and protection of green assets, consistent with **RSO 9** and **RSO 10**.

Consistency with other key RPOs is further described below:

- **RPO 3.2:** Housing is delivered within the built-up area, meeting compact urban development targets.

- **RPO 3.3:** The development will deliver increased densities on the currently under-utilised site.
- **RPO 4.50:** It will contribute to the consolidation of Naas, while improving permeability and promoting sustainable mobility.
- **RPO 4.52:** It will deliver active travel infrastructure.
- **RPO 4.53:** It will contribute to enhancing Naas's role as a Key Town, supporting its function as a hub for employment, amenities, and services.

The proposed development will actively deliver the RSES vision for sustainable, compact, and connected growth in Naas. It will contribute to balanced regional development and an improved quality of life.

6.8 Transport Strategy for the Greater Dublin Area 2022-2042

The Transport Strategy for the Greater Dublin Area 2022 to 2042 (hereafter referred to as the GDA Transport Strategy), prepared by the National Transport Authority (NTA), sets out an updated transport infrastructure strategy for the region, covering Dublin, Meath, Wicklow and Kildare up to 2042. The overall aim of the GDA Transport Strategy is: *“To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports economic growth.”*

With regard to development, including residential development, the GDA Transport Strategy supports the integration of land use and transport. It promotes significant improvements to the pedestrian and cycling network to maximise modal shift.

RPO 4.48 supports improvement in transport provision in Naas, stating:

“Promote the improvement of the transport network within and serving Naas town, including delivery of a robust and efficient walking, cycling and bus network with strong links to Sallins Railway Station, key destinations within the town and to the North West Quadrant and town centre area”

Measure RAIL3 – DART Extension supports further investment in the area of Naas, which in turn will facilitate an increased town population, reading:

“The NTA and Irish Rail will, over the lifetime of the Strategy, extend the DART to deliver electrified rail services to the following towns: • Sallins / Naas; • Kilcock; and • Wicklow”

6.8.1 Statement of Consistency with the GDA Transport Strategy

The proposed development will contribute to the vision set in the GDA Transport Strategy. As noted elsewhere in this Report, and further detailed in the materials accompanying the planning application, the proposed development includes the delivery of transport and connectivity infrastructure, such as the delivery of the extension of Gallops Avenue, cycle tracks, road network, links to adjoining lands, active travel infrastructure such as cycle tracks, bicycle parking, footpaths, etc. Together, these proposals will ensure that residents and visitors enjoy a high level of connectivity and permeability, linking the subject site to the area's existing public transport infrastructure and incentivising sustainable mobility.

7 Statement of Consistency with Local Planning Policy

This section outlines the relevant policies, objectives, and development management standards set out in the KCDP and Naas LAP. Detailed assessments demonstrating that the proposed development has had regard to and is consistent with these local planning frameworks are provided in the following subsections.

Proposed Variation No. 3 to the KCDP

It is noted that KCC has recently published Proposed Variation No. 3 to KCDP. This seeks to align the KCDP with the Compact Settlement Guidelines and the updated national growth targets under the NPF's implementation plan for the NPF First Revision. The consistency of the proposed development with those two documents is demonstrated in **Section 6** of this Report.

7.1 Kildare County Development Plan 2023-2029

7.1.1 Chapter 2: Core Strategy & Settlement Strategy

Chapter 2 of the KCDP sets out the Core and Settlement Strategies for the County. It forecasts a population increase of 31,500 by 2031, reaching approximately 254,000, and sets a target of 9,144 new households for the Plan period (2023–2029). Naas is designated as a Key Town, with a target residential density of 30 to 50 units per hectare.

The chapter promotes housing growth in areas with sufficient demand, emphasising compact, sustainable development aligned with the “10-minute settlement” principle, which encourages connected, walkable neighbourhoods to reduce travel demand.

Key objectives relevant to this development include **CS O5** (Compact Growth), **CS O7** (Utilisation of Underutilised Lands), and **CS O13** (10-Minute Settlement Principles).

The proposed development aligns with these objectives by delivering a compact scheme at a net density of 37.7 units per hectare, within the target range for Naas. It optimises underutilised land within the town boundary, supporting sustainable urban growth. The design prioritises pedestrian and cyclist connectivity, facilitating access to local services and public transport, thereby embodying the 10-minute settlement concept and promoting a sustainable, well-connected community.

7.1.2 Chapter 3: Housing

Chapter 3 of the KCDP sets out key housing objectives to guide development in response to demographic changes, including a likely decline in average household size and a growing ageing population. These changes necessitate a diverse range of housing types to meet evolving needs. Relevant objectives include **HO O1** (housing strategy compliance), **HO O2** (zoning), **HO O4** and **HO P5** (density), **HO O15** (housing mix – statement of housing mix), **HO O16** (apartment provision), **HO O17** (apartment standards), and **HO O18** (housing quality and design).

In accordance with Objective **HO O15**, a Statement of Housing Mix has been prepared; please refer to **Appendix B** to be read in conjunction with **Section 5.3** of this Report.

The proposed development will deliver 37.7 units per hectare, which falls within the recommended range of 30 to 50 units per hectare for outer suburban and greenfield sites in Naas, as set out in Table 3.1 of the KCDP.

Furthermore, the development complies with the minimum 20% Part V social housing requirement by designating 53 no. units for social and affordable housing, thereby supporting social inclusion and affordable housing objectives.

For further details about the residential element of the proposal, please refer to the Architectural Design Statement, Housing Quality Assessment, and associated architectural drawings prepared by RAU, which are enclosed with the planning application materials.

7.1.3 Chapter 4: Resilient Economy & Job Creation

Chapter 4 of the KCDP identifies Naas as the County's principal employment centre, with 10,999 jobs representing 17.5% of total County employment. The Plan supports further job growth in Naas, recognising its capacity to accommodate additional employment and industrial expansion alongside population growth.

Naas benefits from strong rail and road connectivity to the Greater Dublin Area via the N7/M7 motorway and Sallins and Naas train station. The increasing prevalence of remote working offers opportunities for residents to access wider labour markets.

Key objectives relevant to the proposed development include **RE O1** (supporting economic growth), **RE O3** (promoting mixed-use settlements), and **RE O5** (ensuring a high-quality living environment to attract and retain skilled workers).

The proposed development aligns with these objectives by delivering 234 no. residential units that support sustainable population growth and local economic expansion. The housing mix includes units designed to accommodate home working. At the same time, the provision of a childcare facility and excellent transport links fosters a balanced, live-work community that contributes to the economic vitality of Naas and Kildare.

7.1.4 Chapter 5: Sustainable Mobility & Transport

Chapter 5 of the KCDP recognises the negative impacts of dispersed development, including increased car dependency, congestion, inhibited economic growth, and rising greenhouse gas emissions. The Plan promotes compact development located appropriately relative to existing services to reduce travel demand and encourage sustainable transport modes.

Policy **TM P1** seeks to “*Promote sustainable development through facilitating movement to, from, through and within the County that is accessible to all and prioritises walking, cycling and public transport.*”

The Plan adopts the ‘Avoid-Shift-Improve’ framework to address transport and mobility challenges. This includes reducing journey demand through measures such as digitalisation and remote working (Avoid), encouraging modal shift from private vehicles to public and active transport (Shift), and improving infrastructure and services (Improve).

Relevant objectives and policies within Chapter 5 for the proposed development include **TM O5** (SUDS delivery), **TM P2** (pedestrian and cycling infrastructure), **TM O19** and **TM O99** (compliance with the Design Manual for Urban Roads and Streets 2019), **TM O20**, **TM O21** and **TM O101** (residential permeability and connectivity), **TM O38** (bicycle mobility and infrastructure), **TM O71** (traffic and noise impact), **TM O110** and **TM O113** (parking design, quantum and standards), and **TM O124** and **TM O125** (public lighting).

Moreover, Chapter 5 includes **TM O66**, which seeks to secure the implementation of the Priority Road and Bridge Projects as well as the Regional Roads identified for improvement listed in Tables 5.4 and 5.5 of the KCDP. Table 5.4 specifically identifies Gallops Avenue as a Priority Road and Bridge Project, highlighting that this project should be progressed in accordance with Objective **MTO 3.3** of the Naas LAP.

The proposed development supports these objectives:

- The proposed development accords with **TM O66**. It includes the extension and enhancement of Gallops Avenue, designed in accordance with DMURS principles to ensure safe and convenient active travel routes. Compliance with **MTO 3.3** of the Naas LAP is demonstrated in **Section 7.2.2** of this Report.
- In accordance with **TM O71**, which requires that all new developments located near National Routes, Regional Routes, and other heavily trafficked roads undergo spatial and acoustic assessment to minimise noise impacts and protect sensitive noise receptors from traffic noise,

an acoustic assessment has been prepared by AWN and is submitted with the planning application materials.

- The internal road network promotes permeability and connectivity, facilitating walking and cycling within and beyond the site, including convenient access to Naas town centre and the surrounding public transport infrastructure.
- SuDS are integrated throughout the development to manage surface water runoff in compliance with Policy **TM 05**.

For further details on parking, drainage, lighting, and transport and mobility infrastructure, please refer to the supporting documentation accompanying the planning application. This includes the Infrastructure Design Report by DOBA, the Landscape Design Report by M+S, the lighting reports prepared by Sabre, the Traffic & Transport Assessment Report by Systra, and the associated drawings prepared by these consultants, all enclosed with the planning application materials.

7.1.5 Chapter 6: Infrastructure & Environmental Services

UÉ is the national authority responsible for the provision of drinking water supply and wastewater collection, treatment, and disposal. The KCDP states that KCC will support UÉ in managing the water and wastewater network, ensuring that new developments are designed to connect efficiently with existing infrastructure, minimising disruption where capacity allows.

Surface water management within the Plan is guided by SuDS, which the KCDP seeks to facilitate across all developments. Flood risk management is also emphasised as a key consideration. Additionally, the control of light pollution is addressed, recognising its importance for residential amenity, nature conservation, and energy efficiency.

Accordingly, Chapter 6 sets out a range of infrastructure and environmental services objectives and policies relevant to the proposed development, including: **IN 03** (promote water conservation), **IN 04** (pre-planning consultation with UÉ), **IN 013** (ensure wastewater services in new developments), **IN 015** (connection to public wastewater infrastructure), **IN 021**, **IN 022**, **IN 025**, and **IN 026** (facilitate development and implementation of SuDS), **IN 023** (adequate surface water management), **IN 030** (compliance with relevant water management guidelines), **IN 033** (flood risk management), **IN 042** (waste management, including provision of storage), **IN 064** and **IN 065** (noise control), and **IN 068** and **IN 069** (street lighting design).

The proposed development has had regard to these objectives by implementing a comprehensive water management strategy, including potable water supply, wastewater drainage, and surface water management incorporating SuDS, as summarised in **Section 5.11** of this Report.

Flood risk has been assessed and addressed in line with **IN 033**, ensuring that the development does not increase flood risk on or off-site. Waste management facilities, including storage provisions, are incorporated in accordance with **IN 042**. Lighting considerations have been integrated into the design, consistent with **IN 064**, **IN 065**, **IN 068**, and **IN 069**.

For further details on infrastructure and environmental services, please refer to the Infrastructure Design Report and SSFRA by DOBA; the Architectural Design Statement by RAU; the Landscape Design Report by M+S; the lighting reports by Sabre; and the associated drawings prepared by these consultants, all enclosed with the planning application materials.

As noted in **Section 5.11** of this Report, a CoF and SODA issued by UÉ are included with the planning application.

7.1.6 Chapter 7: Energy & Communications

Chapter 7 of the KCDP sets out policies aimed at achieving high levels of energy conservation and efficiency in buildings. This includes adherence to NZEB standards and the promotion of sustainable microgeneration of energy and heating solutions.

The proposed development incorporates these principles through energy-efficient building design and the integration of sustainable technologies. Furthermore, the development includes the removal of existing ESB overhead powerlines and their replacement with underground cabling, ensuring modern, reliable, and less visually intrusive electrical infrastructure in line with Chapter 7 objectives.

For further details on energy efficiency measures and electrical infrastructure, please refer to the Architectural Design Statement by RAU, the suite of drawings prepared by JAK, and the Climate Action & Energy Statement by Tetra Tech, enclosed with the planning application.

Moreover, Chapter 7 includes key policies such as Policy **EC P1**, which aims to reduce the county's carbon footprint in line with national climate mitigation and adaptation targets, and Objective **EC O1**, which promotes the incorporation of renewable energy sources within energy-intensive sectors.

In line with these policies, and as noted above, a Climate Action & Energy Statement by Tetra Tech is submitted with the planning application.

7.1.7 Chapter 10: Community Infrastructure and Creative Places

Chapter 10 emphasises the Council's commitment to providing and facilitating appropriate community infrastructure that promotes social inclusion and supports holistic development. The Plan requires the delivery of universally accessible, integrated, and well-connected social, community, cultural, and recreational facilities close to the communities they serve.

Relevant objectives for the proposed development include Objective **SC O6** (protecting, enhancing, and increasing provision of facilities), Objective **SC O7** (clustering of facilities), Objective **SC O8** (ensuring access to community centres), and Objective **SC O15** (requiring facilities to be operational prior to residential occupation).

Additionally, Objective **SC O16** requires that residential developments of 20 or more dwellings submit a Social & Community Infrastructure Assessment. In this regard, the proposed childcare facility, with a capacity for 97 no. children, directly supports the provision of community facilities within the development. A Social & Community Infrastructure Assessment has been prepared by Tetra Tech and is enclosed with the planning application materials, demonstrating the adequacy of social infrastructure within the scheme and the receiving environment to accommodate the needs of future residents.

For further details of the proposed community and recreational facilities, please refer to the Architectural Design Statement by RAU, the Landscape Design Report by M+S, and the associated drawings enclosed with the planning application.

7.1.8 Chapter 11: Built & Cultural Heritage

Chapter 11 seeks to protect, conserve and sensitively manage the county's built and cultural heritage, including archaeological sites, protected structures and historic landscapes, ensuring heritage is considered through the planning process.

Relevant objectives and policies for the proposed development include Objective **AH O2** (manage development to protect and conserve archaeological heritage, avoiding adverse impacts and favouring preservation in-situ), Objective **AH O3** (require archaeological impact assessment, surveys, test excavation and/or monitoring and/or underwater archaeological impact assessments for planning applications), Objective **AH O4** (protection of archaeological monuments), Policy **AH P2** (protect and enhance archaeological sites and their settings, including sites listed in the Record of Monuments and Places (RMP) and newly discovered remains).

A Cultural Heritage Impact Assessment Report prepared by ACSU accompanies the application. The assessment concludes that the site contains no monuments listed in the Record of Monuments and Places (RMP) or the Sites and Monuments Record (SMR), nor any sites listed in the KCDP, any protected structure, or sites listed in the National Inventory of Architectural Heritage (NIAH). Moreover, it recommends that an assessment, including a geophysical survey of green fields and

testing, be carried out in advance of any development of the site, which the Applicant commits to undertake post-planning, in accordance with standard practice (i.e., pre-commencement condition).

7.1.9 Chapter 12: Biodiversity & Green Infrastructure

Chapter 12 seeks to protect, manage and enhance County biodiversity and to promote an integrated green infrastructure network that supports resilient, sustainable communities. It emphasises the intrinsic value of biodiversity and ecosystem services, the protection and enhancement of semi-natural features (hedgerows, rivers, ponds, woodlands, etc.), the role of urban green infrastructure in health and placemaking, and the need to apply the mitigation hierarchy and pursue biodiversity enhancement and connectivity across the county.

Relevant objectives for the proposed development include Objective **BI O1** (requirement for a Ecological Impact Assessment), Objective **BI O70** (use the County Green Infrastructure Strategy to inform layout, design and landscaping so development contributes to habitat/species conservation), **BI O71** (identify existing green infrastructure at the initial stage and show on landscaping plans how retained features and new linkages have shaped the site layout and management), Objective **BI O72** (ensure new development does not fragment the green infrastructure network — retain and connect ecological corridors and habitats), Objective **BI O74** (strengthen ecological networks between urban areas and designated sites by providing or enhancing linkages to improve connectivity), and Objective **BI O75** (require provision of multifunctional open space that supports ecology, recreation and sustainable water management/SuDS). Related policy expectations include **BI P1** (apply the mitigation hierarchy — avoid, minimise, mitigate/compensate — and pursue opportunities for biodiversity net gain) and specific requirements to protect, retain and manage hedgerows and other semi-natural features with appropriate buffers and management measures.

The proposed development complies with Chapter 12, as demonstrated by the supporting materials included with the planning application, notably, the Architectural Design Statement by RAU, the Landscape Design Report by M+S, the Arboricultural Report by CMAc, and the suite of ecological and environmental reports prepared by Tetra Tech (see summary in **Section 8** of this Report).

The landscape, planting, and open space strategy (see Landscape Design Report and M+S materials) will enable the site's integration into existing green infrastructure by retaining and reinforcing the hedgerow that traverses the site and conserving the hedgerow along the western boundary, thereby providing protective measures during construction. SuDS features are also proposed, while additional measures — native tree and shrub planting- will deliver measurable biodiversity enhancement, strengthen ecological connectivity and provide multifunctional open space and amenity for residents, in accordance with Chapter 12 requirements.

7.1.10 Chapter 13: Landscape, Recreation and Amenity

Chapter 13 seeks to protect, manage and enhance the County landscape character while supporting high-quality, accessible recreational facilities and multifunctional open spaces that contribute to health and wellbeing. The chapter emphasises safeguarding scenic routes, protected views, and landscape character areas, and expects new development to respond sensitively to siting, scale, and design.

Relevant objectives for the proposed development include **LC O1** and **LC O2** (protect and enhance landscape character and scenic views), **RA O1** and **RA O2** (support accessible recreational amenities and open space provision), and **LC O5** (ensure new development respects and integrates with the landscape context).

Protected views and scenic routes identified in the KCDP (including those associated with the Grand and Royal Canal corridors and several bridge/viewpoint locations around Naas) lie within a 5 km radius of the proposed development. These viewpoints are generally low-level in elevation. The site sits within the Northern Lowlands Landscape Character Area, classified in the KCDP as low sensitivity. Given the distance to the identified viewpoints, their low elevation and the modest scale

of the proposed development, it is considered that no designated view will be materially compromised by the scheme. Verified views, CGIs and aerial imagery prepared by 3DDB accompany the application to demonstrate visual outcomes.

As demonstrated by the supporting materials, the scheme has been designed to respect and integrate with the receiving environment. Building heights are limited to a maximum of three storeys, consistent with the prevailing low-rise character of the surrounding area and have been positioned and massed to avoid significant adverse effects. A quantitative daylight, daylight and shadow assessment found no material loss of amenity to surrounding properties and shadowing consistent with a low-rise residential scheme.

In summary, the proposed development will conserve the local landscape character, safeguard relevant views, and deliver accessible, multifunctional open spaces and recreational facilities. These measures ensure compliance with Chapter 13 objectives and support sustainable placemaking in Naas.

7.1.11 Chapter 14: Urban Design, Placemaking, and Regeneration

Chapter 14 promotes high-quality urban design principles aligned with the 10-minute city concept, ensuring facilities and services are within walking and cycling distance of residential areas. The chapter references the Urban Design Manual (2009) (now revoked) and the Building Heights Guidelines, which advocate for a mix of 2, 3, and 4-storey buildings in suburban edges to integrate well with surrounding development.

Key objectives relevant to the proposed development include **UD O1** (integrated design and layout promoting healthy placemaking) and **UD O11** (compliance with national building heights guidance).

It is noted that since the publication of the KCDP, some Section 28 Guidelines have been updated or replaced. Thus, the Compact Settlements Guidelines have superseded the Sustainable Residential Developments in Urban Areas – Guidelines for Planning Authorities (2009).

Local authorities are required to review statutory development plans and consider whether they are in line with the newly issued Guidelines. Where the development plan is materially inconsistent with the Guidelines, the local authority must vary it accordingly. In this regard, a variation to the KCDP is underway, reflecting the requirements of the Compact Settlements Guidelines. It is noted that the proposed variation does not update the entire Plan in relation to other national and local policies, objectives, and guidance that may have been issued since the adoption of the Plan. Full regard will be given to such matters when the Plan is reviewed in its entirety in preparation for the next County Development Plan.

The proposed development responds to the Compact Settlements Guidelines and the urban design and placemaking policies contained in the KCDP by delivering a well-considered mix of building heights, including two, three, and four-storey units, in line with the updated guidance and the development pattern of Naas.

Further details on the design and architectural quality of the proposal are provided in the Architectural Design Statement by RAU, prepared in accordance with the urban design principles outlined in the Compact Settlements Guidelines.

7.1.12 Chapter 15: Development Management Standards

Table 7.1 below outlines how the proposed development has had regard to Chapter 15 of the KCDP, including Section 15.4 Housing Developments.

Table 7-1: Statement of Regard to Chapter 15 of the KCDP**Kildare County Development Plan**

Relevant Section	Details of Development Management Standards	Prospective Applicant Response
Section 15.1.6 Appropriate Assessment (p. 518)	<i>“All plans or projects, including the Council’s own proposals under Part 8 of the Planning and Development Regulations 2001 (as amended), unless they are directly connected with or necessary to the management of a European (Natura 2000) site, are required to be subject to screening for Appropriate Assessment, to determine if they are likely to have a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects. Full Appropriate Assessment must be carried out unless it can be established through screening that the plan or project in question will not have a significant effect on the Natura 2000 Site.”</i>	The planning application is accompanied by a Report to Inform Appropriate Assessment prepared by Tetra Tech. A summary is provided in Section 8 of this Report.
Section 15.1.7 Pre-Application Discussions (p. 519)	<i>“A prospective applicant shall have consulted with the Planning Authority in respect of development that comprises: Residential development of more than 10 housing units - Non-residential development of more than 1,000 sq. meters gross floor space. Other development as may be prescribed in legislation.”</i>	Details of pre-application consultations with KCC are provided in Section 4 of this Report, and copies of relevant minutes are appended in Appendix A .
Section 15.2.1 Site Coverage and Plot Ratio (p. 520)	<i>“Appropriate site coverage and plot ratio will now be considered on a qualitative basis, rather than quantitative, having regard to the quality of design, response to site context (including sensitivity to Architectural Conservation Areas where applicable) and potential impacts on the surrounding environment.”</i>	The development proposes a net density of 37.7 units per hectare, consistent with Tables 2.8 and 3.1 of the KCDP (30-50 units per hectare) and with the Compact Settlement Guidelines. Site coverage is 0.23 with a plot ratio of 0.44. Further details are provided in the Architectural Design Statement and the Development Schedules by RAU.
Section 15.2.2 Overlooking / Separation Distances (p. 520-521)	<i>“Traditionally a minimum distance of 22m is required between directly opposing first floor windows. However, in cases of innovative design, where overlooking into habitable rooms does not occur, this figure may be reduced, subject to the protection of adjoining residential amenities and privacy, the quality of design and adherence to the Sustainable Urban Housing: Design Standards for New Apartment Guidelines (2020) where applicable.”</i> <i>“A separation distance of 35 metres will normally be required in the case of overlooking living room windows and balconies at upper floors”</i>	Note: Since the publication of the KCDP, some Section 28 Guidelines have been updated or replaced. Regarding the development standard, the New Apartment Guidelines have been updated. Moreover, separation distances are now guided by the Compact Settlement Guidelines. Consistency with these new and updated guidelines is demonstrated in Section 6 of this Report. Building separation distances have been designed to prevent overlooking and protect privacy. Architectural drawings prepared by RAU are enclosed, providing details of the

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	<i>“A minimum distance of 2.3 metres shall be provided between the side walls of adjacent dwellings or dwelling blocks with each building being a minimum of 1 metre from the boundary to allow for adequate maintenance and access”</i> <i>“In all instances where minimum separation distances are not met, the applicant shall submit a sunlight/daylight/overshadowing analysis for proposed developments.”</i>	proposed separate distances. A Sunlight and Daylight Assessment Report by 3DDB is also included.
Section 15.2.3 Overshadowing (p. 521)	<i>“All new developments are required to have regard to the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and British Standard (B.S.) 8206 Lighting for Buildings, Part 2, 2008: Code of Practice for Day Lighting or other updated relevant documents.”</i>	The layout and building heights have been designed to optimise daylight and sunlight access, minimising overshadowing. See the Architectural Design Statement by RAU and the Sunlight and Daylight Assessment Report by 3DDB enclosed.
Section 15.2.4 Soft Landscaping (p. 521-522)	a) <i>“The planting of semi-mature trees¹ depending on location and circumstances. Proposals to provide semi-mature trees of appropriate species (as set out in Table 15.1) in suitable prominent locations within a development site will be considered favourably.</i> (...) b) <i>Where a large site adjoins a green corridor, public open space or area of high ecological value, any new public open space on the site should be contiguous to same and encourage visual continuity and expansion of the green infrastructure/biodiversity network. The appropriate grading or transition of public open space towards a green biodiversity corridor shall be factored into the consideration.</i> c) <i>Landscaping works shall incorporate nature based drainage systems such as biodiversity areas or wetlands, which can reduce surface water run-off. Green roofs, walls, street trees and permeable surfaces will be encouraged.</i> d) <i>Street trees shall be encouraged into developments where possible and facilitated by way of appropriately designed tree pits.</i> e) <i>All planting must take place in the first planting season following occupation of the building or completion of the development, whichever is sooner. Any trees or plants, which within a period of 5 years from the completion of the development die or become</i>	Section 5.8 of this Report provides a summary of the landscape (soft and hard), open space and play strategy for the proposed development. The submission is also accompanied by a Landscape Design Report and associated landscape drawings prepared by M+S, which provide details of the overall landscape strategy, including open spaces and planting, demonstrating that the proposed development has had regard to guidance and requirements set out in Section 15.2.4 of the KCDP.

¹ Semi-mature trees are defined as trees with an overall height of more than 4 metres and/or a stem girth measurement (circumference) of 20 centimetres or larger.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	<i>seriously damaged or diseased, shall be replaced in the next planting season.</i> f) <i>Leylandii trees Cupressocyparis ‘Leylandii’, Cupressocyparis ‘Castlewellan Gold’ and Laurel Prunus laurocerasus shall no longer be permitted as part of landscaping proposals for any new development. Leylandii because of their nuisance and safety risk they pose when not managed and Laurel due to the invasive nature of this species.</i> g) <i>The planting of species listed as of concern by invasive species Ireland, including species such as Cherry Laurel Prunus Laurocerasus and also species of a potential invasive nature as outlined by invasive species Ireland such as Cornus sericea L. shall neither be permitted in rural nor urban areas.”</i>	
Section 15.2.5 Hard Landscaping (p. 526)	<i>“Hard Landscaping shall address the following:</i> a) <i>Applications for substantial hard-surfaced areas (e.g., streets, squares, open spaces, paved areas, footpaths, and driveways) must use appropriate materials that are durable and of good quality while demonstrating methods of controlling and limiting surface water run-off consistent with sustainable development.</i> b) <i>Use of permeable paving/surfaces, ponds, bio-retention areas, tree pits, rain gardens, swales and other nature based drainage system methods, such that rainfall is not directed immediately to surface water drains. Such methods can serve to reduce the risk of flooding.</i> c) <i>The use of artificial grass in all new residential developments shall not be permitted, save in exceptional circumstances including for children’s play areas.</i> d) <i>Walls, fences, metal railings, and gates used to define spaces should be selected so as to be an integrated part of the overall design. Street furniture should be appropriately designed and sited such that it does not provide an obstacle for people with disabilities.</i> e) <i>Where underground or surface works are carried out, the Council will ensure the reinstatement of materials or the replacement with materials of similar style and quality.</i> <i>Hard-landscaping proposals for public areas shall also be assessed with regard to the principles of the Urban Design Manual Best Practice Guide (DEHLG, 2009), as appropriate”</i>	Section 5.8 of this Report provides a summary of the landscape (both soft and hard), open space, and play strategy components of the proposed development. The planning application is accompanied by a Landscape Design Report and associated landscape drawings prepared by M+S, which provide details of the overall landscape strategy, including open spaces and planting, demonstrating that the proposed development has had regard to guidance and requirements set out in Section 15.2.5 of the KCDP. SuDS features are incorporated. Artificial grass is not proposed.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
Section 15.2.6 Access to Land (p. 526)	<i>“Development should be designed in such a fashion that it will not prejudice the provision of vehicular or pedestrian access, or key infrastructural services in adjoining lands. Development should also be designed to ensure ‘ransom strips’ will not inhibit future development.”</i>	Access to the site will be via the extended Gallops Avenue, connecting Tipper Road and Dublin Road. Links will also be created to connect to adjacent communities. The proposed development benefits from passive surveillance and integration with existing and future communities. See Section 5.9 of this Report for a summary description of the access and movement strategy as part of the proposed development. More details are proposed in the Architectural Design Statement by RAU, the Landscape Design Report by M+S and the Infrastructure Design Report by DOBA, which are enclosed with the planning application materials.
Section 15.2.7 Universal Access / Design (p. 527)	<i>“The Council will require that proposed developments, in their layout and design, are accessible, understandable, and usable to the greatest extent possible by all people, regardless of their age, size, ability or disability.”</i>	The proposal complies with Part M requirements. See the Architectural Design Statement by RAU and associated architectural drawings, which include floor plans for all proposed units.
Section 15.3 Design Statements (p. 527)	<i>“While a design statement can be prepared for all development proposals, the Planning Authority will require one to be submitted alongside applications for the following: Residential development comprising of 10 or more units (...)”</i>	An Architectural Design Statement, prepared by RAU, accompanies this submission and should be read in conjunction with the associated architectural drawings.
Section 15.4 Residential Development (p. 528-529)	<i>“(...) the Council require that all new residential development should integrate with its surroundings, incorporate green infrastructure features, maximise the potential for present and future connectivity, maximise opportunities for social interaction, and be of high-quality design constructed with attractive and durable materials that positively contribute to the creation of a sense of place and identity for the area”</i>	The development integrates with its surroundings, maximises connectivity, and provides green and social infrastructure. See Sections 5.2 and 5.8 of this Report, alongside the Architectural Design Statement by RAU, and the Landscape Design Report by M+S.
Section 15.4.1 Development Capacity (p. 529)	<i>“Applications for residential development in urban areas will be required to comply with the principles of compact growth and demonstrate that they will contribute to the overall consolidation of the settlement.”</i> <i>Furthermore, it is stated that:</i> <i>“(...) applications for residential development over 20 units or, 2,000m² in the case of commercial developments, (including office/industrial</i>	The scheme promotes compact growth with an efficient land use mix of houses and apartments. See Appendix B of this Report for the housing mix, alongside the Architectural Design Statement by RAU. An SCIA by Tetra Tech is enclosed with the planning application materials.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	<i>developments), will be required to be accompanied by a Social Infrastructure Audit (SIA)”</i>	
Section 15.4.2 Development Phasing (p. 529)	<i>“(…) planning applications for multi-unit residential developments to be accompanied by a phasing schedule detailing the number of dwellings, quantum of public open space and infrastructure which will be developed as part of each phase” (p. 529)</i>	A phasing plan is included in the suite of architectural drawings prepared by RAU and enclosed with the planning application materials. Further details of the construction and demolition phasing are also provided in the Construction Environmental Management Plan prepared by AWN.
Section 15.4.3 Residential Density (p. 530)	<i>“Indicative density levels for residential development are set out in Table 3.1 of Chapter 3. As per the Section 28 Guidelines on Urban Development and Building Heights (2018) this Plan supports a drive for increased building heights in appropriate locations in order to maximise the efficient use of development land in urban areas. In this regard, Section 14.8 identifies specific locations within the county which have the capacity to suitably accommodate taller buildings, including for residential development. Local Area Plans will also identify density targets for particular sites and specify locations for taller buildings as appropriate.”</i>	The net density is 37.7 units per hectare with building heights ranging from two to three storeys, consistent with the KCDP and local context. See Section 5.5 of this Report, alongside the Architectural Design Statement and architectural drawings, including elevations, prepared by RAU and enclosed with the planning application materials. Densities are also consistent with Compact Settlement Guidelines requirements, as demonstrated in Section 6.2 of this Report.
Section 15.4.4 Housing Mix (p. 530)	<i>“In accordance with Objective HO O15 a ‘Statement of Housing Mix’ will be required to accompany applications for 10 or more units in order to ensure an appropriate mix of house types and sizes within individual residential development schemes and that they are adaptable, designed to meet the needs of an aging population and cater for people with disabilities. Accordingly, this statement shall set out how the proposed housing mix, including type, size and tenure has been determined, having regard to local supply and demand”</i>	The housing mix comprises a diverse range of unit sizes and types, including houses and apartment units, with sizes ranging from 1 to 5 bedrooms. This variety of units and sizes caters to the needs of both current and future residents. For a summary of the types and sizes of units proposed, please see Section 5.3 of this Report, as well as the Statement of Housing Mix provided in Appendix B of this Report. Further information is provided in the Architectural Design Statement and the associated architectural drawings, including housing-type drawings and floor plans, prepared by RAU and enclosed with the planning application materials.
Section 15.4.5 Design, Layout and Boundary Treatments (p. 530)	<i>“(…) proposals for residential development in towns and villages will be required to fully address the 12 Criteria for sustainable residential development as outlined in the Urban Design Manual – A Best Practice Guide (DoEHLG, 2009), as well as the guidance set out in Section 14.6 of this Plan.</i>	The design and layout adhere to the guidance and principles outlined in relevant design manuals and DMURS standards. This is demonstrated in the Architectural Design Statement by RAU. A Statement of Consistency with DMURS has also been prepared by DOBA and is enclosed with the planning application materials.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	<i>Furthermore, the design and layout of all residential developments must fully comply with the Design Manual for Urban Roads and Streets (2019)”</i>	Note: Since the publication of the KCDP, some Section 28 Guidelines have been updated or replaced. Specifically, the Sustainable Residential Development and Compact Settlements Guidelines (2024) have superseded the Sustainable Residential Developments in Urban Areas – Guidelines for Planning Authorities (2009) and the Urban Design Manual (2009). Consistency is demonstrated in Section 6 of this Report.
Section 15.4.6 House Design (p. 530-531)	<i>“Table 15.2 ‘Minimum Floor Space and Open Space Requirements for Houses’ of Section 15.4.6 outlines minimum private open spaces.”</i>	Please refer to the drawings and the Housing Quality Assessment prepared by RAU, which detail all house types, including floor areas and layouts.
Section 15.4.7 Apartment Developments (p. 533)	<i>“Planning applications for apartments shall be assessed against the Sustainable Urban Housing: Design Standards for New Apartments (2020) or any subsequent guidelines and the Urban Development and Building Height Guidelines (2018).”</i>	Note: Since the publication of the KCDP, some Section 28 guidelines have been updated or replaced. Regarding the development standard, the New Apartment Guidelines have been updated. Consistency with these new and updated guidelines is demonstrated in Section 6 of this Report. Apartments comply with the New Apartments Guidelines (2025) and the Building Heights Guidelines (2018). Consistency is demonstrated in Sections 6.3 and 6.4 of this Report. See also the Architectural Design Statement and Housing Quality Assessment prepared by RAU and enclosed with the submission materials.
Section 15.4.10 Management Companies for Apartments (p. 534)	<i>“Apartment developments are not taken in charge by the local authority and therefore a management company is required.”</i>	A Property Management Strategy Report prepared by Aramark is enclosed with the planning application materials. This report provides details of the development’s future management by an owner management company,
Section 15.4.15 Naming of Residential Developments (p. 538)	<i>“All applications for residential development shall provide for the naming of residential developments in the following manner: Three potential names that reflect local heritage shall be submitted as part of a planning application. The three names shall be submitted in both Irish and in English. There should be a brief description of the source and reason for the proposed name of the development having regard to the Council’s Naming of New Residential Developments (2018).”</i>	The Applicant is committed to agreeing on a name for the residential development with KCC following the grant of planning permission.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	<i>Avoid names already used in the county but particularly, in the local area."</i>	
Section 15.4.16 Taking in Charge of Residential Developments (p. 538)	<i>"When a residential development is completed in accordance with all the conditions and particulars of the planning permission, the developer or the majority of homeowners may make a written request in accordance with the provisions of Section 180 of the Planning and Development Act 2000 (as amended) to have the estate taken in charge (roads and services)."</i>	A Taking in Charge drawing is enclosed with the suite of architectural drawings prepared by RAU.
Section 15.5.1 Social Infrastructure Audit (p. 538)	<i>"(...) any new residential development over 20 units or commercial developments (including office/industrial developments) over 2,000 square metres, will be required to undertake a social infrastructure audit to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents.</i> <i>(...)</i> <i>"It should be noted that the Planning Authority has undertaken a number of SIAs to date as part of the preparation of the Leixlip, Naas and Athy Local Area Plans and will continue to do so as part of the rollout of the Local Area Plan programme. The content of any SIAs submitted as part of planning applications can therefore be considered in the context of SIAs already undertaken, where relevant, in order to develop a comprehensive database of available social infrastructure to plan for the sustainable development of communities over the Plan period and beyond."</i>	The development addresses social infrastructure needs, including a childcare facility and amenity spaces. Please refer to the Architectural Design Statement by RAU and the Landscape Design Report by M+S, which are enclosed with the submission materials. In addition to the above, the planning application materials include an SCIA prepared by Tetra Tech.
Section 15.5.2 Childcare Facilities (p. 539)	<i>"As part of the undertaking of a Social Infrastructure Audit (as above), for developments proposed (residential and / or commercial), the onus shall be on the developer to demonstrate that there are adequate childcare facilities to cater for the proposed development."</i>	The childcare facility has a capacity for 97 no. children, with dedicated external play areas and parking spaces. The SCIA prepared by Tetra Tech is enclosed as part of the documentation supporting the application.
Section 15.6.3 Amenity Green Spaces (p. 544-545)	<i>"Amenity Green Spaces are generally small areas of open space associated with individual housing estates. Requirements are outlined in 15.6.6 below"</i>	See the provided response to Section 15.6.6 of the KCDP below.
Section 15.6.5 Formal / Informal Play Spaces (p. 544-545)	<i>"Developments shall provide 'scale appropriate' children's play in semi-private or public open spaces through provision of a scale appropriate Natural Play Area"</i>	The proposed development includes open spaces that will provide a mix of formal and informal play areas.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
Section 15.6.6 Public Open Space for Residential Development (p. 544-545)	<i>“Open space shall be provided within the development site as follows:</i> <i>a) On greenfield sites, the minimum area of open space that is acceptable within the site is 15% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 8%.</i> <i>b) On institutional sites a minimum requirement of 20% of the site area may be required. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 10%.</i> <i>c) In all other cases, public open space should be provided at the rate of 15% of the total site area (at a minimum). This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 6%.</i> <i>d) A relaxation of these standards may be considered in smaller developments (less than 8 units) for which a minimum of 10% would be required which includes 4% for biodiversity.</i> <i>e) A relaxation of these standards may also be considered on brownfield and / or regeneration sites where higher residential densities are required. On such sites a minimum of 10% would be required which includes 4% for biodiversity.</i> <i>f) In cases where standards have been relaxed or where there is a shortfall in the provision of open space due to the practicalities of the site (e.g., unsuitable due to topography, flooding, gradient, SuDS, overhead powerlines etc.) the council will require an equivalent monetary contribution in lieu of remaining open space</i>	Section 5.8 of this Report provides a summary of the landscape (both soft and hard), open space, and play strategy components of the proposed development. The planning application is also accompanied by a Landscape Design Report by M+S and associated landscape drawings, which provide details of the overall landscape strategy, including play areas, demonstrating that the proposed development has had regard to guidance and requirements set out in Section 15.6.5 of the KCDP. See Section 5.8 of this Report and the Landscape Design Report by M+S. The development includes c. 10,007 sqm (c. 16% of the net site area, c. 6.2 ha) of public open space distributed across the site. The provision complies with requirements set out in the Compact Settlement Guidelines, as demonstrated in Section 6.2 of this Report. Note: Since the publication of the KCDP, some section 28 guidelines have been updated or replaced. With respect to the open space, the New Apartment Guidelines (2025) have been updated. Moreover, the Compact Settlement Guidelines (2024) also provide guidance in terms of open space. Consistency with these new and updated guidelines is demonstrated in Section 6 of this Report.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	provision via the Kildare County Council Development Contribution Scheme. g) SuDS are not generally acceptable as a form of public open space provision, except where they contribute in a significant and positive way to the design and quality of open space. Where the Council considers that this is the case, in general a maximum of 10% of the open space provision shall be taken up by SuDS. Each application shall also have regard to the qualitative standards outlined in Section 4.18 of the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, DEHLG, (2009)."	
Section 15.6.7 Private Open Spaces – Gardens, Terraces, Balconies (p. 546-547)	<u>Houses</u> "All houses should have an appropriate and useable area of private open space to the rear of the dwelling. The minimum area of private open space to be provided is set out in Table 15.2. (...) Flexibility will be considered for well-designed development proposals. <u>Apartments</u> - The minimum private open space standards for Apartments are outlined in Table 15.3. - It is expected that all private balconies, patios, terraces, or roof gardens comply with or exceed the minimum standards set out in Table 15.3. - All private balconies, patios, terraces, or roof gardens shall be located to optimise solar orientation and designed to minimise overshadowing and overlooking. - All private balconies, patios, terraces, or roof gardens shall be suitably screened in a manner complementing the design of the building to provide an adequate level of privacy and shelter for residents."	All houses and apartments are provided with private open spaces, such as gardens, balconies, or terraces, designed to be compliant with the New Apartments Guidelines (2025) and the Compact Settlements Guidelines (2024). Section 6 of this Report demonstrates consistency with relevant development standards. See also the Housing Quality Assessment and the architectural drawings prepared by RAU, enclosed with the submission materials.
Section 15.7.1 Walking and Cycling (p. 547)	"New pedestrian and cycle paths shall be designed in accordance with the Government's Design Manual for Urban Roads and Streets - 2019 (DMURS), the national Cycle Manual (2011 and any subsequent	The internal network is designed according to DMURS, ensuring permeability and connectivity. Refer to the Infrastructure Design Report, prepared by DOBA and enclosed with the planning application materials.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	updates), <i>Draft GDA Cycle Network Plan (NTA, 2021)</i> and Section 5.4.1 of this Plan. <i>Ensure new development areas are fully permeable for walking and cycling as outlined in Section 5.4.1 of this Plan</i>	
Section 15.7.2 Cycle Parking (p. 549)	<i>“The cycle parking standards set out in Table 15.4 shall be taken as minimum standards.”</i>	The proposed development includes suitable levels of cycle parking, catering to both residents and visitors. The level of parking provision will be compliant with the relevant standards. For further details, please refer to the Architectural Design Statement prepared by RAU and drawings enclosed with the submission materials.
Section 15.7.3 Public Transport (p. 549)	<i>“All new development should be designed to maximise permeability and connectivity to public transport networks in accordance with the provisions of the ‘Design Manual for Urban Roads and Streets’ (DMURS, 2019).”</i>	The proposed development is designed to maximise connectivity to public transport. Refer to the Infrastructure Design Report and associated DOBA drawings enclosed with the submission materials, as well as the Mobility Management Plan prepared by Systra.
Section 15.7.4 Road and Street Network (p. 550)	<i>“The principles, approaches and standards set out in the Design Manual for Urban Roads and Streets (2019) apply to the design of all urban roads and streets (with a speed limit of 60 km/h or less), except national roads and in exceptional circumstances, certain urban roads and streets with the written consent of the relevant Authority.</i> <i>The standards set out in the TII publication DN-GEO-03031 Rural Road Link Design (2017) applies to Single and Dual Carriageway roads (including Motorways) in rural areas. It also applies to single carriageway Urban Relief Roads and Urban Dual Carriageways and Motorways.</i> <i>The Council requires the submission of a Traffic and Transport Assessment (TTA) as part of planning applications for larger developments, as outlined in Table 15.6 below, in accordance with the TII publication PE-PDV-02045 Traffic and Transport Assessment Guidelines (2014). These guidelines advise that applicants should consult with the Transportation Department of</i>	See response above to Section 15.7.3 of the KCDP. The submission is also accompanied by a Traffic & Transport Assessment Report prepared by Systra.
Section 15.7.5 Stopping Distances and Sightlines (p. 551)	<i>“Sightline requirements are determined by the Council on a case-by-case basis. Factors including the type, speed limit and condition of the road are taken into consideration.</i>	Please refer to the drawings prepared by DOBA, which are enclosed with the planning application materials, for information on access and sightlines.

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	- Where sightlines are inadequate and would give rise to a traffic hazard, development will not be permitted. - Where the improvement of sightlines requires the removal of hedgerow, developers must retain as much of the existing hedgerow as possible and must provide a clear justification for the extent of removal of any hedgerow which will be considered by the Planning Authority when assessing planning applications. Planning permission may be refused where the Planning Authority concludes that excessive hedgerow is being removed in order to achieve adequate sightlines. Notwithstanding the above, where any hedgerow is being removed, with the consent of the Planning Authority, the applicant shall submit detailed landscape proposals to minimise the impact. - In cases where an access already exists with inadequate sightlines, it is Council policy to recommend the closing-up of this entrance prior to the use of an alternative access with adequate sightlines. - All applications for planning permission must clearly indicate the sightlines available at the proposed access.”	
Section 15.7.6 Access Requirements (p. 551-552)	- Generally, where the capacity, width, alignment, or surface condition of the road are inadequate, development will not be favoured. - Where new development would adversely impact on road drainage, development will not be permitted unless applicants agree proposals with the Council to improve the road. - Generally, it is the policy of the Council to discourage the proliferation of access points onto public roads, particularly in areas where the maximum speed limit applies or where road safety is of concern in accordance with the objectives in Section 5.6. The Council also encourages and promotes shared access points in all circumstances. - Where the removal of hedgerow is required in order to achieve sight lines, the minimum amount of hedgerow shall be removed (see Section 15.2.4 above). Any new boundary should be planted with suitable indigenous species as outlined in section 15.2.4. - The provision of sheep / cattle grids in new developments adjacent to the Curragh will be mandatory.	The proposed development has been designed to provide an adequate level of access, including the extension of the existing Gallops Avenue and the internal road network, as well as links to existing communities. For further details, please refer to the Infrastructure Design Report as well as the associated road layouts prepared by DOBA. Boundary treatments are detailed in the Landscape Design Report and associated landscape drawings prepared by M+S.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	<i>In accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG (2012), the creation of additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply shall be avoided.”</i>	
Section 15.7.8 Car Parking (p. 553-556)	<i>“Car parking standards are set out in Table 15.8 below to guide proposed development. Parking standards are maximum standards.</i> <i>“Additionally, the maximum provision of parking should not be viewed as a target. Lower rates of parking and car-free developments should be considered in the first instance, particularly where such developments are close to and can avail of public transport.”</i> <i>“The electric vehicle charging infrastructure requirements are set out in Table 15.9 below to guide proposed development.</i> <i>“New residential development should take account of the different criteria regarding car parking including:</i> <i>• A reduction of car parking standards will be considered on a case-by-case basis, having regard to ‘Sustainable Urban Housing: Design Standards for New Apartments (2020)’ where applicable.</i> <i>• Vehicular parking for detached and semi-detached housing which should be within the curtilage of the subject house; o Vehicular parking for apartments, where appropriate, should generally be at basement or undercroft level. Where this is not possible, parking for apartments and terraced housing should be in informal groups overlooked by residential units;</i> <i>• The visual impact of large areas of parking should be reduced by the use of screen planting including semi mature native trees connecting to existing green infrastructure networks, where possible, low walls and the use of different textured or coloured paving for car parking bays; and</i> <i>• Parking spaces for visitors should be a minimum of 10% of the overall number of parking spaces provided in new residential developments.</i> <i>• New or substantially expanded private car parks will be required to erect appropriate signage clearly indicating to the public that they</i>	The proposed development will include the appropriate levels of car parking, including universal access parking and electric vehicle charging infrastructure. For further details, please refer to the Architectural Design Statement, the Development Schedules, Housing Quality Assessment and associated RAU drawings enclosed with the planning application materials, as well as the Mobility Management Plan prepared by Systra. Note: Since the publication of the KCDP, some Section 28 Guidelines have been updated or replaced. With respect to the car parking, the New Apartment Guidelines (2025) have been updated. Moreover, the Compact Settlement Guidelines (2024) also provide guidance in terms of car parking provision. Consistency with these new and updated guidelines is demonstrated in Section 6 of this Report.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
	<i>are a privately owned facility as a condition of any granting of permission for such development.”</i>	
Section 15.7.9 Street Lighting and Public Utilities (p. 556)	• <i>Street lighting should, at a minimum, comply with the standards set out in the most recent revision of the Kildare County Council document ‘Street Lighting Technical Specification’ and Section 5.12 of this Plan.</i> • <i>The planning authority may require residential schemes to comply with any forthcoming “National Specification for Public Lighting”.</i> • <i>Adequate public lighting should be provided for road safety reasons and for the safety of all pedestrians, cyclists and minority groups. Lighting levels within a new development must create a secure environment. Dark corners and alleyways must be avoided.</i> • <i>Require all lighting design strategies to be developed to minimise impacts on biodiversity, particularly bats, in accordance with Section 5.12 of this Plan.</i> • <i>Landscape Proposals should detail public lighting locations and ensure tree planting will not compromise any proposed street lighting in accordance with Section 5.12 of this plan.</i> • <i>Where a residential development has not yet been taken in charge by the County Council, the developer is responsible for the management and maintenance of the public lighting in the development, including the payment of all utility bills.</i> • <i>To preserve the amenity and visual character of an area, and in the interests of public safety, all services including electricity, public lighting, telephone, broadband and television cables shall be provided underground in appropriate ducting in all new developments. Provision should be made for the unobtrusive siting of transformer stations, pumping stations and other necessary service buildings. Pole mounted equipment (such as transformers) will not be permitted.</i> <i>The Planning Authority will require utility boxes to be carefully integrated into the surrounding environment. Conditions may be included in permissions in relation to external materials and screening for such utility boxes or any above ground installations.</i>	Street lighting designed to minimise light pollution and enhance safety. Please see the lighting reports and associated lighting plans prepared by Sabre and enclosed with the planning application materials.

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Relevant Section	Details of Development Management Standards	Prospective Applicant Response
Section 15.8 Surface Water (p. 557-558)	<i>“All planning applications for developments shall include proposals for the following²:</i> <i>• Detailed proposals for the management of surface water, where Nature Based Surface Water Management solutions are considered and prioritised in the first instance. Groundwater monitoring, if required, should last at least 6 months and include at least one winter season.</i> <i>• A Surface Water Management Plan shall be submitted which includes details inter alia the location, design and any future maintenance proposals / procedures required to maintain the surface water management system. - Proposals for surface water management shall be in compliance with the Greater Dublin Drainage Strategy (GDSDS), in particular Volume 2 Chapter 6 Stormwater Drainage Design Criteria, and CIRIA SuDS Manual (C753) and with Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document (2021, DHLGH).</i> <i>• In the event that a Nature Based Surface Water Management solution is not feasible, detailed information must be submitted to explain why it was not considered to be a practical solution. Traditional drainage systems will only be permitted where a demonstrable exceptional circumstance has been provided.</i> <i>• Sustainable Drainage Systems should not form part of the public open space provision, except where they contribute in a significant and positive way to the design and quality of open space. In instances where the Council determines that SuDS make a significant and positive contribution to open space, a maximum 10% of the open space provision shall be taken up by SuDS.</i> <i>• In the event that underground attenuation storage structures are required, they will not be accepted under areas of public open space, save in exceptional demonstrable situations.</i> <i>All existing site watercourses shall be retained and existing site pipework should be “de-culverted” where feasible.”</i>	Surface water management follows SuDS principles. For details of the proposed surface water drainage network and infrastructure, including SuDS, please refer to the Infrastructure Design Report by DOBA, and associated layouts, alongside the Landscape Design Report by M+S enclosed with the planning application materials.

² Insufficient details submitted at planning application stage may incur requests for additional information or a refusal of planning permission.

7.2 Naas Local Area Plan 2021-2027

7.2.1 Land-Use Zoning

The following land-use zoning designations apply to the subject site (see **Figure 7-1**):

- **C: New Residential** — objective: *“To provide for new residential development.”*

All residential units are proposed on lands zoned C. Residential use is permitted in principle within this zoning.

- **L: Leisure and Amenity** — objective: *“To provide for leisure and tourism facilities within the town.”*

The proposed childcare facility will be located on land zoned L. Childcare is *“open for consideration”* in this zoning, and details of the design, capacity and supporting infrastructure and facilities are provided in the planning application materials.

- **F: Open Space and Amenity** — objective: *“To protect and provide for open space, amenity and recreation provision.”*

Access links are proposed within lands zoned F; these links will improve connectivity and permeability between the subject site and surrounding communities. The current open-space character of these lands will be retained.

The proposed extension to Gallops Avenue will partly run through land zoned L. Transport infrastructure is not identified as a separate land-use class in the zoning matrix; accordingly, works of this nature are subject to assessment against the general policies and objectives of the Naas LAP (see Section 7.2.3 of this Report).

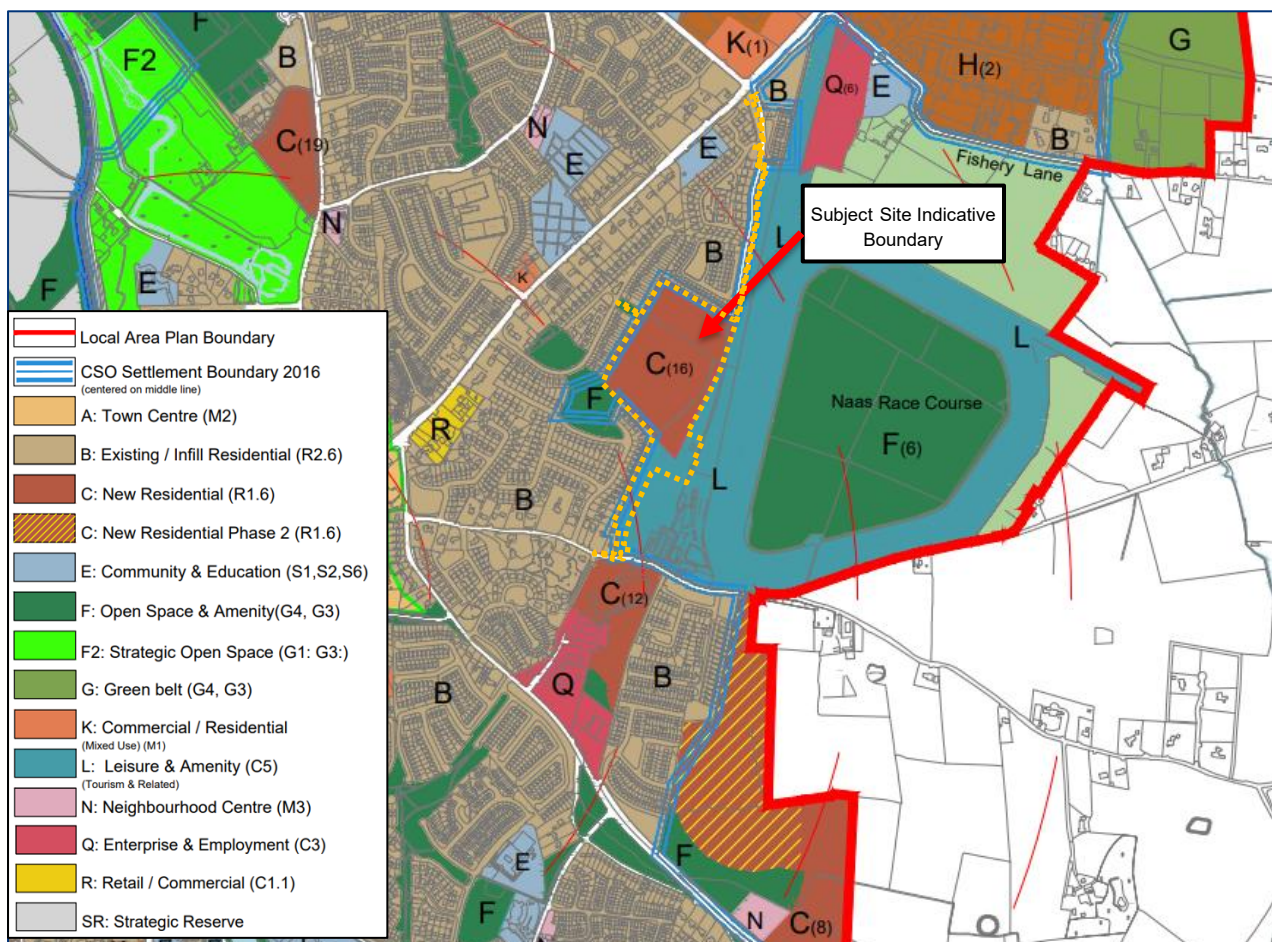


Figure 7-1: Land Use Zoning Map with indicative subject site in orange dash outline

Source: Map 11.1 of the Naas LAP.

7.2.2 Gallops Avenue

Section 3.5.2 of the Naas LAP highlights that *“the development of the lands adjacent to the Racecourse is fully dependant on the delivery of Gallops Avenue”*. The Naas LAP further identifies Gallops Avenue as a critical piece of infrastructure intended to provide cycling, pedestrian, and vehicular access for local residents, while also helping to alleviate traffic congestion in Naas town centre.

Table 5.4 of the Naas LAP lists key road infrastructure projects to be delivered during the plan period, including Gallops Avenue (designated as RD1). Map 5.4 illustrates the Gallops Avenue as a priority road infrastructure project.

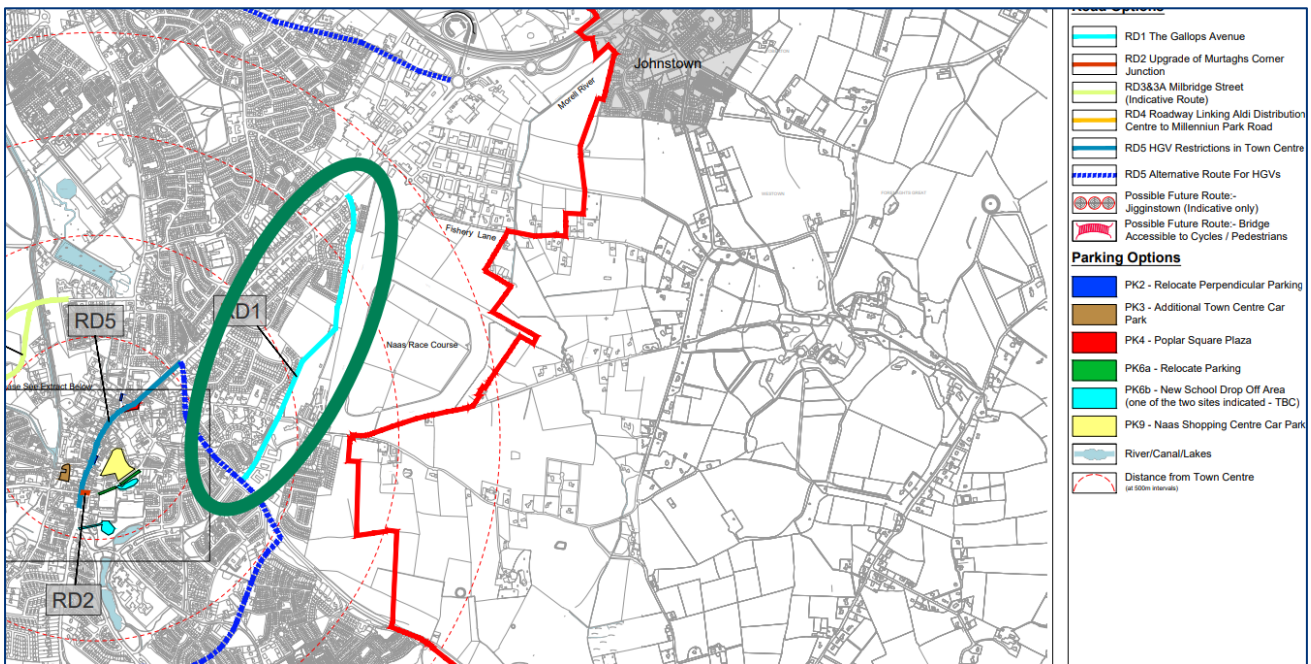


Figure 7-2: Map 5.4 Movement & Transport Road Measures (location of subject site circled in green)

Source: Appendix 1 of the Naas LAP.

Complementing the above, Table 5.2 outlines the pedestrian infrastructure measures, referencing Map 5.1, which shows clearly a planned road extending the existing Gallops Avenue southwards, including footpaths to facilitate safe pedestrian movement.

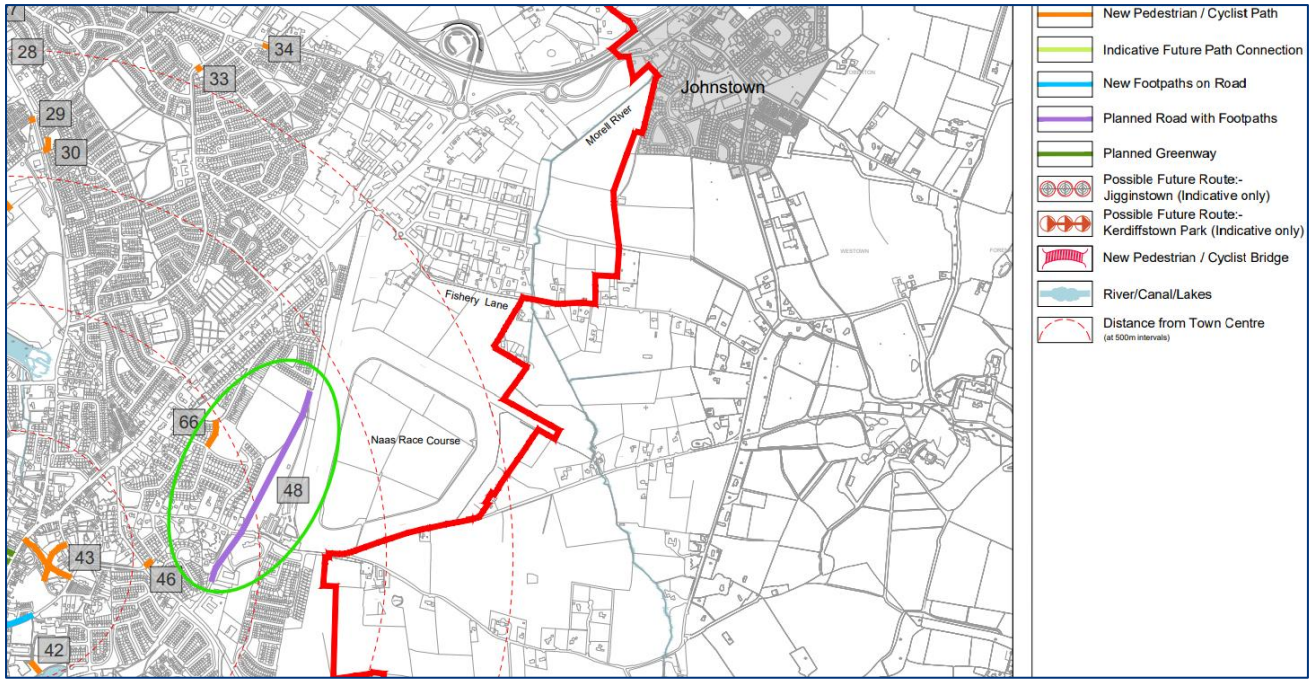


Figure 7-3: Map 5.1 Movement & Transport Pedestrian Measures (location of subject site circled in green)

Source: Appendix 1 of the Naas LAP.

Similarly, Table 5.3 details the cycle infrastructure requirements, with Map 5.2 depicting the proposed road extension featuring dedicated cycle tracks and lanes as part of the Gallops Avenue delivery.

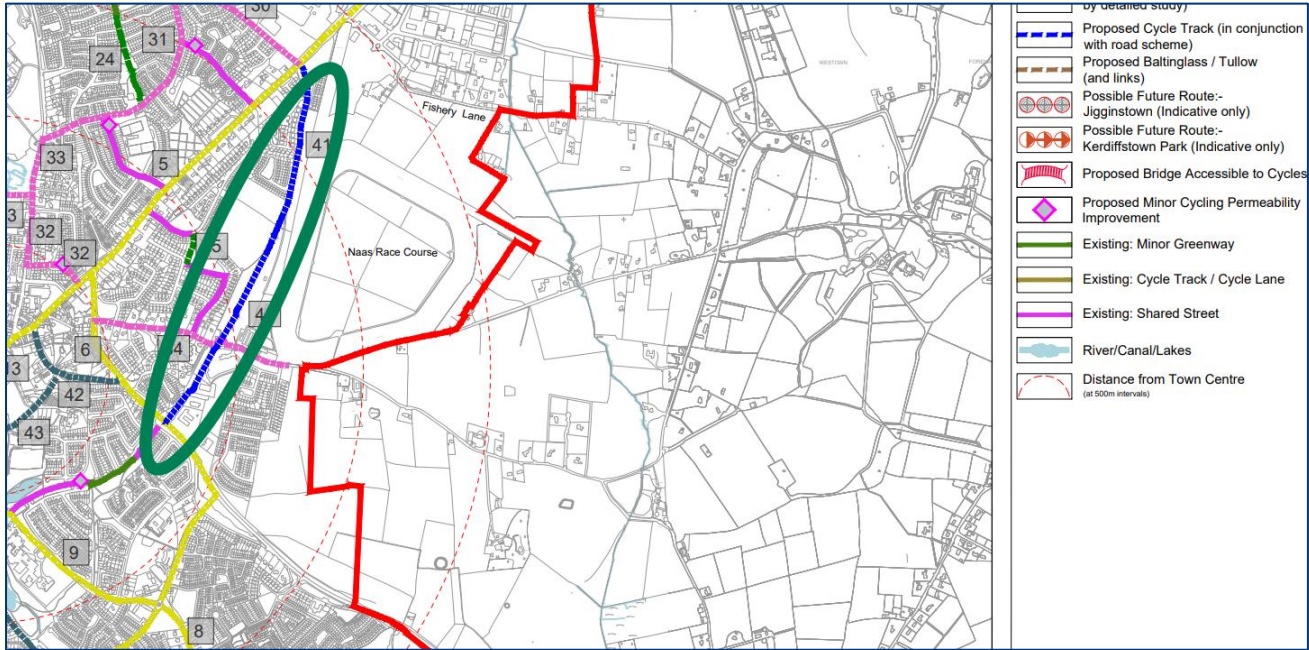


Figure 7-4: Map 5.2 Movement & Transport Cycling Measures (location of subject site circled in green)

Source: Appendix 1 of the Naas LAP.

Figure 5.6 of the Naas LAP presents an indicative cross-section for the design of Gallops Avenue, illustrating the integrated road, pedestrian, and cycling infrastructure elements envisioned.

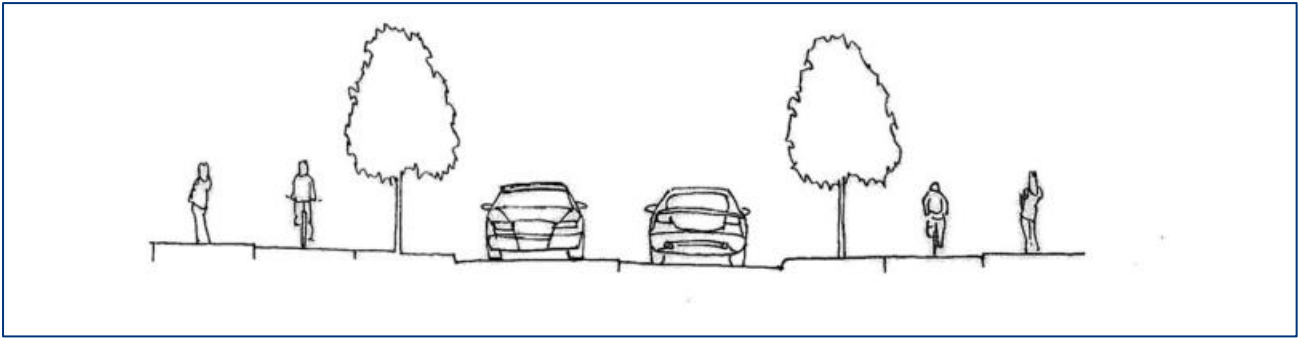


Figure 7-5: Indicative Cross Section for Gallops Avenue

Source: Naas LAP.

Objectives URD 1.15, MTO 3.2 and MTO 3.3 of the Naas LAP address the future of Gallops Avenue, and therefore, are relevant to the proposed development.

URD 1.15: *“Require the completion of the Gallops Avenue (MTO 3.2 and MTO 3.3) in advance of or in tandem with the development of the new residential lands, C (16) to the west of Naas Racecourse.”*

MTO 3.2: *“Support the implementation of the following road schemes/projects (as detailed on Map 5.4), subject to the availability of funding, the relevant legislative process and appropriate environmental assessment and where necessary to preserve the identified routes free from development: (i) The Gallops Avenue. (ii) Upgrade of Murtagh’s Corner junction. (iii) Millbridge Street. (iv) Roadway linking Aldi Distribution Centre to Millennium Link Road. (v) Town centre HGV restrictions. (vi) Upgrade signalised junctions to MOVA or SCOOT as appropriate. (vii) Possible future route through the lands at Jigginstown.”*

MTO 3.3: *“To comprehensively re-examine the design of the Gallops Avenue (R410 to R445 - Blessington Road to Dublin Road). The focus of the redesign will be on providing a route which focuses on green initiatives such as expanded footpaths and cycle ways, providing a safe route for pedestrians and cyclists. The new route will be designed to have the appearance of a street, avenue or boulevard which would provide a generous tree lined verge, including segregated cycle lanes and pedestrian paths in accordance with the Principles of Sustainable Safety to offer a safe environment for all road users including cyclists. The redesign shall be carried out after consultation with local residents, stakeholders and other interested parties. The redesign will comply with best practice design guidance for sustainable infrastructure, such as the Design Manual for Urban Roads and Streets (DMURS) and the NTAs National Cycle Manual. The redesign shall include, but not be limited to, examination of the following:*

- *Delivery of protected junctions with consideration for raised tables where appropriate.*
- *Delivery of island bus stops in line with guidance provided in the NTAs National Cycle Manual (or any successor to same in terms of best practice).*
- *Examination of a HGV ban on the Gallops Avenue.*
- *Examination of a dedicated Greenway as part of the detailed design.*
- *The Gallops Avenue should be completed with a noise reducing road surface.*
- *Consideration of an alternative route located on a corridor to the east of the Racecourse, including the provision of documentary evidence detailing this consideration and examination in any development consent process.”*

(Emphasis by TT; formerly RPS)

As noted above, **Objective URD 1.15** requires the completion of Gallops Avenue in advance of or in tandem with the development of the new residential lands, C (16), west of Naas Racecourse. In this regard, as demonstrated in the planning application materials, the proposed development includes

the construction of an extension to Gallops Avenue, together with the overall proposed residential scheme, and therefore fully complies with this objective.

The proposed Gallops Avenue extension will connect the existing Gallops Avenue to Tipper Road and, in turn, provide access to the rest of the subject site where the residential units and the childcare facility are proposed. As shown in the planning application materials, this has been designed to incorporate dedicated pedestrian and cycling infrastructure, as well as landscaping, thereby allowing the realisation of **Objective MTO 3.2** and complying with the direction and guidance set out in **Objective MTO 3.3**.

As demonstrated in the suite of drawings prepared by RAU and DOBA and submitted with the planning application materials, the design of the Gallops Avenue extension follows the indicative layout and cross-section presented in Figure 5.6 of the Naas LAP, ensuring compliance with the principles of sustainable safety and best practice design.

In conclusion, the proposed development accords fully with the Naas LAP's strategic transport infrastructure priorities by delivering the necessary extension of the Gallops Avenue with integrated active travel facilities. This will facilitate improved connectivity, promote sustainable modes of transport, and enable the wider development of lands adjacent to the Racecourse as envisaged in the local planning framework.

7.2.3 Relevant Naas LAP Objectives

Table 7-2 below details how the proposed development has had regard to, and is consistent with, when required, the relevant objectives set out in the Naas LAP.

Table 7-2: Statement of Regard to Relevant Naas LAP Objectives

Naas Local Area Plan		
Relevant Chapter / Objective	Details	Prospective Applicant Response
Chapter 3: Core Strategy		
Policy CS1 Compliance with the Core Strategy (p. 24)	<i>"It is the policy of the Council to support the sustainable long-term growth of Naas in accordance with the Core Strategy of the Kildare County Development Plan 2017-2023 (as varied), or any subsequent plan, the provisions of the National Planning Framework (2018) and the Regional Spatial and Economic Strategy 2019-2031."</i>	In accordance with the Core Strategy of the KCDP, the proposed development will contribute to the sustainable growth of Naas, providing new residential units to help cater for Naas and the County population growth.
Objective CSO 1.1 (p. 24)	<i>"Support and facilitate compact growth through the sustainable intensification and consolidation of the town centre and established residential areas."</i>	The proposed development consists of the construction of 234 no. units which will ensure the practical realisation of the principles of compact growth and sustainable land intensification within Naas.
Objective CSO 1.5 (p. 25)	<i>"Support the delivery of supporting physical and social infrastructure to support all residential development."</i>	The proposed development includes the provision of social, community and recreational facilities, including a range of formal and informal open spaces, formal and informal play areas and a childcare facility. These will support the needs of future residents and complement the range of services available within the receiving environment. For details of the proposed social, community and recreational facilities, please refer to the Architectural Design Statement prepared by RAU, the Landscape Design Report prepared by M+S, and the accompanying architectural and landscape drawings. It is also noted that an SCIA has been prepared by Tetra Tech and enclosed with the planning application materials, providing details of existing social and community infrastructure within the defined study area.
Chapter 4: Homes and Communities		
Policy HC1 Residential Development (p. 30)	<i>"It is the policy of the Council to ensure that sufficient land is available at appropriate locations to satisfy the County Core Strategy growth allocation for Naas, to ensure Naas maintains its status as one of Kildare's Key Towns and that good quality housing is provided."</i>	It is considered that the proposed development accords with the relevant land-use zoning designations (see Section 7.2.1 of this Report).
Objective HCO 1.1 (p. 30)	<i>"Support new residential development and infill development that occurs in tandem with the delivery of supporting physical and social infrastructure."</i>	See response to Objective CSO 1.5 .

Naas Local Area Plan

Relevant Chapter / Objective	Details	Prospective Applicant Response
Objective HCO 1.7 (p. 30)	<i>“Require all Strategic Housing Development applications, or applications for 100 residential units or more, to include an assessment of how the development connects to high-capacity sustainable transport services and measures proposed to improve this.”</i>	The planning application is accompanied by an Infrastructure Design Report from DOBA, a Traffic & Transport Assessment Report, and a Mobility Management Plan prepared by Systra. These documents provide information on the access and movement strategy for the proposed development. The MMP also details a plan to promote sustainable mobility. As noted elsewhere in this Report and further detailed in the planning application materials, the proposed development includes the construction of an extension of the existing Gallops Avenue to connect to Tipper Road. This will serve as the primary access point to the subject site, providing vehicular, cyclist, and pedestrian access to the site. Moreover, links to existing communities at Kingsfurze Avenue are proposed (see Section 5.8.5 and 5.9 of this Report). The proposed development also includes provisions for bicycle parking, encouraging residents and visitors to engage in active travel and adopt sustainable mobility practices. For further details, please see the Architectural Design Statement and the site layout plans prepared by RAU, alongside the reports mentioned above.
Objective HCO 1.8 (p. 31)	<i>“Require all new housing developments to deliver safe areas for children to play as part of the public open space provision, in accordance with standards for new developments set out in the Kildare County Development Plan.”</i>	The open spaces for the proposed development have been designed to integrate with the overall proposed development. Play areas, formal and informal, will benefit from passive surveillance. Details of the proposed landscape, open space and play areas are provided in the Landscape Design Report and accompanying landscape drawings prepared by M+S and enclosed with the submission.
Policy HC2 Residential Density, Mix and Design (p. 33)	<i>“It is the policy of the Council to ensure that all new residential development provides for a sustainable mix of housing types, sizes and tenures and that new development complements the existing residential mix.”</i>	A Statement of Housing Mix is provided in Appendix B, to be read in conjunction with Section 5.3 of this Report, demonstrating a sustainable mix of housing types and sizes to cater for a broad spectrum of household types and life stages, from singles and couples to families and older persons. The approach to housing mix aligns with the KCC’s HNDA. For further details on the proposed residential units, including descriptions of internal areas, layouts, and sizes, please refer to the Architectural Design Statement, Housing Quality Assessment, and full-scale house-type drawings (plans and elevations) prepared by RAU, which accompany the submission materials.

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Relevant Chapter / Objective	Details	Prospective Applicant Response
Objective HCO 2.1 (p. 33)	<i>“Require that a good mix of housing types and sizes is provided in all new residential areas and in appropriate brownfield/infill areas, to meet the needs of the population of Naas, including the provision of appropriate supported housing and longer-term residential care solutions designed for older people and/or people with disabilities.</i> <i>All planning applications on lands zoned C: New Residential or C: New Residential Phase 2 shall be accompanied by a Housing Mix Statement illustrating compliance with this objective.”</i>	See response to Policy HC2 .
Objective HCO 2.4 (p. 34)	<i>“To apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use or for a mixture of residential and other uses (save where the development is exempt from the provisions of Part V).</i>	The proposed development includes the provision of 53 no. units for social and affordable housing in accordance with requirements set out in Part V of the Planning Act. This consists of a mix of one-, two-, and three-bedroom units. For details of proposed units to satisfy Part V of the Planning Act, please refer to Drawing No. NRC-02-SW-XXX-DR-RAU-AR-1012 – Proposed Site Layout Plan – Part V Units, prepared by RAU and enclosed with the submission materials. The planning application is also accompanied by a Part V Package prepared by the Applicant.
Objective HCO 2.5 (p. 34)	<i>“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).”</i>	The aspect and orientation of the residential units have been designed to maximise solar and daylight access. For details of dual aspect units, please refer to the Architectural Design Statement and Housing Quality Assessment prepared by RAU. A Sunlight and Daylight Assessment by 3DDB is also included. The planning application is accompanied by a Climate Action & Energy Statement prepared by Tetra Tech and a Building Lifecycle Report prepared by Aramark.
Objective HCO 2.7 (p.34)	<i>“To comply with the Special Policy Planning Requirements (SPPRs) for apartment standards and building heights issued under Section 28(1) of the Planning and Development Act 2000 (as amended).”</i>	All apartment units within the proposed development have been designed in accordance with the Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025). Please refer to the Architectural Design Statement and Housing Quality Assessment prepared by RAU, which is enclosed with the submission. In accordance with the Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025), which requires a lifecycle report for apartment developments, a lifecycle report is included with the planning application materials. Note: Since the publication of the Naas LAP, some section 28 guidelines have been updated or replaced. The Sustainable Urban

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Relevant Chapter / Objective	Details	Prospective Applicant Response
		Housing: Design Standards for New Apartment Guidelines (2020) has been updated by the Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025).
Policy HC3 – Social Infrastructure (p. 44)	<i>“It is the policy of the Council to facilitate and secure the provision of social infrastructure to support existing and new communities within the Naas Local Area Plan area, in a manner which provides flexibility to respond to varied and changing community needs.”</i>	Please refer to the response to Objective CSO 1.5 .
Objective HCO 3.1 (p. 44)	<i>“Encourage the development of new facilities and improvements to and expansion of existing facilities for educational, early learning, childcare and healthcare facilities, at appropriate locations in Naas”</i>	The proposed development includes the construction of a childcare facility with a capacity for 97 no. children.
Objective HCO 3.2 (p. 44)	<i>“Require the provision of appropriately located and purpose-built early learning and childcare facilities to meet the pro-rata childcare needs of housing development during the plan period. Childcare facilities will be required, by a condition of planning permission, to be developed within the first phase of any new residential development.”</i>	See response to Objective HCO 3.2 .
Policy HC4 – Community, Sports, and Recreational Facilities (p. 45)	<i>“It is the policy of the Council to facilitate and support a broad range of community, cultural and recreational facilities to serve the needs of the residents of the Plan area and its wider catchment.”</i>	Please refer to the response to Objective CSO 1.5 .
Objective HCO 4.6 (p. 45)	<i>“Facilitate and promote the development of a network of playgrounds, amenity spaces (to include community gardens and allotments) and recreational areas for children of all ages which are universally designed throughout the town and its environs.”</i>	The design of the proposed amendments will ensure that the open spaces and play areas fully integrate with the rest of the overall development. Please refer to the response to Objective CSO 1.5 .
Chapter 5: Movement and Transport		
Policy MT1 Walking and Cycling (p. 57)	<i>“It is the policy of the Council to promote enhanced universal permeability for pedestrians and cyclists within Naas in order to improve access to the town centre, local schools, residential areas, recreational facilities, public transport services and other amenities.”</i>	The planning application is accompanied by an Infrastructure Design Report from DOBA, a Traffic & Transport Assessment Report, and a Mobility Management Plan prepared by Systra. It is also noted that the application is supported by an Urban Design Report — DMURS Statement of Compliance, prepared by DOBA. These documents provide comprehensive information on aspects such as access, connectivity, permeability, sightlines, parking, and more. It also outlines how the permitted development adheres to the technical

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Relevant Chapter / Objective	Details	Prospective Applicant Response
		and design standards outlined in the Design Manual for Urban Roads and Streets (2019) concerning the design of urban roads and streets. As summarised in Section 5.9 of this Report, the proposed development provides for the construction of an extension of the Gallops Avenue, as well as an internal road network, and links to existing communities, which will ensure the subject site is highly accessible, with a focus on pedestrian and cyclists, including the provision of new pedestrian links to existing communities, new pedestrians crossings, cyclist infrastructure within the existing Gallops Avenue, and pedestrian-friendly zones within the residential area. It is noted that the proposed extension to Gallops Avenue will include dedicated pedestrian and cycling infrastructure, in accordance with requirements set out in tables 5.2 and 5.3 and illustrated in Maps 5.1 and 5.2 of the Naas LAP.
Objective MTO 1.1 (p. 57)	<i>“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.”</i>	See the response provided to Policy MT1 of the Naas LAP.
Objective MTO 1.2 (p. 57)	<i>“Ensure all footpaths in Naas are accessible to all members of the community, including people with disabilities, the elderly and people with young children.”</i>	See the response provided to Policy MT1 of the Naas LAP.
Objective MTO 1.6 (p. 57)	<i>“Ensure that all development within Naas allows for connectivity (pedestrian, cyclist and vehicular) to adjacent lands in accordance with the National Transport Authority’s Permeability Best Practice Guide (2015) or any updated version of same.”</i>	See the response provided to Policy MT1 of the Naas LAP.
Objective MTO 3.2 (p. 57)	<i>“Support the implementation of the following road schemes/projects (as detailed on Map 5.4), subject to the availability of funding, the relevant legislative process and appropriate environmental assessment and where necessary to preserve the identified routes free from development:</i> <i>(i) The Gallops Avenue.</i> <i>(ii) Upgrade of Murtagh’s Corner junction.</i>	The proposed development complies with Objective MTO 3.2 . See Section 6.3.2 of this Report.

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Relevant Chapter / Objective	Details	Prospective Applicant Response
	(iii) Millbridge Street. (iv) Roadway linking Aldi Distribution Centre to Millennium” Link Road. (v) Town centre HGV restrictions. (vi) Upgrade signalised junctions to MOVA or SCOOT as appropriate. (vii) Possible future route through the lands at Jigginstown.	
Objective MTO 3.3 (p. 67)	<i>“To comprehensively re-examine the design of the Gallops Avenue (R410 to R445 - Blessington Road to Dublin Road). The focus of the redesign will be on providing a route which focuses on green initiatives such as expanded footpaths and cycle ways, providing a safe route for pedestrians and cyclists. The new route will be designed to have the appearance of a street, avenue or boulevard which would provide a generous tree lined verge, including segregated cycle lanes and pedestrian paths in accordance with the Principles of Sustainable Safety to offer a safe environment for all road users including cyclists.</i> <i>The redesign shall be carried out after consultation with local residents, stakeholders and other interested parties. The redesign will comply with best practice design guidance for sustainable infrastructure, such as the Design Manual for Urban Roads and Streets (DMURS) and the NTAs National Cycle Manual. The redesign shall include, but not be limited to, examination of the following: • Delivery of protected junctions with consideration for raised tables where appropriate. • Delivery of island bus stops in line with guidance provided in the NTAs National Cycle Manual (or any successor to same in terms of best practice). • Examination of a HGV ban on the Gallops Avenue. • Examination of a dedicated Greenway as part of the detailed design. • The Gallops Avenue should be completed with a noise reducing road surface. • Consideration of an alternative route located on a corridor to the east of the Racecourse, including the provision of documentary evidence detailing this consideration and examination in any development consent process.”</i>	The proposed development complies with Objective MTO 3.3 . See Section 6.3.2 of this Report.
Objective MTO 3.7 (p. 68)	<i>“Reduce the harmful effects of traffic noise by ensuring noise mitigation measures are implemented into new developments in proximity to motorway routes, national routes, regional routes and significant urban streets. Developers shall engage a suitably qualified acoustic specialist to prepare an Acoustic Design Statement for all new developments with the potential to impact sensitive noise receptors. The Statement shall have</i>	See the response provided to Policy MT1 of the Naas LAP.

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Relevant Chapter / Objective	Details	Prospective Applicant Response
	<i>regard to the thresholds set out in the Kildare Noise Action Plan 2019-2023 (or any subsequent plan)."</i>	
Policy MT4 Parking (p. 71)	<i>"Apply the parking standards in the Kildare County Development Plan, and relevant Section 28 Guidelines, to all applications for planning permission in Naas. Dispensations will only be considered in exceptional circumstances and having regard to location, proximity to key public transport routes, heritage and urban design context."</i>	Car and cycle parking will be provided in line with the KCDP's standards. Section 5.10 of this Report provides a summary of the proposed parking provision.
Objective MTO 4.1 (p. 71)	<i>"Apply the parking standards in the Kildare County Development Plan, and relevant Section 28 Guidelines, to all applications for planning permission in Naas. Dispensations will only be considered in exceptional circumstances and having regard to location, proximity to key public transport routes, heritage and urban design context."</i>	Car and cycle parking will be provided in line with the KCDP's standards. Section 5.10 of this Report provides a summary of the proposed parking provision.
Objective MTO 4.2 (p. 71)	<i>"Support and facilitate the implementation of the preferred car parking management measures, as illustrated on Map 5.4, as identified in the Naas/Sallins Transport Strategy."</i>	Please see the response provided to Policy MT4 and Objective MTO 4.1 of the Naas LAP.
Objective MTO 4.3 (p. 71)	<i>"Ensure that all new proposed developments make provision for the use of electric vehicles through a significant increase in the provision of clearly and exclusively designated electric car charging points on public and private land in partnership with ESB and other relevant stakeholders and landowners."</i>	Adequate levels of electric vehicle parking will be provided.
Chapter 6: Economic Development, Retail and Tourism		
Objective EDO 1.10 (p. 83)	<i>"Facilitate home-working and other innovative forms of working which reduce the need to travel but are subordinate to the main residential use of the dwelling and do not result in a disamenity in an area."</i>	The internal layout of the proposed residential units has been designed to be flexible, delivering high-quality living spaces that can also be utilised as a home working space for remote workers. This, in turn, can support achieving critical mass to benefit the local economy and facilitate job creation. Please see the floor plans prepared by RAU, which are enclosed with the planning application materials.
Chapter 7: Natural Environment and Climate Change		

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Relevant Chapter / Objective	Details	Prospective Applicant Response
Policy NE1 Green Infrastructure (p. 95)	<i>“It is the policy of the Council to protect, reinforce and strengthen the Green Infrastructure network in Naas and to strengthen links to the wider regional network.”</i>	As summarised in Section 5.8 of this Report, the proposed development will provide for landscaping areas, open space and play areas. The landscape strategy, along with the provision of open space and play areas within the development, is detailed in the accompanying Landscape Design Report and associated landscape drawings prepared by M+S, as well as the Architectural Design Statement prepared by RAU. These documents provide comprehensive information relevant to the landscape and open spaces strategies proposed within the development. The development includes c. 10,007 sqm of public open space distributed across the site. These public open spaces are designed to support a variety of uses, including formal and informal play, passive recreation, and community gatherings.
Objective NE 1.1 (p. 95)	<i>“Protect identified key green infrastructure (Map 7.1) and ‘steppingstone’ habitats (according to their value), enhance where possible and integrate existing and new green infrastructure as an essential component of new developments and prohibit development that would fragment the green infrastructure network. Site specific ecology surveys should be carried out to inform proposed development and assess and mitigate potential impacts.”</i>	The landscape strategy has been designed with due regard to the habitats identified in Map 7.1 of the Naas LAP (Green Infrastructure). The landscape strategy, along with the provision of open space and play areas within the development, is detailed in the accompanying Landscape Design Report and associated landscape drawings prepared by M+S, as well as the Architectural Design Statement prepared by RAU. As noted in Section 7 of this Report, an Ecological Impact Assessment Report and Hedgerow and Biodiversity Management Plan prepared by Tetra Tech are enclosed with the planning application materials. These include details of hedgerow, ecological base, and bat surveys.
Objective NE 2.1 (p. 97)	<i>“Increase tree planting and pollinator friendly planting, in accordance with the recommendations of the All-Ireland Pollinator Plan throughout Naas and in open spaces in new developments in order to enhance local biodiversity, visual amenity and surface water management.”</i>	Please see the response to Objective NE 1.1 of the Naas LAP.
Objective NE 2.2. (p.97)	<i>“Protect trees and woodlands of particular amenity value, identified in the Naas Green Infrastructure Map (Map 7.1), from damage and/or degradation.”</i>	Please see the response to Objective NE 1.1 of the Naas LAP.
Objective NE 3.1 (p. 98)	<i>“Encourage the use of SuDS within public and private developments and within the public realm to minimise and limit the extent of hard surfacing and paving, in order to reduce the potential impact of existing and predicted flooding risks.”</i>	Details of the proposed approach to the management of surface water on the site and overall SUDS strategy are set out in the Infrastructure Design Report prepared by DOBA, and associated drawings are enclosed with the planning application materials.

Naas Local Area Plan

Relevant Chapter / Objective	Details	Prospective Applicant Response
Objective NE 4.1 (p. 98)	<i>“Enhance and protect the existing green infrastructure open spaces and recreation areas, and facilitate the development of new green infrastructure corridors, through the provision of additional open and amenity areas.”</i>	Overall, the permitted development provides for extensive green amenity spaces. c. 10,007 sqm of public open space distributed across the site. These public open spaces are designed to support a variety of uses, including formal and informal play, passive recreation, and community interaction. All open spaces have been designed to protect and enhance biodiversity within the site, as well as to integrate with the existing green infrastructure adjoining the site. The landscape strategy, along with the provision of open space and play areas within the development, is detailed in the accompanying Landscape Design Report and associated landscape drawings prepared by M+S, as well as the Architectural Design Statement prepared by RAU.
Objective NE 5.1 (p. 99)	<i>“Ensure that new development proposals protect and enhance the identified habitats detailed in the Green Infrastructure Map (Map 7.1). Site specific ecology surveys should be carried out to inform proposed developments and assess and mitigate potential impacts.”</i>	Please see the response to Objective NE 1.1 of the Naas LAP. A Report to Inform Appropriate Assessment, an EIA Screening Report, and an Ecological Impact Assessment Report are enclosed with the planning application materials.
Objective NE 5.2 (p. 100)	<i>“Require proposals for development to demonstrate how they integrate/respond to Green Infrastructure and contribute to the development and protection of overall Green Infrastructure assets..”</i>	The landscape strategy, along with the provision of open space and play areas within the development, is detailed in the accompanying Landscape Design Report and associated landscape drawings prepared by M+S, as well as the Architectural Design Statement prepared by RAU. The information presented in these documents addresses the requirements set in Objectives NE 5.2 and 5.3.
Objective NE 5.3 (p. 100)	<i>“Ensure new development proposals have regard to the future function and variety of open spaces with a view to making provision for new areas of biodiversity, tree planting and / or pollinator friendly planting.”</i>	See the response provided to Objective NE 5.3 of the Naas LAP.
Chapter 9: Infrastructure and Environmental Services		
Objective IO 1.2 (p. 111)	<i>“Seek to ensure that development proposals comply with the standards and requirements of Irish Water in relation to water and wastewater infrastructure.”</i>	Please refer to Section 5.11 of this Report, which should be read in conjunction with the Infrastructure Design Report prepared by DOBA and enclosed with the planning application materials.

Naas Local Area Plan

Relevant Chapter / Objective	Details	Prospective Applicant Response
Objective IO 1.4 (p. 111)	<i>“Any project which has the potential to significantly increase the demands on the water supply for the town (e.g. Data Centres) will be required to carry out an Appropriate Assessment to ascertain whether the project has the potential to cause adverse effects on the integrity of any European/Natura 2000 site. EPA and Irish Water abstraction licensing will also require Appropriate Assessment for a project which might significantly affect a European/Natura 2000 site.”</i>	A Report to Inform Appropriate Assessment, an EIA Screening Report, and an Ecological Impact Assessment Report prepared by Tetra Tech are enclosed with the planning application materials.
Objective IO 2.2 (p. 112)	<i>“Ensure that all new development maintain surface water discharge at greenfield run-off rate, including an allowance for climate change.”</i>	Please refer to Section 5.11 of this Report, which should be read in conjunction with the Infrastructure Design Report prepared by DOBA and enclosed with the planning application materials.
Objective IO 2.3 (p. 112)	<i>“Incorporate Sustainable Urban Drainage Systems (SuDS) and other nature-based surface water drainage solutions as part of all plans and development proposals in Naas. Priority shall be given to SuDS that incorporate green infrastructure and promote biodiversity including green roofs, walls and rain gardens. Proposals for development in the Key Development Areas, Core Regeneration Areas and Masterplan areas must consider the potential for SuDS to control surface water outfall and protect water quality, with underground retention solutions only being considered when all other options have been exhausted.”</i>	SuDS measures are proposed across the proposed development. Please see the Infrastructure Design Report prepared by DOBA and the Landscape Design Report prepared by M+S, and enclosed with the planning application materials.
Objective IO 3.4 (p. 114)	<i>“All development proposals should apply the use of the sequential approach in terms of the site layout and design. If there is a proportion of the site at risk of flooding, the sequential approach must be applied to ensure that there is no encroachment onto, or loss of, the flood plain. Only water compatible development such as Open Space should be permitted for the lands which are identified as being at risk of flooding within that site. This shall ensure that flood risk on sites can be managed through the sequential approach only, without the requirement for further mitigation measures. If this cannot be achieved the applicant must clearly show that the sequential approach cannot be followed, they must satisfy all the criteria of the Justification Test and demonstrate that appropriate flood mitigation and management measures are put in place.”</i>	Please refer to Section 5.11 of this Report, which should be read in conjunction with the Infrastructure Design Report prepared by DOBA and enclosed with the planning application materials.
Chapter 10: Urban Regeneration and Development Strategy		

Naas Local Area Plan

Relevant Chapter / Objective	Details	Prospective Applicant Response
Objective URD 1.15 (p. 174)	<i>Require the completion of the Gallops Avenue (MTO 3.2 and MTO 3.3) in advance of or in tandem with the development of the new residential lands, C (16) to the west of Naas Racecourse.</i>	Please refer to Section 6.3.2 of this Report, which should be read in conjunction with the Infrastructure Design Report prepared by DOBA and enclosed with the planning application materials.

8 Environmental Considerations

The planning application is accompanied by the following ecological and environmental documents:

- The Arboricultural Report and associated tree plans (survey, tree protection, tree removals), prepared by CMAC, informing the proposed site layout and design, are enclosed with the submission. This report confirms that the proposed development will comply with relevant climate and energy policy through detailed design, a number of sustainability and efficiency features.
- The Report to Inform Appropriate Assessment prepared by Tetra Tech. This report confirms that the proposed development, whether alone or in combination with other identified projects, will not result in any likely significant effects on European Sites. It is concluded that at Stage 2, a Natura Impact Statement is not required.
- The Environmental Impact Assessment (EIA) Screening Report prepared by Tetra Tech. This report concludes that there will be no likely significant effects on the receiving environment resulting from the proposed development and that the preparation and submission of an EIAR is not required.
- The Biodiversity and Hedgerow Management Plan prepared by Tetra Tech. This report sets out biodiversity and hedgerow management measures.
- The Ecological Impact Assessment Report prepared by Tetra Tech. This report concludes that the proposed development will not have any significant adverse effects on the ecological features of the 'Ecology Study Area'.

As noted elsewhere in this Report, and listed in the List of Enclosures enclosed with the Cover Letter accompanying the planning application, this is also supported by specific technical assessments, which ensure the proposed development will not result in significant adverse impact to residents and the receiving environment, including the Inward Noise Impact Assessment, Construction Environmental Management Plan, and Resource and Waste Management Plan, all prepared by AWN, Stage 1 Road Safety Audit (inc. Designer's Response) prepared by Traffico.

9 Conclusion

This Report has been prepared to accompany the submission of an LRD planning application for the proposed development to KCC for the proposed LRD on lands west of Naas Racecourse.

Together with the comprehensive documentation prepared by the Applicant and its project team, this Report (see **Sections 6 and 7**) demonstrates that the proposed development has been designed with regard for and align when applicable with the Kildare County Development Plan 2023–2029 (KCDP), the Naas Local Area Plan 2021–2027 (Naas LAP), the National Planning Framework (First Revision) (NPF), the Eastern & Midland Regional Spatial and Economic Strategy 2019–2031 (RSES) and relevant Ministerial Guidelines.

The proposed development thoughtfully responds to the site context, delivering a well-considered housing mix and density that respects the overall character of Naas and its existing communities, while promoting compact settlement patterns.

Importantly, the design has evolved through constructive consultations with KCC during the LRD process, ensuring that the proposed development effectively addresses the comments, feedback and requirements expressed at different stages, including those matters set out in the LRD Opinion.

The proposed development will deliver 234 homes to Naas together with significant infrastructure improvements, including the extension of Gallops Avenue, thereby enhancing connectivity and accessibility in the area. In addition, the development provides improved pedestrian and cyclist linkages, extensive open spaces, and essential community infrastructure such as a creche facility, thereby supporting social inclusion and community wellbeing.

In summary, it is considered that the proposed development will make efficient use of strategically zoned and serviced lands, in accordance with relevant national, regional and local planning policy, and will represent a sustainable and positive contribution to the residential growth, infrastructure provision, and urban fabric of Naas.

Appendix A: Copy of LRD Opinion & Pre-Planning Consultation Records



Comhairle Contae Chill Dara

Kildare County Council

Date: 30th October 2025.
Ref.: LRD2025006.

By email to carlos.laragonzalez@tetrattech.com

Ballymore Development Ltd.
c/o RPS,
West Pier Business Campus,
Dun Laoghaire,
Co. Dublin.
A96 N6T7.

Planning & Development Act 2000 (as amended). Notice of LRD Opinion: Large-scale Residential Development.

Reference Number: LRD2025006.
Application Received Date: 11/9/2025.
Meeting Date: 02/10/2025.
LRD Opinion: 30/10/2025.

The Proposed Development will consist of 237 residential units at site west of Naas Racecourse, Kingsfurze, Naas, County Kildare.

The Planning Authority refers to your request pursuant to section 32 of the Planning and Development (Large Scale Residential Developments) Act 2021. Section 32D of the Act provides that the Planning Authority shall provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Following consideration of the issues raised during the LRD meeting, the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act **does not yet constitute a reasonable basis** for an application for Large-scale Residential Development.

The Assessment Section of this Opinion details the issues to be addressed, in order for the submitted planning documents to be considered as a reasonable basis on which to make the planning application. The key items are summarised as follows:

In accordance with **Section 32D (2)(a)** of the Planning and Development Act 2000 (as amended) the reasons the documents submitted do not constitute a reasonable basis on which to make the application are:

1. The proposed layout does not reflect the urban design requirements under UD 01 of the Kildare County Development Plan 2023-2029.



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2. The surface water drainage system, where it is proposed to incorporate an underground attenuation tank, which is contrary to County Development Plan policy and to proper planning and sustainable development. The Applicant is required to design surface water drainage in terms of incorporating appropriate Sustainable Drainage Systems (SuDS) and demonstrate fully compliance with the Kildare County Development Sustainable Drainage Systems (SuDS) Guidance Document.
3. It has not been demonstrated that the proposal complies fully with the Design Manual for Urban Roads and Streets due to a number of long straight internal roads and the provision of on-street car parking and other items.
4. The proposal does not demonstrate fully the protection and inclusion of biodiversity, ecology and items of heritage significance.

In accordance with **Section 32D (2) (b)** of the Planning and Development Act 2000 (as amended) the issues, if addressed by the relevant documents, that could result in the documents constituting a reasonable basis on which to make the application are set out below, along with, in accordance with **Article 16A** of the Planning and Development Regulations 2000 (as amended) the specific information that should be submitted with any LRD application for permission for the proposed development:

Layout/Design.

The following concerns remain regarding design and layout and a revised layout and design proposal addressing the following issues are required:

1. The layout and design for the south west corner of the site should be fully redesigned. It does not take cognisance of the significant levels at this location, nor the importance of formalising an informal connection, nor the impact on the residential amenity of the proposed dwellings at this location:

The design of the western corner of the site, where a 3-metre level difference is identified, is concerning with respect to accessibility, passive surveillance and achieving a successful link between the subject site and the wider area (including connections to the transport and activities located off the Naas Road). The proposed layout relies heavily on two side-facing gables to overlook a key pedestrian/cyclist route; considerations should be made for the reconfiguration and better orientation of houses at this point and the achievement of a more successful linkage / connection at this location – a full redesign of this south-west corner is required. It is also noted that the residential amenity of the proposed dwellings at this location (rear amenity) would be negatively impacted due to their orientation, and the overlooking from the connecting route due to levels. Full contextual drawings including cross sections to demonstrate how the above concerns have been addressed through design should also be submitted.





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2. The north west, south east and north east corners of the site require a redesign to address:
 - (a) Demonstration that all that vistas are truncated with a high-quality view i.e the north east and north west corners should be redesigned so that high quality dwelling(s) (front elevation, not side elevation) truncate the view when entering the site from the new Gallops Street (no blank gables). All views should be revisited and modified where required.
 - (b) The north-east corner, identified as a gateway into the estate, appears to have a blank gable and lacks visual impact, consideration should be made to relocate or redesign buildings at this location to create a stronger entrance feature.
 - (c) The proposal to provide two isolated dwellings (marooned by car parking and a sliver of open space) in the south east corner is not acceptable and not conducive to quality urban design. The proposed design does not offer sense of place, placemaking, overlooking, sense of arrival, legibility etc. Either omit these dwellings altogether or fully redesign this corner of the site to address the urban design concerns.
3. Linkages and Permeability:
 - (a) Pedestrian and cycle linkages westwards to and from the site are required to enhance permeability between existing and proposed developments.
 - (b) The required linkages (two) westwards from the site into adjoining housing developments should be clearly mapped out, illustrated and their feasibility demonstrated on revised drawings to allow for a full assessment to take place. They should both form part of the statutory notices.
 - (c) The south west linkage should **not** seek to connect into Gallows Glen. The south west linkage should seek to formalise the existing informal connection into and through the Kingsfurze estate. The Applicant should submit a full photographic and topographical survey of the existing informal connection and submit revised proposals of the south west connections that is both feasible and functional.
 - (d) The **existing informal pedestrian routes** through the site do not appear to have not been successfully capitalised on in the proposed design and scheme, particularly the omission of crisscrossing paths that are currently used by locals. These connections, being the most comfortable for current users, are important for the success of the scheme, especially providing a seamless link towards Naas town centre and public transport corridors for new and existing residents.
 - (e) Both proposed pedestrian and cycling connections / linkages should form part of the statutory notices.
4. The unsuccessful incorporation of green infrastructural elements (as identified in the Green Infrastructure Map (Appendix 1 of the Naas Local Area Plan) into and through the scheme. There are further concerns relating to the treatment of the townland boundary, where short back gardens are proposed, which will result in the removal of hedgerows - this removal conflicts with biodiversity policies and objectives. It is recommended that the proposed development and realignment of dwellings along the entirety of the western boundary should be fully redesigned in order to retain the hedgerow and avoid rear access alleys. There is significant Ecological Value associated with Townland Boundary Hedgerows, being identified as of county-level ecological and cultural importance. These townland boundaries hedgerows:
 - are typically older and more structurally diverse,
 - support a wide range of native flora and fauna,



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- serve as vital ecological corridors for species movement and gene flow and contribute to the landscape character and heritage of the region.

The 2024 Kildare Survey of Townland Boundary Hedgerows confirms their higher biodiversity value and their role in maintaining ecological connectivity across agricultural and semi-natural landscapes. The Council's Heritage Officer has stated that *'the existing townland boundary hedgerows [should be] retained for the combined reason of protection of cultural heritage and biodiversity'*.

5. The undergrounding of attenuation tanks is contrary to County Development Plan policy and objectives [IN O24 and Section 15.8 Surface Water of the County Development Plan].
 - The subject site is a green field site and there is no rationale or justification for the proposed heavy engineering solutions. The proposal should be revisited to incorporate nature-based solutions across the entire site. The site measures 8.6ha and therefore can, and should, be designed to incorporate nature-based solutions to manage all surface water on the site for slow release off the site.
6. Urban Design and Place Making.
 - (a) Proposed contextual elevational drawings across the entire landholding have too many blank gables, which has the effect of undermining the streetscape quality. Specific house types (such as HT05, HT07, **not exhaustive**) are considered to be unsuitable for end block units due to their lack of dual frontage, while others (HT08, HT09) were preferred, but required better placement.
 - (b) The entrance to the estate has excessive car parking and a lack of welcoming character – the Applicant needs to demonstrate a high quality of 'sense of arrival'.
 - (c) There is a requirement to break up hard surfacing with significantly more green infrastructure and planting to improve the visual experience and sense of arrival.
 - (d) The layout requires revisiting to provide for a more cohesive, accessible, and visually engaging layout that aligns with local policy, placemaking and community expectations.
 - (e) The Applicant needs to demonstrate that all buildings and structures are located significantly away from all hedgerows (including the hedgerow that that traverses the site in north west – south east alignment) to ensure their survival in situ.
 - (f) The existing field drainage system, present on the site (along existing hedgerow corridors) should be retained fully in situ and incorporated within the surface water drainage proposals for the site.
 - (g) the proposed development is generally in accordance with national policy and the Kildare County Development Plan with regard to building heights, subject to demonstration of impact on the proposed intended occupants' residential amenity. This would include but is not limited to the provision of fully detailed cross-section/contextual elevation drawings to be submitted with the final planning application.
 - (h) Provision of private amenity space at upper floor levels should be designed so that they do not overlook neighbouring properties.
 - (i) Mid-blocks to be designed to omit / minimise overlooking and overshadowing potential.
 - (j) The design should also incorporate on-street car parking for visitors. Not all car parking for dwelling houses should be in-curtilage. This is the interests of creating place and successful streetscapes.
 - (k) Justification is required for having one single block of apartments and significant number of duplex/triplex units. Perhaps an additional block of apartments along the Gallops may





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support higher densities along the public road and reduce densities centrally and to the edges (west) of the site.

- (l) Side gardens proposed for two storey dwellings (units 137, 138, 174 and 175) would create toothgap design and require significant construction of 2m high walls that would have a negative impact on the streetscape at this location. A streetscape is required at this specific location – this needs to be demonstrated in a future proposal. Reduce 'toothgap' nature and requirement for 2m high walls – these items can be designed out of the scheme.

7. Urban Design and Hedgerow.

At each of the meetings that have occurred between the Applicant and Kildare County Council, the protection and retention of the hedgerows (green infrastructure and heritage pieces) has been consistently raised. The Applicant was requested to provide for a design and layout that would embrace the hedgerows in situ i.e. the layout should have been designed around the hedgerows / green infrastructure to ensure their survival, their retained contribution to climate adaptation, their benefit to ecology, human health (both physical and mental) and visual amenity. This has not been addressed or demonstrated within the proposed development. Having regard to this, the Applicant should address the following:

- (a) The creation of 'no man's land' behind the proposed dwellings, along the entire western boundary with Kingsfurze is not acceptable. This must be addressed. A full redesign and realignment of the scheme is required – the revised design should provide for dwellings facing onto the hedgerows. No dwellings should side onto or back onto the hedgerow. Specifically (**but not exhaustive**) a full redesign is required for the entirety of the western boundary to ensure the hedgerow is fully retained in situ and will survive into the future.
- (b) The Applicant should submit a full hedgerow survey, including the depth/width of the hedgerow on and around the site. An overlay of the proposed realignment (required under Item a) should be placed over the hedgerow survey. The revised layout should demonstrate that streets, pathways, alleyways, dwellings units etc will not require the removal of hedgerow (except where punctuation is required to provide for access, which is to be kept to a minimum). ****This is to ensure that the integrity of the Townland boundary and other hedgerow (which forms part of the Naas Local Area Plan green infrastructure) are protected.**
- (c) As per item a and b above, it is a concern that it is proposed to provide units 25-31 with rear entrances (along the western boundary) which would necessitate the removal of town land boundary – this is not acceptable.

8. Urban Design and Place Making.

The applicant is to submit a specific urban design report that demonstrates that all streets proposed within the scheme are compliant with the Design Manual for Urban Roads and Streets. The report should demonstrate the provision of on-street car parking, junction dimensions, home zone quality requirements and successful horizontal /vertical deflections throughout the site. These should all be illustrated on a separate drawing.

9. The Creche Structure.

The Applicant should seek to incorporate some of the design language found in the horse-industry (immediate proximity to the site) within the design of the structure. The design should seek to pay 'lip-service' to the horse-industry (discussed at pre-planning meeting).



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Roads/Transportation.

1. The applicant is to have consideration to the KCC Transport, Mobility and Open Spaces Department pre-planning report: PP6071.
2. In conjunction with item 1, the Traffic and Transport Assessment is to have a detailed assessment of the impact on Junction 9, and operation, of the M7 Motorway having consideration to the recently granted planning permissions register references: 25/60574 and 24/61154. This is also to have reference to DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).
3. The applicant will be required to submit to Kildare County Council design details of the junction signalised works between the Road Objective/L-2992 local road including Vulnerable Road Users (VRU) crossing facilities in line with current standards. The Applicant shall liaise with the Traffic Management Section of Kildare County Council in regard to this. The junction works including all equipment and infrastructure shall be in accordance with Kildare County Council's required specifications including:
 - (a) Final details of traffic signals.
 - (b) The controller to have ELV and LED signals.
 - (c) The installation of MOVA technology.
 - (d) The installation of CCTV camera.
 - (e) The survey and upgrade of existing public lighting.
 - (f) The upgrade of the road layout and markings including the provision of dished kerbs and tactile paving.
 - (g) The safe controlled movement of vulnerable road users.

The construction stage final design shall be the subject of a condition should a grant of planning permission be made. All installations shall be connected to Kildare County Council's Traffic Management Centre located at the Council's headquarters at Áras Chill Dara, Devoy Park, Naas, County Kildare. The cost of the design, supervision and delivery of all works described in the foregoing should be borne solely by the Applicant. These works shall be completed after the written agreement of the KCC Traffic Management Section and prior to the residential and commercial units of the development being occupied.

4. The applicant is to note a Project Supervisor for the Design Process, a Project Supervisor for the Construction Stage of the Road Objective and a full time Resident Engineer will be required to be provided and funded by the Developer to supervise for the provision of the Road Objective and public road and footpath works by way of a legal agreement with the Local Authority and for these works to be conducted by an agreed competent contractor. In the event of a grant of permission, conditions will be recommended by this department in respect of the above.
5. The applicant is to note the following details will be required and conditioned by this department in the event of a grant of planning permission. These are, inter alia:
 - (a) A detailed design for the Road Objective that is to indicate lines of sight and corner radii at junctions, longitudinal gradients / vertical and horizontal curvature for the Road Objective to be in accordance with the Design Manual for Urban Roads and Streets (DMURS) 2019. All manhole covers and frames shall not be located in the wheel track of the main carriageway of the Distributor Road. E600 manhole covers and frames with a 150mm deep frame shall



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be used for both foul and surface water manholes located on the main carriageway of the Road Objective. This is having consideration to the projected high volumes of traffic that will use the fully opened Road Objective in order to avoid rocking of manhole covers from vehicular traffic.

- (b) A low noise road surface.
 - (c) Mitigation measures to prevent speeding.
 - (d) A detailed design of surface water runoff collection, attenuation and disposal system for the Road Objective is to be completely separate to that serving the proposed residential development.
 - (e) The Road Objective embankment is to be constructed using Class 1 or Class 2C fill with a design CRB $\geq 2.5\%$. This would permit the use of a 150mm subbase over a minimum of 600mm of capping layer.
 - (f) Finished road levels are to be indicated in the design for the full length of the overall Road Objective providing existing road levels on the L-2992 local road and at the Gallops residential development. This is to include horizontal and vertical alignment sections.
 - (g) The cycle tracks on the Road Objective are to be in accordance National Transport Authority's Cycling Design Manual pertaining to widths and signage, the location of lighting standards, ironmongery and signs, the avoidance of obstructions and the re-establishment of a cyclist's position on-road.
 - (h) The surface water runoff disposal system for the Road Objective to be separate from the residential development.
6. As indicated in the pre-planning report, the applicant will be required to submit an Acoustic Design Statement, assessing through noise modelling software, the Road Objective qualifying as a "Major Road" pursuant to the (principle) Environmental Noise Regulation 2018. This is to assess the potential noise on an analysis based on 3 million vehicular movements per year. This is to future proof the development in complying with the Lden and Night thresholds of the Kildare County Council Third Noise Action Plan 2019 – 2023.
- (a) The predicted post mitigation Lden noise levels at 1.5 metres above all floor levels are below the 70 dB (A) Lden threshold of the Kildare County Council Third Noise Action Plan 2019 – 2023 so as not to negatively impact on the useability of open space (both public and private) and the ability of future residents to have patio doors/windows open during the summer months.
 - (b) The predicted post mitigation Lnight noise levels at 1.5 metres above all floor levels are below the 57 dB (A) Lden threshold of the Kildare County Council Third Noise Action Plan 2019 – 2023.
 - (c) Consideration to be had by the applicant to relocating and or omitting residential units that cannot comply in full with the terms of items a and b set out in the foregoing.
 - (d) The predicted internal noise levels of the proposed residential units to be in accordance with the recommended indoor ambient noise levels for a dwelling as prescribed under the British Standards BS 8233:2014. This is also to have an assessment with regard to opening windows at night (in summer months) and the impact on internal ambient noise levels.
 - (e) An assessment of the number of LAFmax events at 15 minute intervals from 11.00 pm to 7.00 am and mitigation measures in ensuring sleep disturbance will not be an issue for future occupiers.



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- (f) A full set of tabled noise survey monitoring results conducted midweek during a school term including the Date, Time, Run, Duration, LAeqT (15min), LAFmax, LAF10 and LAF90 calculated Lden noise levels and Night noise levels.
 - (g) This is to include mitigation measures in preventing speeding. The applicant is requested to liaise with the KCC Traffic Management Section prior to a planning application being made.
 - (h) The inclusion of a Low Noise Road Surface.
 - (i) A concluding statement indicating full compliance with the Kildare County Council Third Noise Action Plan 2019 – 2023 and the British Standards BS 8233:2014.
7. The applicant will be required to submit a Site Layout Plan at a scale of 1:500 indicating the following:
- (a) Corner radii, lines of sight at all junctions within the residential development and longitudinal gradients to be in accordance with the Design Manual for Urban Roads and Streets DMURS (2019).
 - (b) Details of 30 km/h Slow Zones signage and their respective locations in the residential development in accordance with the Department of Transport, Tourism and Sport's traffic signs advice note TSAN-2016-02.
 - (c) Surface wearing course of the road within development to be Stone Mastic Asphalt, SMA 14 surf PMB 65/105-60 des 45mm thick, in compliance with clause 942 of NRA/TII specification.
 - (d) The manner in which surface water runoff is collected at the vehicular access points and not discharged onto the Road Objective.
 - (e) Mitigation measure in order to prevent speeding on the Road Objective. This is to include raised tables in preference to VRU movements.
 - (f) The locations of electric vehicle EV charge points for the residential and crèche development that are also in accordance with Chapter 5 of the Kildare County Development Plan 2023 – 2029.
8. As indicated in the pre-planning report, the applicant will be required to submit a Stage 1 Road Safety Audit/Assessment (RSA) by an independent approved and certified auditor. The RSA is to assess the interface with the existing public road/footpath network. The applicant will be required to make the necessary changes to the design proposals following the Stage 1 RSA. The applicant is requested to note that if the application is subsequently granted, then the applicant will be required to carry out a Stage 2, 3 and 4 RSA.
9. As indicated in the pre-planning report, the applicant will be required to submit a draft Construction Management Plan that is to contain:
- (a) A Construction Traffic Management Plan indicating all haul routes to and from the site. Delivery times for plant and materials and waste collection shall have consideration to morning and evening peak school times in the area and peak traffic periods. This plan is also to contain mitigation measures to minimize the effects the proposed development would have on the immediate public road and footpath network, existing VRU and traffic movements.
 - (b) Wheelwash arrangements and locations for the construction phase.
 - (c) Location of the construction compound, use of cranes, scaffolding and screening, parking and storage areas during the construction phase with particular consideration to adjacent residential property.



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- (d) Relevant construction site warning signs shall be in accordance with the Department of Transport, Tourism and Sport (DTTAS) Traffic Signs Manual for the overall development.
- (e) Hours of operation during the construction phase to be 08.00 hours to 18.00 hours Monday to Friday and 08.00 hours to 14.00 hours Saturday. No work permitted on the Sundays and public holidays. (This is in the interest of the existing residential amenity of properties in the area).

Surface Water.

1. All surface water drainage proposals must comply with:
 - Kildare County Council's Sustainable Drainage Systems (SuDS) Design Guidance Document.
 - Greater Dublin Strategic Drainage Study (GDSDS).****Underground attenuation tanks are contrary to County Development Plan policy and should be designed out of the proposal.**
2. Fully detailed drawings showing existing and proposed plan and longitudinal views of surface water drainage layouts shall be submitted. Standard cross section details of all drainage components shall also be submitted.
3. Surface water and Wastewater drainage systems must discharge to separate pipe networks.
4. The surface water run-off from the site shall be limited to greenfield runoff rates and details shall be provided on how surface water up to and including the 1 in 100 year critical storm with climate change allowance (+30%) will be managed within the curtilage of the site in accordance with the GDSDS. An "Urban Creep" attenuation storage allowance shall be applied where applicable (8.4.7 KCC SuDS Design Guide). The applicant shall also demonstrate that there will be no reduction in the quality of the surface water.

Plans shall show flow routes including exceedance flow routes, subcatchment boundaries, flow control locations, storage locations, contributing impermeable areas and phasing where appropriate.

An Engineering Services Design Report shall be submitted which includes all design details regarding surface water drainage proposals including attenuation storage and greenfield discharge rate calculations.

5. Sustainable Drainage Systems (SuDS) are a mandatory requirement for all new developments including domestic extensions and side garden developments. Drainage designs shall incorporate Nature Based SuDS features such as but not limited to the following: Green/Blue Roofs, Infiltration systems, Filter Drains/Strips, Tree pits, Swales, Ponds/Wetlands, Detention basins, Bio Retention systems, Pervious pavement, Rain Gardens, Channel Rills, Rainwater harvesting systems. Applicants must refer to and comply with Kildare County Council's Sustainable Drainage Design Guidance Document which is available to download at:
<https://kildarecoco.ie/AllServices/Planning/DevelopmentGuidelines/SustainableDrainageG>



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[uidelines/KCC%20Sustainable%20Drainage%20Systems%20Guidance%20%20Single%20page.pdf](#)

All proposed SuDS details shall be submitted including details of ancillary items such as inlet and outlets.

6. Underground attenuation systems are not an acceptable nature-based SuDS measure and should only be considered as a last resort.

IN 024.

It is the intention of Kildare County Council that the use of underground drainage techniques are to be limited across Kildare as per Objective IN 024, with that said only where a clear and plausible rationale is agreed with WSP for the exclusion of a particular SuDS class or type within a class, shall the next preferred SuDS class or type be considered. In that vein, it is requested the applicant revises the surface water design to remove the proposed underground Cellular Attenuation System and replace same with a nature based above ground solution such as detention basins.

7. Soakaways may be used for the disposal of surface water, and must comply with the BRE Digest 365. Submitted soakaway design details shall include infiltration test results. The design shall be certified to BRE Digest 365 standard by a suitably qualified person. Only clean, uncontaminated surface water shall be discharged to soakaways. The soakaway shall be located fully within the curtilage of the property and shall be:
 - (a) at least 5m from any buildings, public sewers, road boundary or structures
 - (b) generally, not within 3m of the boundary of the adjoining site
 - (c) not in such a position that the ground below foundations is likely to be adversely affected.
 - (d) 10m from any sewage treatment percolation area and from any watercourse / flood plain.
 - (e) Soakaways to include an overflow connection to a public surface water sewer where possible.
8. Flood risk must be assessed and commented on for all sites. Submissions must comply with OPW Guidelines for Planning Authorities, available at: <https://www.opw.ie/media/Planning%20System%20and%20Flood%20Risk%20Management%20Guidelines.pdf>

Open Space, Landscaping and Boundary Treatment.

1. Retention and Protection of Existing Vegetation.

It is imperative that all retained vegetation across the site is afforded the highest level of protection. Specifically, the boundary hedge between Kingsfurze Avenue and the proposed development must be preserved and safeguarded. Hedges should not be removed due to boundary inconsistencies; it is the applicant's responsibility to regularise such areas without compromising existing vegetation.



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2. **Arborist Supervision for Retained Hedge Sections.**
Hedge sections designated for retention within the open space must be securely protected throughout the development process. Close supervision by a qualified arborist is required, particularly where construction activities occur in proximity to these hedges which have been detailed on the protection plan.
3. **Relocation of Trees at The Gallops Entrance.**
Small trees identified for removal along The Gallops (entrance to the racecourse) should be considered for relocation to alternative suitable areas within the site.
4. **Street Tree Planting Deficiencies.**
Certain roads within the proposed development lack street tree planting, which may result in visually harsh environments dominated by hard infrastructure. Additional tree planting should be incorporated to soften these areas and enhance the streetscape.
5. **Pathways Adjacent to Retained Hedges.**
Pathways should be sensitively designed and routed to respect and complement the presence of retained hedgerows.
6. **Amendment of Timber Seating Specification.**
Timber seating currently specified should be replaced with more durable alternatives such as composite materials, concrete, or galvanised powder coated metal to ensure longevity and reduced maintenance.
7. **Removal of Picnic Benches.**
All picnic benches proposed within the development should be removed due to concerns regarding suitability and maintenance.
8. **Repositioning of Bicycle Racks.**
Bicycle racks are currently located in areas unlikely to be utilised. These should be repositioned to locations where they will be functional and accessible to users.
9. **Removal of Play Features Near Units 183–184.**
Play features situated near residential units 183–184 should be removed to avoid potential conflicts with residential amenity.
10. **Play Features on Open Space Between Units 169, 170, and 189.**
Play features in this open space should be removed. The log pile may be relocated to the central open space to maintain play value while reducing impact on adjacent residences.
11. **Confirmation of Link Path Gradients.**
Detailed confirmation is required regarding the sections and gradients of the proposed link path in the western corner of the site to ensure accessibility and compliance with design standards.



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12. **Pedestrian Link Through Kingsfurze Avenue Playground.**
The existing playground at Kingsfurze Avenue, through which a pedestrian link is proposed, is not under the management of Kildare County Council. Permission must be obtained from the relevant playground management authority prior to any works, to maintain and enhance this space.
13. **Replacement of Picnic Bench at Half Basketball Court.**
The picnic bench located at the half basketball court should be replaced with a single standard bench to better suit the space and usage patterns.
14. **Future Management Proposal.**
The future management proposal from the site, detailed in the taking in charge drawing should be discussed with the development control section.
15. **The use of boulders in the landscape plan should be reduced.**

Building and Development Control.

1. The Applicant is asked to consider proposed boundary treatments to ensure that there is no creation of areas behind proposed boundaries which are inaccessible for future maintenance. All areas should be clearly accessible for maintenance by the landowner – noting that such areas will not be Taken in Charge.
2. The Applicant is asked to consider the siting of SuDS features (swales) adjacent to the proposed home zones on the basis of them impacting on the natural refuge for Vulnerable Road Users (VRUs) and also given the possibility of overrunning from vehicles exiting driveways.
3. The Applicant is asked to outline the proposed future ownership and maintenance arrangements for the laneways that serve to access rear gardens noting that such laneways will not be Taken in Charge.

Community/Social Infrastructure.

1. A Community / Social infrastructure assessment is required and should be submitted.



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Uisce Éireann.

1. The Applicant submitted Pre-Connection Enquiry (PCE) application to Uisce Éireann for c.251 no units [as per the pre-connection enquiry; the subject application proposes 237 dwelling units] on the site and a Confirmation of Feasibility (COF) was issued on the 26th August, 2025, stating both water and wastewater connections were feasible subject to upgrade works being required.

In relation to Water, the COF states a connection is feasible without infrastructure upgrade works by UÉ.

In relation to Wastewater, the COF states a connection is feasible subject to upgrade works. It notes, the preferable connection point is to the existing 225 CO sewer, approximately 25 metres from the western site boundary. That connection may include crossing a private land and the developer would be responsible for obtaining all necessary consents/permissions. In the case of connection of all or part of the development to the existing 225 uPVC sewer on Naas Inner Road, approximately 180 metres network extension is required. The developer will be required to fund the extension works. The fee will be calculated at a connection application stage. A gravity connection option/s should be prioritized.

UÉ notes the current wastewater design proposal include for the preferred connection to the existing 225 CO sewer, approximately 25 metres from the western site boundary.

All COF letters are usually valid for a period of c.12 months from date of issuance. After this period and in this instance, it will be required for the applicant to submit a new PCE in order to obtain an updated COF letter. The applicant is required, under the Large-scale Residential Development Regulations to submit a valid confirmation of Feasibility (COF) when lodging their LRD planning application.

2. Uisce Éireann does not permit build over of its assets. Separation distances from public infrastructure, as per Uisce Éireann's Standards Codes and Practices must be achieved. It is the applicant's responsibility to submit a diversion enquiry to Uisce Éireann Diversions Section (diversions@water.ie) prior to construction, where a potential build over of public assets is in question and/or where the applicants proposals cannot achieve separation distances from public infrastructure as per UÉ Standards & Codes of Practice.
3. Protection of drinking water source(s) from potentially adverse impacts is a priority for Uisce Éireann. It is Uisce Éireann's current policy to maintain safe and secure drinking water supplies and ensure that development will not give rise to any deterioration in water quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s). It is also a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected to avoid deterioration in quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s).
4. A SODA Statement of Design Acceptance is recommended to be in place and submitted at full LRD planning application lodgement stage.
5. Uisce Éireann is requested to be consulted via an EIAR Scoping letter c. 6 months prior to the completion of the planning application.





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Housing/Part V.

1. The following issues in relation to Part V shall be addressed:

(a) Part V form to be completed.

Contact socallaghan@kildarecoco.ie or Partvteam@kildarecoco.ie

(b) Evidence of date of purchase of site required to confirm the rate of Part V obligation.

(c) Part V proposal to contain a mix of unit types (ie. Houses, Duplex Units & Apartments) and of a capacity in line with the Naas social housing need below:

1 bed-	1070	48%
2 bed-	734	33%
3 bed-	329	15%
4 bed-	80	4%

(d) Part V units to be dispersed throughout the site. Maximum two adjacent units.

(e) Own door access required where available.

(f) Dedicated parking, bin and bicycle storage are required for each unit.

(g) Storage and private amenity to comply with the relevant current County Development Plan/ Local Area Plans and all relevant Departmental guidelines.

(h) Ensuites are not required as these are not funded by the Department.

(i) Management fee details, where available, to be submitted

(j) If a phased development is proposed, then Part V units are to be delivered at a minimum of 20% of units per phase.

(k) Plot areas to be supplied for all individual residential house units.

(l) Apartment exclusive plot areas for each apartment block and internal floor areas of all apartments to be supplied.

(m) Part V to be calculated by the relevant Housing Agency Part V ' Example 5: Developments of Apartments and Houses: where Part V is to be satisfied through the provision of both apartments and houses' using plot area method of calculation.

(n) All areas and dimensions to comply with-

- Kildare County Development Plan 2023-2029/ Local Area Plan.
- Quality Housing for Sustainable Communities: Design Guidelines December 2020.
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities July 2023.

Fire Safety.

1. A minimum of 25 litres per second of water is to be available in the mains at 2 bar pressure for fire fighting.
2. The Applicant shall obtain Fire Safety Certificates in accordance with the requirements of the Building Control Act.



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Ecology.

1. Ecological Impact Assessment (EcIA).

The applicant is required to submit a comprehensive Ecological Impact Assessment (EcIA) in accordance with the CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland (2018).

The EcIA must:

- Identify and evaluate all ecological receptors potentially affected by the proposed development, with particular attention to:
 - Bats (commuting and foraging species).
 - Hedgerows and treelines (as key ecological corridors).
 - Other protected species or habitats of local biodiversity value.
- Assess both construction-phase and operational-phase impacts, including:
 - Artificial lighting.
 - Habitat loss, fragmentation, or degradation.
 - Disturbance to commuting and foraging routes.
- Include mitigation and biodiversity enhancement measures to avoid or reduce ecological impacts and to support ecological connectivity across the site.
- Clearly identify and propose the conservation of all major hedgerows and treelines, particularly those with established ecological value or connectivity functions.

2. Bat Survey and Assessment.

The applicant is required to carry out a bat survey and impact assessment in accordance with:

- Collins, J. (ed.) (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition), Bat Conservation Trust.
- Bat Conservation Ireland Guidelines for bat surveys and lighting near bat habitats.

The survey must:

- Include transect and static detector surveys during the appropriate seasonal window.
- Identify commuting routes, foraging areas, and any potential roosts within or adjacent to the site.
- Assess the impact of lighting and habitat changes on bat activity.
- Propose lighting mitigation and habitat protection measures, including the retention and enhancement of dark corridors along key hedgerows and treelines.

3. Lighting Impact Assessment (Ecological Focus).

A Lighting Impact Assessment is required to assess potential impacts on bats and other nocturnal wildlife. This should include:

- Lighting specifications (e.g. lux levels, colour temperature, beam angles).
- A lighting layout plan showing predicted light spill.
- Assessment of impacts on bat commuting corridors and hedgerow networks.
- Mitigation measures to maintain dark corridors and reduce ecological disruption.

4. Biodiversity Management Plan.

The applicant is requested to submit a Biodiversity Management Plan that:

- Identifies areas within the site where biodiversity enhancement works can be implemented.



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- Proposes measures to enhance local biodiversity, such as native planting, pollinator-friendly landscaping, and habitat creation.
- Demonstrates how the development will contribute to the biodiversity objectives of the Kildare County Development Plan (CDP).
- Includes a long-term management strategy for retained and enhanced habitats, particularly hedgerows and treelines.
- Biodiversity planting requires plants to be native species of local provenance.

5. Screening for Appropriate Assessment (AA).

In accordance with the Planning and Development Act 2000 (as amended) and the EU Habitats Directive (92/43/EEC), the applicant is required to submit a Screening Report for Appropriate Assessment. This report must:

- Identify any European Sites (Natura 2000) within the potential zone of influence.
- Assess the potential for likely significant effects, alone or in combination with other plans or projects.
- Be prepared in accordance with NPWS guidance and relevant case law.

If the screening cannot rule out likely significant effects, a Natura Impact Statement (NIS) will be required.

6. The preparation and submission of a Hedgerow Management Plan that specifically addresses the protection and integration of the townland boundary hedgerow on site. Townland boundary hedgerows were found to be generally of higher ecological and biodiversity value in the Kildare Hedgerow Survey 2022 and 2024. This is in line with the Kildare County Development Plan 2023–2029, which places particular emphasis on the conservation of hedgerows as key ecological and cultural features.

Please ensure the plan addresses the following objectives:

(a) Retention and Protection (BI O26 & BI O27).

- Avoid removal of hedgerows wherever possible. If removal is deemed unavoidable, provide a clear and satisfactory justification to the Planning Authority. Any necessary removal must be kept to an absolute minimum and include mitigation planting of similar length and species composition, ideally using native plants of local provenance and origin, and located as close as practicable to the original hedgerow.
- Include proposals for infill planting or transplanted hedgerow sections to maintain continuity of the green infrastructure network.

(b) Integration into Site Design (BI O28).

- Integrate existing boundary hedgerows into the site layout to avoid “trapped hedges” at the rear of residential plots.
- Encourage additional planting of native trees, woodlands, and hedgerows as part of the landscape design.

(c) Seasonal Considerations (BI O31).

- Ensure that any hedge cutting or removal complies with the Wildlife (Amendment) Act 2000, particularly the restriction on cutting during the bird-nesting season (1st March to 31st August), except under legally defined circumstances.

Additional Notes:

1. Removal of hedgerows prior to planning submission will be viewed negatively and may result in refusal.





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2. The townland boundary hedgerow is of particular concern and must be treated as a priority feature in the plan.
3. Please submit the Hedgerow Management Plan as part of the planning documentation. If the Applicant requires an ecological input or mapping support, the Council's Ecologist can assist.
4. Demonstrate that Hedgerow Objectives of the Kildare County Development Plan have been addressed within the proposed design:

Kildare County Development Plan 2023–2029 Objectives for Hedgerows.

- *BI O26 Prevent, in the first instance, the removal of hedgerows to facilitate development. Where their removal is unavoidable, same must be clearly and satisfactorily demonstrated to the Planning Authority. In any event, removal shall be kept to an absolute minimum and there shall be a requirement for mitigation planting comprising a hedge of similar length and species composition to the original, established as close as is practicable to the original and where possible linking to existing adjacent hedges. Ideally, native plants of a local provenance and origin should be used for any such planting. Removal of hedgerows and trees prior to submitting a planning application will be viewed negatively by the planning authority and may result in an outright refusal.*
- *BI O27 Require the retention and appropriate management of hedgerows and to require infill or suitably sized transplanted planting where possible in order to ensure an uninterrupted green infrastructure network.*
- *BI O28 Promote the integration of boundary hedges within and along development sites into development design so as to avoid "trapped hedges" located to the boundary of houses within the development layout. Encourage the planting of woodlands, trees and hedgerows as part of new developments and as part of the Council's own landscaping works ideally using native plants of local provenance and origin.*
- *BI O31 Restrict the cutting of hedges during the bird-nesting season (1st March until 31st August), except in certain legally defined circumstances, in accordance with the provisions of the Wildlife (Amendment) Act 2000.*

Heritage.

1. The Applicant should note that in light of the recent archaeology find in proximity to the site, in advance of the commencement of any construction works, the developer shall engage a suitably qualified archaeologist to carry out a full geophysical survey by a suitably qualified professional.
2. If permission is granted, the developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works, topsoil stripping and groundworks within the proposed development boundary.





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3. The Applicant should note that should archaeological remains be identified during the course of archaeological monitoring, all works shall be suspended in the area of archaeological interest pending a decision of the Planning Authority, in consultation with the Department of Housing, Local Government and Heritage regarding appropriate mitigation (preservation in situ/excavation).
4. The Applicant should note that in the event of a grant of permission the Planning Authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/ excavation required, following the completion of all archaeological work on site and any necessary post- excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Environment.

1. Demonstrate that all foul sewage and soiled water will discharge to the public foul sewer system.
2. Demonstrate that only clean, uncontaminated surface water will discharge to the surface water system.
3. Demonstrate that all surface water from the carpark areas will pass through adequately sized and sited petrol/oil interceptor(s) before being discharged to the surface water system.
4. Demonstrate that consideration has been given that during Construction Phase that a Surface Water Management Plan will be in place in accordance with IFI Publication 2016 "Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters". Note: the Plan should address the collection, control and management of any surface water run-off from the site to prevent any polluting matter, suspended solids and silt, being discharged to any receiving water.

The Plan should, inter alia, include:

- (a) Site Layout Plan at sufficient scale identifying any potential surface water and/or groundwater receptors,
 - (b) The location and design of any proposed mitigation measures, and
 - (c) Proposals for a surface water and/or groundwater monitoring programme, as appropriate.
5. Note: discharge can only be authorised under Section 4 of the Local Government (Water Pollution) Act 1977, as amended.
 6. An operational waste management plan (OWMP) in accordance with the Kildare County Council Waste Presentation Byelaws will be required. The OWMP shall consider the domestic waste management needs of the proposed occupants, the storage needs for receptacles including in shared locations, in accordance with the byelaws, and the servicing needs with regards to domestic waste for the long-term.





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Strategic Planning and Public Realm.

1. Regarding the landscape layout further clarification is required regarding the materials and finishes proposed for the basketball half court, seating elements, and landscaped areas intended for public use, to ensure they are robust, durable, and easily maintained.
2. The overall quantum and spatial distribution of open space is noted. The inclusion of play areas is welcomed; however, additional detail should be provided regarding their design, accessibility, and suitability for a range of age groups.
3. The design of public spaces should incorporate principles of passive surveillance.
4. Lighting proposals, particularly along permeability routes, should be carefully considered and implemented to promote safety and comfort for users.
5. Details should be submitted on gradients, tactile paving, seating dimensions, and accessible routes.
6. A phasing strategy should be provided to demonstrate how public realm and amenity spaces will be delivered in parallel with residential units, ensuring timely access for occupants.
7. While a maintenance plan has been submitted, primarily focused on planting and hard surface areas, a more comprehensive public realm management strategy is required. This should outline responsibilities for ongoing maintenance, cleaning, and long-term stewardship of communal and public spaces, with particular attention to the basketball half court and play areas.
8. The integration of Sustainable Drainage Systems (SuDS) within the public realm is acknowledged. Where SuDS features interface with play areas, careful consideration should be given to the selection of materials to ensure safety, usability, and durability.

30th October 2025.


Ger Maher SEO
Planning Department,
Kildare County Council.

Note 1:

Under section 32E of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021, neither the taking place of an LRD meeting nor the provision of an LRD opinion shall prejudice the performance by the Planning Authority of its functions under this Act or any regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Note 2:

The LRD Opinion will be valid for 6 months from the date of this letter. A planning application must be submitted within 6 months of receipt of the LRD Opinion or the Applicant must re-commence the pre-application consultation process.





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APPENDIX A.

Internal Reports from Service Departments and Uisce Éireann.





Planning Report For KCC LRD Opinion Report

File Number: LRD2025006

Applicant: Ballymore Development Limited.

Address: At the site west of Naas Racecourse, Kingsfurze, Naas,
County Kildare.

Date: 14th October 2025.

The proposed development is as follows: • 237 no. residential units in total, including 126 no. houses (mix of three- and four-bedrooms) and 111 no. apartments (a mix of one-, two- and three-bedrooms), distributed as follows:

1. 33 no. duplex blocks, each containing 2 no. individual units stacked vertically with separate entrances, totalling 66 no. units;
2. 3 no. triplex blocks, each containing 3 no. individual units stacked vertically with separate entrances, totalling 9 no. units;
3. 2 no. maisonettes, each containing 2 no. individual units stacked vertically with separate entrances, totalling 4 no. units; and,
4. 1 no. apartment block comprising 32 no. units. • A crèche facility with capacity for 133 children, accessed via a separate access road;
5. Extension of the existing Gallops Avenue to connect with Tipper Road, together with improvements to Gallops Avenue, including a two-way cycle track and pedestrian and cyclist crossing;
6. Improvements to footpaths and pedestrian crossings at the junctions of Gallops Avenue with Tipper Road, Dublin Road (R455), and The Gallops, to enhance pedestrian and cyclist safety and connectivity;
7. Removal of existing ESB overhead power lines and related electrical infrastructure, with replacement by new underground cabling;
8. All related infrastructure to include provision of public open spaces, play, an internal road network, ancillary parking, landscaping and boundary treatments, public lighting, drainage infrastructure, a substation, links to Kingsfurze Avenue and existing green at The Woodlands; and,
9. Ancillary works, including clearance works, demolition of existing structure on site and other site development works.



The following observations of KCC Transport, Mobility and Open Spaces Department of the submitted particulars of the LRD Meeting held on the 2nd October 2025 can be incorporated in the KCC Opinion Report for the applicant to address in the LRD Application:

1. The applicant is to have consideration to the KCC Transport, Mobility and Open Spaces Department pre-planning report: PP6071.
2. In conjunction with item 1, the Traffic and Transport Assessment is to have a detailed assessment of the impact on Junction 9, and operation, of the M7 Motorway having consideration to the recently granted planning permissions register references: 25/60574 and 24/61154. This is also to have reference to DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).
3. The applicant will be required to submit to Kildare County Council design details of the junction signalised works between the Road Objective / L-2992 local road including Vulnerable Road Users (VRU) crossing facilities in line with current standards. The Applicant shall liaise with the Traffic Management Section of Kildare County Council in regard to this.

The junction works including all equipment and infrastructure shall be in accordance with Kildare County Council's required specifications including:

- a. Final details of traffic signals.
- b. The controller to have ELV and LED signals.
- c. The installation of MOVA technology.
- d. The installation of CCTV camera.
- e. The survey and upgrade of existing public lighting.
- f. The upgrade of the road layout and markings including the provision of dished kerbs and tactile paving.
- g. The safe controlled movement of vulnerable road users.

The construction stage final design shall be the subject of a condition should a grant of planning permission be made. All installations shall be connected to Kildare County Council's Traffic Management Centre located at the Council's



headquarters at Áras Chill Dara, Devoy Park, Naas, County Kildare. The cost of the design, supervision and delivery of all works described in the foregoing should be borne solely by the Applicant. These works shall be completed after the written agreement of the KCC Traffic Management Section and prior to the residential and commercial units of the development being occupied.

4. The applicant is to note a Project Supervisor for the Design Process, a Project Supervisor for the Construction Stage of the Road Objective and a full time Resident Engineer will be required to be provided and funded by the Developer to supervise for the provision of the Road Objective and public road and footpath works by way of a legal agreement with the Local Authority and for these works to be conducted by an agreed competent contractor. In the event of a grant of permission, conditions will be recommended by this department in respect of the above.
5. The applicant is to note the following details will be required and conditioned by this department in the event of a grant of planning permission. These are, inter alia:
 - a. A detailed design for the Road Objective that is to indicate lines of sight and corner radii at junctions, longitudinal gradients / vertical and horizontal curvature for the Road Objective to be in accordance with the Design Manual for Urban Roads and Streets (DMURS) 2019. All manhole covers and frames shall not be located in the wheel track of the main carriageway of the Distributor Road. E600 manhole covers and frames with a 150mm deep frame shall be used for both foul and surface water manholes located on the main carriageway of the Road Objective. This is having consideration to the projected high volumes of traffic that will use the fully opened Road Objective in order to avoid rocking of manhole covers from vehicular traffic.
 - b. A low noise road surface for the Road Objective.
 - c. Mitigation measures in order to prevent speeding.
 - d. A detailed design of surface water runoff collection, attenuation and disposal system for the Road Objective is to be completely separate to that serving the proposed residential development.
 - e. The Road Objective embankment is to be constructed using Class 1 or Class 2C fill with a design CRB $\geq$ 2.5%. This would permit the use of a 150mm subbase over a minimum of 600mm of capping layer.



- f. Finished road levels are to be indicated in the design for the full length of the overall Road Objective providing existing road levels on the L-2992 local road and at the Gallops residential development. This is to include horizontal and vertical alignment sections.
 - g. The cycle tracks on the Road Objective are to be in accordance National Transport Authority's Cycling Design Manual pertaining to widths and signage, the location of lighting standards, ironmongery and signs, the avoidance of obstructions and the re-establishment of a cyclist's position on-road.
 - h. The surface water runoff disposal system for the Road Objective to be separate from the residential development.
- 6. As indicated in the pre-planning report, the applicant will be required to submit an Acoustic Design Statement, assessing through noise modelling software, the Road Objective qualifying as a "Major Road" pursuant to the (principle) Environmental Noise Regulation 2018. This is to assess the potential noise on an analysis based on 3 million vehicular movements per year. This is to future proof the development in complying with the L_{den} and L_{night} thresholds of the Kildare County Council Third Noise Action Plan 2019 – 2023.
 - a. The predicted post mitigation L_{den} noise levels at 1.5 metres above all floor levels are below the 70 dB (A) L_{den} threshold of the Kildare County Council Third Noise Action Plan 2019 – 2023 so as not to negatively impact on the useability of open space (both public and private) and the ability of future residents to have patio doors / windows open during the summer months.
 - b. The predicted post mitigation L_{night} noise levels at 1.5 metres above all floor levels are below the 57 dB (A) L_{den} threshold of the Kildare County Council Third Noise Action Plan 2019 – 2023.
 - c. Consideration to be had by the applicant to relocating and or omitting residential units that cannot comply in full with the terms of **items a and b** set out in the foregoing.
 - d. The predicted internal noise levels of the proposed residential units to be in accordance with the recommended indoor ambient noise levels for a dwelling as prescribed under the British Standards BS 8233:2014. This is also to have an assessment with regard to opening windows at night (in summer months) and the impact on internal ambient noise levels.



- e. An assessment of the number of LAF_{max} events at 15 minute intervals from 11.00 pm to 7.00 am and mitigation measures in ensuring sleep disturbance will not be an issue for future occupiers.
 - f. A full set of tabled noise survey monitoring results conducted midweek during a school term including the Date, Time, Run, Duration, LA_{eqT} (15min), LAF_{max}, LAF₁₀ and LAF₉₀ calculated L_{den} noise levels and L_{night} noise levels.
 - g. This is to include mitigation measures in preventing speeding. **The applicant is requested to liaise with the KCC Traffic Management Section prior to a planning application being made.**
 - h. The inclusion of a **Low Noise Road Surface**.
 - i. A concluding statement indicating full compliance with the Kildare County Council Third Noise Action Plan 2019 – 2023 and the British Standards BS 8233:2014.
7. The applicant will be required to submit a Site Layout Plan at a scale of 1:500 indicating the following:
- a. Corner radii, lines of sight at all junctions within the residential development and longitudinal gradients to be in accordance with the Design Manual for Urban Roads and Streets DMURS (2019).
 - b. Details of 30 km/h Slow Zones signage and their respective locations in the residential development in accordance with the Department of Transport, Tourism and Sport's traffic signs advice note TSAN-2016-02.
 - c. Surface wearing course of the road within development to be Stone Mastic Asphalt, SMA 14 surf PMB 65/105-60 des 45mm thick, in compliance with clause 942 of NRA/TII specification.
 - d. The manner in which surface water runoff is collected at the vehicular access points and not discharged onto the Road Objective.
 - e. Mitigation measure in order to prevent speeding on the Road Objective. This is to include raised tables in preference to VRU movements.
 - f. The locations of electric vehicle EV charge points for the residential and crèche development that are also in accordance with Chapter 5 of the Kildare County Development Plan 2023 – 2029.



8. As indicated in the pre-planning report, the applicant will be required to submit a stage 1 Road Safety Audit / Assessment (RSA) by an independent approved and certified auditor. The RSA is to assess the interface with the existing public road / foot path network.

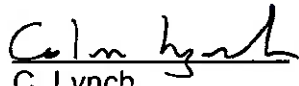
The applicant will be required to make the necessary changes to the design proposals following the stage 1 RSA. The applicant is requested to note that if the application is subsequently granted, then the applicant will be required to carry out a stage 2, 3 and 4 RSA.

9. As indicated in the pre-planning report, the applicant will be required to submit a draft Construction Management Plan that is to contain:
- a. A Construction Traffic Management Plan indicating all haul routes to and from the site. Delivery times for plant and materials and waste collection shall have consideration to morning and evening peak school times in the area and peak traffic periods. This plan is also to contain mitigation measures to minimize the effects the proposed development would have on the immediate public road and footpath network, existing VRU and traffic movements.
 - b. Wheelwash arrangements and locations for the construction phase.
 - c. Location of the construction compound, use of cranes, scaffolding and screening, parking and storage areas during the construction phase with particular consideration to adjacent residential property.
 - g. Relevant construction site warning signs shall be in accordance with the Department of Transport, Tourism and Sport (DTTAS) Traffic Signs Manual for the overall development.
 - h. Hours of operation during the construction phase to be 08.00 hours to 18.00 hours Monday to Friday and 08.00 hours to 14.00 hours Saturday. No work permitted on the Sundays and public holidays. (This is in the interest of the existing residential amenity of properties in the area).

Kildare County Council
Roads, Transportation and Public Safety Department,
Aras Chill Dara,
Devoy Park,
Naas,
Co. Kildare.



Signed:


C. Lynch,
Executive Engineer.

Date: 14/10/2025

Endorsed:


A. Keaveney,
Senior Executive Engineer.

Date: 15/10/2025

Planning Register Reference: LRD2025006.

Kildare County Council Surface Water Drainage Notes



LRD 2025006 Ballymore Development Ltd Opinion Meeting-Stage 2- 237 units at Kingsfurze Naas

All surface water drainage proposals must comply with:

- Kildare County Council's Sustainable Drainage Systems (SuDS) Design Guidance Document
- Greater Dublin Strategic Drainage Study (GDSDS)

1. Fully detailed drawings showing existing and proposed plan and longitudinal views of surface water drainage layouts shall be submitted. Standard cross section details of all drainage components shall also be submitted.
2. Surface water and Wastewater drainage systems must discharge to separate pipe networks.
3. The surface water run-off from the site shall be limited to greenfield runoff rates and details shall be provided on how surface water up to and including the 1 in 100 year critical storm with climate change allowance (+30%) will be managed within the curtilage of the site in accordance with the GDSDS. An "Urban Creep" attenuation storage allowance shall be applied where applicable (8.4.7 KCC SuDS Design Guide). The applicant shall also demonstrate that there will be no reduction in the quality of the surface water.

Plans shall show flow routes including exceedance flow routes, subcatchment boundaries, flow control locations, storage locations, contributing impermeable areas and phasing where appropriate.

An Engineering Services Design Report shall be submitted which includes all design details regarding surface water drainage proposals including attenuation storage and greenfield discharge rate calculations.

4. Sustainable Drainage Systems (SuDS) are a mandatory requirement for all new developments including domestic extensions and side garden developments. Drainage designs shall incorporate Nature Based SuDS features such as but not limited to the following: Green/Blue Roofs, Infiltration systems, Filter Drains/Strips, Tree pits, Swales, Ponds/Wetlands, Detention basins, Bio Retention systems, Pervious pavement, Rain Gardens, Channel Rills, Rainwater harvesting systems. Applicants must refer to and comply with Kildare County Council's Sustainable Drainage Design Guidance Document which is available to download at: <https://kildarecoco.ie/AllServices/Planning/DevelopmentGuidelines/SustainableDrainageGuidelines/KCC%20Sustainable%20Drainage%20Systems%20Guidance%20%20Single%20page.pdf>
All proposed SuDS details shall be submitted including details of ancillary items such as inlet and outlets.
5. Underground attenuation systems are not an acceptable nature-based SuDS measure and should only be considered as a last resort. IN 024
It is the intention of Kildare County Council that the use of underground drainage techniques are to be limited across Kildare as per Objective IN 024, with that said only where a clear and plausible rationale is agreed with WSP for the exclusion of a particular SuDS class or type within a class, shall the next preferred SuDS class or type be considered. In that vein, it is requested the applicant revises the surface water design to remove the proposed underground Cellular Attenuation System and replace same with a nature based above ground solution such as detention basins.

6. Soakaways may be used for the disposal of surface water, and must comply with the BRE Digest 365. Submitted soakaway design details shall include infiltration test results. The design shall be certified to BRE Digest 365 standard by a suitably qualified person. Only clean, uncontaminated surface water shall be discharged to soakaways. The soakaway shall be located fully within the curtilage of the property and shall be:
- (i) at least 5m from any buildings, public sewers, road boundary or structures
 - (ii) generally, not within 3m of the boundary of the adjoining site
 - (iii) not in such a position that the ground below foundations is likely to be adversely affected.
 - (iv) 10m from any sewage treatment percolation area and from any watercourse / flood plain.
 - (v) Soakaways to include an overflow connection to a public surface water sewer where possible.
7. Flood risk must be assessed and commented on for all sites. Submissions must comply with OPW Guidelines for Planning Authorities, available at: <https://www.opw.ie/media/Planning%20System%20and%20Flood%20Risk%20Management%20Guidelines.pdf>

Kildare County Council, Parks Section, Transport, Mobility and Open Spaces.



Planning Reference: LRD2025006 and PP6071.

Applicant: Ballymore Homes/Millroad Estates Ltd.

Development Description: LRD.

Address: Kingsfurze Naas.

Date: 30/09/2025.

Type: Pre-Planning Commentary. LRD Opinion stage 2.

1.0 Preamble/Introduction

The preliminary description for the proposed development is as follows: • 237 no. residential units in total, including 126 no. houses (mix of three- and four-bedrooms) and 111 no. apartments (a mix of one-, two- and three-bedrooms), distributed as follows: • 33 no. duplex blocks, each containing 2 no. individual units stacked vertically with separate entrances, totalling 66 no. units; • 3 no. triplex blocks, each containing 3 no. individual units stacked vertically with separate entrances, totalling 9 no. units; • 2 no. maisonettes, each containing 2 no. individual units stacked vertically with separate entrances, totalling 4 no. units; and, • 1 no. apartment block comprising 32 no. units. • A crèche facility with capacity for 133 children, accessed via a separate access road; • Extension of the existing Gallops Avenue to connect with Tipper Road, together with improvements to Gallops Avenue, including a two-way cycle track and pedestrian and cyclist crossing; • Improvements to footpaths and pedestrian crossings at the junctions of Gallops Avenue with Tipper Road, Dublin Road (R455), and The Gallops, to enhance pedestrian and cyclist safety and connectivity; • Removal of existing ESB overhead power lines and related electrical infrastructure, with replacement by new underground cabling; • All related infrastructure to include provision of public open spaces, play, an internal road network, ancillary parking, landscaping and boundary treatments, public lighting, drainage infrastructure, a substation, links to Kingsfurze Avenue and existing green at The Woodlands; and, • Ancillary works, including clearance works, demolition of existing structure on site and other site development works.

2.0 Assessment and Recommendations.

The Parks Section has reviewed the documents and submitted drawings.

- I. **Retention and Protection of Existing Vegetation**
It is imperative that all retained vegetation across the site is afforded the highest level of protection. Specifically, the boundary hedge between Kingsfurze Avenue and the proposed development must be preserved and safeguarded. Hedges should not be removed due to boundary inconsistencies; it is the applicant's responsibility to regularise such areas without compromising existing vegetation.
- II. **Arborist Supervision for Retained Hedge Sections**
Hedge sections designated for retention within the open space must be securely protected throughout the development process. Close supervision by a qualified arborist is required, particularly where construction activities occur in proximity to these hedges which have been detailed on the protection plan.
- III. **Relocation of Trees at The Gallops Entrance**
Small trees identified for removal along The Gallops (entrance to the racecourse) should be considered for relocation to alternative suitable areas within the site.
- IV. **Street Tree Planting Deficiencies**
Certain roads within the proposed development lack street tree planting, which may result in visually harsh environments dominated by hard infrastructure. Additional tree planting should be incorporated to soften these areas and enhance the streetscape.
- V. **Pathways Adjacent to Retained Hedges**
Pathways should be sensitively designed and routed to respect and complement the presence of retained hedgerows.
- VI. **Amendment of Timber Seating Specification**
Timber seating currently specified should be replaced with more durable alternatives such as composite materials, concrete, or galvanised powder-coated metal to ensure longevity and reduced maintenance.
- VII. **Removal of Picnic Benches**
All picnic benches proposed within the development should be removed due to concerns regarding suitability and maintenance.
- VIII. **Repositioning of Bicycle Racks**
Bicycle racks are currently located in areas unlikely to be utilised. These should be repositioned to locations where they will be functional and accessible to users.
- IX. **Removal of Play Features Near Units 183–184**
Play features situated near residential units 183–184 should be removed to avoid potential conflicts with residential amenity.
- X. **Play Features on Open Space Between Units 169, 170, and 189**
Play features in this open space should be removed. The log pile may be relocated to the central open space to maintain play value while reducing impact on adjacent residences.
- XI. **Confirmation of Link Path Gradients**
Detailed confirmation is required regarding the sections and gradients of the proposed link path in the western corner of the site to ensure accessibility and compliance with design standards.

- XII. **Pedestrian Link Through Kingsfurze Avenue Playground**
The existing playground at Kingsfurze Avenue, through which a pedestrian link is proposed, is not under the management of Kildare County Council. Permission must be obtained from the relevant playground management authority prior to any works, to maintain and enhance this space.
- XIII. **Replacement of Picnic Bench at Half Basketball Court**
The picnic bench located at the half basketball court should be replaced with a single standard bench to better suit the space and usage patterns.
- XIV. **Future Management Proposal.**
The future management proposal from the site, detailed in the taking in charge drawing should be discussed with the development control section.
- XV. The use of boulders in the landscape plan should be reduced.



Figure 1: Streetscapes lack any proposed street trees.

Michael Yallop

Michael Yallop,
Executive Parks and Landscape Officer.

Endorsed by:

Pp: Michael Yallop

Carmel O Grady,
Senior Executive Parks and Landscape Officer.

Building & Development Control – Opinion Stage Report

Ref. LRD2025006

Date: 20/10/2025

Applicant: Ballymore Development Ltd.

The Building Control and Development Control Section of Kildare County Council wishes to make the following comments in relation to the Opinion Stage of LRD2025006:

- The applicant is asked to consider proposed boundary treatments to ensure that there is no creation of areas behind proposed boundaries which are inaccessible for future maintenance. All areas should be clearly accessible for maintenance by the landowner – noting that such areas will not be Taken in Charge.
- The applicant is asked to consider the siting of SuDS features (swales) adjacent to the proposed home zones on the basis of them impacting on the natural refuge for Vulnerable Road Users (VRUs) and also given the possibility of overrunning from vehicles exiting driveways.
- The applicant is asked to outline the proposed future ownership and maintenance arrangements for the laneways that serve to access rear gardens noting that such laneways will not be Taken in Charge.



Liam McNeela
Senior Executive Engineer
Building & Development Control

Uisce Éireann Ref: PN25000030368

Planning Ref: LRD2025006_Ballymore Development Ltd_Opinion S32B Meeting

Planning Authority: Kildare County Council

Issue Date: 2 October 2025

Development Location:

Kingsfurze, Naas

Development Description:

Large-Scale Residential Development (LRD) application comprising 237 no. residential units and all associated ancillary development works at Kingsfurze, Naas. Co. Kildare

A Chara,

Uisce Éireann (UÉ) welcomes the opportunity to submit an opinion response on Ballymore Development Ltd's. request for a Section 32B LRD Meeting for a Large-scale Residential Development consisting of the construction of 237 no. residential units and all associated ancillary development works at Kingsfurze, Naas. Co. Kildare.

Pre-Connection Enquiry (PCE)

UÉ notes a Pre-Connection Enquiry (PCE) application was submitted to Uisce Éireann for c.251 no units on the site and a Confirmation of Feasibility (COF) was issued on the 26th August, 2025, stating both water and wastewater connections were feasible subject to upgrade works being required.

In relation to Water, the COF states a connection is feasible without infrastructure upgrade works by UÉ.

In relation to Wastewater, the COF states a connection is feasible subject to upgrade works. It notes, the preferable connection point is to the existing 225 CO sewer, approximately 25 metres from the western site boundary. That connection may include crossing a private land and the developer would be responsible for obtaining all necessary consents/permissions. In the case of connection of all or part of the development to the existing 225 uPVC sewer on Naas Inner Road, approximately 180 metres network extension is required. The developer will be required to fund the extension works. The fee will be calculated at a connection application stage. A gravity connection option/s should be prioritized.

UÉ notes the current wastewater design proposal include for the preferred connection to the existing 225 CO sewer, approximately 25 metres from the western site boundary.

All COF letters are usually valid for a period of c.12 months from date of issuance. After this period and in this instance, it will be required for the applicant to submit a new PCE in order to obtain an updated COF letter. The applicant is required, under the Large-scale Residential

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Éire

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T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Development Regulations to submit a valid Confirmation of Feasibility (COF) when lodging their LRD planning application.

Queries relating to the terms and observations above should be directed to planning@water.ie

Signed on behalf of Dermot Phelan
Connections and Developer Services

Advisory Notes:

In situ public Infrastructure

Uisce Éireann does not permit build over of its assets. Separation distances from public infrastructure, as per Uisce Éireann's Standards Codes and Practices must be achieved. It is the applicant's responsibility to submit a diversion enquiry to Uisce Éireann Diversions Section (diversions@water.ie) prior to construction, where a potential build over of public assets is in question and/or where the applicants proposals cannot achieve separation distances from public infrastructure as per UÉ Standards & Codes of Practice.

Protection of Drinking Water Sources

Protection of drinking water source(s) from potentially adverse impacts is a priority for Uisce Éireann. It is Uisce Éireann's current policy to maintain safe and secure drinking water supplies and ensure that development will not give rise to any deterioration in water quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s). It is also a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected to avoid deterioration in quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s).

Statement of Design Acceptance (SODA)

Please note that a SODA is recommended to be in place and submitted at full LRD planning application lodgement stage.

Environmental Impact Assessment Report (EIAR)

If an EIAR is required to be submitted by the applicant, Uisce Éireann is requested to be consulted via an EIAR Scoping letter c. 6 months prior to the completion of the planning application. All scoping letters can be forwarded to our planning administration email address planning@water.ie

KILDARE COUNTY COUNCIL**Housing Section Report**

Planning Ref. No.	LRD-2025006
Name of Applicant	Ballymore Development Ltd,
Address of Development	Kingsfurze, Naas, Co. Kildare
Type of Development	237 no. residential units in total, including 126 no. houses (mix of three- and four-bedrooms) and 111 no. apartments (a mix of one-, two- and three-bedrooms), distributed as follows: • 33 no. duplex blocks, each containing 2 no. individual units stacked vertically with separate entrances, totalling 66 no. units; • 3 no. triplex blocks, each containing 3 no. individual units stacked vertically with separate entrances, totalling 9 no. units; • 2 no. maisonettes, each containing 2 no. individual units stacked vertically with separate entrances, totalling 4 no. units; and, • 1 no. apartment block comprising 32 no. units. • A crèche facility with capacity for 133 children, accessed via a separate access road;
Type of Assessment	Pre-Planning Stage- LRD
Assessment Date:	24/10/2025
Report due date	24/10/2025
Part V Units Proposed	None
Notes:	20% Part V- Social & Affordable

Relevant Standards:

- **Kildare County Development Plan 2023-2029.**
- **Quality Housing for Sustainable Communities:**
Design Guidelines December 2020.
- **Sustainable Urban Housing:**
Design Standards for New Apartments Guidelines for Planning Authorities March 2023.

Social Housing need:

Housing need in Naas- 2213 units as below:

Part V Proposal-. units

1 bed-	1070	48%	0	00 %
2 bed-	734	33%	0	00 %
3 bed-	329	15%	0	00. %
4 bed-	80	4%	0	00 %

Observations:

- The proposed scheme contains 1, 2, 3 & 4-bedroom units in a mix of 237 no. residential units in total, including 126 no. houses (c.53%), (mix of three- and four-bedrooms)
- and 111 no. apartments (c.47%), (a mix of one-, two- and three-bedrooms).
- Part V application form has not been completed.
- No House type units proposed in Part V proposal.

Advisory:

- KCC Part V form to be fully completed.
Contact socallaghan@kildarecoco.ie or Partvteam@kildarecoco.ie.
- Evidence of date of purchase of site required to confirm the rate of Part V obligation.
- Part V proposal to be revised to contain a **mix of units of varying capacity and of both house and apartment types** in line with the Naas **Social & Affordable** housing need as follows:

1 bed-	48.00%
2 bed-	33.00%
3 bed-	15.00%
4 bed-	4.00%

Note: Social units will have a number of variations to the standard unit specifications. Once specific Part V social units are identified, these variations can be applied. Contact- socallaghan@kildarecoco.ie or Partvteam@kildarecoco.ie.
Affordable units will have standard specification.

- Part V units to be dispersed throughout the site. Maximum two adjacent units.
- Own door access required where available.
- Dedicated parking, bin and bicycle storage are required for each unit.
- Storage and private amenity to comply with the relevant current County Development Plan/ Local Area Plans and all relevant Departmental guidelines.
- Ensuites are not required as these are not funded by the Department.
- Management fee details, where available, to be submitted
- If a phased development is proposed, then Part V units are to be delivered at a minimum of 20% of units per phase.
- Plot areas to be supplied for all individual residential house units.
- Apartment exclusive plot areas for each apartment block and internal floor areas of all apartments to be supplied.
- Part V to be calculated by the relevant Housing Agency Part V ' Example 5: Developments of Apartments and Houses: where Part V is to be satisfied through the provision of both apartments and houses' using plot area method of calculation.

All areas and dimensions to comply with-

- Kildare County Development Plan 2023-2029/ Local Area Plan.
- Quality Housing for Sustainable Communities: Design Guidelines December 2020.
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities July 2023.

Darren McNally

Executive Technician

Housing | Kildare County Council

Áras Chill Dara, | Devoy Park, | Naas, | Co. Kildare, | W91 X77F

T: 353-(0)45-980 717 M: 353-(0)87-232 4924

E: Dmcnally@kildarecoco.ie

Kildare County Council

Fire Service,
Central Fire Station,
Newbridge,
Co. Kildare.
W12 PW70



Comhairle Chondae Chill Dara

Seirbhís Dóiteáin

Phone: 045 454800
Fax: 045 432530

21st October 2025

Planning Dept.,
Kildare County Council

File Num: LRD Post-meeting Opinion - LRD2025006
Applicant Name: Ballymore Development Ltd.
Development Address: Lands to the west of the Naas Racecourse, Kingsfurze, Naas

A Chara,

The applicant is requested to consider the following:

1. A minimum of 25 litres per second of water is to be available in the mains at 2 bar pressure for firefighting.
2. The Applicant shall obtain Fire Safety Certificates in accordance with the requirements of the Building Control Act.

Mise, le meas,

PP 

NIALL O'RIORDAN
A/CHIEF FIRE OFFICER



Comhairle Contae Chill Dara
Kildare County Council

Referral Report

TO: Development Management Unit

FROM: Heritage Officer

FILE REF: LRD 2025006

APPLICANT NAME: Ballymore Development Ltd.

ADDRESS One Royal Canal House, Royal Canal Park, Dublin, D15 DKW4

APPLICATION TYPE Permission

DETAIL: Permission for 237 no. residential units in total, including 126 no. houses (mix of three- and four-bedrooms) and 111 no. apartments (a mix of one-, two- and three-bedrooms), distributed as follows: 33 no. duplex blocks, each containing 2 no. individual units stacked vertically with separate entrances, totalling 66 no. units; 3 no. triplex blocks, each containing 3 no. individual units stacked vertically with separate entrances, totalling 9 no. units; 2 no. maisonettes, each containing 2 no. individual units stacked vertically with separate entrances, totalling 4 no. units; and, 1 no. apartment block comprising 32 no. units. A crèche facility with capacity for 133 children, accessed via a separate access road; Extension of the existing Gallops Avenue to connect with Tipper Road, together with improvements to Gallops Avenue, including a two-way cycle track and pedestrian and cyclist crossing; Improvements to footpaths and pedestrian crossings at the junctions of Gallops Avenue with Tipper Road, Dublin Road (R455), and The Gallops, to enhance pedestrian and cyclist safety and connectivity; Removal of existing ESB overhead power lines and related electrical infrastructure, with replacement by new underground cabling; All related infrastructure to include provision of public open spaces, play, an internal road network, ancillary parking, landscaping and boundary treatments, public lighting, drainage infrastructure, a substation, links to Kingsfurze Avenue and existing green at The Woodlands; and, Ancillary works, including clearance works, demolition of existing structure on site and other site development works.

HERITAGE DESIGNATIONS (RPS/NIAH/SAC/RMP) REF:

The site contains no monuments listed in the *Record of Monuments and Places* (RMP) or the *Sites and Monuments Record* (SMR) nor any sites listed on the Record of Protected Structures or the National Inventory of Architectural Heritage (NIAH).

The site consists of two large agricultural fields, and cartographic sources show that the site has remained largely unchanged in layout since the 19th century (though there is evidence of later quarrying/disturbance). Townland boundaries within the site, were removed as evidenced by successive satellite imaging. However, the site does lie in proximity to one recorded monument where human remains have been recovered - **KD019-063**, which was located approx. 250m to the west. It also lies approx. 450m south of **KD019-021**, a possible 17th-century burial ground. Consequently, given its proximity to known archaeological features, other archaeology may be present within the proposed development site.

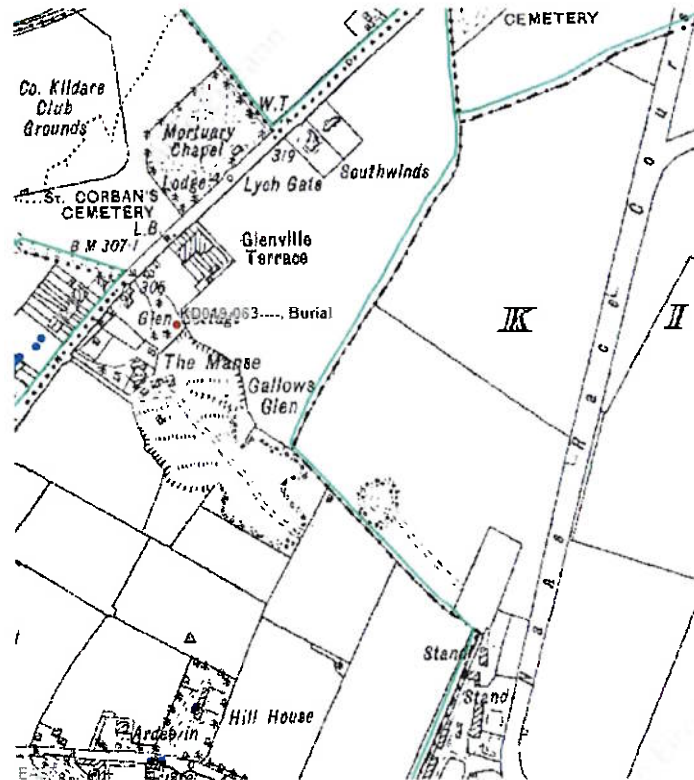
Policy Context – Kildare County Development Plan 2023-2027

CDP Objective AH O2

‘Manage development in a manner that protects and conserves the archaeological heritage of County Kildare, avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest and secures the preservation in-situ or by record of all sites and features of historical and archaeological interest, including underwater cultural heritage. The Council will favour preservation in – situ in accordance with the recommendation of the Framework and Principles for the Protection of Archaeological Heritage (1999) and the Council will seek and have regard to the advice and recommendations of the Department of Housing, Local Government and Heritage.’

ASSESSMENT

The proposed development has two archaeological sites within 500m of the proposed development boundary. On the last OS map, there is evidence of quarrying or other disturbance on the southern portion of the site:



This may be of interest archaeologically.

RECOMMENDATION

Given the large area involved and the proximity of known archaeology, a programme of geophysical testing should be undertaken in advance of any site clearance works to identify potential archaeology in the area. A number of conditions are recommended to be included in any grant of permission:

1. In advance of the commencement of any construction works, the developer shall engage a suitably qualified archaeologist to carry out a full geophysical survey by a suitably qualified professional.
2. If permission is granted, the developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works, topsoil stripping and groundworks within the proposed development boundary.
3. Should archaeological remains be identified during the course of archaeological monitoring, all works shall be suspended in the area of archaeological interest pending a decision of the Planning Authority, in consultation with the Department of Housing, Local Government and Heritage regarding appropriate mitigation (preservation in situ/excavation).
4. The Planning Authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.



Dara Wyer

Heritage Officer

Date: 29/09/2025



Amy Granville, SP

Date 29.09.2025

Reference Number: LRD2025006

Environment Section

**Name of applicant: Ballymore Developments Ltd
Kingfurze Naas**

**LRD Opinion Meeting
Report**

No objection to LRD2025006 following Opinion Meeting subject to the following conditions:

1. Prior to the commencement of development, the applicant shall prepare a Construction and Demolition Resource Waste Management Plan (RWMP) in accordance with Appendix C of the *"EPA Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)"* including demonstration of proposals to adhere to best practice and protocols. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness, these details shall be placed on the file and retained as part of the public record. The RWMP must be submitted to the planning authority for written agreement prior to the commencement of development.
Reason: In the interest of proper planning and sustainable development.
2. All foul sewage and soiled water shall discharge to the public foul sewer system.
Reason: In the interest of public health, to avoid pollution, and to ensure proper development.
3. Only clean, uncontaminated surface water shall discharge to the surface water system.
Reason: In the interest of public health, to avoid pollution, and to ensure proper development.
4. All surface water from the carpark areas shall pass through adequately sized and sited petrol/oil interceptor(s) before being discharged to the surface water system.
Reason: In the interest of public health, to avoid pollution, and to ensure proper development.
5. Noise Control
The following noise limits shall apply to construction activities: 70 dB(A) (LAeq 1 hour) between 0800 hours and 1800 hours Monday to Friday inclusive (excluding bank holidays) and between 0800 hours and 1300 hours on Saturdays when measured at any noise sensitive location in the vicinity of the site. Sound levels shall not exceed 45 dB(A) (LAeq 1 hour) at any other time following completion of the site development works.
Reason: In the interest of public health and the use of best practice guidelines in order to avoid pollution.
6. Applicant shall use "Best Practicable Means" to prevent/minimise noise and dust emissions during the construction phase of the development, through the provision and proper maintenance, use and operation of all machinery, all to the satisfaction of the Planning Authority.
Reason: In the interest of public health, and the use of best practice guidelines in order to avoid nuisance.
7. Prior to Commencement Notice Stage, the developer shall submit a Construction Phase Surface Water Management Plan in accordance with IFI Publication 2016 *"Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters"* for the written approval of the Planning Authority. The Plan shall address the collection, control and management of any surface water run-off from the site to prevent any polluting matter, suspended solids and silt, being discharged to any receiving water. The Plan shall, inter alia, include:
 - (a) Site Layout Plan at sufficient scale identifying any potential surface water and/or groundwater receptors;
 - (b) The location and design of any proposed mitigation measures; and

(c) Proposals for a surface water and/or groundwater monitoring programme, as appropriate.

Reason: In the interest of public health, to avoid pollution, and to ensure proper development.

8. If a discharge to waters of any silt laden water is proposed as part of the Surface Water Management plan for either the development or the operational stages of the proposal; the Environment Section shall be consulted as such a discharge can only be authorised under Section 4 of the Local Government (Water Pollution) Act 1977, as amended.

Reason: In the interest of public health, to avoid pollution, and to ensure proper development.

9. An operational waste management plan (OWMP) in accordance with the Kildare County Council Waste Presentation Byelaws is to be prepared by a competent person and issued for approval prior to occupation. The OWMP shall consider the domestic waste management needs of the proposed occupants, the storage needs for receptacles including in shared locations, in accordance with the byelaws, and the servicing needs with regards to domestic waste for the long-term.

Inspector:

Date:

Morgan O Flaherty

13/10/2025_____

Approved by SEE/SE:

Date:



Comhairle Contae Chill Dara

Kildare County Council

LRD2025006 Ballymore Developments Ltd SPPR Opinion Report

The proposed landscape layout is acknowledged. Further clarification is required regarding the materials and finishes proposed for the basketball half court, seating elements, and landscaped areas intended for public use, to ensure they are robust, durable, and easily maintained.

The overall quantum and spatial distribution of open space is noted. The inclusion of play areas is welcomed; however, additional detail should be provided regarding their design, accessibility, and suitability for a range of age groups.

It is positively noted that the design of public spaces incorporates principles of passive surveillance. Lighting proposals, particularly along permeability routes, should be carefully considered and implemented to promote safety and comfort for users.

Details should be submitted on gradients, tactile paving, seating dimensions, and accessible routes.

A phasing strategy should be provided to demonstrate how public realm and amenity spaces will be delivered in parallel with residential units, ensuring timely access for occupants.

While a maintenance plan has been submitted, primarily focused on planting and hard surface areas, a more comprehensive public realm management strategy is required. This should outline responsibilities for ongoing maintenance, cleaning, and long-term stewardship of communal and public spaces, with particular attention to the basketball half court and play areas.

The integration of Sustainable Drainage Systems (SuDS) within the public realm is acknowledged. Where SuDS features interface with play areas, careful consideration should be given to the selection of materials to ensure safety, usability, and durability.

Signed:

Aidan Martin, A/Project Manager

Strategic Projects and Public Realm



Comhairle Contae Chill Dara
Kildare County Council

APPENDIX B.

Minutes of Pre-planning meetings and LRD Meeting.





Kildare County Council Comhairle Contae Chill Dara

Áras Chill Dara, Devoy Park, Naas, Co. Kildare

Telephone: 045-980845; Fax: 045-980834; Email: preplanning@kildarecoco.ie

Minutes of Pre-Planning Meeting

Meeting Date	PP Ref. No.
17 TH April 2025	PP6071

Applicant	Development Address
Mill Road Estates Ltd	Site west of Naas Racecourse, Kingsfurze, Naas, County Kildare

Proposed Development	Development of a Largescale Residential Development of [259] residential units
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Attendees

For KCC	For Applicant
Rory O'Donnell - Assistant Planner, Planning Tracy McGibbon – Snr Exec Planner, Planning Michael Yallop – Exec Landscape & Parks Officer George Willoughby – Snr Exec Engineer, Transport Design Ronan Toft – Exec Engineer, Environment Barry Kelly – Uisce Eireann Colm Lynch - Exec Engineer, Transport Design Annette Keavney - – Snr Exec Engineer, Transport Design Erica Mulread – Clerical Officer, Planning	Cathal Dalton – Mill Road Estates Ltd Ciaran Rush – Mill Road Estates Ltd Joe Clarke – Mill Road Estates Ltd David McDowell – Reddy Architecture Donnachadh O'Brien – Donnachadh O'Brien Engineers Andy Kotze – Donnachadh O'Brien Engineers Helena Gavin – RPS Planning & Environment Carlos Sara Gonzalez - RPS Planning & Environment Barry Foote – Reddy Architecture Cillian Cronin – Murphy + Sheanon Colum Sheanon – Murphy + Sheanon

The Applicant is advised in accordance with Section 247 (3) of the Planning & Development Acts 2000 (as amended) that 'the carrying out of consultations shall not prejudice the performance by a Planning Authority of any other of its functions under this Act, or any regulations made under this Act and cannot be relied upon in the formal planning process or in legal proceedings'.

Notes of Meeting

David Mc Dowell- Reddy Architecture, gave a background the site and proposed development. Naas Racecourse Lands – location 0.5-1km from town centre and close to services. Proposed 259 residential units consisting of two-sided duplexes, apartments and 5 bed, 4 bed and 3 bed residential units with 15 percent open space. Alignment for inner relief road objective within Kildare County Development Plan 2023-2029 and the Naas-Sallins

Transportation Strategy linking the Dublin Road with the Blessington Road which is going to be delivered up to the Tipper Road through this development and connectivity to the Dublin Road Active Travel Scheme. Good connectivity regarding surface water and drainage within the site.

Rory O'Donnell, Assistant Planner detailed the Planning comments. Fits into land zoning and positive to hear discussions with Transportation Department regarding the Link Road. Inclusion of a creche facility in parallel application for Naas Racecourse expected to serve the proposed development. Retention of hedgerows and inclusion of SuDS is a positive note.

George Willoughby – Snr Executive Engineer, Roads Design, positive to see road objective will be delivered as part of this development, happy with indicative design and horizontal alignment. Looking for more information re cross sections, location of the crossing facilities, vertical alignment and design work on signalized works – traffic management section. Roads will forward a revised report to the planner to be sent to the Applicant.

Please see revised Roads report sent following the meeting.

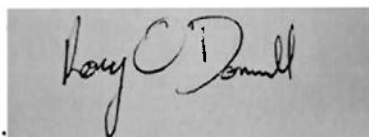
Tracy McGibbon, Senior Executive Planner, Objective MTO 3.3 – Gallops Avenue – needs to be designed as a street, designed with road safety and engineering in mind also. Demonstrate how the cycle movement will tie in with development and scheme.

Ronan Toft, Storm Water Drainage – refer Kildare Sustainable Drainage Guidelines documents, Nature based SuDS is positive, regarding site layout there is still a lot of underground infrastructure proposed in contravention of IN024 of the Kildare County Development Plan. SuDS Maintenance Drainage Plan to be submitted and details of CCTV survey and Site-Specific Flood Assessment.

Michael Yallop, Parks & Landscaping, A the eastern side, the pinch point with road is required to be retained, if losing the Southeast hedgerow. Two tree lines along proposed link road, possibility of moving of trees on site. Boundaries – areas along Kingsfurze Avenue, boundaries need to run tight to each other. Bio retention tree pits should be located on public area for suitable space for maintenance. Identify if residence led or Owner Management Company? Natural Play integrated with SuDS features. Ensure tree survey picks up haul routes etc.

Barry Kelly, Uisce Eireann, Applicant issued with Confirmation of Feasibility 2024, Timelines usually working off 12-month timeline, re apply if application will not be lodged in the next few months.

Meeting then concluded.



Signed:

Executive Planner

27/05/2025



Kildare County Council

Comhairle Contae Chill Dara

Áras Chill Dara, Devoy Park, Naas, Co. Kildare

Telephone: 045-980845; Fax: 045-980834; Email: preplanning@kildarecoco.ie

Minutes of Pre-Planning Meeting

Meeting Date	PP Ref. No.
15 th July 2025	PP6071

Applicant	Development Address
Mill Road Estates Ltd	a site west of Naas Racecourse, Kingsfurze, Naas, County Kildare

Proposed Development	Development of a Largescale Residential Development of [259] residential units
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Attendees

<u>For KCC</u>	<u>For Applicant</u>
Rory O'Donnell - Assistant Planner, Planning Tracy McGibbon – Snr Exec Planner, Planning Ronan Toft – Exec Engineer, Environment Colm Lynch - Exec Engineer, Transport Design Annette Keavney - – Snr Exec Engineer, Transport Design Erica Mulread – Clerical Officer, Planning	Cathal Dalton – Mill Road Estates Ltd Ciaran Rush – Mill Road Estates Ltd Joe Clarke – Mill Road Estates Ltd David McDowell – Reddy Architecture Donnachadh O'Brien – Donnachadh O'Brien Engineers Andy Kotze – Donnachadh O'Brien Engineers Helena Gavin – RPS Planning & Environment Carlos Sara Gonzalez - RPS Planning & Environment Barry Foote – Reddy Architecture Cihan Alp Surucu – Reddy Architecture Cillian Cronin – Murphy + Sheanon

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Notes of Meeting

David Mc Dowell- Reddy Architecture, presented the proposed development with key points taken into account, following the previous pre-planning meeting held 17th April 2025.

Cillian Cronin, Murphy + Sheanon, presented the landscaping concept plan proposal for the development. This proposal has been sent to Michael Yallop in Kildare County Council Parks Department for review.

Rory O'Donnell, Assistant Planner began discussing the planning comments regarding the new proposal. Positive to hear engagement with the Parks Department and boundary treatments in regard to adjoining residential developments. Rory looked for clarification regarding the creche and relation to the road re-alignment. Is there potential for the creche to of the proposed road and as to whether the creche facility would be included in the red line boundary for the application.

Joe Clarke, Mill Road Estates Ltd, confirmed that the creche would be considered as part of this development when making the planning application.

Donnacha O'Brien, Donnacha O'Brien Engineering, from their understanding the road alignment has been substantially agreed in principle following engagement with Roads Department of Kildare County Council. Location of the road is set to allow for the delivery of cyclist and pedestrian connectivity up through the gallops and linking into the active travel scheme on the Dublin Rd while allowing the racecourse to continue normal business.

Annette Keavney, Senior Executive Engineer, Roads Department confirmed that the question on alignment arose during a meeting and concerns regarding alignment and the creche and woodlands residential development behind the southern end of the proposed site. The desire is for the road to be similar to Lyreen Avenue.

Tracy McGibbon, Senior executive Planner, coming from a planning perspective there is a desire to make the development and the road liveable and useable well into the future. There are concerns regarding the sliver of land left behind close to the rear boundary of Woodlands, is there the possibility of looking at other uses or alternatives. The Southwestern Boundary is a Townland Boundary of which Kildare County Council have policies and objectives in place for. This needs to be looked at and what can be done. Kildare County Council Ecologist has advised that a Bat Survey would be required, identify the hedgerow to be removed and biodiversity on site.

RO'D regarding home zones and the internal layout, the design in terms of DMURS, Kildare County Council is supportive generally where they can be taken in charge by the Local Authority. Ensure compliance with Chapter 15 of the Kildare County Development Plan 2023-2029 and any specific policies and objectives within the Naas Local Area Plan 2021-2027.

TMcG will send on some notes regarding the general layout, minor changes or tweaks. The only concern now is the townland boundary; something will be needs to pull the development away from the boundaries as much as possible to the South and West. The Developers are asked to liaise with Michael Yallop in the Parks Department as there is no desire for any no man's land but wants the boundaries protected. The Northwest boundary with Kingsfurze, what type of boundary will that be. Is it going to be retained hedgerows that will be the vista.

AK, meeting with Andy Kotze of Donnacha O'Brein Engineers, discussing the home zones, happy enough with review.

Andy Kotze – General layout discussed on Friday, the noted two key points where roads were not through roads as potential home zones.

AK – Road's lengths of less than 70m so as not to require traffic calming measures. Gallops Avenue, 7-metre-wide section would like to see that reduced, happy for it to be reduced to 6.5m.

Colm Lynch, as per notes, regarding pocket parks, kick about spaces and the communal amenity area, have consideration of the guidelines for the setting and management of speed limits in Ireland with regard to planting, including some sort of segregation of landscaping or planting from the road objective, to prevent children running out, which would be of concern. This would be addressed as part of the Stage 1 Road Safety Audit to be submitted with the application. Duplexes facing onto the road objective is a concern that will require a response in the Road Safety Audit and consideration to visitor parking contained within the development. Regarding home zones, have consideration to refuse collection and reversing, subject this within the Road Safety Audit. There is particular concern regarding the lack of driver intervisibility and vulnerable road users and try to avoid any potential hazards.

Ronan Toft, Water Services Planning, good sustainable drainage features proposed such as bioretention areas and swales tree pits. At the planning stage there will be more detail required with cross section details, long sections and on the SuDS strategy plan and drainage plans. Infiltration trenches need to be discussed, conscious of long-term maintenance and what are they draining, is the storm network connecting in at sub-base level and percolating down through stone and the requirement for more detail at the planning stage. Water Services Planning would prefer to see open channel features with possibly a rain garden or swale above that may infiltrate down into an infiltration system to ideally come in at a surface level. At the northern catchment there is a lot of green space that SuDS measures can be introduced rather than piped infrastructure as a more nature-based solution. Southern catchment holds significant underground attenuation due to limited open space however if the developers can create some sub catchments with more flow controls throughout the overall development may reduce the kind of storage of underground attenuation. Road drainage cross section how the road is drained into nature-based features, there is a stormwater sewer and kerbs either side, revisit this in line with DMURS advice Note 5. Include SuDS maintenance plan for the overall development and proposed features for taking in charge.

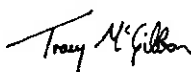
Ronan queried if there was an existing drainage ditch along the road.

DO'B responded to query there is not currently an existing drainage ditch or open channel drainage on the site itself and requested to discuss in greater detail offline with Water Services Planning.

RO'D checked if there were any other comments or queries regarding the proposed development.

TMcG Underground attenuation is contrary to the Kildare County Development Plan 2023-2029 and the Naas Local Area Plan 2021-2027, this is something the developer needs to act upon. Will come ack to Helena and team with minor tweaks required. Clarity regarding the location for the creche facility.

Meeting then concluded.



Signed: _____
Planner



Kildare County Council

Comhairle Contae Chill Dara

Áras Chill Dara, Devoy Park, Naas, Co. Kildare

Telephone: 045-980845; Fax: 045-980834; Email: preplanning@kildarecoco.ie

Minutes of LRD Opinion

Meeting Date: 02/10/2025	PP Ref. No.: LRD2025006

Proposed Development	Ballymore Development Ltd
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Attendees <u>For KCC</u> Tracy McGibbon (TMcG) – Senior Planner Jose Monteiro (JM) – Assistant Planner Annette Keaveney (AK) Roads Colm Lynch (CL) Roads Gordon Weston (GW) Architects Darren McNally (DMcN) Architects Morgan O’Flaherty (MOF) Environment Colm Flynn (CF) Environment Liam McNeela (LMcN) Building Control Ifeanyi Okeoma (IO) Water Geraldine Morris – minutes	For Applicant: Cathal Dalton (CD) Joe Clarke (JC) Kieran Rush (KR) Planning and Environment RPS: Helena Gavin (HG) Carlos Lara Gonzalez (CLG) Reddy Architecture + Urbanism: David McDowell (DMcD) Cihan Alp Surucu (CAS) MSA Landscape: Cillian Cronin DOBA Engineering: Donnachadh O’Brien (DOB) Andy Kotze (AK) Systra Transport: Shaun Edwards (SE)
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The Applicant is advised the purpose of this section 32 LRD meeting is to enable KCC to form an opinion as to whether the documents referred to in Section 32B of the Planning and Development Act 2000 (i) constitute a reasonable basis for an application under Section 32 of the Planning and Development Act 2000 Or (ii) whether the documents require further consideration and amendment in order to constitute a reasonable basis for an application under the Act. This is not a section 247 pre-planning meeting, and we will not have any presentations on the proposed development today. On completion of this meeting, the Planning Authority will prepare a report and recommendation on the case which is known as the LRD opinion. This will be sent out within 4 weeks of the holding of this meeting. This LRD opinion is required in order to make a valid planning application, and it is a valid opinion for 6 months. Once the 6 months expire a new LRD meeting would need to be held and a

new LRD opinion would need to be given. It should also be noted that neither the taking place of an LRD meeting nor the provision of an LRD opinion shall prejudice the performance by the planning authority of its functions under the Act or any regulations under the Act and cannot be relied upon in the formal planning process.

Notes of Meeting

TMcG commenced the meeting notifying those present of the above statement. She invited the applicant side to make a short presentation.

Background – given by Agent/Applicant

HG from RPS went through the proposed development at Naas Racecourse, 237 units and a creche with proposed works and extension to Gallops Avenue. Submitted documents. Will show Site Plans now if needed. TMcG asked for Site Layout to be shown.

TMcG asked that the applicant/agent demonstrate and be mindful of the National policy documents.

HG advised they included a statement of regard to development and local area plan.

Planning: TMcG:

- Asked applicant/agent to be careful when creating their description and the further breakdown, to make it easier to decipher houses and apartments for public to understand.
- Concerns remain that were raised previously on this – e.g. Figure 2.3 shows the permeability through the site that people are using informally, and the informal criss-crossing of the site is not demonstrated within the proposed design.
- Concerns raised regarding the design of the south-western corner - levels on this site. The retaining walls and the pedestrian access is going up 3m so there has to be retaining walls for the 2 side-on houses – this needs to be reconsidered and redesigned. Applicant/agent needs to demonstrate how it will work. Anyone walking the pathway will be 3m above the property unless major cut and fill – redesign required.
 - In response DMcD advised that when he walked the site, the change in levels seem to be when walking across the park. CC advised that the level changes are towards the boundary and that the path would be universally acceptable path, 1:21 and contoured around it. CC will show in more detail.
 - TMcG noted contour plans submitted with the proposal - recognised a fall of 3m in that location. Even if it was flat, it is reliant on 2 side gables on two properties for passive surveillance. Connection S/W towards Naas and Bus stops and main public transport corridors and all the amenities is a very important connection and needs to be looked at again.
 - DMcD asked with regard to the passive supervision, if it was the orientation of the houses:
 - TMcG advised that the scheme relied on 2 side gables and possibly two houses across the road for passive surveillance, - orientation and reconfiguration at the corner required.

- DMcD asked even with the main entrance into the house are through the sides facing onto the parks, addressing the green areas, but it is not in detail at current stage but will enhance it to bring it across more.
 - TMcG asked for a study to be submitted with the application
 - Conscious of the other development by Ballymore Homes at Pipershill has very steep gradient into the floor plain and this needs to be easier for cyclists to navigate.
- North/East corner was discussed up before, because it is going to be main entrance in, it needs to be truncated – perhaps relocate a property from there and turn the corner and make it stand out at the entrance. Noted the blank gable of houses. Not ideal.
- Access into Kingsfurze is welcome but the drawings is not showing what is on the ground e.g. the little playground – need to reassure the existing residents (carrot).
- Townland boundary concerns – has been looked at within KCC. Back gardens are short and need more space and hence when applicant/agent proposed to take out the hedgerow. Perhaps bring houses forward and bring development into protect the hedgerow – see Section 12.9.1 in County Development Plan (Heritage and Biodiversity)
 - In response, CC advised they have spoken to the Parks Section, and they have gone to site with the Design team and Charles McCorkill team. Are aware what the boundary treatment needs to be. Hard landscape boundary reinforces the hedgerow to the rear; the rear access alley is of concern and hope to remove them and then retain the hedgerow. Will be shown in next proposal.
- The access into the dip needs to form part of the development description in the notices – HG advised to keep notice of this.
- The contextual elevation drawing No 4 – too many blank gables, (Section 1) not getting a streetscape there. Needs to be reconsidered.
 - DMcD said it was used in other development in Naas, and it seemed to work well.
 - TMcG said it was a better 'welcome' into the estate.
 - DMcD noted the request
- House type HT05 – not appropriate for end blocks and needs to be dual frontage as does HT07. HT08 good dual frontage and advise to use that typology. HT09 are dual frontage but located mid-block. Gateway into the estate – blockwork along Gallops needs to be improved. Dual frontage into rear garden at bottom needs to be looked at.
- Need clarification on 2 houses – face gallops, side on to pedestrian, can't understand the concept – needs 3 dual frontage. DMcD noted they wanted passive in 3 areas and not gable into Gallops. TMcG suggested more houses but DMcD felt they were moving out of their site nett area and advised they will look at it further. TMcG complimented the house design but felt these 2 houses were sat alone there.

Roads

See report submitted by Colm Lynch which he read out at the meeting.

TMcG requested more work on the crisscrossing, with regards to tying it in with the cycle track to bring it into the site – needs to be comfortable for cyclists to use

CL welcomes any design prior to submission of next application. See also Initial roads report.

All the drainage for link road is separate for the Taking in Charge.

Water Services: IO

- Please adhere to the KCC SuDs Guidance documents and the Greater Dublin Area Strategy Drainage Study Document
- Attenuation tanks are no longer permitted as per new guidance document – noted 3 on the plan – need to do without underground attenuation tanks and need to see how it is worked around or justified the need for these. See notes from Ronan at the last meeting
- Tree pits – would need design to be clear that it should be overland and not through the gully
- Dividing hedgerow on the site – see if Swails can be integrated there. Not just trees – need to know what you intend to do if water flows there
 - In response DOB advised they had a comprehensive SuDs strategy on the site, there is one area that has poor infiltration results and catchment 3 is catching them out a bit. All the rest is oversubscribed on the SuDs and have excess in other areas. 86% is nature based but will look at it again. By his reading of the KCC SuDS policy it doesn't preclude them, but it looks to minimise, but if there is a residual part and ask for flexibility on this design. They have tried their best to get everything into Swales, Tree pits, basins, and sometimes it is technically not possible to get it all done.

Environment Services: MO'F

- No major concern regarding wastewater as it will fall into the public sewer
- Overall Waste Management Strategy for the development needs to be in accordance with KCC Waste Presentation Bylaws and IN042 and IN047 of County Development Plan – have noted the reference in Architectural Design Statement to the Waste Management Strategy and a bit of detail there but needs to be in accordance with respective bylaws
- Please provide an elevation with regards to waste storage facilities
- Apartment blocks – need to include calculations of the waste management requirements of the occupants and this will help show there is enough provision provided in the community waste storage facilities

Housing/Architects: DMcN

- Predominately interested in units with own door access as follows in Naas:
 - 49% 1 beds
 - 33% 2 beds
 - 15% 3 beds
 - 4% 4 beds
 - Calculated on plot areas, refer to the housing agency for these figures
 - Make sure units are evenly spaced
 - Proof of purchase required
 - Dedicated parking and bin and bike storage
 - Please put plot areas in Autocad

Development Control: LMcN

- Boundary treatments – try to avoid creation of no man's land
- Parking at the apartments – look at the footpaths to see if guidelines catered for
- Homezones – running of swails up to homezone and 4.8 carriage way look at in respect of pedestrians and car reversing into swails
- Laneways to be shown on Taking in Charge Map and ownership
- EV charging provision for the off-carriage parking for the apartments

Parks: MY (not present)

See report submitted

As well as additional response on this from TMcG

Planning:

TMcG asked for site plan to be shown again, re terrace in central block at first floor level and wished to know about the development behind it and distance between the blocks – HT05 – DMcD will look further into this and get clarification on the residential amenity by all living there will not be hampered to avoid overlooking.

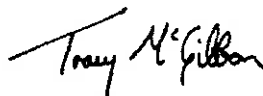
TMcG acknowledged the creche at Stone Haven, and similar/better and pay lip service to the racecourse.

Asked applicant/agent to be careful at the entrance to estate (pedestrian/vehicle), lots of carparking at the entrancing and it is not conducive to welcoming need to break up with strong green infrastructure and planting.

AOB:

Applicant had no further comment

TMcG thanked all for attending and HG thanked KCC for comments and looked forward to receiving opinion.

A handwritten signature in black ink, reading "Tracy McGilban". The signature is written in a cursive style with a long horizontal stroke at the end.

Signed:

Planner

Issue Parks, Heritage and Ecologist notes with these minutes

Appendix B: Statement of Housing Mix

In accordance with **Objective HO 015** of the KCDP, this Statement of Housing Mix accompanies the proposed development of 234 no. residential units and sets out the rationale underpinning the proposed mix of unit types, sizes and tenures.

This Statement of Housing Mix is to be read in conjunction with the information presented in **Tables 5-1** and **5-2** in this Report, which provide a summary of the housing mix, unit types, and sizes (i.e., number of beds). For further details regarding the proposed residential units, including descriptions of internal areas, layouts, and sizes, please refer to the Architectural Design Statement, Housing Quality Assessment, Development Schedules and full-scale house-type drawings prepared by RAU, which accompany the submission materials.

The development comprises a total of 234 no. residential units, including 115 no. houses and 119 no. apartments, equating to c. 49% houses and 51% apartments.

The apartments are provided in a variety of formats, including units within an apartment block (Block 1) and own-door duplex and triplex typologies, thereby contributing to a diverse and flexible housing offering.

The distribution of unit sizes is balanced across a range of household needs. Approximately 32% of units comprise 1- and 2-bedroom dwellings, while c. 68% comprise 3- to 5-bedroom units. Notably, 3-bedroom units account for the largest share of the development, ensuring a strong provision for family housing while also allowing flexibility for a range of household types.

In this context, the proposed development delivers a broad and balanced mix of housing types, providing both traditional family housing and more compact units. The near-even split between houses and apartments introduces greater typological diversity in an area historically characterised by lower-density housing, while also aligning with national and local policy objectives that promote compact growth and efficient use of serviced land.

The inclusion of own-door duplex and triplex units provides an intermediate housing typology between standard houses and apartments within the apartment block, increasing choice and supporting a varied urban form across the site.

Overall, the proposed housing mix will:

- Provide a suitable range of unit types and sizes to meet the needs of a diverse and evolving population;
- Support lifecycle housing by accommodating first-time buyers, families, and downsizers;
- Reflect the identified trends within the HNDA, including the need for both family housing and smaller units;
- Contribute to the creation of a balanced and sustainable residential community in Naas.

In addition, 53 no. units (c. 23% of the total) are proposed as Part V provision, in accordance with statutory requirements, further supporting the delivery of social and affordable housing within the scheme.