

Statement of Response to LRD Opinion

Proposed Large-Scale Residential Development: Naas
Racecourse Lands

IE002507
A01
27 April 2026

Statement of Response to LRD Opinion

Document status					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
D01	Planning	CLG	CLG	HG	22 April 2026
A01	Planning	CLG	CLG	HG	27 April 2026

Approval for issue	
HG	27 April 2026

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1 INTRODUCTION

This Statement of Response to the LRD Opinion has been prepared by Tetra Tech (formerly RPS) on behalf of Ballymore Development Limited (the Applicant) to accompany a planning application to Kildare County Council (KCC) for a Large-Scale Residential Development (LRD) on lands to the west of Naas Racecourse, Kingsfurze, Naas, County Kildare.

1.1 Background

Following the LRD Stage 1 consultation, the Applicant submitted a formal request to KCC for an LRD meeting under section 32B on 11 September 2025 (Stage 2). A meeting facilitated by KCC was held on 2 October 2025 to review the then-current proposals. On 30 October 2025, KCC issued a formal LRD Opinion (ref. LRD2025006) pursuant to section 32D of the Planning and Development Act, 2000 (as amended). A copy of KCC's LRD Opinion, together with minutes from the different pre-planning meetings, is appended to this Statement (see **Appendix A**).

The LRD Opinion concluded that the Stage 2 materials, as submitted, did not yet constitute a reasonable basis for an application for LRD and identified four principal reasons for this conclusion.

Notwithstanding this, the LRD Opinion confirmed that, in accordance with **Section 32D(2)(b)** of the Planning and Development Act 2000 (as amended), the issues identified could, if appropriately addressed through the relevant documentation, result in the materials constituting a reasonable basis on which to make the application. The LRD Opinion further set out, pursuant to **Article 16A** of the Planning and Development Regulations 2000 (as amended), the specific information that should be submitted with any application for LRD permission for the proposed development.

1.2 Purpose of this Statement

This Statement provides a clear and coherent response to the LRD Opinion, addressing the issues and specific information requests set out therein.

It summarises how the Applicant and project team have addressed the matters raised through design refinement, technical assessment, and supporting documentation, all of which are submitted with the planning application.

Where relevant, this Statement cross-references to the accompanying reports, design drawings and other supporting documents submitted with the application, in order to assist KCC in readily identifying where each matter has been addressed in detail and to facilitate a reasoned assessment of the proposed development.

1.3 Structure of this Statement

This Statement is organised to respond to the LRD Opinion issued by KCC, as follows:

- **Section 2** addresses the four overarching reasons set out in the LRD Opinion. Each reason is set out, and a summary of the design refinements and proposals in response is provided, identifying the supporting documents that contain the detailed information and evidence.
- **Section 3** uses, as appropriate, the same approach outlined above, but with regard to the specific information listed in the LRD Opinion.

It is noted that detailed discipline-based responses to some of the LRD Opinion items are also provided within the accompanying application documentation, including:

- Section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement (architectural, urban design, scheme design rationale items) prepared by Reddy Architecture + Urbanism (RAU);
- Section 2.2 of the Landscape Design Report (landscape architectural items) prepared by Murphy + Sheanon Horticulture and Landscape Architects (M+S);

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- Section 1.1 of the Infrastructure Design Report (engineering, including roads, drainage and DMURS compliance) prepared by Donnachadh O'Brien & Associates Consulting Engineers (DOBA);
- Section 1.1 of the Construction and Environmental Management Plan prepared by AWN Consulting (AWN); and
- Section 1.1 of the Inward Noise Assessment prepared by AWN.

The information provided in those documents should be read in conjunction with this Statement and the accompanying drawings, as they provide the full technical and design rationale underpinning the proposed development.

2 STATEMENT OF RESPONSE TO REASONS RAISED IN THE LRD OPINION

Following consideration of the issues raised during the LRD meeting, the Planning Authority concluded that the documentation submitted in accordance with Section 34B of the Act did not yet constitute a reasonable basis for an LRD application. The LRD Opinion set out the matters that would need to be addressed for the documents to constitute a reasonable basis.

The LRD Opinion identified four key reasons why the submitted Stage 2 documentation did not yet constitute a reasonable basis for making the application. Each of these reasons is addressed below, together with a summary of the design refinements and revised proposals prepared in response. Reference is also made, where relevant, to the supporting documents that provide the detailed information and evidence addressing each issue.

2.1 Reason No. 1

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

2.1.1 Applicant’s Response to Reason No. 1

Objective UD 01 of the Kildare County Development Plan 2023–2029 (KCDP) seeks to ensure that new development delivers a high standard of urban design and healthy placemaking, including compact growth, permeable neighbourhoods, strong pedestrian and cycle connectivity, access to services and amenities, and a clear sense of place.

In response, the Applicant confirms that Reason No. 1 has now been addressed. The proposed site layout has been comprehensively revised following receipt of the LRD Opinion and now reflects a policy-led, iterative and site-responsive design approach which accords with the urban design requirements of Objective UD 01.

In this regard, an architectural and urban design-focused response to Reason No. 1 is provided in the section titled ‘Architectural Response to the LRD Opinion’ within the Architectural Design Statement prepared by RAU. This section should be read in conjunction with the accompanying suite of architectural drawings and the Housing Quality Assessment. Collectively, these demonstrate how the revised layout directly responds to the matters raised during pre-planning engagement and in the LRD Opinion, and how the proposed development delivers a high standard of urban design and placemaking. In doing so, the scheme is consistent with Objective UD 01, the urban design principles set out in Table 14.2 of the KCDP, and Appendix D of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (hereafter referred to as Compact Settlement Guidelines).

Moreover, it is noted that the proposed development has been prepared having regard to, and in accordance with, the wider planning policy framework, including the KCDP, the Naas Local Area Plan 2021–2027 (Naas LAP), and relevant Ministerial Guidelines. These include the Compact Settlements Guidelines and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (hereafter referred to as the New Apartments Guidelines). Importantly, the Architectural Design Statement (refer to the response to Objective UD 01 and Section 6 within) and the Housing Quality Assessment prepared by RAU demonstrate compliance with the design principles in Appendix D of the Compact Settlements Guidelines, which provides a design checklist for quality urban design and placemaking; and in turn, this confirms that the final site layout satisfies the key urban design principles relevant to Objective UD 01.

Summary of Key Design Refinements and Compliance with Objective UD 01

The final site layout incorporates a series of targeted refinements that directly address the matters raised by KCC during pre-planning consultations and in the LRD Opinion. These refinements, which ensure that the scheme delivers the urban design requirements sought under Objective UD 01 of the KCDP, include the following:

Urban Structure, Legibility and Placemaking

The layout has been reconfigured to establish a coherent and legible urban structure, with clearly defined streets, nodes and arrival points. Gateway locations, including along the extended Gallops Avenue, have been strengthened to provide a clearer sense of arrival and identity, while terminating vistas and the relationship between built form and open space improve spatial definition and legibility across the scheme.

Street Network and Movement

The internal street network has been refined to avoid long, uninterrupted straight roads and instead provide a more varied, human-scaled and legible environment. A clear street hierarchy is established, incorporating traffic-calming by design and supporting safe, attractive pedestrian and cycling movement, consistent with the principles of DMURS.

Connectivity, Permeability and Compact Growth

Pedestrian and cycle permeability has been significantly enhanced. The layout provides a fine-grained network of routes, including connections to adjoining lands and established residential areas to the west and south-west. The extension and upgrading of Gallops Avenue establishes a key movement corridor through the lands, integrating the development with the wider urban area and supporting compact growth and sustainable mobility in this part of Naas.

Built Form, Scale and Enclosure

Block structure, building orientation and frontage treatment have been refined to create a varied and balanced urban grain. The revised built form provides appropriate enclosure to streets and spaces, positively addresses corners and key nodes, and ensures active frontages and passive surveillance throughout the development. This contributes to a high-quality residential environment with a clear sense of place.

Open Space, Public Realm and Social Interaction

The open space strategy has been reconfigured so that public spaces are well distributed, overlooked and integrated with movement routes and residential frontages. This supports active use, informal recreation, social interaction and healthy placemaking, while reinforcing the relationship between landscape structure and built form.

Access to Services and Amenities

The site benefits from proximity to Naas Town Centre and a range of established services and amenities. The revised layout, through improved permeability and connectivity, ensures convenient access to these facilities, public transport corridors, and local employment and community uses. This further supports the conclusion that the development delivers a sustainable and well-connected neighbourhood structure.

Supporting Documentation

The above is demonstrated within the application documentation, including:

- the Architectural Design Statement and associated architectural drawings, including the proposed Site Layout Plan, prepared by RAU;
- the Housing Quality Assessment prepared by RAU;
- the Landscape Design Report and associated landscape drawings prepared by M+S;
- the Infrastructure Design Report, associated engineering drawings and the Urban Design Report – DMURS Statement of Compliance prepared by DOBA; and
- the Planning Report by Tetra Tech.

A full list of enclosures is provided in the Cover Letter accompanying the planning application. Collectively, these documents, when read in conjunction with the site layout plans (see Drawing

Nos. NRC-02-SW-XXX-DR-RAU-AR-1007 to 1009 by RAU), demonstrate the rationale and evidence-based approach underpinning the proposed development.

Having regard to the revised site layout and the accompanying documentation, it is considered that the proposed development achieves a high standard of urban design and placemaking and accords with Objective UD 01 of the KCDP. It is therefore the Applicant's opinion that Reason No. 1 has been comprehensively addressed, and the application provides a reasonable basis for the Planning Authority's assessment.

2.2 Reason No. 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."

2.2.1 Applicant's Response to Reason No. 2

With regard to Reason No. 2, KCC is referred to the Infrastructure Design Report prepared by DOBA, together with associated surface water drainage drawings, i.e., Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 series.

The proposed surface water drainage strategy has been developed to incorporate a comprehensive suite of suitable Sustainable Drainage Systems (SuDS) measures, in accordance with the KCDP and the Kildare County Development Sustainable Drainage Systems (SuDS) Guidance Document.

The Infrastructure Design Report sets out the detailed design approach and technical rationale underpinning the proposed SuDS measures and confirms that no underground attenuation tanks are proposed as part of the development.

Accordingly, the matters raised under Reason No. 2 have been addressed through the submitted SuDS strategy, which provides a robust and policy-compliant basis on which the Planning Authority can assess the proposed development.

2.3 Reason No. 3

"It has not been demonstrated that the proposal complies fully with the Design Manual Roads and Streets due to a number of long straight internal roads and the provision of on-street car parking and other items."

2.3.1 Applicant's Response to Reason No. 3

With regard to Reason No. 3, KCC is referred to the Urban Design Report – DMURS Statement of Compliance prepared by DOBA and submitted as part of this application. This report should be read in conjunction with DOBA's Drawing Nos. 2431-DOB-XX-SI-DR-C-0501 to 0503, and the final site layout as presented in Drawing Nos. NRC-02-SW-XXX-DR-RAU-AR-1007 to 1009 prepared by RAU.

The Urban Design Report – DMURS Statement of Compliance confirms that the final proposed layout, including the internal street network, street hierarchy, parking strategy and movement framework, has been designed in accordance with the principles and requirements of the Design Manual for Urban Roads and Streets (DMURS).

In summary, the submitted site layout:

- avoids long, uninterrupted straight internal road sections through the introduction of a more articulated street pattern and varied horizontal alignments;

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- provides a clear and legible street hierarchy, including home-zone and shared-surface environments, which support lower vehicle speeds and a people-centred street environment;
- incorporates an appropriate on-street parking strategy in suitable locations, contributing to traffic calming and passive surveillance without detracting from overall street quality; and
- is supported by detailed engineering design and a Stage 1 Road Safety Audit by Traffico confirming safe operation of the street network for all users, including pedestrians and cyclists.

Further detail is provided in the Urban Design Report – DMURS Statement of Compliance, the Infrastructure Design Report and associated engineering drawings prepared by DOBA, together with the Architectural Design Statement prepared by RAU, and the Stage 1 Road Safety Audit prepared by Traffico.

Having regard to the above, it is considered that the submitted documentation provides a reasonable basis on which KCC can assess the planning application in respect to Reason No. 3.

2.3.2 Reason No. 4

“The proposal does not demonstrate fully the protection and inclusion of biodiversity, ecology and items of heritage significance.”

2.3.2.1 Applicant’s Response to Reason No. 4

In response, the Applicant confirms that this matter has been comprehensively addressed through revisions to the site layout and the preparation of an integrated landscape and ecological strategy. This strategy is set out in the accompanying application materials, including the Architectural Design Statement prepared by RAU, the Landscape Design Report prepared by M+S, and associated drawings, as well as the Biodiversity and Hedgerow Management Plan prepared by Tetra Tech.

The proposed development has been specifically designed to retain, protect and enhance key ecological features of the site, including existing hedgerows and the landscape structure, while embedding green infrastructure as a fundamental and integral component of the overall layout. Existing hedgerows are retained where feasible, ecological corridors are reinforced, and a network of high-quality public, communal and private open spaces is provided. These spaces are closely related to homes and movement routes, ensuring both ecological and amenity functionality.

In particular, the existing hedgerow traversing the site is retained and incorporated within the public open space as a defining landscape feature (the ‘Hedgerow Walk’), providing ecological value, seasonal interest and a natural framework for movement and informal recreation. This is complemented by the retention of the western boundary hedgerow and the introduction of additional native planting, which together enhance biodiversity, strengthen ecological connectivity and reinforce the landscape character of the site.

The landscape strategy has been developed in close co-ordination with the architectural, arboricultural, and ecological disciplines. It provides for the retention and protection of existing vegetation, the integration of SuDS as multifunctional green infrastructure, and the introduction of additional native tree and shrub planting. These measures deliver measurable biodiversity enhancement and high-quality multifunctional open space. Accordingly, the proposed development accords with the biodiversity and green infrastructure objectives of the KCDP and relevant guidance issued by KCC.

The above is supported by a comprehensive suite of environmental, ecological and cultural heritage documentation submitted with the application, including:

- an Arboricultural Report (including tree and hedgerow survey, protection measures and impact assessment) prepared by Charles McCorkell;
- a Biodiversity and Hedgerow Management Plan and Ecological Impact Assessment Report prepared by Tetra Tech, which set out the proposed biodiversity protection, management and enhancement measures;

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- a Report to Inform Appropriate Assessment prepared by Tetra Tech, which confirms that the proposed development will not result in likely significant effects on European Sites;
- an Environmental Impact Assessment Screening Report prepared by Tetra Tech, which concludes that the proposed development is not likely to have significant effects on the environment; and
- a Cultural Heritage Impact Assessment Report prepared by ACSU, which confirms that the site does not contain any recorded monuments, protected structures or sites of architectural heritage significance.

Taken together, these documents demonstrate that biodiversity, ecological, and cultural heritage considerations have informed the design process. They further confirm that appropriate avoidance, mitigation, and enhancement measures are fully integrated into the proposed development and the revised site layout, thereby satisfactorily addressing Reason No. 4 of the LRD Opinion.

3 Response to Specific Information Requests

Pursuant to Article 16A of the Planning and Development Regulations 2000 (as amended), the LRD Opinion identifies the specific information required to accompany any application for LRD permission for the proposed development. This information is provided below and within the relevant technical reports submitted as part of this application. Where appropriate, cross-references are made to the relevant documents.

3.1.1 Layout & Design

Table 3-1: Summary Response to Layout & Design Items

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 1	The layout and design for the southwest 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.	RAU (Architecture) M+S (Landscape)	This item has been addressed through the comprehensive redesign of the south-west corner of the site. The revised layout responds to the identified level changes, improves the accessibility and legibility of the connection to Kingsfurze Avenue, enhances passive surveillance through the orientation and placement of dwellings, and safeguards the residential amenity of adjoining units. We note that an architectural response for this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement, which should be read in conjunction with the accompanying architectural drawings, including site layout plans, contextual elevations and cross-sections demonstrating the treatment of levels and the relationship with adjoining lands. Similarly, a landscape architectural response is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which is to be read in conjunction with the associated landscape drawings. This confirms that proposed landscape proposals, such as planting and greening, will also ensure the integration of this location and the proposed connection to offer a safe, usable and accessible amenity.
Item 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,	RAU (Architecture) M+S (Landscape)	This item has been addressed through the redesign of the north-west, north-east and south-east corners of the site. The revised layout ensures that key vistas into the development are appropriately terminated by high-quality building frontages, avoiding blank or inactive gables and enhancing legibility and streetscape quality. As shown in the submitted site layout plans prepared by RAU, the north-east corner has been reconfigured to provide a stronger, more legible gateway to the proposed development, incorporating active frontage and a defined entrance space.

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	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.		The south-east corner has been redesigned, with the removal of the previously proposed isolated dwellings and their replacement with built form that establishes a stronger sense of place, improves overlooking, and creates a more coherent urban structure. We note that an architectural response for this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement, prepared by RAU, which should be read in conjunction with the accompanying architectural drawings, including site layout plans and elevations demonstrating the proposed treatment of key views, corners and arrival points. Similarly, a landscape architectural response is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which is to be read in conjunction with the associated landscape drawings. These demonstrate that the proposed landscape strategy for these locations reinforces legibility, creates a sense of place, and ensures adequate levels of passive surveillance and private amenity are achieved.
Item 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	RAU (Architecture) M+S (Landscape)	This item has been addressed through the revision of the site layout to enhance pedestrian and cycle permeability, including improved connections to adjoining residential areas and the integration of existing movement patterns. The proposed development provides: - a new connection to allow pedestrians and cyclists access at the southwest corner of Kingsfurze Avenue, and - provision for a potential future connection at the western boundary to the existing playground adjacent to Kingsfurze Avenue. These linkages are clearly illustrated on the site layout plans prepared by RAU and the landscape drawings prepared by M+S and are reflected in the statutory notices. A photographic record and topographical survey (see M+S enclosures) of the existing informal route at the south-west corner have been undertaken, and the revised design demonstrates a feasible and functional connection at this location. The internal layout has also been refined to respond to established desire lines, incorporating a network of routes that facilitate permeability through the site and connections to adjoining lands and public transport corridors.

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	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.		We note that an architectural response for this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement, which should be read in conjunction with the accompanying architectural drawings. Similarly, a landscape architectural response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which is to be read in conjunction with the associated landscape drawings. Details of the south-west route survey and the landscape design of the southwest connection are set out in the Landscape Design Report and associated drawings prepared by M+S.
Item 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, - 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 town/and boundary hedgerows [should be] retained for the combined reason of protection of cultural heritage and biodiversity'.	M+S (Landscape)	This item has been addressed through the redesign of the site layout to prioritise the retention and integration of the townland boundary hedgerow along the western boundary. The proposed development has been amended to remove rear access alleys and reconfigure dwellings along this boundary, thereby avoiding encroachment and ensuring the full retention and protection of the hedgerow. This approach responds directly to the concerns raised and allows the hedgerow to continue to function as a key ecological corridor and an important landscape and cultural feature. The hedgerow will be safeguarded during construction and operation, including protection measures in accordance with BS 5837:2012 under arboricultural supervision. As noted in the accompanying arboriculture package prepared by Charles McCorkell, small sections of the hedgerow are proposed for removal, e.g., to facilitate the proposed connections westwards. This item is further addressed from a landscape architectural perspective in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Sections 5.11 (Ecological Strategy) and 5.17 (Boundary Proposal – Western Boundary Hedgerow), and the associated landscape drawings. Further details on hedgerow protection, management, and ecological measures are provided in the Biodiversity and Hedgerow Management

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
			Plan prepared by Tetra Tech and the arboriculture package prepared by Charles McCorkell, both submitted with the application materials. Finally, we note that although the LRD Opinion refers to 'the 2024 Kildare Survey of Townland Boundary Hedgerows', the Applicant has engaged with KCC's Biodiversity Officer, who confirmed that the available materials comprise only the 2024 hedgerow survey for Celbridge and Leixlip. The 2022 County Kildare Hedgerow Appraisal Survey remains the only available one to date, despite the reference to the 2024 in this item of the LRD Opinion.
Item 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.	DOBA (Engineering – Civil)	This item has been addressed through the submission of a revised surface water drainage strategy prepared in accordance with KCC SuDS strategy and guidance. It is noted that no underground attenuation tanks are included. For full details, please refer to the Infrastructure Design Report prepared by DOBA and associated surface water drainage drawings, including: - Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 (Series) - Drawing No. 2431-DOB-XX-SI-DR-C-0255
Item 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	RAU (Architecture) DOBA (Engineering – Civil)	This item has been addressed through the comprehensive revision of the site layout and architectural design to improve streetscape quality, sense of arrival, integration of green infrastructure, and overall placemaking. The revised scheme removes blank and inactive gables, strengthens corner and gateway conditions, and introduces a more coherent and legible street hierarchy. The principal entrance has been redesigned to create a stronger sense of arrival, with reduced car dominance and enhanced landscape treatment. Increased planting and green infrastructure have been incorporated to break up areas of hard surfacing and improve the visual quality of the public realm. In addition, the layout has been refined to ensure appropriate setbacks from all existing hedgerows to support their retention and long-term viability, while existing drainage features along hedgerow corridors have been retained and integrated into the surface water strategy. A suite of contextual elevations and cross-sections is provided to demonstrate the relationship between built form, levels and residential amenity. It is noted that a technical architectural response to this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement, which should be read in conjunction with

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	(including the hedgerow 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 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.		the accompanying architectural drawings, and enclosures prepared by M+S (i.e., landscape proposals). Finally, it is noted that Item 6.f has been addressed by submission of a revised surface water drainage strategy prepared in accordance with the KCC SuDS strategy and guidance. For full details, please refer to the Infrastructure Design Report prepared by DOBA and associated surface water drainage reports.
Item 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	RAU (Architecture) M+S (Landscape)	This item has been addressed through the revision of the site layout and landscape strategy to ensure the protection, retention and integration of existing hedgerows as key ecological, landscape and heritage features. a) The layout has been redesigned along the western boundary to avoid the creation of 'no-man's land', with appropriate setbacks and boundary treatments, and bespoke design solution to allow retention of the hedgerow. The Applicant has also clarified its ownership status and kindly requests that KCC include a condition

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	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.		prohibiting the removal of the hedge in perpetuity. This approach supports the long-term viability and management of the hedgerow while maintaining active and well-defined edges. b) A full hedgerow survey has been undertaken and informs the revised layout, which demonstrates that the proposed development avoids unnecessary removal of hedgerows and protects the integrity of the townland boundary and associated green infrastructure network. c) The layout has been further refined, including the redesign of previously proposed units along the western boundary, ensuring that no development necessitates the removal of the townland boundary hedgerow. An architectural response to this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement, which should be read in conjunction with the accompanying architectural drawings. This item is also addressed from a landscape architectural point of view in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Sections 5.11 (Ecological Strategy) and 5.17 (Boundary Proposal – Western Boundary Hedgerow), and the associated landscape drawings, including Drawing No. 25-595-PD-03.2 – Tree and Hedgerow Removal & Replacement Planting. Further detail on hedgerow protection, management and ecological measures is provided in the Biodiversity and Hedgerow Management Plan prepared by Tetra Tech and the arboriculture package prepared by Charles McCorkell submitted with the application materials.
Item 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.	DOBA (Engineering – Civil)	This item has been addressed by the submission of an Urban Design Report – DMURS Statement of Compliance prepared by DOBA, enclosed with the application materials. This confirms that all streets, on-street parking, junction dimensions, and related elements comply with DMURS requirements. The subject design has been revised to ensure that no straight segment of road exceeds 70m in length. On-street car parking has been added to the 6.0m-wide Link Road to naturally lower the design speed, and homezones

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			are proposed at cul-de-sacs using coloured asphalt and a raised/vertical deflection. For further details, please refer to the following DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 (Series) • Drawing Nos. 2431-DOB-XX-SI-DR-C-0600 (Series) • Drawing Nos. 2431-DOB-XX-SI-DR-C-0700 (Series)
Item 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).	RAU (Architecture)	This item has been addressed through the redesign of the proposed childcare facility building, which incorporates contemporary architectural elements that reference the local horse-industry vernacular, while maintaining a high-quality contemporary design approach. An architectural response for this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement, which should be read in conjunction with the accompanying architectural drawings.

3.1.2 Roads & Transportation

Table 3-2: Summary Response to Roads & Transportation Items

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 1	The applicant is to have consideration to the KCC Transport, Mobility and Open Spaces Department pre-planning report: PP6071.	Project Team	The Applicant and its project team have had due regard to the contents of the KCC Transport, Mobility and Open Spaces Department to ensure that comments, feedback, and requests have been addressed and, where appropriate and relevant, incorporated into the final design, as shown in the suite of materials included with the planning application. As demonstrated in the application materials, the proposed development complies with relevant national, regional, and local planning policies, including the KCDP and the Naas LAP, as well as their policies, objectives, and development standards in respect of transportation, mobility, and open space. For further details, see the Planning Report prepared by Tetra Tech (formerly RPS), the Infrastructure Design Report prepared by DOBA and the Landscape Design Report prepared by M+S.

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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).	Systra (Traffic & Transport)	This item has been addressed by the submission of a Traffic and Transport Assessment Report, prepared by Systra, which is included with the application materials. This includes details of the assessment on the potential impact on Junction 9.
Item 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 Aras 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. /	DOBA (Engineering – Civil)	The Applicant and the project engineer have liaised with the KCC Traffic Management Department prior submission of the planning application, who confirmed that the current design is acceptable and that the post-planning stage will include a detailed sequencing design by a specialist. The results will be shared with the KCC Traffic Management Section at that stage. In this regard, the following is noted: a) Signalling layouts have been added to the relevant drawings; however, details such as the staging/timing of the signals will be provided as part of a detailed design package at the post-planning stage. b) The controllers will be designed to have ELV and LED signals. c) MOVA Loops have been provided as part of the junction design. d) CCTV cameras have been provided, providing a point of view on each leg of the junction. e) Public lighting will be upgraded and any works/design are proposed as part of a detailed design stage – results of which will be shared with KCC Traffic Management Section. f) Road markings and dished kerbs with tactile paving have been provided as part of the junction design, g) Safe crossing locations have been provided, and a Stage 1 Road Safety Audit has been conducted on the design, and the report is enclosed with the application materials. Further details are provided in DOBA's enclosures: • Drawing No. 2431-DOB-XX-SI-DR-C-0610 • Drawing No. 2431-DOB-XX-SI-DR-C-0615

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	DOBA (Engineering – Civil)	A full-time Project Supervisor for the design stage and a resident engineer for the construction stage of the works will be provided.
Item 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. 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	DOBA (Engineering – Civil)	The Applicant and its design team have had full regard to the required details. A summary of how these have been addressed, together with the supporting documentation prepared in response, is set out below. a) Corner radii have been added to all the curves on the proposed Gallops Extension, along with contours indicating the fall and levels. The road long sections have also been provided. It is noted that any chamber cover in the proposed Gallops Extension will have E600 rating. For further details, please refer to DOBA's drawings: • Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 (Series) • Drawing No. 2431-DOB-XX-SI-DR-C-0550 b) A surface wearing course as follows is proposed: Stone Mastic Asphalt, SMA 14 surf PMB 65/105-60 des 45mm thick, in compliance with clause 942 of NRA/TII specification. For further details, please refer to DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-1000 to 1200 c) A signalised pedestrian crossing is provided along with a streetscape that will naturally slow vehicles down. For further details, please refer to DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 (Series) d) A Surface water design, including nature-based SuDS and infiltration areas are proposed for the Gallops Extension. An InfoDrainage Model/Analysis has also been conducted. For further details, please refer to DOBA's enclosures: • Section 3 of DOBA's Infrastructure Design Report

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	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.		• Drawing Nos. Series 2431-DOB-XX-SI-DR-C-0200 • Drawing No. 2431-DOB-XX-SI-DR-C-0255 • Drawing No. 2431-DOB-XX-SI-DR-C-0257 e) The proposed Gallops Avenue Extension will have embankments constructed using Class 1 or 2C material. For further details, please refer to DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-1000 to 1200 f) The proposed Gallops Avenue Extension has been designed in full, and levels/contours are indicated on the drawings. For further details, please refer to DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 (Series) g) All of the proposed cycle tracks, signs and any other associated works are designed to be in compliance with the NTA Cycle Design manual. A full Stage 1 Road Safety Audit has also been conducted on the proposed design. For further details, please refer to DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 (Series) h) The proposed Gallops Avenue Extension and the proposed residential development act as two completely separate surface water catchments. For further details, please refer to DOBA's enclosures: • Section 3 of DOBA's Infrastructure Design Report • Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 (Series) • Drawing No. 2431-DOB-XX-SI-DR-C-0255 • Drawing No. 2431-DOB-XX-SI-DR-C-0257
Item 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 Lnight thresholds of the Kildare County Council Third Noise Action Plan 2019 - 2023.	AWN (Noise)	This item has been addressed by the submission of an Inward Noise Impact Assessment prepared by AWN, which is included with the application materials. A technical response to each of the sub-items is provided in Section 1.1 of the AWN's Inward Noise Impact Assessment.

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	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. 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 Lnight 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.		
Item 7	The applicant will be required to submit a Site Layout Plan at a scale of 1:500 indicating the following:	DOBA (Engineering – Civil)	A summary of how this item has been addressed is provided below. a) For details of sightlines and corner visibility, please refer to DOBA's enclosures:

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	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 creche development that are also in accordance with Chapter 5 of the Kildare County Development Plan 2023 - 2029.		• Drawings No. 2431-DOB-XX-SI-DR-C-0500 (Series) • Drawing No. 2431-DOB-XX-SI-DR-C-0550 b) It is proposed that the residential development is designed for a 30kph speed limit. Signage indicating the same has been added throughout the development. For details, please refer to DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-0600 (Series) c) The surface wearing course as requested, will be provided for the development. For details, please refer to DOBA's enclosures.: • Drawing Nos. 2431-DOB-XX-SI-DR-C-1000 to 1200 d) Road gullies have been provided at all of the junctions onto the proposed Gallops Avenue Extension. For details, please refer to DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 (Series) e) Due to the volume of road users expected on the Gallops Extension, a formal signalised pedestrian crossing is proposed in lieu of a raised crossing. For details, please refer to DOBA's enclosures: • Drawing Nos. 2431-DOB-XX-SI-DR-C-0500 (Series) f) It is noted that the EV charging provision is in line with the standards set out in the KCC Development Plan. For further details, please refer to the following enclosures: • Architectural Design Statement prepared by RAU • Drawing Nos. NRC-02-SW-XXX-DR-RAU-AR-1007 to prepared by RAU • Drawing Nos. NRC-JAK-SW-ZZ-DR-E-62001 and 62002 prepared by JAK
Item 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	Traffico (Traffic & Transport)	This item has been addressed by the submission of a Stage 1 Road Safety Audit prepared by Traffico, which is included with the application materials.

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	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.		
Item 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. 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).	AWN (Construction)	This item has been addressed by the submission of a Construction and Environmental Management Plan prepared by AWN, which is included with the application materials. A technical response to each of the sub-items is provided in Section 1.1 of the AWN's Construction and Environmental Management Plan.

3.1.3 Surface Water

Table 3-3: Summary Response to Surface Water Items

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Item No.	Surface Water: Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	DOBA (Engineering – Civil)	The proposed development has been designed in accordance with the KCC SuDS Guidance. In this regard, surface water is disposed of through nature-based SuDS and infiltration trenches. In line with this item of the LRD Opinion, no underground tanks are proposed in the design. For further details, please refer to DOBA's enclosures: - Section 3 of the Infrastructure Design Report - Drawings. Nos. 2431-DOB-XX-SI-DR-C-0200 (Series) - Drawing Nos. 2431-DOB-XX-SI-DR-C-0255 to 0257
Item 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.	DOBA (Engineering – Civil)	Cross-sectional details of the proposed SuDS and long sections of the surface water network have been included in the planning pack. For further details, please refer to DOBA's enclosures: Drawing Nos. 2431-DOB-XX-SI-DR-C-1400 (Series)
Item 3	Surface water and Wastewater drainage systems must discharge to separate pipe networks.	DOBA (Engineering – Civil)	Fully separate surface water and wastewater networks are proposed in line with the Irish Water code of practice and the relevant KCC guidance. For further details, please refer to DOBA's drawings enclosures: Drawing Nos. 2431-DOB-XX-SI-DR-C-2000 (Series)
Item 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.	DOBA (Engineering – Civil)	A climate change factor of 30% has been included in the sitewide design, and an additional 10% Urban Creep factor for all of the houses. The proposed surface water design will flow through at least 2 SuDS mechanisms prior to the outfall. For further details, please refer to the following DOBA's enclosures: - Section 3 of the Infrastructure Design Report, which includes details of the site's catchments - Drawings. Nos. 2431-DOB-XX-SI-DR-C-0200 (Series) - Drawing no. 2431-DOB-XX-SI-DR-C-0260, which includes details of exceedance routes An Infrastructure Design Report has been prepared by DOBA and is enclosed with the application materials, including details of the proposed surface water drawing strategy.

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Item No.	Surface Water: Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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/SustainableDrainageGuidelines/KCC%20Sustainable%20Orainage%20Systems%20Guidance%20%20Single%20page.pdf All proposed SuDS details shall be submitted including details of ancillary items such as inlet and outlets.	DOBA (Engineering – Civil)	SuDS, including permeable paving, swales, tree pits, infiltration trenches and above-ground detention basins, are part of the SuDS strategy for the proposed development, in line with the KCC SuDS Guidance. For further details, please refer to the following DOBA's enclosures: • Section 3 of the Infrastructure Design Report • Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 (Series) • Drawing Nos. 2431-DOB-XX-SI-DR-C-0255 to 0257
Item 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.	DOBA (Engineering – Civil)	This item has been addressed. As shown in the suite of proposed surface water drawings, the proposed development does not include any underground tanks. For further details, please refer to the following DOBA's enclosures: • Section 3 of the Infrastructure Design Report • Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 (Series) • Drawing Nos. 2431-DOB-XX-SI-DR-C-0255 to 0257
Item 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	DOBA (Engineering – Civil)	The infiltration trenches at the subject site have been designed in accordance with the BRE Digest 365 standards, and high-level overflows are provided to these. Full details of the infiltration tests conducted at the subject site are provided in the Infrastructure Design Report prepared by DOBA and submitted with the application materials. For full details as to how the sub-items have been fully addressed, please refer to the following DOBA's enclosures: • Section 3 of the Infrastructure Design Report • Drawings. Nos. 2431-DOB-XX-SI-DR-C-0200 (Series)

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Item No.	Surface Water: Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	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 or flood plain. e) Soakaways to include an overflow connection to a public surface water sewer where possible.		Drawing Nos. 2431-DOB-XX-SI-DR-C-0255 to 0257
Item 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	DOBA (Engineering – Civil)	This item has been addressed by the submission of a Site-Specific Flood Risk Assessment prepared by DOBA, which is included with the application materials.

3.1.4 Open Space, Landscaping and Boundary Treatment

Table 3-4: Summary Response to Open Space, Landscaping and Boundary Treatment Items

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	M+S (Landscape)	As noted in the summary response to Item 4 of the theme Layout & Design, the site layout has been redesigned to prioritise the retention and integration of the townland boundary hedgerow along the western boundary. The proposed development has been amended to remove rear access alleys and reconfigure dwellings along this boundary, thereby avoiding encroachment and ensuring the retention and protection of the hedgerow. This approach directly addresses the concerns raised and allows the hedgerow to continue functioning as a key ecological corridor and an important landscape and cultural feature. The hedgerow will be safeguarded during construction and operation, including protection measures in accordance with BS 5837:2012 under arboricultural supervision. As noted in the accompanying arboriculture package prepared by Charles McCorkell, small sections of the hedgerow are proposed for removal to facilitate the proposed westward connections. This item is addressed from a landscape architecture point of view in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments'

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
			within the Landscape Design Report prepared by M+S, which should be read in conjunction with Sections 5.11 (Ecological Strategy) and 5.17 (Boundary Proposal – Western Boundary Hedgerow), and the associated landscape drawings, including Drawing Now. Drawing No. 25-595-PD-03.2 - Tree and Hedgerow Removal & Replacement Planting. Further detail on hedgerow protection, management and ecological measures is provided in the Biodiversity and Hedgerow Management Plan prepared by Tetra Tech, and the arboriculture documentation prepared by Charles McCorkell, enclosed with the application.
Item 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.	M+S (Landscape)	This item has been addressed through the provision of appropriate protection measures and arboricultural supervision for all retained hedgerows and trees, including those within open space areas. All retained vegetation will be protected during construction in accordance with BS 5837:2012, including the establishment of Root Protection Areas and protective fencing where required. Works in proximity to retained hedgerows will be subject to supervision by a qualified arborist to ensure their continued protection and long-term viability. A landscape architecture response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Sections 5.11 (Ecological Strategy). See also the suite of arboriculture documentation prepared by Charles McCorkell and the Biodiversity and Hedgerow Management Plan submitted with the application, which provide details on hedgerow protection, management and ecological measures
Item 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.	M+S (Landscape)	This item has been addressed through the consideration of tree relocation along existing Gallops Avenue, in consultation with the project arborist. Where feasible, trees identified for removal along existing Gallops Avenue, will be carefully transplanted and relocated to suitable locations within the site, including along the proposed Gallops Avenue extension, thereby retaining their ecological and visual value. A landscape architecture response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Sections 4.6.1 (Hedgerow Retention and Management), 5.11 (Ecological Strategy) and 5.14 (Extended Gallops Avenue Landscaping

Statement of Response to LRD Opinion

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
			Strategy), and the associated landscape drawings, including Drawing No. 25-595-PD-03.2 - Tree and Hedgerow Removal & Replacement Planting.
Item 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.	M+S (Landscape)	This item has been addressed through the revision of the layout and landscape proposals to significantly increase the provision of street tree planting across the development. The revised scheme incorporates a substantial increase in street trees, ensuring that streets are more consistently framed by tree planting, thereby softening the visual impact of hard infrastructure and enhancing overall streetscape quality and green infrastructure. A landscape response to this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Section 5.13 (Street Tree Planting Strategy) and the associated landscape drawings, including Drawing No. 25-595- PD-03.1 Landscape Planting Plan & Schedule.
Item 5	Pathways Adjacent to Retained Hedges. Pathways should be sensitively designed and routed to respect and complement the presence of retained hedgerows.	M+S (Landscape) RAU (Architecture)	This item has been addressed through the revision of the layout and landscape design to ensure that pathways are appropriately routed to respect and protect retained hedgerows. The revised scheme removes pathways previously located adjacent to hedgerows and repositions routes outside Root Protection Areas where possible. Where limited connections are required to respond to pedestrian and cycle desire lines, these are designed using sensitive construction methods to minimise impact on retained vegetation. For further details, please refer to: - The landscape response to this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Section 5.15 (Hard Landscape Elements and Surfaces) and the associated landscape drawings, including Drawing No. 225- 595-PD-11 Hard Landscaping Details. - The architectural response to this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement, which should be read in conjunction with the accompanying architectural drawings.

Statement of Response to LRD Opinion

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	M+S (Landscape)	This item has been addressed through the revision of the seating specification to provide durable and low-maintenance materials suitable for long-term use within the public realm. Thus, the previously proposed timber seating has been replaced with robust alternatives incorporating metal components (specification MMCité – Emau Solo EMS456 / EMS457), ensuring improved durability, reduced maintenance requirements, and enhanced usability. A landscape architecture response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Section 5.15 (Hard Landscape Elements and Surfaces) and the associated landscape drawings.
Item 7	Removal of Picnic Benches. All picnic benches proposed within the development should be removed due to concerns regarding suitability and maintenance.	M+S (Landscape)	This item has been addressed through the removal of all picnic benches from the proposed development, ensuring that public realm furniture is appropriate, durable and low-maintenance. For further details, please refer to the Landscape Design Report prepared by M+S, which should be read in conjunction with Section 5.15 (Hard Landscape Elements and Surfaces) and the associated landscape drawings.
Item 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.	M+S (Landscape) RAU (Architecture)	This item has been addressed through the review and repositioning of bicycle parking across the site to ensure that it is located in functional, accessible and well-used locations. 50 visitor bicycle parking spaces are shown throughout the site. The revised layout provides bicycle parking at key destinations and along primary movement routes, ensuring that facilities are conveniently located, visible and integrated within the overall streetscape and public realm. For further details, please refer to: - The landscape response to this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Section 5.15 (Hard Landscape Elements and Surfaces) and the associated landscape drawings, including Drawing No. 25-595-PD-01 Landscape Design Plan. - The architectural response to this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
			Architectural Design Statement, which should be read in conjunction with the accompanying architectural drawings.
Item 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.	M+S (Landscape)	Removal of play features adjacent to Units 183–184 has been incorporated into the revised site layout following review of the LRD Opinion, thereby avoiding potential impacts on residential amenity. The updated play strategy consolidates play provision within appropriate locations across the site, including a central play area adjacent to the entrance plaza and additional integrated play elements within open spaces. The play strategy and design have been developed through consultation with KCC Parks and are informed by the guidance in KCC Parks' Public Open Space & Landscaping Incl. Boundaries document and the KCC Parks Section – Public Open Space Play Area Requirements: Natural Play Memo. A landscape architectural response for this item is included in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Sections 5.7–5.9 and the associated landscape drawings, including Drawing No. 25-595-PD-01 Landscape Design Plan, and landscape focus area plans.
Item 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.	M+S (Landscape)	Play features previously proposed within the open space between Units 169, 170 and 189 have been removed as part of the revised site layout and updated play strategy. Remaining informal play elements have been repositioned within suitable locations across the site, ensuring appropriate separation from residential units while maintaining passive surveillance and play value. For further details, please refer to the landscape architecture response for this item under Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Sections 5.7–5.9 and the associated landscape drawings, including Drawing No. 25-595-PD-01 Landscape Design Plan, and the landscape focus area plans.
Item 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.	RAU (Architecture) M+S (Landscape)	All proposed links and footpaths are designed in compliance with Part M Building Regulations. Further details are illustrated on Drawing No. 25-595-PD-01.5 - Kingsfurze Link Path Plan - Photographic & Topographical Survey.

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	M+S (Landscape)	The site boundary and layout have been revised in response to this item. Thus, the proposed development includes for an appropriate boundary treatment which allows for the provision of future connection, subject to agreement with the relevant landowner and stakeholders. The proposed landscaped path now runs to the site boundary, where a welded mesh fence and gate are proposed. This arrangement safeguards a potential future pedestrian connection to Kingsfurze Avenue should this wish be progressed by the relevant parties and subject to KCC agreement. A landscape architecture response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Drawing No. 25-595-PD-01 Landscape Design Plan, 25-595-PD-04 Proposed Landscape Boundary Plan as well as on 25-595-PD-12.1/2 Landscape Boundary Details.
Item 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.	M+S (Landscape)	This item has been addressed through the removal of the previously proposed picnic bench and its replacement with a standard park bench (specification MMCité – Emau Solo EMS456 / EMS457) more appropriate to the scale and use of the space. Further details are provided in the M+S Landscape Design Report, including Section 5.15 (Hard Landscape Elements and Surfaces) and the associated landscape drawings. This item is addressed in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Section 5.15 (Hard Landscape Elements and Surfaces) and the associated landscape drawings.
Item 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.	RAU (Architecture) M+S (Landscape)	A taking in charge drawing has been prepared by RAU and is enclosed with the application materials. Please see Drawing No. NRC-02-SW-XXX-DR-AR-RAU-1011 - Proposed Taken In Charge Plan prepared by RAU. Moreover, also refer to Section 5.19. (Future Management and Maintenance of Open Spaces) and Appendix A.1(Public Realm Management Strategy) of the Landscape Design Report prepared by M+S.
Item 15	The use of boulders in the landscape plan should be reduced.	M+S (Landscape)	This item has been addressed through the reduction and rationalisation of boulders within the landscape design.

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
			A reduced number of boulders is now proposed (34, from previous 125), with remaining elements integrated as part of the overall landscape and informal play strategy, consistent with the guidance in the KCC Parks Section – Public Open Space Play Area Requirements: Natural Play Memo. Further details are illustrated on M+S Landscape Design Report, Drawing No. 25-595-PD-01 Landscape Design Plan, and the series of landscape focus area plans.

3.1.5 Building & Development Control

Table 3-5: Summary Response to Building & Development Control Items

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	M+S (Landscape)	This item has been addressed through the revision of the landscape strategy to ensure the retention and protection of existing boundary vegetation along the western boundary, including the townland boundary hedgerow adjacent to Kingsfurze Avenue. As noted in previous responses (see summary response to Open Space, Landscaping and Boundary Treatment – Item 1, and Layout / Design – Item 4) the layout's design has been coordinated by the design team (i.e., architecture, engineer, etc) to facilitate the retention of the hedgerow, with no encroachment from development, and its maintenance. A 1.8 m high welded mesh fence will be installed along the development-side edge of the hedgerow, with post footings hand-augered within root protection areas where required. This approach ensures that construction impacts are minimised and that the retained vegetation remains viable. The retained hedgerow will lie within the ownership of the future residential property owners, with their legal boundary extending to the site boundary line. The proposed welded mesh fence forms the physical boundary treatment on the development side, avoiding potential ownership or maintenance issues and preventing the creation of inaccessible or unmanaged areas. Appropriate protection measures will be implemented, including the installation of a boundary treatment and adherence to BS 5837:2012 under

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			arboricultural supervision, ensuring the long-term viability of the retained vegetation. A landscape response to this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which should be read in conjunction with Sections 5.11 (Ecological Strategy) and 5.17 (Boundary Proposal – Western Boundary Hedgerow), and the associated landscape drawings, including Drawing No. 25-595-PD-03.2 - Tree and Hedgerow Removal & Replacement Planting Further detail on hedgerow protection, management and ecological measures is also provided in the Biodiversity and Hedgerow Management Plan prepared by Tetra Tech, and the arboriculture documentation prepared by Charles McCorkell, enclosed with the application.
Item 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.	DOBA (Engineering – Civil)	It is noted that these locations will have a full height kerb, with dropped kerb locations at set intervals. For further details, please refer to the following enclosures prepared by DOBA: - Drawing Nos. 2431-DOB-XX-SI-DR-C-0255to 0257, which provide SuDS details - Drawing Nos. 2431-DOB-XX-SI-DR-C-1000 and 1200, which include details of the roads.
Item 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.	RAU (Architecture)	This item has been addressed. The proposed laneways serving rear gardens are to be provided as private access routes, with ownership and maintenance assigned to the Development Owners' Management Company (OMC), and appropriate rights of way granted to the benefiting residential units. The laneways are not proposed to be taken in charge by KCC. An architectural response to this item is provided in the section titled 'Architectural Response to the LRD Opinion' within the Architectural Design Statement prepared by RAU, which should be read in conjunction with the application drawings, including Drawing No. NRC-02-SW-XXX-DR-AR-RAU-1011 - Proposed Taken In Charge Plan prepared by RAU. It is also noted that a Property Management Strategy Report, prepared by Aramark, is enclosed with the application materials.

3.1.6 Community/Social Infrastructure

Table 3-6: Summary Response to Open Space, Landscaping and Boundary Treatment Items

Statement of Response to LRD Opinion

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 1	A Community I Social infrastructure assessment is required and should be submitted.	Tetra Tech (Planning)	This item has been addressed by the submission of a <i>Social & Community Infrastructure Audit</i> prepared by Tetra Tech (formerly RPS), which is included with the application materials.

3.1.7 Uisce Éireann

Table 3-7: Summary Response to Uisce Éireann Items

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 1	The Applicant submitted Pre-Connection Enquiry (PCE) application to Uisce Eireann 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 UE. 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. UE 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	DOBA (Engineering – Civil)	A Confirmation of Feasibility (CoF) and Statement of Design Acceptance have been issued by Uisce Éireann and are appended to the Infrastructure Design Report prepared by DOBA, enclosed with the application materials. Regarding the proposed water supply and wastewater, please refer to the following DOBA enclosures for further details: - Sections 4 and 5 of the Infrastructure Design Report - Drawing Nos. 2431-DOB-XX-SI-DR-C-0300 (Series) for details of wastewater infrastructure proposals - Drawing Nos. 2431-DOB-XX-SI-DR-C-0400 (Series) for details of water main infrastructure proposals

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	Development Regulations to submit a valid confirmation of Feasibility (COF) when lodging their LRD planning application.		
Item 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 UE Standards & Codes of Practice.	DOBA (Engineering – Civil)	The proposed development's design complies with the relevant ÚE's Codes of Practice. Adequate separation has been provided throughout the proposed development. A SODA has also been issued by ÚE and is appended to the Infrastructure Design Report prepared by DOBA. For further details, please refer to the following DOBA's enclosures: - Sections 4 and 5 of the Infrastructure Design Report - Drawing Nos. 2431-DOB-XX-SI-DR-C-0300 (Series) for details of wastewater infrastructure proposals - Drawing Nos. 2431-DOB-XX-SI-DR-C-0400 (Series) for details of water main infrastructure proposals
Item 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).	DOBA (Engineering – Civil)	A CoF and a SODA have been issued by Uisce Éireann and are appended to the Infrastructure Design Report prepared by DOBA, which is enclosed with the application materials. For further details, please refer to the following DOBA's enclosures: - Sections 4 and 5 of the Infrastructure Design Report - Drawing Nos. 2431-DOB-XX-SI-DR-C-0300 (Series) for details of wastewater infrastructure proposals - Drawing Nos. 2431-DOB-XX-SI-DR-C-0400 (Series) for details of water main infrastructure proposals
Item 4	A SODA Statement of Design Acceptance is recommended to be in place and submitted at the full LRD planning application lodgement stage.	DOBA (Engineering – Civil)	As noted in responses to previous items, a SODA is appended to the Infrastructure Design Report prepared by DOBA and enclosed with the application materials.
Item 5	Uisce Éireann is requested to be consulted via an EIAR Scoping letter c. 6 months prior to the completion of the planning application.	Tetra Tech (Environment)	An Environmental Impact Assessment (EIA) Screening Report has been prepared by Tetra Tech and is enclosed with the application materials. 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 are not required. Therefore, it is considered that EIAR Scoping does not apply in this instance.

3.1.8 Housing/Part V

Table 3-8: Summary Response to Part V Items

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures												
Item 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: <table><tr><td>1 bed-</td><td>1070</td><td>48%</td></tr><tr><td>2 bed-</td><td>734</td><td>33%</td></tr><tr><td>3 bed-</td><td>329</td><td>15%</td></tr><tr><td>4 bed-</td><td>80</td><td>4%</td></tr></table> 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.	1 bed-	1070	48%	2 bed-	734	33%	3 bed-	329	15%	4 bed-	80	4%	The Applicant	The Applicant has prepared a Part V Package in response to the requests under this LRD item. The proposed development will deliver 53 no. Part V units. Details of the units are provided in the Part V drawings prepared by RAU and enclosed with the application materials.
1 bed-	1070	48%													
2 bed-	734	33%													
3 bed-	329	15%													
4 bed-	80	4%													

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	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.		

3.1.9 Fire Safety

Table 3-9: Summary Response to Fire Safety Items

Item No.	Item & Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 1	A minimum of 25 litres per second of water is to be available in the mains at 2 bar pressure for firefighting.	DOBA (Engineering – Civil)	A flow test has been conducted, and a fire storage tank is required to supplement the flow requirements. For further details, please refer to the following DOBA enclosures: • Section 5.4 of the Infrastructure Design Report • Appendix I of the Infrastructure Design Report for the test results. • Drawing Nos. 2431-DOB-XX-SI-DR-C-0400 (Series)
Item 2	The Applicant shall obtain Fire Safety Certificates in accordance with the requirements of the Building Control Act.	The Applicant	The Applicant confirms that the relevant Fire Safety Certificates will be obtained post-planning, in line with standard practice.

3.1.10 Ecology

Table 3-10: Summary Response to Ecology Items

Statement of Response to LRD Opinion

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 1	Ecological Impact Assessment (EclA). The applicant is required to submit a comprehensive Ecological Impact Assessment (EclA) in accordance with the CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland (2018). The EclA 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.	Tetra Tech (Environment)	This item has been addressed by submitting the Ecological Impact Assessment Report prepared by Tetra Tech, which is enclosed with the application materials. This includes details of the bat survey and impact assessment carried out in line with relevant guidance and guidelines. This document concludes that the proposed development will not have any significant adverse effects on the ecological features of the 'Ecology Study Area'. Please refer to the report for details on the baseline conditions, the assessment of impact significance, and the proposed mitigation and enhancement measures.
Item 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.	Tetra Tech (Ecology)	This item has been addressed by submitting the Ecological Impact Assessment Report prepared by Tetra Tech, which is enclosed with the application materials. This includes details of the bat survey and impact assessment carried out in line with relevant guidance and guidelines. This document concludes that the proposed development will not have any significant adverse effects on the ecological features of the 'Ecology Study Area'. Please refer to the report for details on the baseline conditions, the assessment of impact significance, and the proposed mitigation and enhancement measures.

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	- 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.		
Item 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.	Tetra Tech (Ecology)	This item has been addressed by the submission of the Ecological Impact Assessment Report prepared by Tetra Tech, and enclosed with the application materials. This includes details of the lighting impact assessment conducted to evaluate potential effects on bats and other nocturnal wildlife. Lighting proposals, including a lighting layout plan, have been prepared by SABRE and are enclosed with the application materials.
Item 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. - 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.	Tetra Tech (Ecology)	This item has been addressed by the submission of the Biodiversity and Hedgerow Management Plan, prepared by Tetra Tech, and enclosed with the application materials.

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	Tetra Tech (Ecology)	This item has been addressed by the submission of a Report to Inform Appropriate Assessment, prepared by Tetra Tech, which clearly identifies any European Sites (Natura 2000) within the potential zone of influence, assesses the potential for likely significant effects, alone or in combination, and has been prepared in accordance with NPWS guidance and relevant case law. 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.
Item 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).	Tetra Tech (Ecology)	This item has been addressed by the submission of the Biodiversity and Hedgerow Management Plan, prepared by Tetra Tech, and enclosed with the application materials. The document demonstrates that the proposed development has been designed to protect, integrate, and enhance the on-site townland boundary hedgerow, in line with the specific objectives and policies of the KCDP 2023-2029, such of listed under this LRD Opinion item, including avoiding the removal of hedgerows wherever possible, hedgerow integration with the proposed design, The Biodiversity and Hedgerow Management Plan should be read in conjunction with the arboriculture package prepared by Charles McCorkell (including tree impact, hedgerow survey, and impact assessment), the Ecological Impact Assessment Report, the EIA Screening Report, and the Report to Inform Appropriate Assessment prepared by Tetra Tech, enclosed with the application materials. Finally, details of proposed landscape proposals, including proposed greening measures, SuDS and planting, are illustrated in the Landscape Design Report and associated landscape drawings prepared by M+S.

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	- 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. <u>Additional Notes:</u> - Removal of hedgerows prior to planning submission will be viewed negatively and may result in refusal. - The townland boundary hedgerow is of particular concern and must be treated as a priority feature in the plan. - 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. - 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		

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Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
	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.		

3.1.11 Heritage

Table 3-11: Summary Response to Heritage Items

Item No.	Heritage: Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	The Applicant	The Applicant notes the request. It is noted that a Cultural Heritage Impact Assessment, prepared by ACSU is submitted with the planning application.
Item 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.	The Applicant	The Applicant notes the request.
Item 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	The Applicant	The Applicant notes the request.

Statement of Response to LRD Opinion

	Housing, Local Government and Heritage regarding appropriate mitigation (preservation in situ/excavation).		
Item 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.	The Applicant	The Applicant notes the request.

3.1.12 Environment

Table 3-12: Summary Response to Environment Items

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 1	Demonstrate that all foul sewage and soiled water will discharge to the public foul sewer system.	DOBA (Engineering – Civil)	The subject design complies with the Irish Water Codes of Practice. The proposed wastewater outflows to public sewers. For further details, please refer to the following DOBA enclosures: - Section 4 of the Infrastructure Design Report - Drawing Nos. 2431-DOB-XX-SI-DR-C-0300 (Series)
Item 2	Demonstrate that only clean, uncontaminated surface water will discharge to the surface water system.	DOBA (Engineering – Civil)	A range of nature-based SuDS are proposed for the proposed development, and surface water will travel through at least 2 SuDS mechanisms as a minimum. For further details, please refer to the following DOBA enclosures: - Section 3 of the Infrastructure Design Report - Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 (Series)
Item 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.	DOBA (Engineering – Civil)	It is noted that no petrol interceptors are proposed for the proposed development. This is in line with the KCC SuDS Guide 2024, Section 7.4.7, due to adequate provision of SuDS and flow through of surface water through them. For further details, please refer to the following DOBA enclosures: - Section 3 of the Infrastructure Design Report - Drawing Nos. 2431-DOB-XX-SI-DR-C-0200 (Series)

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Item 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.	AWN (Construction & Waste)	A Construction and Environmental Management Plan, prepared by AWN, is enclosed with the application materials. This includes the commitment to prepare a Surface Water Management Plan (SWMP) prior to commencement. For further details, please refer to Sections 1.1 and 7.6 of the above-mentioned report.
Item 5	Note: discharge can only be authorised under Section 4 of the Local Government (Water Pollution) Act 1977, as amended.	DOBA (Engineering – Civil)	This is noted by the Applicant.
Item 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.	AWN (Construction & Waste)	This item has been addressed by the submission of an Operational Waste Management Plan prepared by AWN, which is included with the application materials. This considers all the domestic waste management needs of the proposed occupants.

3.1.13 Strategic Planning and Public Realm

Table 3-13: Summary Response to Strategic Planning and Public Realm Items

Item No.	Item Description	Relevant Consultant(s) & Discipline	Summary Response & Relevant Enclosures
Item 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.	M+S (Landscape)	This item has been addressed through the specification of robust, durable and easily maintained materials for all public realm elements, including the basketball half court, seating and hard landscaping. All hard landscaping will be installed in accordance with the KCC Parks' Public Open Space & Landscape Incl. Boundaries. A landscape architectural response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments'

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			within the Landscape Design Report prepared by M+S, which is to be read in conjunction with the accompanying landscape drawings. Further detail on materials and finishes for the proposed basketball half court are illustrated on Drawing No. 25-595-PD-06 - Landscape Focus Area 2 Plan prepared by M+S.
Item 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.	M+S (Landscape)	This item has been addressed through the refinement of the play strategy to provide accessible and appropriately distributed play opportunities, including a centrally located primary play area and additional play elements integrated throughout the open spaces across the site. A landscape architectural response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which is to be read in conjunction with the accompanying landscape drawings. Further detail is set out in Sections 5.7–5.9 of the Landscape Design Report and Drawing No. 25-595-PD-01 Landscape Design Plan and focus landscape drawings prepared by M+S and enclosed with the application materials.
Item 3	The design of public spaces should incorporate principles of passive surveillance.	M+S (Landscape)	This item has been addressed through the integration of passive surveillance principles within the landscape and public realm design, including the positioning of open spaces, routes and play areas in locations overlooked by surrounding dwellings and active frontages. A landscape architectural response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which is to be read in conjunction with the accompanying landscape drawings. Further details of the proposed public realm strategy and design principles are provided in Section 5.6.
Item 4	Lighting proposals, particularly along permeability routes, should be carefully considered and implemented to promote safety and comfort for users.	M+S (Landscape) SABRE (Lighting)	This item has been addressed through the coordinated design of lighting and landscape proposals along permeability routes to ensure user safety and comfort, while maintaining compatibility with the landscape strategy and tree planting proposals. From a landscape perspective, a 5 m exclusion zone is proposed around all lighting standards to prevent conflicts with tree planting, ensuring that lighting levels and quality are maintained as vegetation matures. A landscape architectural response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which is to be read in conjunction with the accompanying landscape drawings, including Drawing No. 25-595-PD-02 Landscape Design Plan - Services Overlay.

Statement of Response to LRD Opinion

			Moreover, details of the lighting proposal can be seen in the lighting plans and outdoor lighting reports prepared by SABRE, which are enclosed with the application materials.
Item 5	Details should be submitted on gradients, tactile paving, seating dimensions, and accessible routes.	M+S (Landscape) DOBA (Engineering - Civil)	This item has been addressed through the provision of the detailed design information requested. • Details regarding road gradients and tactile paving layouts are provided on the DOBA engineering drawings; and • Information on hard landscaping elements, seating dimensions, and accessible routes is illustrated in Sections 5.3 and 5.15 of the Landscape Design Report and Drawing No. 25-595-PD-11 – Hard Landscaping Details prepared by M+S and enclosed with the application materials. A landscape architectural response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S.
Item 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.	RAU (Architecture)	A phasing strategy has been prepared, demonstrating how public realm and amenity space will be delivered in parallel with residential units. Please refer to Drawing No. NRC-02-SW-XXX-DR-AR-RAU-1013 - Overall Proposed Site Layout Plan- Proposed Phasing and Section 12 of the Architectural Design Report prepared by RAU.
Item 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.	M+S (Landscape)	This item has been addressed through the preparation of a comprehensive Public Realm Management Strategy by M+S, which sets out responsibilities for the ongoing maintenance, management and long-term stewardship of all communal and public spaces. Details are provided in Section 5.19 and Appendix A.1 (Public Realm Management Strategy) of the Landscape Design Report prepared by M+S.
Item 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.	M+S (Landscape)	This item has been addressed through the coordinated design of SuDS features within the public realm, including the careful selection of materials where these interface with play areas to ensure safety, usability and durability. A landscape architectural response for this item is provided in Section 2.2 titled 'Landscape Architectural Response to Requirements/Comments' within the Landscape Design Report prepared by M+S, which is to be read in conjunction with the accompanying landscape drawings.

4 Conclusion

As noted elsewhere in this Statement, the LRD Opinion issued by KCC (ref. LRD2025006) concluded that the Stage 2 documentation prepared and submitted by the Applicant did not constitute a reasonable basis for a planning application and identified four principal reasons for that conclusion. Notwithstanding this, the Opinion also confirmed that, where the matters raised were addressed through the submission of revised documentation and specific information, the proposal could provide a reasonable basis for an application pursuant to Section 32D(2)(b).

In response, the Applicant has comprehensively reviewed and revised the proposed development. As summarised in this Statement and further demonstrated by the suite of documentation accompanying the planning application, the four principal reasons identified in the LRD Opinion have been addressed in full, together with the specific items and information requests raised by the KCC. These matters are addressed through targeted design refinements and the preparation of a comprehensive suite of supporting documentation, including the Architectural Design Statement by RAU, Landscape Design Report by M+S, Infrastructure Design Report by DOBA, and other accompanying reports and drawings submitted as part of the application, and listed in the Cover Letter enclosed with the planning application.

Accordingly, it is considered that the proposed development, by virtue of its revised design and the documentation now submitted, provides a reasonable basis for an application for permission for a Large-scale Residential Development.

Furthermore, it is submitted that the proposed development represents a high-quality, policy-compliant residential scheme that responds positively to its context, delivers a coherent and legible urban structure, and incorporates enhanced connectivity, public realm, green infrastructure, and community facilities. The development will therefore provide new homes and contribute positively to the planned and sustainable growth of Naas in accordance with the relevant national, regional and local planning policy framework.

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 (GSDSDS).****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 GSDSDS. 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) Ensuities 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.





Comhairle Contae Chill Dara

Kildare County Council

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.





Comhairle Contae Chill Dara
Kildare County Council

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.

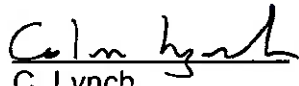
The applicant will be required to make the necessary changes to the design proposals following the stage 1 RSA. The applicant is requested to note that if the application is subsequently granted, then the applicant will be required to carry out a stage 2, 3 and 4 RSA.

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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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.

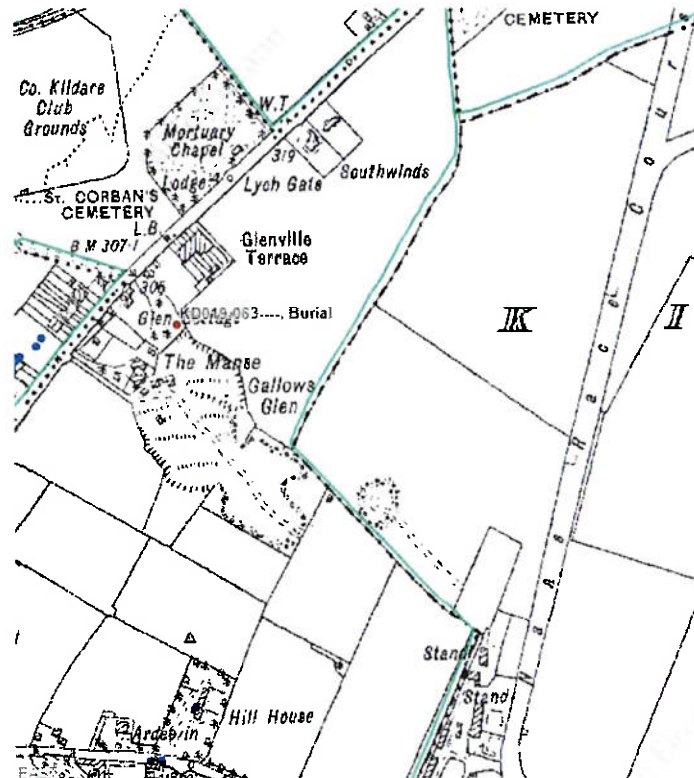
Policy Context – Kildare County Development Plan 2023-2027

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.

A handwritten signature in black ink, appearing to read 'Dara Wyer'.

Dara Wyer

Heritage Officer

Date: 29/09/2025

A handwritten signature in black ink, appearing to read 'Amy Granville'.

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

<u>For KCC</u>	<u>For Applicant</u>
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.

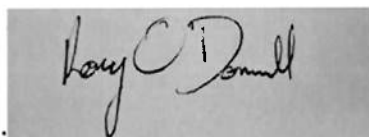
Tracy McGibbon, Senior Executive Planner, Objective MTO 3.3 – Gallops Avenue – needs to be designed as a street, designed with road safety and engineering in mind also. Demonstrate how the cycle movement will tie in with development and scheme.

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
----------------------	--

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

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, 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.

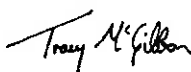
Ronan queried if there was an existing drainage ditch along the road.

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
----------------------	---------------------------

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.

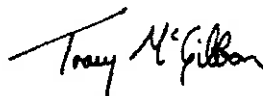
TMcG acknowledged the creche at Stone Haven, and similar/better and pay lip service to the racecourse.

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