



Chief Executive's Report

on Submissions Received on
Proposed Variation No.5 of the
County Kildare Development Plan
2023-2029 (as varied)

Northwest Quadrant (Naas)

5 August 2026



Comhairle Contae Chill Dara
Kildare County Council



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Table of Contents

1	Introduction.....	1
	1.1 Legislative Requirements	1
	1.2 Public Consultation	1
	1.3 Contents of the Chief Executive's Report.....	3
	1.4 Next Steps.....	3
	1.5 Recommendation to NOT MAKE the Variation.....	4
2	List of Persons who made Submissions	6
3	Recommendations and Submissions from the Office of the Planning Regulator and the National Transport Authority (NTA).	8
	Submission No. 80 – Office of the Planning Regulator (OPR)	8
	Submission No. 84 – The National Transport Authority (NTA).....	10
4	Submissions in respect of the Prescribed Authorities	12
	Submission No. 10 - The Maritime Area Regulatory Authority (MARA)	12
	Submission No. 25 – Health Service Executive (Environmental Health)	13
	Submission No. 29 – Office of Public Works (OPW) / Flood Management.....	14
	Submission No. 35 – Department of Education and Youth.....	16
	Submission No. 37 – Eirgrid	17
	Submission No. 42 – Transport Infrastructure Ireland (TII).....	18
	Submission No. 48 – Uisce Éireann	19
	Submission No. 51 – Office of Public Works (OPW) / Heritage.....	21
	Submission No. 76 – Electricity Supply Board (ESB).....	22
5	Issues Raised by Themes in Submissions made by other persons	24
	Proposed Variation No.5.....	24
	Chapter 1: NWQ Vision	25
	Chapter 2: The Framework Masterplan.....	27
	Chapter 3: Land Use Strategy	27
	Chapter 4: Housing.....	34
	Chapter 5: Built Heritage, Archaeology and Visual Environment.....	35
	Chapter 5A: Green & Blue Infrastructure and Biodiversity	37
	Chapter 6: Urban Density Strategy	39
	Chapter 7: Sustainable Mobility Strategy	41
	Chapter 8: Community Infrastructure Strategy	61
	Chapter 9: Urban Recreation and Amenity.....	70
	Chapter 10: Phasing	76

Chief Executive's Report on Proposed Variation 5
of the *Kildare County Development Plan 2023 – 2029* (as varied)

Chapter 11:	Infrastructure Delivery Plan	77
Chapter 12:	Delivery and Funding of Enabling and Supporting Infrastructure	84
Chapter 13:	Land Acquisition	88
Chapter 14:	Placenaming	89
Chapter 15:	Energy Resilience	89
Chapter 16:	Urban Development Zone	91
	Strategic Environmental Assessment Screening and Appropriate Assessment Screenings	92
	Strategic Flood Risk Assessment	94
	Surface Water Management Plan	97
	Miscellaneous Issues	98
6	Submissions from Landowners relating to requests for the rezoning of land and other items.....	100
6.1	Land use zoning objective requests	102
	Submission No. 20 – Boran Packaging Limited	102
	Submission No. 46 – Millennium Falcon Holdings Limited	104
	Submission No. 49 – Millennium Falcon Holdings Limited	108
	Submission No. 50 – Aravonian Limited	110
	Submission No. 61 – Christine Mahoney	113
	Submission No. 71 – Westar Group	115
	Submission No. 74 – ALDI Stores (Ireland) Limited	119
	Submission No. 77 – Evava Developments Limited and Millennium Falcon Holdings Limited	121
6.2	Landowner requests relating to non-land use zoning objectives	124
	Submission No. 33 – Gleanveagh Limited	124
	Submission No. 50 – Aravonian Limited	127
	Submission No. 61 – Christine Mahoney	129
	Submission No. 71 – Millennium Falcon Holdings Limited	130
	Submission No. 71 – Westar Group	133
	Submission No. 77 – Evava Developments Limited and Millennium Falcon Holdings Limited	134

APPENDICES

- Appendix A:** Copy of the submissions received from:
- Office of the Planning Regulator (OPR),
 - National Transport Authority (NTA)
- Appendix B:** A summary of all submissions received.

GLOSSARY OF ACRONYMS

AA	Appropriate Assessment
CAG	Character Area Guidance
CDP	Kildare County Development Plan 2023 – 2029 (as varied)
CSO	Central Statistics Office
EMRA	Eastern and Midlands Regional Assembly
EPA	Environmental Protection Agency
KCC	Kildare County Council
KDA	Key Development Area
LAP	Local Area Plan
LUZO	Land Use Zoning Objective
MARA	Maritime Area Regulatory Authority
NPF	National Planning Framework
NPO	National Policy Objective
NTA	National Transport Authority
NWQ	Northwest Quadrant (Naas)
OPR	Office of the Planning Regulator
OPW	Office of Public Works
RSES	Regional Spatial and Economic Strategy
SEA	Strategic Environmental Assessment
SuDS	Sustainable Drainage Systems
SFRA	Strategic Flood Risk Assessment
SSFRA	Site-Specific Flood Risk Assessment
SWMS	Surface Water Management Strategy
SIA	Social Infrastructure Audit
TII	Transport Infrastructure Ireland
TTIA	Traffic and Transportation Impact Assessment
UÉ	Uisce Éireann

1 Introduction

This report relates to the issues raised in submissions received from members of the public, prescribed authorities and key stakeholders following the publication of the Proposed Variation No. 5 of the *Kildare County Development Plan 2023 - 2029* (as varied) pursuant under Section 58 of the *Planning and Development Act 2024* (as amended).

This report is furnished to the Elected Members of Kildare County Council for their consideration alongside the Proposed Variation.

1.1 Legislative Requirements

In accordance with Section 58 (11) of the *Planning and Development Act 2024* (as amended), the Chief Executive is required to prepare a report on the submissions received during the public consultation period in respect of the Proposed Variation. This report should:

- List the persons who made submissions,
- Summarise the recommendations and submissions made by the Minister, the Office of the Planning Regulator (OPR), the regional assembly and the National Transport Authority,
- Summarise the issues raised in the submissions made by any other persons,
- Give the response of the Chief Executive to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of the planning authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government,
- Set out the recommendations of the Chief Executive as to how any recommendations made by the Minister and the Office of the Planning Regulator in any submissions made by them should be dealt with,
- Where required, include the assessment of the chief executive of the proposed variation for the purposes of strategic environmental assessment or appropriate assessment, taking into account the submissions received under this section

1.2 Public Consultation

Proposed Variation No. 5 of the *Kildare County Development Plan 2023 - 2029* (as varied) (hereafter referred to as 'the Proposed Variation' was placed on public display from **Friday 5 June 2026 to Friday 3 July 2026**.

A public notice was published in the Irish Independent on Friday 5 June 2026 notifying members of the public that the Proposed Variation was on public display from **Friday 5 June 2026 to Friday 3 July 2026**.

The following documents were placed on display:

Proposed Variation No. 5: Northwest Quadrant (Naas) of the Kildare County Development Plan 2023 – 2029 (as varied) will comprise amendments to Volume 1: Written Statement and Volume 2: Settlement Plans of the Kildare County Development Plan 2023-2029 (as varied) accompanied by the following supporting documents:

- A Northwest Quadrant (Naas) Written Statement.
- A Northwest Quadrant (Naas) Framework Masterplan Report (FMR).
- A Northwest Quadrant (Naas) Character Area Guidance (CAG).
- A Northwest Quadrant (Naas) Sustainable Mobility Strategy (SMS).
- A Northwest Quadrant (Naas) Surface Water Management Plan (SWMP).
- A Strategic Environmental Assessment Screening Report pursuant to the Land Use Planning - Strategic Environmental Assessment (SEA) Regulations 2025.
- A Screening for Appropriate Assessment (AA) Report pursuant to the EU Habitats Directive (92/43/EEC).
- A Strategic Flood Risk Assessment (SFRA) Report, pursuant to Section 28 of the Planning and Development Act 2000 (as amended).

Documents for the Proposed Variation were displayed at the following locations:

- Planning Office, Áras Chill Dara, Naas, County Kildare
- The County Council's dedicated online public consultation portal at:
<https://consult.kildarecoco.ie/en/browse>.

A total of 87 submissions were received during the public consultation period, which can be viewed at <https://consult.kildarecoco.ie/en/browse>:

1.3 Contents of the Chief Executive's Report

The Chief Executive's Report is set out, as follows:

- Section 1:** Introduction and background to the Chief Executive's Report.
- Section 2:** List of persons who made submissions.
- Section 3:** Recommendations and submissions from the Minister for Housing, Local Government and Heritage, the Office of the Planning Regulator (OPR) and submissions from the Eastern and Midland Regional Assembly (EMRA) and the National Transport Authority (NTA).
- Section 4:** Submissions from other Prescribed Authorities.
- Section 5:** Issues raised on a thematic basis in submissions made by other persons.
- Section 6:** Submissions from landowners relating to requests for the amendments to land use zoning objectives and other objectives.
- Appendix A:** Submissions from the Minister for Housing, Local Government and Heritage, the Office of the Planning Regulator, the Eastern and Midland Regional Assembly (EMRA) and the National Transport Authority (NTA).
- Appendix B:** Detailed summary of submissions received.

1.4 Next Steps

Within six weeks of receiving the Chief Executive's Report, the Elected Members of Kildare County Council must consider Proposed Variation No. 5 of the *Kildare County Development Plan 2023 - 2029* (as varied) and the Chief Executive's Report (this report).

Following consideration of the above, the Elected Members may, where it appears that the Proposed Variation should be made, may, by resolution make the Proposed Variation. Or where it appears that a modified version of the Proposed Variation should be made, may, by resolution make a modified version of the Proposed Variation. Where, in making the Proposed Variation or a modified version of the Proposed Variation, the Elected Members do not comply with any recommendations made by the Minister for Housing, Local Government and Heritage or the Office of the Planning Regulator, they shall, as soon as practicable following the making of the variation, so inform the Minister, or the Office of the Planning Regulator, as the case may be, by notice in writing which notice shall contain a statement of the reasons for the decision not to comply with the recommendations concerns.

If the Elected Members make a modified version of the proposed variation and the modification to the proposed variation constitutes a material alteration, the variation shall be deemed not to have been made. A further period of public consultation not later than two weeks after the passing of a resolution will be necessary, and the

Planning Authority shall determine whether a Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) is or is not required to be carried out in respect of the modifications that constitutes a material alteration of the Proposed Variation.

Alternatively, the Elected Members can resolve not to make the Variation under s58 of the Planning and Development Act 2024. In this specific case the Chief Executive is recommending that the Variation NOT BE MADE (see section 1.5, below).

The Elected Members, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the *Code of Conduct for Councillors* (July 2019) prepared under the *Local Government Act 2001* (as amended), carry out their duties in a transparent manner, must follow due process and must make their decisions based on relevant considerations.

1.5 Recommendation to NOT MAKE the Variation

Fundamental Changes to Draft Proposal

Following detailed review of submissions from the NTA and OPW, it has become evident that the amendments required are of such significance that they would fundamentally alter the proposal originally placed on public display. These matters include the need to consider the need for a public transport bridge over the canal, access to Sallins Road, the suitability of alternative crossing options, issues relating to flood risk and impacts on adjoining lands.

Given the potential scale of these required changes, Kildare County Council cannot reasonably undertake the necessary assessments within the statutory timeframe available for the current County Development Plan Variation process. Proceeding with such substantial modifications during the course of the Variation process could introduce unnecessary procedural and legal risks.

Potential Impact on Overall Masterplan

The issue extends beyond any individual access route and has important implications for the overall integrity and deliverability of the masterplan. Without a clear and deliverable public transport strategy, the ability to provide appropriate access to lands within the framework area, particularly from the eastern side, would be substantially compromised. This would undermine the wider objectives of the masterplan and could significantly affect the future provision of public transport infrastructure and services.

Access to Fair and Equitable Consultation

Any revised public transport proposal may have implications for areas outside the lands currently subject to the Variation process, including established residential neighbourhoods. It is therefore important that any future proposal be subject to an appropriate consultation process.

The option presented to the public is no longer considered deliverable and the comparative assessment of alternative options requires further examination. In these circumstances, it is considered prudent to undertake additional analysis and engagement before advancing a revised proposal.

Consequential Amendments

Given the uncertainty surrounding the location, design and feasibility of a future public transport route and associated infrastructure, it is not currently possible to accurately determine the full extent of consequential zoning, land-use and masterplan amendments that may be required. Until the necessary assessments are completed, the impacts on the wider development framework and infrastructure strategy cannot be fully assessed.

Chief Executive's Recommendation

Having regard to the issues outlined above, and recognising the need for a robust, evidence-based and legally sound planning process, the Chief Executive makes the following recommendation.

It is recommended:

- (1) that the Members do NOT make the current Variation,**
- (2) Kildare County Council undertake the appropriate assessments and revisions to the draft variation having regard to the issues raised by the NTA and OPW, and**
- (3) Kildare County Council publish a revised Variation at the earliest practicable opportunity.**

2 List of Persons who made Submissions

During the public consultation period a total of 87 valid submissions were received. The list of persons, prescribed authorities and stakeholders who made valid submissions are listed below in Table 2.1.

Kildare County Council would like to take the opportunity to thank those who made written submissions on the Proposed Variation.

Table 2.1: Persons Who Made Submissions

Sub. No:	Who from	Sub. No.:	Who from
1	Precious lindelwa Phiri	22	Christine Finn
2	Community Campaigner David Barton	23	Sally J Byrne
3	Joseph Bergin	24	Ger Ui Chongaile
4	Sarah Walsh	25	HSE Environmental Health
5	Scott Walsh	26	James Lawless TD
6	Niall Bolger	27	Diarmuid Parker
7	Conor Whelan	28	RMLA on behalf of An Post
8	Robert Fadden	29	Office of Public Works
9	John Murphy	30	Mike Baker
10	Maritime Area Regulatory Authority	31	Caragh Court Residents Association
11	Housing Infrastructure Services Company	32	Fionnula Nevin
12	Paul Doyle	33	Glenveagh Limited
13	Mick O'Toole	34	Paul O'Brien
14	Naas Town Strategy Group	35	Department of Education and Youth
15	C Murray	36	Mark McDaid
16	Ricardo Paco	37	EirGrid
17	Anisha Khazanchi	38	Jennifer Yates
18	Cian McGuire	39	Councillor Bill Clear
19	Robert Power	40	Sophie Bouré
20	Boran Packaging Limited	41	Ray O'Byrne
21	Gavin Barnes	42	Transport Infrastructure Ireland (TII)

Chief Executive's Report on Proposed Variation 5
of the *Kildare County Development Plan 2023 – 2029* (as varied)

Sub. No:	Who from	Sub. No.:	Who from
43	Abbey Bridge and Canal Residents Group	66	Millennium Falcon Holdings Limited
44	Aimee Byrne	67	M. Donovan
45	Caithlin Craig	68	Brian McGrath
46	Millennium Falcon Holdings Limited	69	Paul Monahan
47	Tesco Ireland Limited	70	Councillor Seamie Moore
48	Uisce Éireann	71	Westar Group
49	Millennium Falcon Holdings Limited	72	Amit Gujar
50	Aravonian Limited	73	Birdwatch Ireland Kildare Branch
51	Office of Public Works (OPW)	74	Inland Waterways Association of Ireland
52	Lorraine Benson	75	ALDI Stores (Ireland) Limited
53	John Kavanagh	76	Electricity Supply Board (ESB)
54	Naas Town Team	77	Evra Developments Limited and Millennium Falcon Holdings Limited
55	Nicolò Wojewoda and Isobel Byrne	78	Jacub S
56	Sheelagh Pentony	79	Anthony Egan
57	Padraig Franklin	80	Office of the Planning Regulator
58	Naas Access and Disability Group	81	T. James Kinlough
59	Stephen Cooney	82	Pat Kane
60	Ciara Doyle	83	Kildare Green Party
61	Christine Mahoney	84	National Transport Authority (NTA)
62	Maxine Mclean	85	Robbie Doyle
63	Berenice Galvan	86	Green Project Management
64	Bob Quinn	87	Cllr Ger Dunne
65	Phoebe and Aonghus Dillane		

3 Recommendations and Submissions from the Office of the Planning Regulator and the National Transport Authority (NTA).

This section summarises the recommendations and submissions received from the Office of the Planning Regulator (OPR) and the National Transport Authority (NTA) to Proposed Variation No. 5 of the *Kildare County Development Plan 2023-2029* (as varied). The Chief Executive's response and recommendation is also provided.

The complete submissions are attached at Appendix A of this report.

Submission No. 80 – Office of the Planning Regulator (OPR)

The Recommendations and Submissions from the OPR on Proposed Variation No. 5 are outlined below:

Issues Raised

The OPR acknowledges and welcomes the preparation of the proposed Variation and its consistency with Variation No. 3 to the Development Plan, where it undertook to bring forward the Northwest Quadrant Masterplan into Volume 2 of the Development Plan in response to the NPF Implementation: Housing Growth Requirements (2025), and also its consistency with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area in accordance with section 58 of the Act.

The proposed Variation sets out a clear, detailed and phased development planning framework for the development of the area over the lifetime of the plan. The Office welcomes the focus on housing delivery at scale, sustainable mobility-led growth and the creation of complete neighbourhoods incorporating schools, services, employment and parks, which are embedded in the framework via land use zoning objectives and associated policies NWQ O1.1-O1.8.

In relation to sustainable mobility, the Office also welcomes the sustainable mobility strategy which prioritises walking, cycling and public transport over private car use, namely measures such as a dedicated bus corridor, enhanced pedestrian and cycle permeability, mobility hubs, reduced car dependency and accessibility-led development patterns.

The Office welcomes the green and blue infrastructure framework, which uses the Grand Canal, open spaces, green corridors and watercourses as key structuring elements of the masterplan, supporting climate adaptation, biodiversity, active travel and high-quality placemaking. The Office makes one recommendation regarding flood risk management that requires further consideration prior to the adoption of the proposed Variation.

Flood Risk Management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) in accordance with National Policy Objective (NPO) 1 of the National Planning Framework

First Revision (2025) (NPF) and the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

As part of the SFRA, Plan Making Justification Tests (Justification Test) have been undertaken for undeveloped lands that are proposed to be zoned as New Residential within Flood Zone B, and Light Industry and Warehousing within Flood Zone A. As highly vulnerable and less vulnerable uses, as defined by the *Flood Risk Management Guidelines for Planning Authorities* (2009), and that these lands are at the periphery of Naas, it is considered that they would not pass the Justification Test.

As such the Office considers that the Planning Authority should reassess these lands to ensure lands within Flood Zone A are not zoned for highly vulnerable or less vulnerable uses, and lands within Flood Zone B are not zoned for highly vulnerable uses. Instead, these lands should be avoided or zoned for a water-compatible use to ensure material consistency with NPO 1 and NPO 78 of the NPF and to demonstrate that due account has been taken of the Flood Guidelines. The OPR recommends the following:

Recommendation 1 - Flood risk management

Having regard to flood risk management, and having considered:

- *NPO 1 of the NPF (ensure all plans are subject to relevant environmental assessment requirements, including Strategic Flood Risk Assessment);*
- *NPO 78 of the NPF (avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test);*
- *RPO 7.12 of the RSES (avoid inappropriate land use zonings and development in areas at risk of flooding);*
- *Policy Objective IN033 of the Kildare County Development Plan 2023-2029 (manage flood risk in the county in accordance with the sequential approach and requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) when preparing plans); and*
- *the Flood Guidelines,*

the Office recommends that the Planning Authority:

(i) reassesses New Residential zoning within Flood Zone B and Light Industry and Warehousing within Flood Zone A; and

(ii) if necessary, re-zone lands for an appropriate use in accordance with the Flood Guidelines.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 84 – The National Transport Authority (NTA)

A summary of the issues raised in the submission received from the NTA on Proposed Variation No. 5 are outlined below:

Issues Raised

The submission refers to The Greater Dublin Area Transport Strategy 2022-2042 which provides the long-term strategic planning framework for the integrated development of the transport infrastructure and services in the Greater Dublin Area and County Kildare.

Naas Town Bus Service

The submission confirms that the NTA have identified two potential routes which can provide connectivity through the town, with the potential for a third route to be considered when the Northwest Quadrant (NWQ) lands are developed.

Proposed Bus Transport Routes

- Refers to the proposed bus crossing points at Tandy's Bridge and Mill Lane, including the alternative route outlined in Section 4.4 which has the potential to form part of an expanded town service in the future.
- It states these routes will require the appropriate infrastructure to be in place, including a solution to the crossing of the Canal to enable a bus service to be provided.
- It states that the NTA does not operate town bus services with smaller buses, rather single decker buses regardless of the service frequency.
- It also notes that bus fleets are expected to get larger with the transition to electric vehicles, including the design of larger bus stops to accommodate such vehicles.
- It states it would not be practical to operate different vehicle types across the town network due to operations and maintenance.
- Whilst the NTA supports the general route alignment (crossing the canal), it states it will not be in position to deliver a wider town service if the appropriate infrastructure and specifications are not in place.
- The submission recommends the identification of a route that can accommodate a regular single decker electric bus for the NWQ to be served as part of the Naas Town Bus Service.

Chief Executive Response

The issues raised in the submission from the NTA are noted.

Notwithstanding, KCC's engagement with the NTA during the preparation of the Masterplan, the issue regarding the use of Tandys Bridge as a public transport route remains a significant consideration and is fundamental to the formulation and design response of the framework. Given the heritage value of both the Bridge and the broader receiving environment of the Canal and associated recreation areas, it is evident that the amendments required are of such significance that they would fundamentally alter the

proposal originally placed on public display. Given the potential scale of these required changes, Kildare County Council cannot reasonably undertake the necessary assessments within the statutory timeframe provided for in the relevant legislation. Without a clear and deliverable public transport strategy, the ability to provide appropriate access to lands within the framework area, particularly from the eastern side, would be substantially compromised. This would undermine the wider objectives of the masterplan and could significantly affect the future provision of public transport infrastructure and services. Any revised public transport proposal may have implications for areas outside the lands currently subject to the Variation process, including established residential neighbourhoods.

It is therefore important that any future proposal be subject to an appropriate consultation process. The option presented to the public is no longer considered deliverable and the comparative assessment of alternative options requires further examination. In these circumstances, it is considered prudent to undertake additional analysis and engagement before advancing a revised proposal.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

4 Submissions in respect of the Prescribed Authorities

During the public consultation period 9 submissions were received from prescribed authorities (excluding those referred to under Section 3 of this report) as shown in Table 4.1 below.

Table 4.1: Prescribed Authorities who made Submissions

Sub. No:	Who from
10	Maritime Area Regulatory Authority
25	HSE Environmental Health
29	Office of Public Works (OPW)
35	Department of Education and Youth
37	EirGrid
42	Transport Infrastructure Ireland (TII)
48	Uisce Éireann
51	Office of Public Works (OPW)
76	Electricity Supply Board (ESB)

Submission No. 10 - The Maritime Area Regulatory Authority (MARA)

Issues Raised

MARA note that Kildare County Council is not a designated Coastal Planning Authority and does not include any Maritime Area within its functional boundaries. Accordingly, MARA advised that having considered the nature of *Proposed Variation No. 5: Northwest Quadrant (Naas) of Kildare County Development Plan 2023 – 2029* and its associated content MARA are satisfied that proposed Variation No. 5 will not directly interact with or impact on, the maritime area. On this basis, MARA has no further comments to make regarding proposed Variation No. 5 within the scope of its statutory functions.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 25 – Health Service Executive (Environmental Health)

Issues Raised

Noise and Air Quality

The NEHS notes that the proposed land use strategy does not include sensitive receptor land uses in the area adjacent to the motorway that is subject to greatest noise pollution. The NEHS request that consideration be given to all sensitive receptors (e.g. schools and creches) after construction phase in any planning assessment and EIA and appropriate mitigations included.

The NEHS recommends that construction phase operating times be limited in line with best practice (M-F 08:00-18:00; Sat 09:00-13:00; Sunday no noisy operations).

Dust

The NEHS recommends that dust emissions should be controlled during the construction phase applying the Bergerhoff limit of 350mg/m² per day (DoEHLG, 2004).

Surface and Ground Water Quality

Measures to protect water source quality within the NWQ lands (if there are any) should be implemented.

Pest Control

Suitable pest control measures (e.g. relating to sanitary accommodation) should be implemented at construction phase. The NEHS recommend that the plan set out how the waste hierarchy will be applied to minimise waste across the new community.

Healthy Ireland Framework 2013-2025

The submission supports the overall sustainable mobility strategy to incentivise active travel by filtered permeable street network.

Pedestrian areas should be accessible to wheelchairs, pushchairs and mobility vehicles in order that all ages and all levels of mobility can access the open space and public realm networks.

Food

Commercial development proposals including food provision should be referred to HSE Environmental Health at planning application stage.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 29 – Office of Public Works (OPW) / Flood Management

Issues Raised

Flooding and flood risk management

This submission is made specifically concerning the OPW's remit regarding flooding and flood risk management.

Flood Risk Management (FRM) – General Guidance

The revision of the National Planning Framework (2025) sets out National Policy Objective 78 to

“Promote sustainable development by ensuring flooding and flood risk management informs place-making by:

- Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management;*
- Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.”*

Flood Zone Mapping

The OPW welcomes the use in the Plan of the present day and future scenario mapping produced for Naas Flood Relief Scheme.

Justification Tests

Plan-making justification tests have been supplied for undeveloped lands that are proposed to be zoned as New Residential, within Flood Zone B, and Light Industry and Warehousing, within Flood Zone A (see Fig 5.2 of the SFRA). The Justification Test applies only to the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions) and would not be applicable to the periphery of urban areas. The use of justification tests is not appropriate for these lands as they are at the periphery and not within the centre core of Naas town. As per the Guidelines the sequential approach must be followed and lands at risk of flooding should be avoided and zoned as a water compatible type of development.

Existing Residential

The justification test supplied for Existing Residential at Finlay Park and Caragh Green should limit development to minor development as per Circular PL 2/2014 the revised text to Section 5.28 of the Guidelines.

Bespoke Zoning Types

There is another New Residential zoning type called Cp2* - Phase 2 New Residential with residual mitigatable flood risk and another Light Industry and Warehousing zoning type called H1* - Light Industry and Warehousing with residual mitigatable flood risk.

Lands in the Northwest Quadrant area will not satisfy the Justification Test, as the lands are at the periphery of Naas town (see above).

Safe Ingress and Egress

There is a *Light Industry and Warehousing* building proposed in the masterplan layout (site 191) to the northeast of the Plan area that is surrounded by flood risk. Kildare County Council will need to ensure that through zoning the lands that there is safe ingress and egress.

Consideration of Climate Change Impacts

The OPW welcomes the inclusion of the high-end future scenario mapping (Fig 5.3 of the SFRA) and the highlighting of lands that could be potentially at risk or an increased risk in the future. However, there are a lot of sites highlighted as at risk and considering the large area and that the lands are all mainly greenfield, site by site solutions may not be appropriate and could potentially increase flood risk to other areas if not monitored and the wider area considered. A flood relief scheme is currently underway for Naas town and the OPW requests that Kildare County Council ensure that through zoning lands that a future scheme will not be required. Therefore, Kildare County Council should take a more forward planning approach to addressing climate change impacts to the Northwestern Quadrant and consider avoiding or substituting for a less vulnerable type of development in areas shown to be potentially at risk of flooding in the future.

Surface Water Management Plan

The OPW welcomes the Surface Water Management Plan prepared for the Northwest Quadrant. The strategy sets out a framework for the delivery of SuDS to manage surface water within the Plan Area. The Map provided in Appendix A includes locations for proposed SuDS features.

Kildare County Council may consider including the Guidance Document for Planners, Developers and Developer Agents 'Implementation of Urban Nature-based Solutions' on the list of documents in Section 1.1 Policy and Guidance References.

Bridges and culverts over watercourses

The OPW advise that the relevant statutory consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945 in relation to watercourses

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 35 – Department of Education and Youth

Issues Raised

Primary Schools

The DoEY sees the need to reserve two or three sites for new primary schools in response to the proposed growth strategy for the Northwest Quadrant and acknowledges *Table NWQ15B: NWQ Community Infrastructure / Educational facilities* which identifies three sites for the provision of potential new primary schools. The Department's normal preference would be to expand existing facilities where this is possible in response to a requirement for additional school places resulting from planned population increases.

Post-Primary Schools

The DoEY sees the need to reserve a site for a new post-primary school in response to the proposed growth strategy for the Northwest Quadrant and acknowledges *Table NWQ15B: NWQ Community Infrastructure / Educational facilities* which identifies a site for this purpose.

School Delivery / Phasing

The Department notes section 4.30 *Phasing Strategy* and its provisions for schools.

Special Educational Needs Accommodation

The Department welcomes and notes the support for the provision of a Special Educational Needs School site within the masterplan, following Department request for this provision.

Masterplan School locations

The submission states that schools should be located at the heart of new and expanding sustainable communities, allowing for the maximum benefit to the communities inside and outside school hours. Co-location with other community facilities is highly desirable to provide for complementary benefits. The department notes the proposed location of potential schools in accessible locations and supports the sustainable travel links to them.

Enabling Infrastructure

The Department requests that all off-school site enabling infrastructure required to service a school should be provided in advance of the school development (e.g. street corridors, sustainable transport links, active travel networks, road safety measures and safe routes to schools). The submission states that the Department will not provide or fund this enabling infrastructure as it is not within its remit.

Co-location of schools and community facilities

The Department welcomes Objective NWQ O1.7 Educational and Training Facilities that Kildare County Council will seek to ensure that the educational needs of the Northwest Quadrant are met within the Northwest Quadrant in collaboration with the Department of Education, KWETB and other key stakeholders. Kildare County Council

will explore the feasibility of co-locating school facilities with other community facilities in collaboration with the Department of Education and school communities.

Collaboration with KCC

The Department welcomes continued engagement with KCC regarding the development of new and existing schools and emphasizes the critical importance of land use zoning to secure school sites for school provision. The engagement will respond to the demographic context in relation to planned growth and unforeseen circumstances (e.g. Ukrainian crisis).

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 37 – Eirgrid

Issues Raised

Kildare Meath Grid Upgrade

Eirgrid request that where plan proposals should not impinge on the construction and operation of nationally critical infrastructure, such as the Kildare-Meath (400kV) Interconnector. Eirgrid request that the Variation should specifically identify route corridor, as consented project and support its construction.

Additionally, Eirgrid note in their submission, that the consented Kildare-Meath Grid Upgrade project is described in Variation 5 as an opportunity for co-located utilities. Eirgrid wish to note that this has not been discussed and request that this text be reframed to state that Eirgrid are open to exploring opportunities subject to feasibility and that this text be omitted from the Variation until there is any confirmation of sharing arrangements.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 42 – Transport Infrastructure Ireland (TII)

Issues Raised

Strategic Policy context

TII's observations seek to address the safety, capacity and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy set out in the Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012). TII observations also accord with relevant provisions of national, regional and County level statutory spatial plans including the *EMRA Regional Spatial and Economic Strategy* (RSES) and the National Transport Authority's (NTA) Greater Dublin Area Transport Strategy 2022-2042.

The first revision of the NPF includes National Policy Objective (NPO) no. 107 which seeks to continue to ensure the alignment of the NPF and the NDP through delivery of National Strategic Outcomes (NSO). TII seeks to ensure that these official national objectives are not undermined and that the anticipated benefits of the investment made in the national roads network are not jeopardised.

Development affecting the M7

Having regard to the relative location of the M7 to the proposed variation area, TII reminds that development arising from the proposed variation that may include interactions with the M7 that will require:

- mitigation in accordance with the Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012);
- demonstration of compliance with TII Publications (Standards and Technical) in accordance with requirements under Section 1.3 of Design Manual for Urban Roads and Streets (DMURS) and Government's *NGS Circular No. 2 of 2022*; and may
- require observance of 3rd party MMarC Network Area A Contractor protocols preceded by consultation with TII for potential interaction with the national roads network.

Reference to s28 Guidelines, standards and maintenance arrangement protocols

TII notes that the *Northwest Quadrant (Naas) Framework Masterplan* report and Sustainable Mobility Report recognise the presence and function of the M7 but do not appear to record or directly refer to the national roads network specific Section 28 Guidelines, standards and maintenance arrangements outlined above.

Observations

- TII is identified alongside the NTA in proposed objective NWQ O1.5B Collaboration with key stakeholders to deliver a Northwest Quadrant sustainable mobility network.

- TII also notes proposed objectives NWQ 01.11 and NWQ01.12 and associated Written Statement, Section 8 *Delivery and Funding of Enabling and Supporting Infrastructure* which set out Kildare County Council's intention to "develop a clear Delivery Strategy for the Northwest Quadrant following adoption of the Framework Masterplan."

TII highlights that having regard to budget allocations, that there are currently no national roads schemes proposed in the vicinity of the *Northwest Quadrant (Naas)* area.

Having regard to the presence and function of the M7 in the vicinity of the proposed variation area, TII looks forward to formalised engagement by the County Council in the making of the *Northwest Quadrant (Naas) Delivery Strategy*.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 48 – Uisce Éireann

Issues Raised

Network infrastructure capacity: Phase One

Uisce Éireann is satisfied that the initial phases of Northwest Quadrant development can be accommodated by the existing networks. Uisce Éireann New Connections Team have confirmed capacity for Phase One.

Network infrastructure capacity: Build out

Uisce Eireann confirm that the later phases of the Northwest Quadrant will require network upgrades and reinforcements to the existing water and wastewater networks, which can be delivered on a developer-led basis, subject to detailed design and assessment.

It should be noted that the projected population growth associated with the full implementation of the Framework Masterplan is likely to require extensions to, and/or operational enhancements of, the existing.

- **Water Supply:** Naas forms part of the Greater Dublin Area (GDA) water supply network and is currently assigned an Amber capacity status under Uisce Éireann's Water Supply Capacity Register.
- **Wastewater Treatment:** Naas is served by the Osberstown Wastewater Treatment Plant, which is located in close proximity to the Masterplan lands. There is currently sufficient treatment capacity available to accommodate projected growth. However, it should be noted that the plant also serves a wider

catchment area, including Sallins, Newbridge and Clane. Should treatment capacity constraints arise in the future, connections will be managed in accordance with Uisce Éireann's connection policy and available capacity at that time. Our wastewater treatment capacity registers are published every year on our website.

Appendix 2: Land Use Zoning Matrix / Utility infrastructure

As the delivery of the proposed development will require the provision of new water services infrastructure, it is essential that adequate planning provisions are included to facilitate such infrastructure across all lands, where required, subject to the principles of proper planning and sustainable development.

In this regard, Uisce Éireann requests that the term "Utility Infrastructure" within the Land Use Zoning Matrix explicitly includes water and wastewater infrastructure be either Permitted in Principle or Open for Consideration across all land-use zonings, including Open Space and Amenity lands, to ensure the timely and efficient delivery of essential water services infrastructure.

Support for Infrastructure and Phasing Objectives

Uisce Éireann welcomes the emphasis placed within the Framework Masterplan on infrastructure delivery, co-ordinated planning, stakeholder collaboration and the creation of sustainable communities. In particular, Uisce Éireann supports the following objectives:

- NWQ O1.9 – Development Phasing
- NWQ O1.12 – Collaboration

These objectives appropriately recognise the importance of aligning the delivery of development with the provision of supporting infrastructure and ongoing engagement between relevant stakeholders.

Wayleaves and Diversions: Some strategic sewers traverse the Masterplan Lands that connect the town to the Osberstown Treatment Plant. Wayleaves will need to be maintained to access these pipelines for maintenance purposes, potential future upgrading and/or duplication. Developers can apply for a diversion via the Connection and Developers Services Section at <https://www.water.ie/connections/developer-services/>.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 51 – Office of Public Works (OPW) / Heritage

Issues Raised

Jigginstown House / Castle, Naas

The OPW reminds KCC that Jigginstown Castle is a scheduled monument on the Record of Monuments and Places. The OPW reminds KCC that they are responsible for the care, operation and maintenance of the National Monuments in State care. In undertaking this duty, the principal is to protect, conserve, maintain and present these sites and facilitate appropriate public access where possible. In this regard, the OPW works in partnership with re National Monuments Service at the DHLGH.

The OPW requests the following are taken into consideration in finalising the Framework Masterplan:

- In the context of the building heights strategy for the Northwest Quadrant (set out in the Character Area Guidance) - views of the new quarter from Jigginstown House / Castle and any negative impact on the heritage experience, existing or proposed at Jigginstown House / Castle and its environs. This would include assessment of building heights / architectural quality. The OPW requests that KCC prepare a view management framework for use in the Development Management process including topography and a public viewing point on the roof of Jigginstown Castle.
- The potential for positive synergies between the Northwest Quadrant and Jigginstown House / Castle and related connections of cultural / natural heritage.
- The integration of urban dark sky light pollution control measures to reduce the visual impact of development and reduce the impact on wildlife and biodiversity, in so far as it affects the national monument at Jigginstown House / Castle.
- The potential impact of a prolonged construction stage on the fragile brick structure of Jigginstown House / Castle (e.g. HGV vibrations).
- The potential impact in the operations stage on Jigginstown monument of additional traffic on street corridors (e.g. R445 and South Ring Road) roads arising from new development.

The OPW requests that Kildare County Council engage with the OPW in relation to baseline measurements for traffic and vibration.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

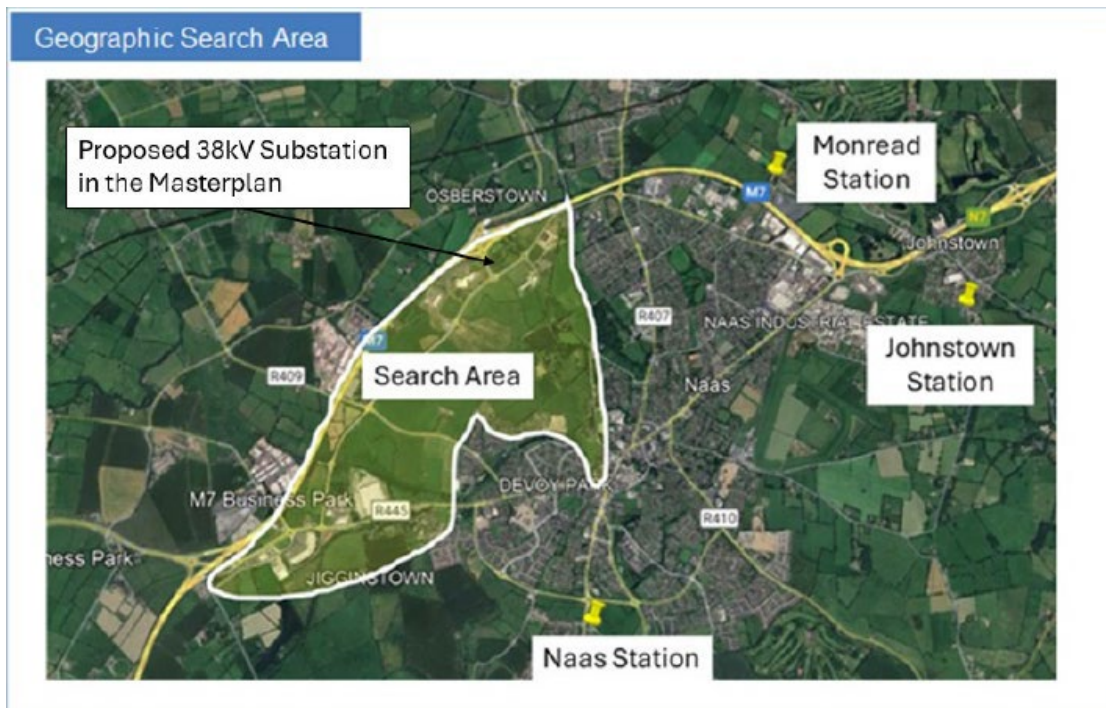
Submission No. 76 – Electricity Supply Board (ESB)

Issues Raised

The submission welcomes the opportunity to make a submission as a landowner with property and infrastructure assets throughout the county, Naas and its hinterland. The issues raised in the submission are as follows:

Energy and Communications Infrastructure

- The submission notes capacity constraints in the area and states that ESB have identified the critical requirement for a new 38kV substation to meet forecasted growth of the NWQ. States this key enabling infrastructure has been integrated into the planned network reinforcement.
- States the identified location for the proposed substation in the Masterplan adjacent the R407/R445 junction has been identified as unsuitable due to flood risk constraints, and states that the ESB are currently reviewing alternative options (see search area map included) with the council and relevant landowners to progress this development.



- Supports objective NWQ 01.2 and the commitment of the council to collaborate with infrastructure and utility providers, whilst emphasising ESB's commitment to future proof the delivery of electrical infrastructure through strong partnerships.
- ESB welcomes the Infrastructure Delivery Plan which supports a robust and transparent approach to development sequencing and ensures that lands identified for growth can be brought forward in a serviced and plan led manner.

- ESB encourages the early engagement of ESB Networks at the earliest stages of design, master planning and phasing stage of key public infrastructure projects which presents opportunities to incorporate ducting and underground cabling in a cost-effective manner whilst avoiding local disruption.
- The submission requests the council to continue collaboration which will be necessary to identify and secure suitable sites for the development of key infrastructure to support additional housing growth targets.
- It welcomes ongoing dialogue to evaluate the implications of delivery of this Masterplan, with particular attention to new residential development and the planning/delivery of electrical infrastructure.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

5 Issues Raised by Themes in Submissions made by other persons

Proposed Variation No.5

Submissions received relating to Variation process.

Submission No. and Name.	Issue
7. Conor Whelan	Evidence-base to Variation Requests that several evidence-based reports be published to accompany the Variation, including: Transport Impact Assessment, Naas Flood Relief Scheme, Water and Wastewater Capacity Assessments, and infrastructure cost and funding assessments.
9. John Murphy	Naas Flood Relief Scheme Requests that the outcome from the Naas Flood Relief Scheme be published in support of the Proposed Variation.
14. Naas Town Strategy Group	Pause in process The submission contends that the adoption of the NWQ Framework is premature until a wider evidence base has been completed, published and scrutinised, and integrated into the land use strategy and its supporting infrastructure delivery plan.
23. Sally J. Byrne	Pause Northwest Quadrant plan-making process to enable supporting documents to be completed It is submitted that KCC should pause the plan-making process to enable the completion of a range of outstanding supporting work packages (highlighted under separate themes).
24. Ger Ui Chongaile	Pause in Variation process The submissions requests that greater detail, certainty and accountability are required before the Variation should be adopted with regard to the range of issues highlighted..
38. Jennifer Yates	Infrastructure: existing deficits and future provision The submission notes that Naas has significant infrastructure deficit challenges, and requests that the Proposed Variation is not supported OR that significant amendments are included that ensure infrastructure delivery precedes residential expansion to ensure that the quality of life for existing Naas residents is not diminished by the proposed urban extension.

82 Pat Kane	Framework Masterplan: Evidence base and adoption - The submission questions whether sufficient evidence is available to justify the incorporation of the Masterplan Framework as the principal long term growth strategy for Naas. - It further questions if sufficient evidence is available to deliver the statutory, financial and implementation mechanisms of the Masterplan vision. The submission concludes that the evidence base supporting the Masterplan Framework needs to be more robust and strengthened before incorporation into the CDP and states that the elected members should be satisfied that the planning model, transport strategy, delivery pathway and the enabling infrastructure have all been demonstrated through clear, transparent and an evidence-based process.
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Chief Executive Response

- This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

- This issue will be considered in the preparation of the revised variation.

Chapter 1: NWQ Vision

Issues Raised

Submissions received relating to Vision for Northwest Quadrant.

Submission No. and Name.	Issue
14. Naas Town Strategy Group	Compelling NWQ vision The Naas Town Strategy Group support the development of the Northwest Quadrant in principle and consider that the Framework Masterplan contains a compelling vision but that there are several additional items required to underpin the vision for this very significant urban extension before Kildare County Council should adopt the Framework Masterplan into the statutory planning framework.
26. Minister James Lawless TD	Vison for Northwest Quadrant This proposal represents a significant opportunity to deliver well-planned and sustainable growth for Naas and County Kildare. The scale and ambition of the masterplan are welcomed, particularly the integrated approach to housing, employment,

	transport, community facilities, green infrastructure, and public services. As well as the commitment to the provision of enabling and supporting infrastructure to meet the needs of the development and to ensure that existing infrastructure is not placed under undue pressure as the area grows.
55 Nicolu Wojewoda and Isobel Byrne	The submission supports the overall vision for the Northwest Quadrant and requests that a number of issues are given further consideration in finalising the Framework Masterplan, and to ensure that the ambition is converted into material binding commitments / targets to ensure that delivery matches the project objectives (set out below under specific issues).
065 Bob Quinn	NWQ Vision Refers to the previous vision contained in the 2007 NWQ Masterplan and notes that much of the language remains the same. Whilst major emphasis was placed on a new public transport corridor linking to the town centre, circulation improvements and integration measures for the town centre, none of these have been delivered to make the vision a reality.
67 M. Donovan	Low Carbon District / Data Centre conflict Whilst the Masterplan seeks to create a low carbon district through the reduction of car use, it suggests that the council should reflect on the carbon emissions created from the proposed data centre adjacent the NWQ.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 2: The Framework Masterplan

Submissions received relating to the Framework Masterplan not captured by other sections.

Issues Raised

Submission No. and Name.	Issue
18. Cian McGuire	Good urban design and planning principles The submission is generally supportive of the proposed amendment to the CDP, and its evidence-based analysis regarding urban design and planning principles.
70. Cllr Seamie Moore	Integration of Northwest Quadrant with Naas - The submission states the proposed Masterplan is weak in its approach and preparation to link the Northwest Quadrant with community and town of Naas. - Requests that all elected members are brought on a one-day tour/site visit of similar urban extension (Adamstown/ Clonburris) to understand their connection with surrounding areas and the level of infrastructure or community facilities required before approving this significant growth.

Chief Executive Response

- These issues will be considered in the preparation of the revised variation.

Chief Executive Recommendation

- These issues will be considered in the preparation of the revised variation.

Chapter 3: Land Use Strategy

Submissions received relating to Northwest Quadrant Land Use Strategy.

Issues Raised

Submission No. and Name.	Issue
14 Naas Town Strategy Group	Naas Town Centre First Approach The Framework documents have not demonstrated that the NWQ development will strengthen the town centre rather than undermine it. The submission expresses concern that Naas Town Centre is in decline and has lost its vitality, and that there

	is a significant suburban retail offer that undermines the town centre. <i>A Town Centre First approach is essential.</i> <i>See wider comments made in submission on limitations to vehicular access to the town centre under “Sustainable Mobility Strategy”.</i> Proposed Town Centre First Integration and Connectivity objectives: two objectives are proposed to address concern around the development of the urban centres in the Quadrant and how they might compete with the town centre, as well as the ability of the Northwest Quadrant to integrate with Naas town centre in terms of movement and access.
15 C Murray	NWQ Business developments The submission supports the proposed mix of non-residential employment uses in the Northwest Quadrant in principle. However, it would also like to see an emphasis on commercial development opportunities for small businesses and that consideration be given to tax reliefs to incentivise set-up investment. Commercial uses to include health services (medical / dental) with pharmacies, mini supermarkets / convenience stores, restaurants / creches, etc. Case Studies The submission recommends that KCC consider the Singapore model for urban planning.
47. Tesco Ireland Limited	Tesco Ireland Limited request that consideration be given to amending the Framework Plan to provide greater flexibility regarding retail floorspace within the Local Centres, subject to the Sequential Approach and the Retail Planning Guidelines. The following specific amendments are requested: • Reviewing the 200 sq.m net retail cap within the Local Centres (a Footnote to the Land Use Zoning Matrix) to allow for the delivery of a viable local/neighbourhood supermarket of an appropriate scale, subject to the Sequential Approach and retail impact assessment where required; and • Advancing the delivery of a neighbourhood centre along New Caragh Road to ensure that retail infrastructure keeps pace with population growth and provides an appropriate and balanced distribution of convenience retail across the Northwest Quadrant and the town of Naas. • Amending the proposed phasing strategy to allow for the New Caragh Road (neighbourhood) centre to be delivered under phase 1. The submission recognises the intention of provisions to maintain an appropriate retail hierarchy, the restriction of 200

	sq.m net retail floorspace per unit is considered to be overly restrictive. In practical terms, this floorspace is “insufficient to accommodate even a modest local shop/neighbourhood supermarket” capable of providing a meaningful range of convenience goods. Units of this size are generally limited to “small confectionary shops or specialist outlets and cannot function as a convenience store capable of serving the needs of a growing residential neighbourhood, even for a basket shop.” Consequently, the current restriction significantly limits the ability of the Local Centres to evolve into genuine neighbourhood destinations and risks increasing reliance on private car trips to existing supermarkets elsewhere in Naas and further afield. Tesco Ireland Limited consider that the 200sqm cap is counterproductive in that it would only provide for small local convenience stores to meet local need and wouldn't provide for the needs of the Northwest Quadrant. The reclassification of the New Caragh Road centre as a Neighbourhood Centre (rather than a Local Centre) would enable the delivery of an appropriately sized supermarket at the New Caragh Road location that would also reduce the need for residents to travel across the town for day-to-day shopping, provide a good distribution of supermarkets across Naas, and thereby promote sustainable travel patterns, reducing unnecessary vehicle trips and ensuring that retail infrastructure is delivered in tandem with the significant residential and employment growth envisaged for the Northwest Quadrant. Provision of the New Caragh Road centre as part of Phase 1 would support a balanced distribution of centres for planning reasons and reinforce the sequential approach by directing appropriately scaled retail development to a location closer to the existing town centre.
52. Lorraine Benson	The submission is supportive of other submissions that seek for the alignment of supporting services and amenities for the Northwest Quadrant (e.g. sustainable transport, education, sport, green space, and community centres). High voltage Kildare-Meath Interconnector The co-location of land uses that would utilise this high voltage network, such as data centres, should not be allowed within the Northwest Quadrant, which will be a predominantly residential urban extension. Other uses incompatible with residential use should not be permissible (e.g. fossil fuel energy intensive, water use intensive or noise and odour emitting facilities).

55. Nicolu Wojewoda and Isobel Byrne	Economic strategy: What kind of economy? The submission notes the jobs target for the Northwest Quadrant of 5000 jobs is useful but that there is no shape on the kinds of jobs that will be created and whether low employment uses (such as data centres and logistics) will be considered positively. The submission requests that the Variation: • Positively prioritise SMEs, cooperatives, social enterprise, the circular economy and the care and creative sectors, and require affordable and flexible workspace to make room for them. • Explicitly identify data centres and large standalone logistics/warehousing as inappropriate uses here, given their high land and energy demand and low employment density.
64. Bob Quinn	Impact of Northwest Quadrant on the Naas Town Centre • States the Northwest Quadrant (NWQ) should not be leapfrogging the existing deficits and infrastructure constraints that exist, where these should be made the starting point rather than afterthought (congestion, public transport, public realm, town centre vitality, school capacity, healthcare access and walkable infrastructure which everyday issues for the existing community). • Refers to the Office of the Planning Regulator's (OPR) submission to the Draft Naas Local Area Plan 2021-2027 which identified the core challenge and issue facing Naas which was the development pattern (peripheral arc) being shaped by the M7 Motorway leading to a detachment from the town centre. • States the Masterplan still raises the same concern which will ultimately pull Naas outwards towards the M7 rather than integrate and strengthen the historic town centre. • Requests that the council undertake a proper town centre and community impact assessment to understand how the NWQ will support the town centre without creating a competing edge district, whilst demonstrating how the future population and workforce will access the necessary local services and social infrastructure without a reliance on the private car.
70. Councillor Seamie Moore	• States that a cultural heritage centre should be established in the Leinster Mills (Former Odlum's) to showcase merits of the industrial and social history of the Grand Canal and its many heritage features/assets in the immediate area from buildings to bridges and blue infrastructure.

74. Inland Waterways Association of Ireland	Use of the Grand Canal and canal corridor • The submission welcome's the Northwest Quadrant (NWQ) Masterplan and the physical, social and economic potential of the canal to future visitors and residents. • Recommends that the moorings at Naas Harbour are recognised for tourism and leisure development (similar to Leinster Mills) which was previously identified in the vision for the Naas Canal Quarter Masterplan. • States the Naas Harbour has the potential to offer a range of wonderful experiences to tourists and residents, whilst becoming the focal point on which people travel along the Grand Canal Greenway, Naas-Sallins Greenway, The Corbally Canal and Liffey Valley Corridor and the Barrow Blueway. • States the inclusion of vital facilitates for visiting boats, liveaboards and all users of Naas Harbour must be considered as essential for the NWQ Masterplan and its potential to animate the waterfront. • States the success/failure of returning the Naas Harbour to a vibrant destination will depend on the council's vision to expand the Naas Canal line towards the Corbally Canal and Harbour by developing a bridge over the R445 (Newbridge Road) to reinstate previous passage. • States the IWA celebrate the industrial history of the canals and would encourage placemaking to root the NWQ to such heritage features. • Refers to examples of waterside communities in Holland that have animated navigations by drawing tourists and residents looking for connections to natural and biodiverse features. • States that the Naas and Corbally Canals/Harbours are manmade leisure and recreational assets that can meet the need of all age groups and a wide range of activities. • The submission requests that the following waterside aspects of the canal system are developed in tandem with the NWQ, ensuring recreational and liveaboard boaters have direct access in Naas Harbour to the following: ➤ Water taps ➤ Pump-out for waste tanks of boats ➤ Service block in the harbour for visitors and residents, including service to all potential waterway activities. ➤ Jetties which can facilitate visitors and support water-based activities, including the objectives of the Kildare Sports Partnership and its water activity hub. • To sufficiently cater the liveaboard communities, there must be a wide section on the canal for turning which is only available at Jigginstown culvert.
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	• Supports the idea of increasing the size of the proposed recreational park at KLeisure which could facilitate a bridge in later years, providing safe access to boaters, cyclists and walkers along the Corbally Canal and future greenway. • The inclusion of jetties/moorings and berths at the harbour has the potential to support short stay tourism with direct links between Shannon, Dublin and the southeast. • Notes that boating communities are low-carbon communities with no demand on the electrical grid compared to conventional housing. The submission believes there is a lack of serviced harbours for recreation and liveaboard uses on the canal system and states the NWQ provides an excellent opportunity to show off the Naas Harbour along with essential services and amenities being delivered for the NWQ.
79. Anthony Egan	Naas Town Centre • The submission objects to the proposed Masterplan as it risks drawing movement, trade and services away from Naas Town Centre, whilst adding extra pressure on the town before necessary infrastructure is delivered. • States the council must demonstrate how the existing retail core area in the town will be rejuvenated and protected prior to the development of another peripheral district. Including a more comprehensive assessment of how the NWQ will impact the town centre which is absent.
083 Kildare Green Party	Land Use Strategy – Data Centre Development • The submission supports the delivery of housing with the condition that no data centre development is permitted within the Northwest Quadrant (NWQ). Adjacent land uses – Data Centres • It notes the potential for two hyperscale data centres to be built adjacent the NWQ lands which could have a negative impact on the surrounding landscape with windowless warehouses and high/heavy fencing. • Refers to a submission from Belmont Data Centres in 2021 to the Draft Naas Local Area Plan 2021-2027 which outlined inflated figures in relation to employment growth as a result of data centre development. It notes concern that this submission from Belmont devoted considerable space to the economic benefits of data centres while making no substantive engagement with the energy realities. • States the Morrell River or any other water body in the region cannot afford to be strained by the resources required

	for data centre development due to domestic water shortages. • It states that Kildare's wetland habitats, bog systems and spring-fed fens are currently under pressure where large-scale industrial water abstraction can result in a compounding threat. • Refers to the Pollardstown Fen (SAC) which is currently closed to the public and is under threat from water extraction from the Curragh aquifer which illustrates the importance of prioritising clean water supply for our ecosystems and our health. Land Use Strategy • The submission strongly opposes the potential development of data centres within the NWQ which has the potential to outpace Ireland's energy capacity and hinder the construction of much needed housing. • States the NWQ should be a vibrant and aesthetically pleasing district, in contrast to bleak overbearing warehousing which poses the question of what will happen to these facilities if the Artificial Intelligence (AI) bubble busts. • Refers to employment projections outlined for the industrial sector (Table NQW6), and states these are not realistic if the projections relate to data centre development. Asserts these uses only produce short term employment and are not labour intensive once operational. • It states that a data centre in the NWQ would increase pressure on the existing grid capacity requiring additional generating infrastructure within its own environmental footprint. • Refers to the submission made by Eirgrid in respect of the Kildare-Meath Grid Upgrade Project which is located in the NWQ. The submission notes the consultant's report which describes the project as an opportunity for co-location of utilities in the area, a recommendation which is not shared/consented by the utility service at this time. • States climate action and carbon emission targets would be at risk if an energy intensive data centre was to be located within the NWQ. Tourism attraction • The submission requests that the following issues be included in the Framework Masterplan: • Making the area a tourist attraction for hotel business
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Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 4: Housing

Issues Raised

Submissions relating to Housing.

Submission No. and Name.	Issue
001 Precious Indelwa Phiri	Social and affordable housing The tenure mix should include social and affordable housing to meet the needs of individuals and families across County Kildare.
03 Joseph Bergin	Social and affordable housing breakdown – The social and affordable housing targets and strategy to meet housing need is not included and this should be clearly set out as it is a key component of housing supply.
031, 56 and 57/ Caragh Court Residents Association	Social and affordable housing breakdown – The social and affordable housing targets and strategy to meet housing need is not included and this should be clearly set out as it is a key component of housing supply.
079 Anthony Egan	Housing States the Masterplan lacks clear detail in respect of the provision of Part V housing, cost rental and the broader housing mix which is a glaring omission.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 5: Built Heritage, Archaeology and Visual Environment

Issues Raised

Submissions received relating to Built Heritage, Archaeology and Visual Environment:

Submission No. and Name.	Issue
3. Community Campaigner David Barton	Submission contains an attachment and the issues raised in the submission are as follows: • The submitter outlines his role as a community campaigner promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA) / Traditional Architecture as a key feature across UK-wide local authorities. States that the submission is considered to be consultation feedback who hopes that it represents an 'umbrella representation' for various merits outlined including Placemaking and Greenery Proposals. • Asserts that Traditional Architecture Design Codes should be a central component across this consultation and its various chapters and sections especially concerning new construction. Further asserts it performs strongly on economic, ecological and environmental grounds as can be attested to by academic studies and figures that corroborate this. • Submission outlines the background of the submitter including successful campaigns in the UK to promote and protect historic buildings. • States that the submission provides 32 Appendices. It is noted that these have not been included with the submission. However, hyperlinks to websites have been provided for the majority. • Submission calls for the establishment of design codes based on TVA principles and that local authorities should partner with key stakeholder organisations. Outlines a range of suggestions about to policy in this regard, including the non-demolition of pre-1950s buildings. • Regarding conservation areas, the submission outlines the need for enhanced conservation efforts in designated areas. Outlines a range of suggested actions including a streamlined process for listed building consent, the preservation of historic street furniture and financial incentives for maintaining/restoring buildings. • Highlights the role of historic buildings in combatting climate change and suggests a range of actions, including a focus on increasing the stock of carbon-rich old buildings,

	retrofitting historic buildings and financial incentives for the demolition of carbon poor contemporary buildings. • Outlines actions that could be taken on historic buildings including the creation of a Designated and a Non-Designated Heritage Asset List and a scheme to rebuild long lost buildings. • Suggests a range of actions that can be taken to promote traditional value architecture. • Regarding to the planning system, the submission emphasises the need to identify applicants which have a history of harming civic heritage and states that this should be a consideration in the granting of permission. Requests Local Authorities to collaborate with the community and heritage bodies to give these people a voice. Submission concludes by identifying a range of miscellaneous issues which are aimed at supporting the historic built environment. These include support for well-designed car parking, the utilisation of specialist skills and the creation of a Top 10 Buildings at Risk Register.
70. Cllr Seamie Moore	Cultural Heritage • States that a cultural heritage centre should be established in the Leinster Mills (Former Odlum's) to showcase merits of the industrial and social history of the Grand Canal and its many heritage features/assets in the immediate area from buildings to bridges and blue infrastructure. • Refers to the little cottage at Tandy's Bridge at the entrance of the Knocks which has deep routed history, and states this should be restored and utilised as potential trail head for the Naas Sallins Greenway and Oldtown Woods.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 5A: Green & Blue Infrastructure and Biodiversity

Submission No. and Name.	Issue
21. Christine Finn	Green areas Existing green areas should be kept intact in the development of the NWQ.
39. Councillor Bill Clear	Grand Canal Corridor protection New development should preserve the character of the canal corridor, biodiversity, and provide green buffer behind existing canal-side homes.
43 Abbey Bridge and Canal Residents Group	Abbey Bridge area Biodiversity: the streams adjacent to Abbey Bridge have a significant eel population. The area west of existing homes should be considered for a green environmental corridor / wildlife sanctuary. Canalside amenity and special character: the area has a unique environment. This should be respected in any development of the Northwest Quadrant, including preservation and protection of Abbey Bridge and the Grand Canal
53. John Kavanagh	Corbally Canal The submission outlines the huge opportunity that the Corbally Canal presents to Naas and the Northwest Quadrant. The canal corridor presents an amenity corridor for walking, running, and more, as far as the Corbally Harbour. A bridge at the Newbridge Road would enhance this offer.
55. Nicolu Wojewoda and Isobel Byrne	Nature and biodiversity The submission requests that the following measurable targets are included in the Variation, in addition to the general commitments on GBI corridors, SuDS and biodiversity net gain: • Set a defined minimum biodiversity net gain measured on a recognised metric, with baseline survey, monitoring and reporting. • Adopt a tree-canopy-cover target, require retention of existing hedgerows and mature trees, and protect and enhance the Grand Canal corridor as the spine of the green network.
65. Phoebe & Aonghus Dillane	Framework Masterplan - Green and Blue Infrastructure • Submission notes to the proposed residential zoned lands adjacent the canal between lock No.4 and lock no.5 and refers to the 100-metre set back previously identified in the

	local area plan and the county development plan to preserve the riparian corridors. • States the proposed Masterplan contradicts this extended variable buffer of 80 to 100 metres from the high-water line in order to segregate housing and development. • Recommends that these wildlife corridors need to remain uninterrupted to safeguard protected species and protect landscape value of the Grand Canal. • Notes the presence of bats, hedgehogs, dormice and frogs in the area, along with the presence of wetlands and large trees at The Knocks which need to be safeguarded and made a mandatory requirement in adherence to local planning policy.
068 Brian McGrath	Framework Masterplan - Canal Buffer Requests that a green buffer (set back) is identified along the canal to replicate lands to the southeast in Oldtown and Oldtown Demesne. States that no development or the delivery of overground electrical infrastructure should take place within this green buffer, supported by the necessary zoning amendments where required.
073 Birdwatch Ireland Kildare Branch	This submission is prepared by Neil J Bourke on behalf of Birdwatch Ireland Kildare Branch and the issues raised in the submission are as follows: Osberstown Attenuation Pond • The submission relates specifically to the attenuation pond (see map excerpt below) and lands surrounding it between the M7 Motorway and the R445 (Millenium Park), where recording and observations have been undertaken at the site for up to 10 years, namely Birdtrack and the National Biodiversity Data Centre. 

	• States there are currently five waterbirds breeding successfully at the site, namely: little grebe, moorhen, coot, mute swan, mallard and is also used by a variety of gulls. • States the site is used by the redshank staging post in spring migration and is a very important wintering area for the common snipe (35 recorded), including the woodcock in winter. • States the site has monitored a total of 69 species from 1277 records, from 46 complete lists made over 10 years and includes a full list of the birds observed. • It further states that otter and freshwater crayfish have been observed at the site. • States the site has a variety of small ecosystems, ranging from dry to wet, rushes, grasses, and a wide variety of wildflowers that include orchids, pyramidal orchid, spotted orchid and the broad leaved hellborine (<i>Epipactis helleborine</i>) which has 240 records on the National Biodiversity Data Centre Site. • States that the rare Blue Fleabane plant (<i>Erigeron acris</i>) can be found at the site which is also listed on the 'rare plant' monitoring list in Ireland. • Notes there were only 10 populations of the Blue Fleabane recorded in Ireland in 2024 for the 'rare planting monitoring scheme'. This population has recorded a strong increase in the number of plants from 2024 – 2025. • The submission requests that this precious biodiversity area will be given the due care and attention it deserves when considering future development that may impact on the diverse wildlife flourishing in this undisturbed attenuation pond.
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Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 6: Urban Density Strategy

Issues Raised

Submissions received relating to Urban Density Strategy

Submission No. and Name.	Issue
15. C Murray	Residential density The submission suggests that the Northwest Quadrant be developed to higher densities with apartments house types suited to its location within the Greater Dublin Area, rather than terraced / semi-detached housing.
18. Cian McGuire	Urban densities The submission proposes that greater densities should be permitted, where possible, and particularly around the neighbourhood centres and at Naas Harbour to extend Naas Town Centre. If better public transport were provided this would also justify increased densities.
67. M Donovan	Urban Density Strategy The submission notes the canal boundary for the NWQ and states that high rise buildings should not be permitted along the canal to respect its natural landscape.
83. Kildare Green Party	Urban density - Increasing urban density to ensure people are in homes close to everyday services that have capacity and where people can move unencumbered without traffic disruption. - Urban density that leads to biodiversity gain through compact residential units with larger spaces for biodiversity and woodlands around each cluster

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 7: Sustainable Mobility Strategy

Issues Raised

Submissions received relating to Sustainable Mobility Strategy:

Submission No. and Name.	Issue
1 Precious lindelwa Phiri	Sustainable mobility Priority should be given to sustainable mobility infrastructure for walking, cycling and public transport.
3 Joseph Bergin (same as Caragh Court Residents Association)	Public transport – The NWQ is dependent on a bus-based transport corridor that does not benefit from any level of commitment from the NTA. Without this the sustainable mobility strategy is at risk and could mean the NWQ could become a standard car-borne development. Detailed Traffic Modelling – A transport / traffic impact assessment is required as an evidence base to support the proposed development strategy.
5. Scott Walsh	Transport links deficit Naas suffers from a significant deficit in transport links around the town. The proposed NWQ Framework Masterplan and urban extension development will not address existing deficits in the town and will compound the existing infrastructure deficit problem that exists in the town. Building homes without the necessary supporting infrastructure will not be acceptable.
6. Niall Bolger	Sustainable Mobility Strategy: Future rail connection from Naas Town Centre It is submitted that Kildare County Council should consider (in consultation with NTA, Irish Rail and Department of Transport) safeguarding lands within the Northwest Quadrant for a future rail-based public transport corridor between Naas Town Centre and the Dublin-Cork rail line to enable the option for the provision of a future rail line that could form part of the DART rail system on the grounds that: • Journeys involving transport interchange to the train service in Sallins (e.g. bus-to-rail) are inherently less attractive to customers and less likely to result in modal shift due to time / convenience costs. • Protecting this option would be consistent with national and regional planning objectives for compact growth, climate action; and a range of other policy. It is acknowledged that

	such a proposal does not form part of the All-Island Strategic Rail Review. • Support the long-term objective of expanding high-capacity public transport to growing settlements within the Greater Dublin Area (transport-oriented development). Naas is one of the largest towns in Ireland without a central train station.
7. Conor Whelan	The following were required by the Naas Local Area Plan Objective NWQ 1.1 and should be published: • Transport Impact Assessment
8. Robert Fadden	Future rail connection to National Rail Network from Naas Town Centre It is submitted that Kildare County Council should consider (in consultation with NTA, Irish Rail and Department of Transport) safeguarding lands within the Northwest Quadrant for a future rail-based public transport corridor between Naas Town Centre and the Dublin-Cork rail line to enable the option for the provision of a future rail line that could form part of the DART rail system on the grounds that: • Journeys involving transport interchange to the train service in Sallins (e.g. bus-to-rail) are inherently less attractive to customers and less likely to result in modal shift due to time / convenience costs. • Protecting this option would be consistent with national and regional planning objectives for compact growth, climate action; and a range of other policy. It is acknowledged that such a proposal does not form part of the All-Island Strategic Rail Review. • Support the long-term objective of expanding high-capacity public transport to growing settlements within the Greater Dublin Area (transport-oriented development). Naas is one of the largest towns in Ireland without a central train station.
14 Naas Town Strategy Group	Transport Impact Assessment The Framework documents have not demonstrated that the proposed movement strategy works or is realistic by means of a Transport Impact Assessment. should be carried out prior to adoption of the Framework, as it has the potential to materially influence development capacity, movement strategy, infrastructure requirements and phasing and parking standards – and thus material impact the Framework in a substantive way. These are core Framework assumptions rather than implementation details and should therefore be

	tested before they are embedded within planning policy. Objective NWQ 1.1. part C states that the masterplan will include a transport impact assessment. The submission proposes that the scale of the urban extension is sufficient to warrant an Area-Based Transport Assessment. This would enable the key question to be answered = How will the entire town of Naas function as a transport system as it develops over the coming decades? Objectives relating to Transport Impact Assessment, Movement Strategy & Public Transport Four linked transport objectives (with draft wording) are proposed. • Transport Impact assessment should be completed. • The preferred public transport route should be identified. • The Public transport corridor should be safeguarded • The wider implications of the Northwest Quadrant and other strategic transport projects should be assessed through an Area-Based Transport Assessment for Naas as part of the next Settlement Plan process.
14. Naas Town Strategy Group	Vehicular access to Naas Town Centre The Framework documents have not demonstrated that the NWQ development will strengthen the town centre rather than undermine it. The submission expresses concern that Naas Town Centre is in decline and has lost its vitality, and that there is a significant suburban retail offer that undermines the town centre. A Town Centre First approach is essential. The way the Northwest Quadrant is connected to the existing town therefore matters greatly. If successful, it has the potential to strengthen the town centre by increasing footfall, supporting local businesses and reinforcing the role of the town centre as the primary focus for retail, services, employment and community activity. If unsuccessful, there is a risk that existing trends towards peripheral and out-of-town destinations could be reinforced. The submission is concerned that the sustainable mobility strategy doesn't allow vehicular traffic direct access to the town centre, which will undermine the economic basis and role of the town centre. The submission identifies that all car trips are routed to the peripheral road network (Millennium Park Road / New Caragh Road), which means that the NWQ could function as a substantial self-contained new urban district entirely disconnected from the town centre from a movement and urban centre and retail spend perspective. The Transport Impact Assessment would be a key way to provide the evidence base for the Northwest Quadrant

	underpinning the town centre, and its movement strategy and how this will influence shopping patterns, service usage, employment trips or town centre activity. Proposed Town Centre First Integration and Connectivity objectives: two objectives are proposed to address concern around the development of the urban centres in the Quadrant and how they might compete with the town centre, as well as the ability of the Northwest Quadrant to integrate with Naas town centre in terms of movement and access.
15. C Murray	Public Parking for public places Parking to serve public space / parks and sports areas should not be surface parking but should be provided within reasonably priced multi-storey car parks that generate revenue for the Council and be well-connected through sustainable mobility networks to avoid the need for people to drive to them.
16. Ricardo Paco	Transport and Traffic Infrastructure The submission requests that KCC demonstrate the traffic impact on the street and road network and identify the measures that could be deployed to manage traffic.
17. Anisha Khazanchi	Road network – the main routes (like N9/N7) are already congested and the NWQ will lead increased congestion and slower commutes. The roads can't be widened quickly. Parking – Town Centre car parking is finite and there will be increased pressure for the use of those spaces. The same principle applies to existing residential streets.
18. Cian McGuire	Public Transport: Naas Town Centre Train Station It is submitted that KCC should push for an extension to the DART+ from Sallins to a Naas Town Centre Terminus to provide for the needs of the current Naas residents and the Northwest Quadrant.
19. Robert Power	Public Transport: Naas Town Centre Train Station The submission asserts that a Naas Town Centre train station should be provided at Abbey Bridge (with a spur from the mainline crossing the Northwest Quadrant) on the grounds that Naas will be one of the largest towns in Ireland without a central train station to provide a high-quality public transport option to cause a real modal shift away from car usage. The train station is also considered to be a “once in a lifetime” opportunity and necessary to reduce congestion in the town centre. Active Travel

	Measures should be found to make the cycle network better and encourage a reduction in car usage. The bridges over the Grand Canal should be prioritised as they are urgently needed. The submission suggests that one option for this would be the introduction of a one-way system into the town (presumably to provide more space for non-vehicular movement).
21. Gavin Barnes	Sports-related car parking provision The submission objects to the proposed maximum car parking standard of 10 car parking spaces per pitch (Table NWQ13) on the grounds that Naas AFC has a wide catchment and people generally drive to deliver children and kit to their sports ground. The submission suggests that there will be overspill from sports parking areas if the standard isn't adjusted. It is requested that consideration be given to adjusting the maximum car parking standards to allow additional car parking provision.
22. Christine Finn	Traffic and Transport Links Improved transport connections to a range of places need to be provided from Naas to ensure that the development is sustainable, including: Citywest, Parkwest, Clondalkin, Lucan, Maynooth and the City Centre. This could include improved train services, improved buses to Sallins-Naas Train Station, improved bus network; a link to the LUAS with a Park and Ride, extension of the LUAS to Naas, extension of train line to Naas with a park and ride.
23 Sally J. Byrne	A Transport Impact Assessment to demonstrate that the receiving environment can accommodate the proposed development, including public transport otherwise many more trips than envisaged would be made by car. Greater clarity on the proposed public transport strategy / route / bridge requirements is required, including who will fund it and when it will be delivered.
24. Ger Ui Chongaile	Traffic and Transport Traffic and transport certainty regarding the capacity of the street and road network in Naas, as well as reliance on public transport services that currently don't exist or have any level of commitment. This is particularly in the context of peak traffic to schools in and around the Sallins Road and town centre areas.
26. Minister James Lawless TD	Sustainable Mobility Strategy / Second Train Station The submission supports the ambition for the Northwest Quadrant and its focus on sustainable mobility and the provision

	of safe and attractive walking / cycling routes within the Quadrant. The submission strongly encourages Kildare County Council to work with national transport agencies to explore the potential for a second train station west of Sallins to serve the Naas-Sallins area as the population grows. Should a second station site be identified then this would require protecting and planning. While the existing Sallins and Naas Railway Station provides a valuable service, the scale of future growth envisaged within the Northwest Quadrant, combined with the continued expansion of Naas and surrounding settlements, will place increasing demands on transport infrastructure. A second rail station would represent a strategic investment in the long-term future of the area. It would provide improved access to public transport for thousands of current and future residents, encourage a shift away from private car use, reduce traffic congestion on local and regional road networks, and support national climate and sustainability objectives. It would also strengthen connectivity between Naas, Dublin, and other regional centres, enhancing the attractiveness of the area as a place to live and work.
27. Diarmuid Parker	Transport Capacity deficit The submission identifies that the Framework Masterplan has a Sustainable Mobility Strategy that has a reliance on the <i>Naas-Sallins Transport Strategy 2020 (NSTS 2020)</i>, which is outdated. The impact of the proposed Northwest Quadrant on the traffic and transport network requires assessment over and above that previously assessed in the NSTS 2020. Future Public transport The submission suggests that the NWQ Framework and its Sustainable Mobility Strategy is reliant on the Sallins-Naas Train Station and a non-existent bus-based service. It is proposed that the strategy be augmented by either: • A second station to the west of Sallins (park and ride); or • Extension of the DART to Sallins (with associated electrification / quad track).
30. Mike Baker	Landen Park Bridge The submission objects to the proposed Landen Park Bridge as it would provide direct access from the main enclosed green space in Landen Park (for the benefit of Landen Park) to the canal. This is considered to be undesirable on the following grounds:

	The bridge would lead to the green space within Landen Park being connected to the canal; The connection to the canal would mean that the estate / green space would not be self-contained. This could lead to risks for children / people resident in Landen Park relating to water safety, antisocial behaviour and perceived safety.
31. Caragh Court Residents Association	Public transport – The NWQ is dependent on a bus-based transport corridor that does not benefit from any level of commitment from the NTA. Without this the sustainable mobility strategy is at risk and could mean the NWQ could become a standard car-borne development. Detailed Traffic Modelling – A transport / traffic impact assessment is required as an evidence base to support the proposed development strategy.
32. Fionnula Nevin	Landen Park Bridge The submission objects to the proposed bridge as it would provide direct access from the main green space in Landen Park to the canal. This is considered to be undesirable on the following grounds: - The bridge would lead to the green space within Landen Park being connected to the canal; - The connection to the canal would mean that the estate / green space would not be self-contained. This could lead to risks for children / people resident in Landen Park relating to water safety, increased footfall, speed of cycles / escooters, and antisocial behaviour. - The submission considers that a more suitable location for a bridge across the canal would be from the DeBurghs estate and Millenium Park as these areas already provide public access. The submission acknowledges that the bridge is already an adopted objective in the Naas Local Area Plan.
34 Paul O'Brien	Public Transport and sustainable connectivity: Improving connectivity between Sallins Railway Station and Naas through enhanced public transport, including the examination of a dedicated bus-only route or bus priority corridor.
38. Jennifer Yates	Public transport: Significant improvements to public transport capacity are committed and delivered to reduce dependence on commuting by car (and the M7/N7) for Naas and wider need (e.g. park and ride facilities), as well as the / Northwest Quadrant.

	Local street network: Any necessary improvements are committed and delivered, including cycle and pedestrian infrastructure.
39 Councillor Bill Clear	Public Transport / Strategic rail infrastructure It is submitted that the Sustainable Mobility Strategy relies too heavily on buses. The Framework misses a significant opportunity by failing to protect and plan for a future rail station serving the Northwest Quadrant and western Naas. Kildare County Council should safeguard a transport corridor that • would allow for: • A future Naas railway terminus. • A connection to the Dublin–Cork railway line. • Potential future extension of DART+ services. Walking and cycling The pedestrian and cycle network should connect all key destinations within the Northwest Quadrant and to adjacent areas via new bridges, including schools, parks, sports facilities, community facilities, existing neighbourhoods, Naas town centre and transport hubs.
040 Sophie Bouré	Congestion on the street network: Peak commuting hours have traffic congestion throughout Naas and Sallins, including access to Sallins-Naas Train Station. Improved bus services to the train station are essential to reduce car dependency and ease congestion and will require bus services for existing and future housing areas. Public transport: Public transport capacity does not match existing demand (e.g. trains from Sallins are overcrowded). Train and bus capacity should be improved before additional development is brought forward.
41. Ray O'Byrne	Public transport: There is a need for a strategic transport intervention (e.g. bus rapid transit (BRT) on a dedicated corridor) to make the Northwest Quadrant work, linking it to Naas Town Centre and the Sallins-Naas Railway Station. Without this there is a significant risk of new development being reliant on private cars, placing pressure on the N7 corridor, local roads and the surrounding communities. Transport / Traffic impact assessment / Congestion on the street network: The Council should clearly demonstrate how the cumulative traffic impacts of this development (combined with existing approved and completed developments) have been assessed and how the existing street and road network will accommodate the substantial increase in vehicle movements.

43. Abbey Bridge and Canal Residents Group	Abbey Bridge cul-de-sac is a private street: The current street network is privately owned and not taken in charge. The residents do not want the Abbey Road street opened to traffic on the grounds of a “severe detrimental impact” on Abbey Bridge itself and traffic impact. Canalside Traffic: The residents consider that there are traffic and health and safety issues on Abbey Road, Abbey Bridge and Canal Road. They request that the Green Route be retained and the canal remains traffic free (apart from for local access). Canal Bridges: The residents oppose new bridges over the canal, “as accepted KCC in previous development plans”.				
44. Aimee Byrne	Landen Park Bridge The submission objects to the proposed bridge on the grounds that the pedestrian and cycle connection to the proposed bridge through Landen Park will: • Affect the safety of children playing in the estate by opening the estate to the canal and risks of water safety; • Increase the number of people coming to the estate. • Increase the risk of antisocial behaviour in the estate; and • Bring movement conflicts between people (e.g. children) living in the estate and cyclists and escooters. The submission requests that KCC consider accessing the canal away from the Landen Park estate and via: • The “Millennium Park side of the famine wall”, which borders Landen Park. or • The De Burghs estate.				
53 John Kavanagh	Implications of demographic profile of the Northwest Quadrant The submission sets out the demographic profile of the Northwest Quadrant based upon the trends established by the Census 2022 relating to the areas adjacent to the area. The submission requests that KCC consider the implications of the population profile in planning for infrastructure and services. The submission suggests some key services and identifies that all age groups will have travel demands.				
	Age cohort	Percentage	Population	Key services	Trips
	0-4	9%	990	Childcare / health services	
	5-12	14%	1540	Primary School	

Chief Executive's Report on Proposed Variation 5
of the *Kildare County Development Plan 2023 – 2029* (as varied)

	12-19	9%	990	Secondary school	Public transport
	19-24	8%	880	3 rd level / apprenticeships	Public transport
	25-66	50%	5550	Employment	
	66)	10%	1110	Health services	
	Harbour Bridge The submission points out that there was a proposal for a pedestrian bridge 41 years ago connecting the town centre to the proposed new park. The submission hopes that the bridge will be built as part of this plan.				
055 Nicolu Wojewoda and Isobel Byrne	Sustainable Mobility Strategy / Modal shift targets - The submission requests that the modal shift targets for Naas included in the strategy should not form the basis for the strategy without commitments for investment in public transport. The submission requests that each phase / homes should not be occupied until public transport services and active travel infrastructure are operational to reduce dependence on the car. - The submission requests that an updated transport assessment be undertaken with Transport Infrastructure Ireland on M7 / N7 junction capacity,.				
056 / 057 Caragh Court Residents Association	See 31				
59. Stephen Cooney	Naas Town Centre Rail Station Population targets in the development plan for Naas are around 40-50 thousand by 2040. This will make Naas the largest town in Ireland without a train station. Whilst there are no current projects to connect Naas to the rail network, this master plan should consider including a corridor that could facilitate and safeguard a future connection of Naas to Sallins train station. Not to do so would be shortsighted.				
60. Ciara Doyle	Mill Lane / Tandy's Bridge and access to homes The Sustainable Mobility Strategy proposes that Tandy's Lane / Mill Lane be used for a bus route, and that upgrades will be provided to enable buses to navigate the route. How will this affect the level of access to homes on Mill Lane and across the bridge. Tandy's Bridge is a beautiful, protected structure that				

	should not be negatively impacted by large vehicles (lorries have previously been stuck on the bridge). The upgrades to Mill Lane will be challenging to enable it to accommodate buses. Cycle network The submission supports the development of a cycle network to serve the area but considers that a cycle network across private agricultural land would not provide value for money / could duplicate existing routes. Canal bridges The canal is a place of natural beauty and has existing bridges that serve Naas and provide for pedestrians and cyclists. The introduction of three new bridges across the canal seems unnecessary. The submission identifies the conflict between the protection of views from Tandy's Bridge and the proposed Millbank Way Bridge.
063 Berenice Galvan	• States existing transport provision for people in the area is poor and notes ongoing traffic congestion between Naas and Sallins. • States that Sallins Train Station is at capacity with parking provision a big issue every day. • The submission states the quality of life in the area is being destroyed and requests the council to focus on how to improve the lives of the existing population before creating further growth and chaos.
064 Bob Quinn	Sustainable Mobility Strategy • Refers to the evidence base provided to support the proposed mobility strategy which highlights the challenges relating to a significant level of car dependency, coupled with a very low public transport usage. States this should not be accepted as the local reality, rather it should be designed out. • States that the bus route options proposed are identified by the council and are proposals intended as inputs into a separate National Transport Authority (NTA) process which are not established, funded or committed to. • States the use of Tandy's bridge to cater smaller bus vehicles is fragile based on its condition and form, and notes that if a higher-capacity and higher frequency service is required, this route and bridge will no longer be appropriate highlighting a major weakness. • States that a public transport system which has not yet been settled and is so heavily constraint, is not infrastructure led and will result in public transport playing catch up.

067 M Donovan	- States that public transport plans need to be more ambitious as the Sallins Train Station is at capacity and has its own limitations in terms of not servicing other parts of County Dublin, including capacity constraints in terms of car parking. - States existing train services in terms of frequency and capacity need to be addressed before the problem is exacerbated. - In order to create low car neighbourhoods, the council need to consider linking the town centre to the train station, including the development of a new train station within the Northwest Quadrant (NWQ). - Recommends that the council consider planning for an additional station at Caragh (between Naas and Newbridge) to serve the local community and future residents on the west of the NWQ, whilst presenting the opportunity for a park and ride facility.
67. M. Donovan	Character Area Guidance – Parking Strategy - Submission welcomes the vision of creating low-car neighbourhoods, however it notes that people will ultimately want to use their cars and avail of the M7 Motorway considering its proximity. - States the Masterplan should not be blind to this fact and make adequate provision for appropriate parking instead. Sustainable Mobility Strategy - States that public transport plans need to be more ambitious as the Sallins Train Station is at capacity and has its own limitations in terms of not servicing other parts of County Dublin, including capacity constraints in terms of car parking. - States existing train services in terms of frequency and capacity need to be addressed before the problem is exacerbated. - In order to create low car neighbourhoods, the council need to consider linking the town centre to the train station, including the development of a new train station within the Northwest Quadrant (NWQ). - Recommends that the council consider planning for an additional station at Caragh (between Naas and Newbridge) to serve the local community and future residents on the west of the NWQ, whilst presenting the opportunity for a park and ride facility.
68. Brian McGrath	The submission states that no development should take place in the NWQ until the transport infrastructure for Naas is fit for purpose. Pedestrian and Cycle Movement - Landen Park Bridge

	The submission supports the proposed pedestrian bridge over the canal leading to Landen Park.
69. Paul Monahan	Pedestrian and Cycle Movement – Landen Park Bridge - The submission objects to the proposed pedestrian/cycle bridge crossing the canal into Landen Park, providing direct access into the existing green open space. - States the existing green space will no longer be self-contained for kids of the estate, which also provides dangerous access for children to the canal and open water. - Refers to tragic incidents involving young children and open water and is worried about the risks and dangers associated with the proposed connection. - The submission notes this is the only new connection proposed along the canal, raising safety concerns about the increased pedestrian, cyclist and e-scooter traffic this will bring due to the large surrounding catchment along the Sallins Road and Monread areas. - Refers to reports of anti-social behaviour in the trees along the canal bank which has the potential to rise with increased footfall which is a concern for residents and the safety of children. - Recommends that alternative crossing points should be considered into public areas/sites such as the De Burgh's Estate or Millenium Park which would serve the community much better, whilst protecting the residents and children of Landen Park. - Requests that consideration is given to placing the proposed bridge crossing between the canal road and Millenium Park on the other side of the famine wall. It states this alternative route can provide the same connection whilst also diverting traffic away from Landen Park. - The submission urges the council to consult with the residents of Landen Park or the Landen Park Owner Management Company to understand the concerns of residents before proceeding with such a proposal.
70. Cllr Seamie Moore	- Refers to the proposed vehicle movement connections within the NWQ and notes there is only one direct 'bus-only-route' linking to the town over the canal, which fails to create strong links or tie ins with the town, resulting in the NWQ becoming isolated. - States the proposed walking/cycling network within the NWQ is great, however some areas could be 3km from the town centre which may be beyond the capabilities for individuals and families.

	• States there should be more eastern boundary vehicle routes identified to allow and encourage contact and connection with the town centre, including the integration of vehicle access to the proposed social/community facilities will be crucial to their promotion to the wider community. • States the existing proposals are limited and requests that two additional vehicle bridges are identified at the Naas Canal Harbour and below the northern side of the 4th lock on the Naas Canal. • Refers to Adamstown and Clonburris examples which are rail-based developments with the addition of bus transport services. States the residents of the NWQ will still require a transport link to Sallins Train Station or the proposed new station in order to transfer them on the first stage of their journey/commute to Dublin. • States the proposal of local bus service will not be acceptable to support these trips and will not appeal to modern, time conscious workers who require more reliable, accessible and more frequent services. • States that the NTA must give a commitment that the public transport service proposed can be delivered prior to the Masterplan being adopted by the elected members. • The proposal to route bus only services over incident prone canal bridges is a challenge and states the preferred route over the Poopluck Bridge should be re-considered due to previous safety concerns resulting in its closure to traffic. • States the impact to the Sallins Road will further compound the bottleneck and congestion problems on this route, particularly the Monread Avenue junction (Oldtown House) which will require significant upgrade to facilitate further growth. • States the bus only route via the Canal Side bridge crossing is weak and will not be sufficient to promote the strong connectivity and excellent service proposed. This presents minimal choice resulting in people utilising the peripheral routes thereby weakening the link with the town. • Recommends the identification of alternative bridge locations at Naas Canal Harbour and the lower section of the 4th Canal Lock to ensure strengthened connections and social development of both the NWQ and Naas Town.
72. Amit Gujar	Sustainable Mobility Strategy • States that Naas requires a new train station or Luas connection which can be effective and reliable, whilst providing an alternative public transport option to existing bus services which are not efficient.

	The submission recommends that the council should consider linking the town centre to Sallins Train Station including the delivery of proper traffic management measures if they are serious about promoting efficiency and facilitating future growth in Naas.
74. Inland Waterways Association of Ireland	Pedestrian and Cycle Movement – Permeability - The submission supports the proposed crossing points/permeability connections at Landen Park, Millbridge and the Canal Harbour which can provide short and direct links to the canal and their natural/biodiverse features. - Requests that proposed bridge connections conform to design standards to allow free passing of barges.
78. Jakub S	Sustainable Mobility Strategy - States Naas is an outlier in the Greater Dublin Area (GDA) with no proper integration with Dublin City and is heavily reliant on bus services with no dedicated bus lanes. States the town has no meaningful connection to the Luas network (Citywest) and remains excluded from the DART+ program. - The submission welcomes the proposed sustainable mobility strategy (bus corridor, active travel, mobility hub, reduced parking and new train station) which pledges to reduce car dependency, however the current state of public transport in Naas puts the deliverability into question. - Requests the council to ensure major public transport projects for Naas are fast tracked before construction starts on the NWQ, noting a 'low car' development will not succeed without a high-quality public transport service for the wider town. - States the new train station will not be fully utilised if the DART+ program is not extended to Naas. - States the council need to strongly advocate for this service to be extended to Naas to strengthen connectivity to the city centre which will be vital to sustain projected growth. - States that existing bus services to the city centre are regularly delayed by congestion and do little to support local travel and commuting. - Recommends that the council engage with the NTA to redesign how bus services operate within Naas and how they will be integrated with the NWQ in the future. - States the main street needs to be redesigned with bus priority lanes and segregated cycle lanes, with on street parking removed where appropriate to facilitate meaningful transport improvements. - States that a local bus loop should be implemented to service Naas, Kill, Sallins (including Sallins Train Station)

	and Johnstown as a matter of priority. The council must ensure this service acts like an urban bus network similar to Dublin Bus and BusConnects services which can be expanded to facilitate the NWQ. • Cycling infrastructure identified should incorporate the Dublin Road and Sallins Road using the NWQ as the catalyst for a town wide active travel network. Current Road Infrastructure • Recommends a review of the Dunnes Stores junction and the impact the site has on the towns traffic flow and congestion. States the existing 'no right turn' restrictions are not being followed and recommends the relocation of the store in the long term. • Opening of the Corban's Lane/Murtagh's Corner route at One New Row. • Visibility at the taxi rank should be improved where sightlines are obstructed by large coaches and buses. • Pedestrian crossings without traffic light dependency along the Dublin Road for easier/safer navigation. • Greater collaboration between the council and An Garda Síochána regarding traffic enforcement to ensure active travel infrastructure is not impeded and normal traffic rules are adhered.
79. Anthony Egan	Sustainable Mobility Strategy • Raises concern with the sustainable mobility strategy which is fully dependent on a priority bus route linking Naas Town Centre to Sallins Railway Station. States the NTA have not committed to delivering this route/service which will leave the entire NWQ fully dependent on car-based travel. • States the sustainable mobility strategy remains aspirational in the absence of appropriate traffic modelling and a traffic impact assessment to understand the impacts on the M7 Motorway, Sallins Road and surrounding region. • Refers to the OPR submission in 2019 which warned against consolidating a peripheral arc along the M7/Millennium Road which will detach growth from the town core resulting in greater car dependency. • States the polished language contained in the Masterplan remains identical to failed promises of the 2007 iteration. Infrastructure Deficit in Naas • States the town already suffers from unresolved issues relating to poor public transport, congestion, school capacity and access to healthcare which should not be leapfrogged by the NWQ.

81. T. James Kinlough	Sustainable Mobility Strategy • States the existing transport infrastructure and services in the town are too weak to support a development of this scale, where the town suffers from a car dependency culture. • Notes the pattern of periphery development in the town has led to a lack of centralised commercial zones, pedestrian infrastructure and a poor local bus service for the town. • Refers to the town's exclusion from recent Greater Dublin Area (GDA) transport projects such as DART+ and BusConnects, which further compounds the issue and reliance on the private car. • It states that all enabling infrastructure should be provided in advance of the NWQ becoming a reality, ensuring quality of life, congestion and accessibility are not impacted any further. • States the NWQ needs to become the catalyst for delivering a quality public transport system and active travel network which Naas has lacked for decades. • Concerned that the planning framework appears to be advancing faster than the transport system required to support the creation of this urban district which will ultimately impact the quality of life for the current population. • States there should clearer responsibility identified for all objectives and measures outlined in the implementation of the sustainable mobility strategy. • States that Naas should be treated as a major commuter town and employment centre within the GDA, where a transport system is planned on that basis, rather than dealing with local traffic issues that may arise from the NWQ. • The Masterplan should include stronger commitments on how public transport will actually operate, whilst identifying routes and streets that need protection for future bus priority infrastructure. • If bus priority/public transport is to be attractive, the Masterplan must provide key corridors, appropriate road design and supporting infrastructure which ensures this service is direct and that it can distinguish itself from local services. • The submission recommends the planning of a local bus network for Naas/Sallins/Johnstown/Kill, treating it as one functional area alongside the NWQ, not after this population has arrived. • It states the plan should include mode-share targets and monitoring. • Suggests examining the application of service road infrastructure in Spain which allows roads to flow freely with limited junctions.
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	• Develop an urban re-design plan for Naas in advance, which seeks to implement public transport infrastructure and active travel measures, drawing on similar projects implemented in Spain and France. • Removal of more on street parking in the town centre which can be relocated to multistorey car parks. DART+ Extension • The submission recommends that the council use the NWQ Masterplan to strongly support and accelerate the case for the extension of DART+ services to Sallins Train Station. • States the Masterplan should actively safeguard the conditions required for improved bus-rail interchange, active travel measures to the station, including the potential for an additional station or park and ride facility with feeder bus service located within the NWQ study area. • The submission states that a proposal for an additional station must be linked to clear DART+ service requirements which includes its ability to support additional capacity and greater frequency. • Recommends a formal commitment to integrate the Masterplan with the DART+ extension, including the assessment of a second rail station and park and ride facility.
82. Pat Kane	Framework Masterplan: Transport • The submission notes that the NWQ will not be a TOD due to its inability to meet specific criteria, and questions why the planning model is informed by comparator developments which are using materially different transport characteristics. It further states that this issue has not been comprehensively addressed in the Masterplan Framework. • It states that transport underpins many of the assumptions contained throughout the framework, particularly the following: ○ Development density ○ Travel behaviour ○ Parking provision ○ Community design ○ Infrastructure planning ○ Climate objectives ○ Housing delivery Sustainable Mobility Strategy • Refers to comparative development models outlined in the Masterplan which are served by an integrated rail, metro or tram system. It notes that these examples are not comparable as the Sallins Train Station is located outside the NWQ and not within convenient walking distance.

	• It further notes that the NWQ will be reliant on future bus services, however no evidence has been published confirming the proposed routes, service frequency, funding or implementation program. • The submission highlights that no Transport Impact Assessment has been prepared as part of the consultation process which makes it difficult to assess the traffic generated, modal split assumptions, impact of the surrounding road network and surrounding neighbourhoods. • The submission requests that a Transport Impact Assessment and appropriate transport modelling are completed and published prior to adoption.
083 Kildare Green Party	Sustainable Mobility Strategy The submission requests that the following public transport infrastructure/services be included in the Framework Masterplan: • Rail terminus between Sallins and the Naas Harbour including tram service • New bus route connecting Caragh to the NWQ and to the Main Street • Segregated bike lanes and bike sharing stations throughout the NWQ that connects the canal to the main street, Newhall and Sallins
085 Robbie Doyle	The issues raised in the submission are as follows: Sustainable Mobility Strategy - Proposed Bus Corridor • Objects to the Masterplan, specifically the proposed road and public transport corridor which traverses the historic Oldtown and Knocks/Keredern area. • Whilst the Plan recognises the Knocks and Keredern houses as heritage assets, including surrounding tree lined avenues and historic field boundaries, it is inconsistent in its objectives to protect the historic landscape due to the proposed bus route passing through the lands. • It raises concerns in respect of Tandy's Bridge and its capacity to facilitate bus traffic, noting its current form and track record of damage from large vehicles. • It states that appropriate action is to avoid damage of the existing landscape through careful route selection, rather than mitigating risk after an indicative route has been incorporated into the statutory plan. • It states the exclusion and deferral of supporting ecological and habitat assessments in the Masterplan is a significant weakness. It also states that once a transport corridor is identified as an objective, subsequent surveys may only

	influence its detailed design rather than its impacts on the landscape. • It requests the council to complete the following assessments prior to identification of the final proposed bus route: ○ Arboriculture survey and tree constraints plan ○ Ecological and hedgerow surveys ○ Archaeological and historic landscape assessment ○ Architectural heritage impact assessment ○ Landscape and visual impact assessment ○ Transparent appraisal of alternative routes • The submission acknowledges the Masterplans commitment to retention of mature trees, hedgerows and woodland. However, replacement planting will not replicate the heritage and ecological value and requests the council to apply a mitigation hierarchy by considering alternative route options where required. • It states the proposed route will impact a number of agricultural landholdings which will impact on the loss of grazing, safe access, animal interference/welfare, stock proof boundaries and the risk of trespassing/anti-social behaviour. • It notes that while the Masterplan considers bus routes, bridge options, vehicle sizes and service frequency, it does not specify its operational requirements. • It states the identification of land acquisition to facilitate a proposed route should not be included without site specific assessments to understand if a transport corridor is necessary, have alternative route options been explored and has the amount of land required been minimised. The submission requests the following amendments in respect of the proposed bus corridor: • Realign or remove the proposed public transport corridor through Oldtown/Keredern historic landscape and avoid the displacement of mature hedgerows, tree lines and field boundaries. • Site specific objective to protect the landscape and its relationship with the Grand Canal and Tandy's Bridge. • Where no route has been justified, identify a route as indicative subject to further assessment, rather than a fixed objective. • Further states that the proposed route is premature in its present alignment and requests that this is removed until proper site assessments are carried out with less damaging alternatives.
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	Pedestrian and Cycle Movement - Landen Park Bridge It states the proposed Landen Park bridge connection will further alter and urbanise the sensitive landscape, noting the cumulative effect of increased traffic in the area which has not been adequately justified.
86. Green Project Management	Sustainable Mobility Strategy - The submission seeks clarity on how the proposed movement network in the Northwest Quadrant (NWQ) will integrate with the wider town, and how does it reflect the strategic connectivity principles identified in the Naas/Sallins Transport Strategy? - States there is insufficient detail on how the proposed connections will integrate with Naas Town Centre, surrounding residential areas and Sallins as part of one coherent transport network. - The submission notes the main principles of the Naas/Sallins Transport Strategy and states the importance of planning Naas as a connected town which should continue to inform the long-term future development of the area. - The submission states that Masterplan should be strengthened to include a more comprehensive connectivity strategy demonstrating how the NWQ will be fully integrated with the surrounding urban areas through direct pedestrian, cycle and public transport links.
87. Cllr Ger Dunne	Sustainable Mobility Strategy – Second Rail Station The submission requests the inclusion of a new train station or park and ride facility to reduce the traffic impact on the M7 Motorway.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 8: Community Infrastructure Strategy

Issues Raised

Submissions received relating to Community Infrastructure

Submission No. and Name.	Issue
1. Precious lindelwa Phiri	Community Facilities - Community facilities should include services that support older persons, people living with dementia / Alzheimer's disease and their families. Healthcare and wellbeing services - Healthcare and wellbeing services should form part of the long-term planning framework for the new community.
5. Scott Walsh	Naas Infrastructure deficit: Multiple It is submitted that Naas suffers from a significant deficit in Schools and childcare The proposed NWQ Framework Masterplan and urban extension development will not address existing deficits in the town and will compound the existing infrastructure deficit problem that exists in the town. Building homes without the necessary supporting infrastructure will not be acceptable.
14. Naas Town Strategy Group	Naas Growth Strategy The Framework documents have not proven that the growth strategy is the right one for Naas. A <i>Social Infrastructure Audit</i> would normally be prepared in support of settlement plans to assess the capacity of each settlement to accommodate future growth and identify infrastructure requirements arising from that growth. No equivalent evidence appears to have been prepared in support of the Northwest Quadrant. This is particularly important given that the Framework is being advanced <i>in advance of the preparation of the new Naas Settlement Plan</i>. The Group would have expected strategic questions relating to growth distribution, infrastructure capacity, social infrastructure provision, environmental constraints and long-term settlement structure to be informed by a comprehensive evidence base before decisions regarding the scale and location of growth are embedded within statutory planning policy. The submission notes that the Variation states that it is providing for the needs of the Northwest Quadrant and not the wider Naas infrastructure requirements. The submission seeks the settlement-wide analysis of Naas's infrastructure capacity to accompany the publication of the Northwest Quadrant Framework Masterplan. Not that it expects the Northwest Quadrant to solve all of Naas's problems but that it expects the assessment to accompany as an evidence-base

	to underpin the Variation / Framework Masterplan process, in accordance with the approach KCC has taken to other plan-making processes.
14. Naas Town Strategy Group	Evidence base to justify schools, recreation and community infrastructure The Framework documents have not proven that the schools, recreation and community infrastructure will be sufficient for the area nor that they will be delivered in a timely fashion. The Group is particularly concerned regarding school provision. The Framework identifies several school sites and states that Kildare County Council will "continue to engage" with the Department of Education regarding future educational requirements. The practical reality is this: the delivery, capacity and timing of these schools remain uncertain. Additionally, the submission contends that the proposed Oldtown Park should be delivered in Phase 1. If Oldtown Park is intended to form a key part of the identity of the Northwest Quadrant and act as an important connection between the new development and the existing town, why is it not being delivered from the outset? Particularly as the Park is a key placemaking component of the Northwest Quadrant. The Park would also benefit the wider Naas town and provide a key integration component for the Quadrant. The submission considers that key community infrastructure should be linked to development phases to ensure that population growth is matched by the timely delivery of supporting facilities. The submission considers that this is a fundamental issue that should be addressed prior to adoption as this will impact on the quality of place and the ability of the NWQ to function as a sustainable community from the outset. Evidence-Based Growth Strategy Draft wording for objectives are proposed. • Settlement Capacity Assessment for Naas objective • Social Infrastructure Audit objective • Evidence Review and Framework Update Mechanism objective Community Infrastructure Community Infrastructure Delivery Plan objective wording proposed
15 C Murray	Schools (Primary & Post-Primary)

	The submission suggests that the typical / average timeline for delivering a school is c.10 years. It recommends that school sites are large enough to accommodate school extensions as these are a pragmatic / quick response to increase school capacity. It also recommends that primary and post-primary schools co-locate adjacent to each other. Health services The submission identifies that the significant growth in Naas will require commensurate increases in the provision of health services, including hospital, GP care, and recommends that a facility be developed within the Northwest Quadrant.
17 Anisha Khazanchi	Impact of the Northwest Quadrant on Naas: Existing infrastructure and service deficits It is submitted that Naas currently suffers from infrastructure deficits that will be made worse by the Northwest Quadrant unless services scale first in advance of the supply of new development, including: Schools – Schools are currently at capacity and new schools are needed. Childcare – There is an existing shortage of creches / after school places with waiting lists and high prices driven up by demand. Healthcare and GP visits – There is a shortage of GPs and space on practice patient lists. It is submitted that this will overall lead to a worsening of quality of life for existing people.
22 Christine Finn	Community infrastructure and services: Education and childcare The plan needs to ensure that there will be “concrete provision” of a range of community services, including: • Schools provision. • Childcare provision. • GP clinics and healthcare. Bottle banks and recycling points Multiple locations are required for these facilities within NWQ.
23 Sally J Byrne	• Pause the NWQ process to enable wider consideration of Naas infrastructure deficits (e.g. active recreational infrastructure).

	Establish meaningful educational infrastructure triggers and “binding commitments” to ensure that educational infrastructure will be provided when it is required rather than rely purely on the zoning of sites for the purposes of schools. A letter is appended relating to Saint Corban's School being requested to accommodate an additional classroom without an additional teacher.
24 Ger Ui Chongaile	Naas Infrastructure and Services Deficit There is a shortage of the following in Naas to serve the existing population with clubs and activities tend to have long waiting lists): Youth amenities
27 Diarmuid Parker	Schools Capacity Deficit The submission acknowledges the proposed schools' provision within the Northwest Quadrant but queries whether the wider capacity challenges in Naas have been considered. The submission queries the phasing / delivery of schools in the Northwest Quadrant whereby schools would be provided after homes have been delivered.
34 Paul O'Brien	The submission requests that Kildare County Council gives particular consideration to addressing a number of issues to help ensure that Naas continues to grow in a balanced, sustainable and well serviced manner for the benefit of current and future generations.: Working with the Department of Education to address secondary school capacity through the extension of Naas Community College and/or the planning and delivery of a new secondary school.
38 Jennifer Yates	Infrastructure: existing deficits and future provision The submission notes that Naas has significant infrastructure deficit challenges, and requests that the Proposed Variation is not supported OR that significant amendments are included that ensure infrastructure delivery precedes residential expansion to ensure that the quality of life for existing Naas residents is not diminished by the proposed urban extension. Education: Additional primary and secondary school capacity for the Northwest Quadrant is planned and funded, and subject to a binding commitment for school places and associated staffing from the DE&Y. Existing schools in and around Naas are at or close to capacity.

	Creche and childcare: Sufficient childcare should be incorporated into the development to avoid placing pressure on existing providers, which are already at capacity / have waiting lists.
39 Councillor Bill Clear	Schools and Education Existing school capacity shortages in Naas must be recognised. A Schools Capacity/Impact Assessment should be completed before residential development proceeds. Schools should be delivered early in the development rather than years after residents move in. Funding and delivery mechanisms should be clearly identified. Childcare The childcare system is at capacity. A community childcare facility should be provided as part of the Framework Masterplan, and its provision should be supported by development levies. Community Infrastructure Existing shortages in facilities for children and young people must be addressed. Existing clubs already experience waiting lists. Community infrastructure should be delivered before demand exceeds capacity and early in the development. The development should include: Community centres; Men's Shed facilities, Women's Shed facilities, youth facilities, playgrounds, MUGAs, basketball courts, pump tracks, walking and cycling facilities, sports pitches, well-equipped public parks
40 Sophie Bouré	The submission asks Kildare County Council to ensure that essential infrastructure, including roads, public transport, schools, childcare and community facilities are delivered in parallel with housing, rather than after residents have moved into the area. Only by investing in infrastructure alongside development can the Northwest Quadrant become a sustainable and well-serviced community for both existing and future residents. The submission identifies that Naas's infrastructure and services are already under pressure: Schools: There is already a shortage of places in local primary schools (particularly at Junior Infants entry) in the Naas SPA (Naas and Sallins area). Childcare (afterschool): There is a shortage of places in the Naas and Sallins area. Additional facilities / places should form part of the development. Community infrastructure: New homes should be delivered alongside a range of community infrastructure to ensure the

	creation of a sustainable community, including: parks; sports facilities; healthcare services; walking and cycling routes.				
41 Ray O’Byrne	Healthcare, Education and Community Infrastructure The Council should clearly demonstrate how healthcare services, schools, childcare facilities, and community facilities will be expanded to support both existing and future residents.				
53 John Kavanagh	Implications of demographic profile of the Northwest Quadrant The submission sets out the demographic profile of the Northwest Quadrant based upon the trends established by the Census 2022 relating to the areas adjacent to the area. The submission requests that KCC consider the implications of the population profile in planning for infrastructure and services. The submission suggests some key services and identifies that all age groups will have travel demands.				
	Age cohort	Percentage	Population	Key services	Trips
	0-4	9%	990	Childcare / health services	
	5-12	14%	1540	Primary School	
	12-19	9%	990	Secondary school	Public transport
	19-24	8%	880	3 rd level / apprenticeships	Public transport
	25-66	50%	5550	Employment	
	66)	10%	1110	Health services	
55 Nicolu Wojewoda and Isobel Byrne	Arts, culture, community and family life The submission expresses concern that the infrastructure delivery plan is not binding and that there are deficiencies in the strategy to meet the needs of the proposed community. The following are requested: • Commit to a dedicated cultural and community facility (not merely a feasibility study), and to affordable space to seed community and cultural life from the outset. Require childcare, school places and play/amenity space to be delivered with the homes they serve in each phase , and design genuinely child- and family-friendly public realm with safe routes to school and play on the doorstep.				

58 Naas Access and Disability Group	Naas Women's Shed (NWS) At present Naas Women's Shed don't have a permanent home and request that consideration be given to accommodating them in the Northwest Quadrant. The NWS have 140 members and 70-80 meeting regularly in spaces rented from other organisations. This leads to disruption in meetings during July and August when community spaces (e.g. at Naas GAA Club) are used for summer camps for children and young people during the school breaks.
063 Berenice Galvan	• The submission notes existing constraints relating to school places, open space provision, GP services including ongoing deficits in community policing with An Garda Síochána in the town. • The submission states the quality of life in the area is being destroyed and requests the council to focus on how to improve the lives of the existing population before creating further growth and chaos.
070 Cllr Seamie Moore	Community Infrastructure – Social Infrastructure Audit • States the exclusion of a Social Infrastructure Audit (SIA) in respect of Naas is unacceptable and refers to a recent Active Recreational Infrastructure Study (ARIS) completed by the council, and states the findings and existing deficits should have been revealed and highlighted alongside this Masterplan. • Notes the identification of a hybrid model for social infrastructure within the NWQ without these findings is very worrying and this is a shortcoming of the proposed Masterplan. • Refers to historical attempts by other local authorities to implant social infrastructure in new urban areas which has never been successful and has resulted in greater anti-social behaviour. • States that without the examination of an SIA and existing capacity, the decision to proceed with a hybrid model has no merit, where local knowledge would disagree that there is any spare capacity in existing facilities for youth and sporting activities. • Recommends that the approach to social infrastructure should include the proposed range of new schools, identify the activity, existing provision, capacity, future needs, proposed location, infrastructure provider and timescale.
072 Amit Gujar	Community Infrastructure: Current deficits The submission states that the current provision and deficits in school places and childcare provision is scary and needs to be addressed.

79. Anthony Egan	Infrastructure Deficit in Naas: Education & Health services States the town already suffers from unresolved issues relating toschool capacity and access to healthcare which should not be leapfrogged by the NWQ.
082 Pat Kane	Community Infrastructure • The submission refers to the Department of Education and Youth submission which states that new schools are only provided where a demographic need has been established, or planned housing has already been completed. • It queries how the pressure placed on existing schools in Naas and Sallins will be managed in the meantime? • The submission requests the council to demonstrate clearly how schools and their enabling infrastructure will be funded, coordinated and delivered alongside housing rather than placing pressure on existing communities.
083 Kildare Green Party	Community Infrastructure The submission requests that the following community infrastructure / services be included in the Framework Masterplan: • More appropriate education services to what is proposed
087 Cllr Ger Dunne	Community Infrastructure • The submission requests the council to provide the necessary community infrastructure and facilities to cater the growing memberships of the Men's and Women's Shed groups, including the growing memberships of local sporting organisations. • It also requests the council to provide all the necessary school, medical, childcare and recreational facilities in advance of developing 4,000 new homes.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 9: Urban Recreation and Amenity

Issues Raised

Submissions received relating to Urban Recreation and Amenity

Submission No. and Name.	Issue
4 Sarah Walsh	Naas Infrastructure deficit: Parks It is submitted that Naas has a significant deficit in parks provision in terms of size and quality, and that the town needs a large park equivalent to other major urban parks (e.g. Marlay Park or Dodder Park). The submission acknowledges that the NWQ makes provision for some parks but the level of provision is not sufficient to meet the needs of Naas, and particularly Naas (West), and this should be addressed through Variation No.5: Northwest Quadrant (Naas). A large park should be provided to the west of K-Leisure.
5 Scott Walsh	Naas Infrastructure deficit: Multiple It is submitted that Naas suffers from a significant deficit in: • Parks provision; and • Sports grounds (e.g. pitches) provision. The proposed NWQ Framework Masterplan and urban extension development will not address existing deficits in the town and will compound the existing infrastructure deficit problem that exists in the town. Building homes without the necessary supporting infrastructure will not be acceptable.
13 Mick O'Toole	Naas Active Recreational Infrastructure: Football facilities deficit: It is submitted that Naas has an existing active recreational infrastructure (ARI) deficit to meet the needs of the population, and more specifically Naas AFC do not have enough space to accommodate their existing or future needs. The submissions seeks for the Framework Masterplan to support the expansion of Naas AFC within the quadrant lands to assist the club and contribute to the achievement of the Northwest Quadrant ambition for sustainable mobility and providing synergies between schools and sports grounds. The submission requests four specific items be integrated into the statutory planning framework: Modify Objective NWQ O1.8 The submission requests that consideration be given to amending this objective to omit reference to the development of

	municipal sports grounds and “mandate a Partnership Lease / Shared Access Model” to benefit locally based clubs that already operate in the area. Land use zoning objective definition for F – Open Space and Amenity Amend Appendix Two (Objective F – Open Space and Amenity) to state that the expansion of contiguous volunteer-led sports grounds takes precedence over “generic, passive public parkland green spaces”. Phasing Strategy – Western Sports Grounds delivery The sports grounds “and associated extensions” should be delivered as part of Phase 1, rather than Phase 2. Development Contributions Scheme Include in the development contributions scheme a provision for capital grants for expanding the physical footprint of volunteer sports clubs situated inside the quadrant.
14 Naas Town StrategyGroup	Evidence base to justify schools, recreation and community infrastructure The Framework documents have not proven that the schools, recreation and community infrastructure will be sufficient for the area nor that they will be delivered in a timely fashion. The Group is particularly concerned regarding school provision. The Framework identifies several school sites and states that Kildare County Council will "continue to engage" with the Department of Education regarding future educational requirements. The practical reality is this: the delivery, capacity and timing of these schools remain uncertain. Additionally, the submission contends that the proposed Oldtown Park should be delivered in Phase 1. If Oldtown Park is intended to form a key part of the identity of the Northwest Quadrant and act as an important connection between the new development and the existing town, why is it not being delivered from the outset? Particularly as the Park is a key placemaking component of the Northwest Quadrant. The Park would also benefit the wider Naas town and provide a key integration component for the Quadrant. The submission considers that key community infrastructure should be linked to development phases to ensure that population growth is matched by the timely delivery of supporting facilities. The submission considers that this is a fundamental issue that should be addressed prior to adoption as

	this will impact on the quality of place and the ability of the NWQ to function as a sustainable community from the outset.
15 C Murray	Public spaces Public spaces should include well-maintained facilities / equipment to ensure that they are of a high quality. There is a wider deficit of public spaces in Naas to meet the needs of the town currently.
17 Anisha Khazanchi	Impact of the Northwest Quadrant on Naas: Existing infrastructure and service deficits It is submitted that Naas currently suffers from infrastructure deficits that will be made worse by the Northwest Quadrant unless services scale first in advance of the supply of new development, including: Greenspace and amenities Naas has limited green space per person / amenities, which will be put under even more pressure by the proposed development. It is submitted that this will overall lead to a worsening of quality of life for existing people.
21 Gavin Barnes	Active Recreational Infrastructure / Naas AFC and the K-Leisure / Naas Sports Centre complex The submission highlights that existing active recreational infrastructure at the Naas AFC grounds are at capacity and that new capacity is required to meet the needs of the club its members and wider community for reasons of sport, community, health and much more. The submission suggests that the new community from the Northwest Quadrant will not be able to join Naas AFC because it does not have capacity to accommodate demand from this new development. The submission requests that the focus for the NWQ lands should be meeting the existing ARI infrastructure deficit in Naas and not for meeting the needs of the NWQ. Sports-related car parking provision The submission objects to the proposed maximum car parking standard of 10 car parking spaces per pitch (Table NWQ13) on the grounds that Naas AFC has a wide catchment and people generally drive to deliver children and kit to their sports ground. The submission suggests that there will be overspill from sports parking areas if the standard isn't adjusted. It is requested that consideration be given to adjusting the maximum car parking standards to allow additional car parking provision.

	Phasing of Active Recreational Infrastructure / Facilities The submission suggests that the western sports ground / K-Leisure extension should be delivered as part of Phase One on the grounds that residential development forming part of Phase 1 will not have sufficient sports facilities / grounds. Operational model for Western sports ground at New Caragh Road The submission requests that the Municipal Pitch Model outlined in NWQ 01.8 be amended to a “long term lease” model for established sports clubs.
23 Sally J Byrne	Pause the NWQ process to enable wider consideration of Naas infrastructure deficits (e.g. active recreational infrastructure).
24 Ger Ui Chongaile	Naas Infrastructure and Services Deficit There is a shortage of the following in Naas to serve the existing population with clubs and activities tend to have long waiting lists): • Safe recreational spaces • Sports facilities • Accessible play areas
34 Paul O'Brien	The submission requests that Kildare County Council gives particular consideration to addressing a number of issues to help ensure that Naas continues to grow in a balanced, sustainable and well serviced manner for the benefit of current and future generations.: • Delivering additional sports and recreational facilities in line with population growth as existing facilities are at or near capacity, and demand continues to grow. Provision should be made for facilities and funding mechanisms for this infrastructure.
36 Mark McDaid	Naas Sports Centre (NSC) Campus (K-Leisure and three sports clubs) Naas Sports Centre was built in 2001 with enough capacity to accommodate growth in Naas for c.20 years. This foresight / infrastructure-led development approach is now required to enable the NSC to be enlarged so that it can meet existing and future need. The submission outlines that the Naas Sports Centre does not have capacity to accommodate additional growth or sufficient capacity to accommodate the existing levels of demand for the facilities / club and struggles to accommodate the existing levels of activity with regard to accessibility, car parking provision, and facilities. The inability to accommodate new families that move

	to Naas (including the Northwest Quadrant) into sporting clubs will have an adverse impact on the ability of Naas to be socially integrated and for new families to be socially integrated into Naas. The constraints on capacity inhibit the ability of the sports clubs to accommodate tournaments / regional competitions. The submission requests that consideration be given to the following: • The enlargement of the Naas Sports Centre should be included in Phase One to accommodate the existing needs of Naas, as well as Phase One. • Separate to Northwest Quadrant - a comprehensive review of the Naas Sports Centre and its parking / access with a view to investment in the short term; • Recognition in Variation No.5 that the NSC site (and its resident clubs) can not absorb significant extra demand without investment; The review process to be collaborative and include engagement with those who use the NSC.
39 Councillor Bill Clear	Public Open Space The submission requests that the quantity of public open space be increased and be of a high quality in terms of their facilities and their connection to other places via walking and cycling and public transport. Avoid large surface car parks beside public open spaces.
41 Ray O'Byrne	Protection of Green Space, recreational facilities, sports facilities and Quality of Life Sustainable communities require far more than housing. They require accessible parks, recreational facilities, sports amenities, open spaces and green areas that contribute to the health, wellbeing and quality of life of residents. Planning should seek to ensure the liveability of Naas and the Northwest Quadrant, and that meaningful parks, recreation and sporting facilities are provided, whilst protecting valued green areas.
53 John Kavanagh	Watersports The submission proposes that a watersports hub be provided as part of the Northwest Quadrant to provide for boat storage and docking (there used to be a canoe club at the harbour).
68 Brian McGrath	Framework Masterplan - Canal Buffer Requests that a green buffer (set back) is identified along the canal to replicate lands to the southeast in Oldtown and Oldtown Demesne. States that no development or the delivery of overground electrical infrastructure should take place within this

	green buffer, supported by the necessary zoning amendments where required.
067 M Donovan	Urban Recreation and Amenity - States there is not enough green space or parks identified within the NWQ and recommends that all recreational space including site F(2) adjacent the KLeisure are expanded even further in the Masterplan. - Recommends that the council engage with local sporting organisations to ensure the provision of additional open space allows them to adequately function and serve existing members.
070 Cllr Seamie Moore	F(2) Southern Sports Grounds - Refers to the 10-hectare site adjacent KLeisure and questions the inclusion of these lands in phase 3 which are in the ownership of a reluctant seller and has repeatedly been included in development plans for over 25 years without any such progress. - States the identification of this site is high risk which could lead to a significant deficiency in social infrastructure provision for the NWQ, placing further pressure on the wider town. - Requests the clarification of the land procurement facilitator for the 10-hectare sports land, alongside the phasing of this delivery to be included in phase two.
77 M. Donovan	Urban Recreation and Amenity - States there is not enough green space or parks identified within the NWQ and recommends that all recreational space including site F(2) adjacent the KLeisure are expanded even further in the Masterplan. - Recommends that the council engage with local sporting organisations to ensure the provision of additional open space allows them to adequately function and serve existing members.
083 Kildare Green Party	The submission requests that the following is provided: - Rowing club at the Naas Harbour - Community garden / allotments for nature in the harbour area - Public basketball courts

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 10: Phasing

Issues Raised

Submissions received relating to Phasing:

Submission No. and Name.	Issue
3. Joseph Bergin	Unrealistic Delivery Timeline – The stated 2027 to 2040 timeline for delivery is overly ambitious and not realistic.
14 Naas Town Strategy Group	Early delivery of Oldtown Park The submission contends that the proposed Oldtown Park should be delivered in Phase 1. If Oldtown Park is intended to form a key part of the identity of the Northwest Quadrant and act as an important connection between the new development and the existing town, why is it not being delivered from the outset? Particularly as the Park is a key placemaking component of the Northwest Quadrant. The Park would also benefit the wider Naas town and provide a key integration component for the Quadrant.
23. Sally J. Byrne	Early delivery of Oldtown Park The proposed main park at Knocks / Keredern should be included in Phase One of the proposed development.
39. Councillor Bill Clear	Phasing of Housing and Infrastructure The Northwest Quadrant development should be infrastructure-led rather than housing-led. Homes should not be occupied until transport, schools, childcare, healthcare, community facilities and recreation have been delivered.
083 Kildare Green Party	Supporting services as part of Phase 1 - The submission supports the delivery of housing with the condition that all supporting services are delivered in advance of Phase 1. - The submission requests the council not to adopt the Masterplan Framework until it has evaluated how the proposed 4,000 homes will intersect with the energy demands from adjacent ICT infrastructures. - Vital infrastructure should be in place prior to the delivery of phase 1 (1,400 units) as outlined in the Masterplan.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 11: Infrastructure Delivery Plan

Issues Raised

Submissions received relating to Infrastructure Delivery Plan:

Submission No. and Name.	Issue
3. Joseph Bergin	Third-party infrastructure delivery risk – The Infrastructure Delivery Plan identifies responsibility for infrastructure delivery, including delivery a range of state and semi-state agencies without “binding commitments”. This presents a project risk for NWQ.
7, Conor Whelan	Utilities infrastructure The following were required by the Naas Local Area Plan Objective NWQ 1.1 and should be published: • Water and Wastewater Capacity Assessment; • Infrastructure cost and funding assessments;
14 Naas Town Strategy Group	Infrastructure Delivery Plan, Cost Plan and supporting Funding Strategy The Framework documents define an extensive Infrastructure Delivery Plan, including enabling and supporting infrastructure, that will cost many millions of euros to deliver. However, the Infrastructure Delivery Plan does not include the enabling infrastructure outside of the Northwest Quadrant boundary that will be required to support the Quadrant. In particular, the absence of a Transport Impact Assessment means that the upgrades to the street network outside of the NWQ lands are not properly understood and have not been included in the Infrastructure Delivery Plan. Thus, the costings for this infrastructure are not understood and provision has not been made for their funding. This means raises legitimate questions about how the unquantified enabling infrastructure can be funded, who will be responsible for their delivery, when it is required, and whether the Northwest Quadrant is viable. This

	will impact on the timeline for the delivery of housing and the assumptions included in the Framework Masterplan.
14 Naas Town Strategy Group	Naas Growth Strategy: Infrastructure capacity The Framework documents have not proven that the growth strategy is the right one for Naas. A <i>Settlement Capacity Audit</i> would normally be prepared in support of settlement plans to assess the capacity of each settlement to accommodate future growth and identify infrastructure requirements arising from that growth. No equivalent evidence appears to have been prepared in support of the Northwest Quadrant. This is particularly important given that the Framework is being advanced <i>in advance of the preparation of the new Naas Settlement Plan</i>. The Group would have expected strategic questions relating to growth distribution, infrastructure capacity, social infrastructure provision, environmental constraints and long-term settlement structure to be informed by a comprehensive evidence base before decisions regarding the scale and location of growth are embedded within statutory planning policy. The submission notes that the Variation states that it is providing for the needs of the Northwest Quadrant and not the wider Naas infrastructure requirements. The submission seeks the settlement-wide analysis of Naas's infrastructure capacity to accompany the publication of the Northwest Quadrant Framework Masterplan. Not that it expects the Northwest Quadrant to solve all of Naas's problems but that it expects the assessment to accompany as an evidence-base to underpin the Variation / Framework Masterplan process, in accordance with the approach KCC has taken to other plan-making processes. Draft objectives are included for the following: • Proposed Infrastructure Delivery, Funding and Viability Strategy objective. • Proposed Housing Delivery and Build-Out Review objective. • Proposed Critical Infrastructure objective. • Proposed Northwest Quadrant Monitoring and Delivery Review objective IDP triggers • Proposed wording for an Infrastructure Delivery Triggers objective is included.

16 Ricardo Paco	Infrastructure delivery and phasing The provision of infrastructure should be subject to robust phasing arrangements linking residential development to the provision of supporting and enabling infrastructure to give confidence that infrastructure will not lag behind housing delivery.
21 Christine Finn	Utility services KCC should ensure that there are upgrades in network / sufficient capacity in water, wastewater and electricity to meet the needs of the proposed development. Bottle banks and recycling points Multiple locations are required for these facilities within NWQ.
23. Sally J Byrne	Infrastructure Delivery Plan – clear sight of who will be responsible for delivering the infrastructure packages to ensure that the plan is more than just a vision. Establish meaningful educational infrastructure triggers and “binding commitments” to ensure that educational infrastructure will be provided when it is required rather than rely purely on the zoning of sites for the purposes of schools. A letter is appended relating to Saint Corban's School being requested to accommodate an additional classroom without an additional teacher. Oldtown Park: The proposed main park at Knocks / Keredern should be included in Phase One of the proposed development.
24. Ger Ui Chongaile	Timing of NWQ Infrastructure delivery The submission asserts that residents should not have to “wait years after moving into a new community before essential facilities become available”. Certainty around NWQ Infrastructure Delivery Plan The Infrastructure Delivery Plan sets out a wide range of responsibilities to state and semi-state agencies, including the Department of Education, the HSE, Uisce Eireann, ESB Networks and the National Transport Authority. The submission requests that clear and binding commitments are provided by these organisations prior to the approval of this large-scale development. Utility capacity The submission seeks confirmation that the development can proceed without having an adverse impact on existing users of water, wastewater and electricity in Naas.

27. Diarmuid Parker	Electricity capacity deficit The submission requests that the Framework Masterplan be amended to be stronger on the requirements for solar or self-sustainable energy production for the Northwest Quadrant. The submission asks that the Vauban urban extension in Freiburg is used as a case study for solar communities. The request is in the context of challenges in electricity supply and the development of data centres across Ireland and their consumption of 20% of national capacity.
28. An Post (RMLA on behalf of)	An Post supports the strategic objectives of the Northwest Quadrant (Naas) Framework Masterplan and welcomes the delivery of a significant new residential and employment area for Naas. However, given the scale of population and employment growth envisaged, it is important that postal services and associated infrastructure are recognised as an integral component of the essential services required to support the creation of sustainable and complete communities. In particular An Post requests that the following are considered in delivering the Northwest Quadrant: • Postal infrastructure and services are recognised as essential supporting infrastructure within the Framework Masterplan. • Advance notification and consultation procedures are established regarding any planned road closures, access restrictions or traffic management measures; • Provision is made to facilitate the future extension, expansion or upgrading of existing An Post facilities where required to meet future demand; • Provision is made to facilitate new facilities where required to meet future demand; and • Opportunities for the incorporation of post boxes and associated postal facilities within new neighbourhood and local centres are considered as part of detailed design proposals.
31. Caragh Court Residents Association	As per submission #3. • Third-party infrastructure delivery risk – The Infrastructure Delivery Plan identifies responsibility for infrastructure delivery, including delivery a range of state and semi-state agencies without “binding commitments”. This presents a project risk for NWQ. • Infrastructure Cost – The Variation doesn't include the cost plan for the proposed infrastructure.
38. Jennifer Yates	Infrastructure: existing deficits and future provision

	The submission notes that Naas has significant infrastructure deficit challenges, and requests that the Proposed Variation is not supported OR that significant amendments are included that ensure infrastructure delivery precedes residential expansion to ensure that the quality of life for existing Naas residents is not diminished by the proposed urban extension. Utility infrastructure (water, wastewater and electricity): Upgrades completed and verified as sufficient to support the proposed population. Phased approach: The phasing approach is adopted whereby housing delivery is directly linked to the completion of supporting infrastructure.
41. Ray O'Byrne	NWQ Infrastructure Delivery Plan The submission asks Kildare County Council to ensure that essential infrastructure, including public transport, healthcare, educational and community facilities are delivered in advance, or concurrently with, residential development. Only by investing in infrastructure alongside development can make the Northwest Quadrant become a sustainable and well-serviced community for both existing and future residents. The submission identifies that Naas's infrastructure and services are already under pressure. Infrastructure-led development Naas has an existing infrastructure deficit across multiple sectors (see community infrastructure, urban recreation and amenity, public transport and street network). The issue is whether the infrastructure required to support that growth is available, funded and capable of being delivered in advance of, or within the same timeframe as, the proposed housing. Traditionally this hasn't happened. Will this be the case for the Northwest Quadrant and to meet the needs of existing residents to ensure quality of life?
45. Caithlin Craig	The submission seeks that infrastructure provision should keep pace with housing delivery and not be a future aspiration. The submission requests that Kildare County Council: • Infrastructure Phasing: Phase housing delivery in line with the provision of childcare, education, healthcare and transport infrastructure. There is a current infrastructure / services deficit and people shouldn't have to fight for everyday needs. • Binding commitments on infrastructure: Secure binding commitments from the relevant Government departments and agencies regarding the funding and timely delivery of schools, healthcare facilities and transport improvements.

	• Timing of facilities and infrastructure operation: Ensure that essential infrastructure is operational before, or at the same time as, residential occupation rather than several years afterwards. • Continue to monitor infrastructure capacity throughout the development to ensure that services keep pace with population growth.
53. John Kavanagh	Infrastructure delivery alignment with housing The submission requests that the necessary infrastructure and services be delivered in alignment with the development of the housing in the Northwest Quadrant. This will include those identified above plus the playgrounds, parks and sports grounds. Utility infrastructure The submission requests that KCC engage with Uisce Eireann to confirm water and waste water capacity.
55. Nicolu Wojewoda and Isobel Byrne	Infrastructure capacity The submission requests that Objective NWQ O1.9 -)1.11 that addresses phasing, infrastructure delivery and funding be reinforced to be provide stronger binding language in the context of the significant infrastructure deficit in Naas. More specifically the submission requests that an explicit “infrastructure first” sequencing rule is applied.with no residential phase occupied until the enabling and social infrastructure serving it is demonstrably in place or contractually committed. The submission also proposes that it should be a precondition that Uisce Eireann confirm capacity for each phase prior to planning being granted.
062 Maxine McClean	Infrastructure Delivery Plan The submission refers to existing local services such as healthcare and childcare, including road infrastructure and inadequate public transport services which are unable to meet the needs of the current population. States the proposed growth of the Northwest Quadrant (NWQ) will place further strain on services which are already at capacity. The submission asserts that the town requires massive infrastructure upgrades prior to delivery on any further housing.
063 Berenice Galvan	Infrastructure Delivery Plan The submission states the quality of life in the area is being destroyed (by lack of transport infrastructure) and requests the

	council focus on how to improve the lives of the existing population before creating further growth and chaos.
064 Bob Quinn	Naas Harbour Bridge delivery States the Naas Canal Harbour connection should be treated as essential strategic infrastructure to connect/stitch this new district with the town centre, rather than an optional public realm enhancement. The Masterplan identifies the need to connect the area with the heart of Naas, but it does not identify a secure connection that is deliverable or enforceable. Legally binding phasing strategy / Canal Quarter The submission requests the council provide a legally binding phasing strategy for the delivery of the necessary public transport, active travel, public realm and social infrastructure, alongside the completion of the Canal Quarter.
078 Jakub S	Infrastructure Delivery Plan • The submission welcomes the proposed Masterplan but states this additional housing cannot happen in isolation as the scale of development will fundamentally reshape the wider town and place additional pressures on existing roads, public transport and social infrastructure provision. • States if existing infrastructure shortfalls in the town are not identified and resolved, the town will continue to face severe congestion issues which ultimately will impact the success of the Northwest Quadrant (NWQ).
079 Anthony Egan	Infrastructure Delivery Plan • States the Masterplan is front loaded with ambition and risk, whilst representing a framework for developers and investors rather than a plan tailored to support existing residents of Naas. • Infrastructure delivery is fully reliant on external agencies, however there is no evidence of binding capital commitments or aligned timelines given. • States the delivery of 300 homes per year on greenfield sites is exceptionally ambitious, where the written statement concedes this may not be achievable where no planning permissions have yet been sought.
081 T. James Kinlough	Infrastructure Delivery Plan States the Masterplan should include binding phasing requirements with clear delivery triggers, rather than the use of loose phrases such as; transport infrastructure will 'keep pace' with development.

	Recommends the insertion of text which states no residential development beyond the initial phase should commence until walking, cycling and public transport, bus priority and interchange infrastructure to serve this phase are delivered and operational. Recommends that public transport infrastructure that includes a dedicated bus corridor and bus priority with direct links to Naas and Sallins Train Station should be treated as key enabling infrastructure and not as a service that needs to be added once demand exists. Recommends the inclusion of a stronger implementation framework that involves the council, the National Transport Authority (NTA), Transport Infrastructure Ireland (TII), Irish Rail, relevant government departments and developers. States that Naas should not continue to sit outside the scope of major transport infrastructure projects, while expecting to absorb major population growth. The Masterplan should include a comprehensive package of transport measures such as DART+, BusConnects, new rail station, including appropriate funding to deliver objectives and the vision of the NWQ mobility strategy.
083 Kildare Green Party	• The submission supports the delivery of housing with the condition that all supporting services are delivered in advance of phase 1, and no data centre development is permitted within the Northwest Quadrant (NWQ). • The submission requests the council not to adopt the Masterplan Framework until it has evaluated how the proposed 4,000 homes will intersect with the energy demands from adjacent ICT infrastructures. • It also requests that vital infrastructure is in place prior to the delivery of phase 1 (1,400 units) as outlined in the Masterplan.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 12: Delivery and Funding of Enabling and Supporting Infrastructure

Issues Raised

Submissions received relating to Delivery and Funding or Enabling and Supporting Infrastructure:

Submission No. and Name.	Issue
3. Joseph Bergin	• Infrastructure Cost – The Variation doesn't include the cost plan for the proposed infrastructure. • Financial Viability / Development Appraisal - There is no development appraisal demonstrating the scheme is financially deliverable. Infrastructure costs (likely hundreds of millions) are uncoded. There is no assessment of whether development levies, state funding, or developer contributions can actually fund the enabling infrastructure. • Funding Strategy – The financial viability of the scheme is deferred until after the statutory plan is adopted, meaning that the funding of infrastructure is not made clear, and decisions difficult for private sector investors. • Master Developer Model – The terms of reference / mechanism for establishing the master developer should be defined. This role is hugely significant in bringing forward the NWQ and will be is very powerful. • Landowner windfall – Increases is land value need to be captured to fund the necessary infrastructure to support the development. A land value uplift mechanism needs to be defined to ensure that the benefits from the development are shared to benefit the common good, rather than the current landowners.
7 Conor Whelan	Infrastructure Cost and funding assessment The following were required by the Naas Local Area Plan Objective NWQ 1.1 and should be published: <i>Infrastructure cost and funding assessments;</i>
11. Housing Infrastructure Services Company (Niall Morrissey, CEO)	The Housing Infrastructure Services Company (HISCo) submit that they would be available to explore potential collaboration with Kildare County Council (and other partners) on the delivery of infrastructure in the Northwest Quadrant. HISCo's Guiding Principles are as follows: • Projects to be considered must be predominantly residential; however, there is recognition that most schemes will contain retail and/or commercial elements. • Schemes that contain a good mix of accommodation types and tenures will be welcomed. • Unit types and prices will be assessed in terms of marketability.

	• There must be an identifiable element of infrastructure that HISCo can deliver at a reasonable cost. • The scheme must have planning approval before being considered for final approval by HISCo (early discussion of projects is welcomed).
14 Naas Town Strategy Group	Infrastructure Delivery Plan, Cost Plan and supporting Funding Strategy The Framework documents define an extensive Infrastructure Delivery Plan, including enabling and supporting infrastructure, that will cost many millions of euros to deliver. However, the Infrastructure Delivery Plan does not include the enabling infrastructure outside of the Northwest Quadrant boundary that will be required to support the Quadrant. In particular, the absence of a Transport Impact Assessment means that the upgrades to the street network outside of the NWQ lands are not properly understood and have not been included in the Infrastructure Delivery Plan. Thus, the costings for this infrastructure are not understood and provision has not been made for their funding. This means raises legitimate questions about how the unquantified enabling infrastructure can be funded, who will be responsible for their delivery, when it is required, and whether the Northwest Quadrant is viable. This will impact on the timeline for the delivery of housing and the assumptions included in the Framework Masterplan. More widely the delivery, funding and financial strategy for the NWQ Infrastructure Delivery Plan are not yet developed. This presents a risk to the deliverability of the Northwest Quadrant, its viability and ability to accelerate housing delivery and achieve the defined housing trajectory. The delivery pathway for the Northwest Quadrant has not been prepared. The submission considers that this affects the credibility of the Framework.
16. Ricardo Paco	Monitoring of cumulative impacts of development The Council / body responsible for monitoring the cumulative impacts of the Northwest Quadrant development, including consideration of transport services; infrastructure provision and capacity and community services.
17. Anisha Khazanchi	Utility infrastructure capacity – impacts on Naas The development of the Northwest Quadrant could lead to potable water pressure drops, drainage issues and service interruptions (e.g. electricity / broadband). This should be monitored as delivery progresses.

23. Sally J Byrne	Funding Strategy and Financial Strategy – clear sight of how much the infrastructure will cost and how this will be funded, and financial planning for when funds will be required for each project and the source of that funding
24. Ger Ui Chongaile	Funding Strategy It is submitted that the infrastructure delivery plan requires costings and a funding strategy to demonstrate that the infrastructure can be delivered in a timely manner.
31. Caragh Court Residents Association	As per submission #3, 56 and 57
34. Paul O'Brien	Embedding a plan-led approach so that essential infrastructure is delivered alongside, or ahead of, new residential development.
45. Caithlin Craig	- The submission seeks that infrastructure provision should keep pace with housing delivery and not be a future aspiration. The submission requests that Kildare County Council: - Continue to monitor infrastructure capacity throughout the development to ensure that services keep pace with population growth.
067. M Donovan	Delivery and Funding of Enabling and Supporting Infrastructure - Considering the scale of investment required, the submission states that developers should be forced to invest in the necessary infrastructure (parks, green spaces, schools, healthcare utilities, traffic solutions) first before developing housing. - Notes that the existing infrastructure provision is at capacity with no room for further growth.
079 Anthony Egan	Delivery, Funding and Financial Strategy - Refers to the concept of a 'Master Developer', who would have control over the delivery of roads, open spaces and utility provision. States this model is not defined in planning law and its selection process is undescribed with no governance structure to safeguard public interest. - Notes concern regarding the financial viability of the NWQ vision due to the lack of capital costings and budget estimates required for the delivery of supporting infrastructure and community services. - It notes concern with the lack of analysis provided in respect of development levies, state funding or developer contributions that can realistically enable infrastructure delivery.

083 Kildare Green Party	- The submission requests the council not to adopt the Masterplan Framework until it has evaluated how the proposed 4,000 homes will intersect with the energy demands from adjacent ICT infrastructures. - It also requests that vital infrastructure is in place prior to the delivery of phase 1 (1,400 units) as outlined in the Masterplan.
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Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 13: Land Acquisition

Issues Raised

Submissions received relating to Land Acquisition

Submission No. and Name.	Issue
3. Joseph Bergin (and 31,56,57)	Land Assembly Risk: There is a real risk that the need to acquire land by CPO (rather than by agreement) could result in the phasing sequence being undermined.
55 Ciara Doyle	Development of private land The submission contends that land shouldn't be zoned for development against the will of private landowners who do not wish to see their land developed, as this is unfair and intimidatory. This includes The Knocks lands, that are proposed for development (park and bus route) against the will of the landowner. The land is used for agriculture and also has great biodiversity value.
079 Anthony Egan	Landownership - States there is no transparency provided in terms of land ownership and title boundaries to show the public which private landowners stand to gain from this zoning exercise. - States the assembly of 300 hectares across multiple landowners is a complex task, where the reliance on compulsory purchase orders (CPOs) is slow and legally

	contested, resulting in the risk of a single landowner disrupting the entire phasing.
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Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 14: Placenames

Issues raised

Submission No. and Name.	Issue
83. Kildare Green Party	The submission requests that the following issues be included in the Framework Masterplan: Naming the streets school competition with 2 out of 4 thousand new units to have logainmneacha (Irish placenames)

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 15: Energy Resilience

Submissions received relating to Energy Resilience

Issues raised

Submission No. and Name.	Issue
53. John Kavanagh	District Heating / circular environment The submission proposes that a district heating system be included to provide energy for public buildings (e.g. the swimming pool, schools, Kildare County Council, and others).

	Energy The submission proposes that the Framework Masterplan goes further than the Building Regulations and requires solar panels on all buildings to provide energy, including on non-residential building elevations. The submission considers this will be essential if data centres are developed.
55. Nicolu Wojewoda and Isobel Byrne	Climate and energy: In order to ensure “low carbon”: • The submission requests that the “low carbon” branding be met with binding standards. The submission suggests: • Energy and fabric standards demonstrably above current building regulations, with an on-site renewable energy requirement and an embodied-carbon limit. • A district-heating / low-carbon energy network feasibility and delivery requirement tied to the Phasing Strategy, rather than left to individual developers’ discretion.
83. Kildare Green Party	The submission requests that the following issues be included in the Framework Masterplan: • Solar street lighting • Community energy bank battery reserve in built into the plans which is paid by developers.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Chapter 16: Urban Development Zone

Issues Raised

Submissions received relating to Urban Development Zone designation.

Submission No. and Name.	Issue
082 Pat Kane	Urban Development Zone (UDZ) Process • The submission refers to Variation No.3 of the CDP which identified a two-stage implementation process for the Northwest Quadrant (NWQ) and notes the second stage of the process which is the commencement of the UDZ process. • States the Masterplan does not provide a clear explanation of how the UDZ process will operate, how the overall statutory delivery mechanism will function, or how the wider vision and housing strategy will be protected if implementation does not progress in accordance with the programme schedule. • The submission acknowledges the recent funding received for the pedestrian bridge linking the NWQ to the town, however this should not be regarded as demonstrating the comprehensive funding and implementation framework required to deliver the entire NWQ. • If the UDZ designation and associated delivery mechanism has changed since the adoption of Variation No.3, it requests the council to explain what mechanism has replaced this and why it is considered capable of delivering a project of this scale. • It asserts the statutory delivery pathway is fundamental to the credibility of the overall housing strategy for not only the NWQ, but for a substantial proportion of future housing in the town. • It states the overall delivery schedule is unclear in the Masterplan and notes that if development cannot realistically proceed until the UDZ mechanism is in place, then the elected members should understand how this will affect the delivery programme and the wider housing strategy for Naas. • It states the Masterplan should clearly demonstrate how piecemeal or out of sequence development will be avoided and what mechanism will enable the council to review the wider housing strategy for Naas if the NWQ does not progress.
77 Evara / Developments Limited and Millennium Falcon Holdings	Also raised in this submission (see section 6)

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Strategic Environmental Assessment Screening and Appropriate Assessment Screenings

Issues Raised

Submission No. and Name.	Issue
03. Joseph Bergin	Environmental Assessments of the Variation – The submission asserts that full SEA and AA are required for the proposed statutory land use plan, and that only undertaking screenings is open to challenge.
07. Conor Whelan	The following evidence base is requested to be published: • Associated Environmental Assessments and their environmental evidence; • Ecological, habitat and species surveys;
024. Ger Ui Chongaile	Environmental assessment The submission queries the lack of detailed environmental assessment and ecological surveys to underpin the proposed development.
027 Diarmuid Parker	Environmental Impact Assessments An environmental impact assessment should be prepared.
031 Caragh Road Residents Association	Environmental Assessments of the Variation – The submission asserts that full SEA and AA are required for the proposed statutory land use plan, and that only undertaking screenings is open to challenge.
056 and 057 Caragh Court Residents Association	Environmental screenings The submission considers that the SEA and AA screenings prepared in support of the Proposed Variation are insufficient to properly assess the environmental impact of the proposed urban extension, considering proximity to heritage assets and the ecological sensitivity of the canal corridor. The submission requests that the Council reconsider whether a full assessment is required before the

	Variation is adopted. Reliance on the County Development Plan SEA and AA is questioned as the urban extension and its scale of development / infrastructure wasn't defined at that stage.
060 Ciara Doyle	Strategic Environmental Assessment The submission questions the conclusion of the SEA Screening and its conclusions. The submission considers that there will be significant impacts on the environment.
079 Anthony Egan	SEA and AA Screening States that the delivery of 4,000 homes on a 300-hectare greenfield area that borders an ecologically sensitive canal, goes well beyond a high-level assessment under the County Development Plan. This leaves the Masterplan open to judicial reviews by environmental groups Environmental Assessments Refers to the lack of environmental assessments to understand the potential impacts on biodiversity and ecological assets which should be provided prior to adoption.
081 T. James Kinlough	SEA and AA Screening The submission refers to the SEA and AA screenings which identifies no significant environmental effects, however the submission states the Masterplan is likely to have major consequences if the area generates high levels of traffic. It notes such consequences as increased emissions and congestion, noise pollution, poor air quality including greater land take for roads and parking. It requests that climate and environmental objectives should be linked to measurable transport outcomes and not just design aspirations.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Strategic Flood Risk Assessment

Issues Raised

Submission No. and Name.	Issue
007 Conor Whelan	Northwest Quadrant Framework Masterplan Evidence base: Naas Flood Relief Scheme and flood risk The submission seeks the publication of a number of supporting documents to the Variation (some identified in Naas Local Area Plan Objective NWQ 1.1) to provide transparency on the evidence-base that underpins the Variation to enable the public to understand, evaluate and comment on their contents as part of the public consultation process. • Naas Flood Relief Scheme outputs (e.g. Hydrology and Hydraulic Modelling Report and climate change scenario mapping); • Inputs to Naas Flood Relief Scheme regarding ground investigation, soil testing and infiltration testing; • Site-Specific Flood Risk Assessment to enable an understanding of the necessary flood relief measures.
009 John Murphy	Northwest Quadrant Flood Risk It is submitted that the <i>OPW Flood Risk Study</i> (full supporting evidence base on flood risk and flood risk management) should be published as an evidence-based document in support of the <i>Framework Masterplan</i> and its <i>Strategic Flood Risk Assessment</i> on the grounds that: • This would help citizens of Naas to understand the flood issues affecting the Northwest Quadrant and their interrelationship with other areas of the town (e.g. the Sallins Road, which has been subject to recent flooding), and whether development will pose a flood risk to adjacent areas of the town. • The preparation of the Study was a requirement of Objective NWQ1.1(b) of the Naas Local Area Plan, which states “<i>No masterplan shall be completed until the OPW Flood Study has been finalised for the lands in the Northwest Quadrant.</i>” • Climate change scenarios (Mid-Range and High-End Future Scenarios) need to be understood. • The OPR previously stated in their submission to the Local Area Plan process (25 May 2021) that the zoning of lands within the Northwest Quadrant was considered premature pending completion of the further flood assessment work,

	and updated Strategic Flood Risk Assessment and the preparation of a detailed masterplan. The submitter requests that the following specific questions be addressed: Flood risk study methodology / detail • Have site-wide permeability testing, infiltration testing or groundwater investigations been completed? If so, can these be published? • If no tests have been completed how has this been considered in preparing the Framework Masterplan and if future tests are required how could this affect the development capacity of the Northwest Quadrant. Flood Risk Study • How future climate change flood risk scenarios affect the lands proposed for development. • What flood relief measures may be required for the Northwest Quadrant and who would pay for them. • Whether any flood relief measures for the Northwest Quadrant would affect other parts of Naas. • What impact the development of the Northwest Quadrant may have on existing communities already experiencing flooding problems. Whether the requirements of Objective NWQ 1.1(b) in the <i>Naas Local Area Plan</i> have been fully satisfied.
012 Paul Doyle	Northwest Quadrant Flood Risk The submission is concerned that the development of the Northwest Quadrant could lead to increased flood risk for other parts of Naas, as well as to flood risk within the Northwest Quadrant itself. It requests that the evidence-base that underpins the Framework Masterplan and the Strategic Flood Risk Assessment should be placed in the public domain for consultation to allow independent scrutiny and to demonstrate that a precautionary approach has been taken. Specific issues / questions are posed for response: • Have cumulative flood risk impacts been fully assessed in the masterplan and statutory plan -making process? • Have climate change scenarios been considered in determining the extent of land zoned for residential, educational and employment lands?

	• Have items been deferred to the planning application stage that would more appropriately be considered at the plan-making stage? If so, why? • Will public money is required to enlarge culverts (under Millennium Park Road and the M7)? • Will Kildare County Council publish a “<i>Flood Risk Transparency Statement</i>” before finalising the land use zoning framework? The submission requests that the following items be clearly set out and confirmed: • Climate change scenarios should be published, along with their assumptions, for the Naas Flood Relief Scheme hydraulic modelling. • Are any land parcels affected by flood risk in climate change scenarios and can safely access and egress be maintained. • Is there reliance on future flood relief works; Development phase delivery will not increase flood risk elsewhere (i.e. on other parts of Naas or the NWQ).
14 Naas Town Strategy Group	Flood risk, Climate Resilience and Self-Sufficiency The Framework documents have not demonstrated that the land is suitable from a flood risk perspective as some land parcels are subject to further investigation regarding flood mitigation works. The submission suggests that if additional flood risk assessment is required then the elected members and the public should not be expected to determine whether the proposed development capacity, land-use allocations, infrastructure requirements and phasing strategy are appropriate. The submission is particularly concerned that it has not yet been demonstrated that the Northwest Quadrant can be developed in a manner that is self-sufficient from a flood management perspective. If future development capacity is dependent upon strategic flood interventions elsewhere within the wider catchment, then those interventions should be clearly identified, assessed and publicly available before the Framework is adopted. The Group considers that the proper planning sequence is straightforward. Firstly, flood risk should be fully assessed. Secondly, any mitigation measures, infrastructure requirements and development constraints should be identified. Thirdly, the Framework should be prepared having regard to those findings. The issue is not whether flood risk can ultimately be managed. The issue is whether sufficient

	information currently exists to <i>justify</i> embedding the proposed development framework into the statutory planning policy of the County Development Plan. The flood risk evidence base to inform decisions should be made available to inform any decisions and public scrutiny.
043 Abbey Bridge and Canal Residents Association	Abbey Bridge area hydrology: There are a number of underground streams in the area that should be considered.
060 Ciara Doyle	Flood risk: Fields around The Knocks and Keredern House regularly flood and this should be taken into account in any development.
070 Cllr Seamie Moore	SFRA • States the Mill Lane Road (outside the NWQ boundary) is a serious flood risk due to a build-up of silt in the long pond in Oldtown Woods that will be located alongside the proposed bus corridor. • States this pond is the sink for two local rivers, namely The Ballymore River (Hospital Lakes) and The Tipper River (Seven Springs). • Requests for a programme of silt removal to at least define the water channel and allow a better flow into the Naas Canal.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Surface Water Management Plan

Issues raised

Submission No. and Name.	Issue
070 Cllr Seamie Moore	SWMP

	- States there is no mention of fish/salmon spawning sites in the streams flowing into the River Liffey and no evidential recommendations or commitments to remove pollution from drains or streams. - The submission requests engagement with Inland Fisheries Ireland to agree and ensure mitigation measures to prevent polluted run-off to the River Liffey are in place.
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Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Miscellaneous Issues

Issues Raised

Submissions received relating to Miscellaneous

Submission No. and Name.	Issue
1. Precious Lindelwa Phiri	Dementia-friendly infrastructure Consideration should be given to dementia-friendly infrastructure and age-friendly design principles.
3. Joseph Bergin	Consultancy Team The submission notes concern with the absence of an independent peer review on consultancy outputs which is a significant governance risk.
27. Diarmuid Parker	Developer-led development The Northwest Quadrant appears to be develop-led without foresight to existing or future issues, or a co-ordinated strategy for development.
43. Abbey Bridge and Canal Residents Group	Pre-planning engagement: The residents association would welcome future engagement in advance of future planning applications.
67 M Donovan	Public Consultation States the public consultation period of 4 weeks is not sufficient for the promoters of the plan to engage with the public or local representatives and encourages the council to

	engage with local stakeholders in a more meaningful way before going forward.
079 Anthony Egan	Consultancy Team The submission notes concern with the absence of an independent peer review on consultancy outputs which is a significant governance risk.
83 – Kildare Green Party	Naas Canal Quarter The submission requests that the following issues be included in the Framework Masterplan: - A water plaza adjacent the Eircom building - Monument to Wolfe Tone in the Naas Harbour

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

6 Submissions from Landowners relating to requests for the rezoning of land and other items

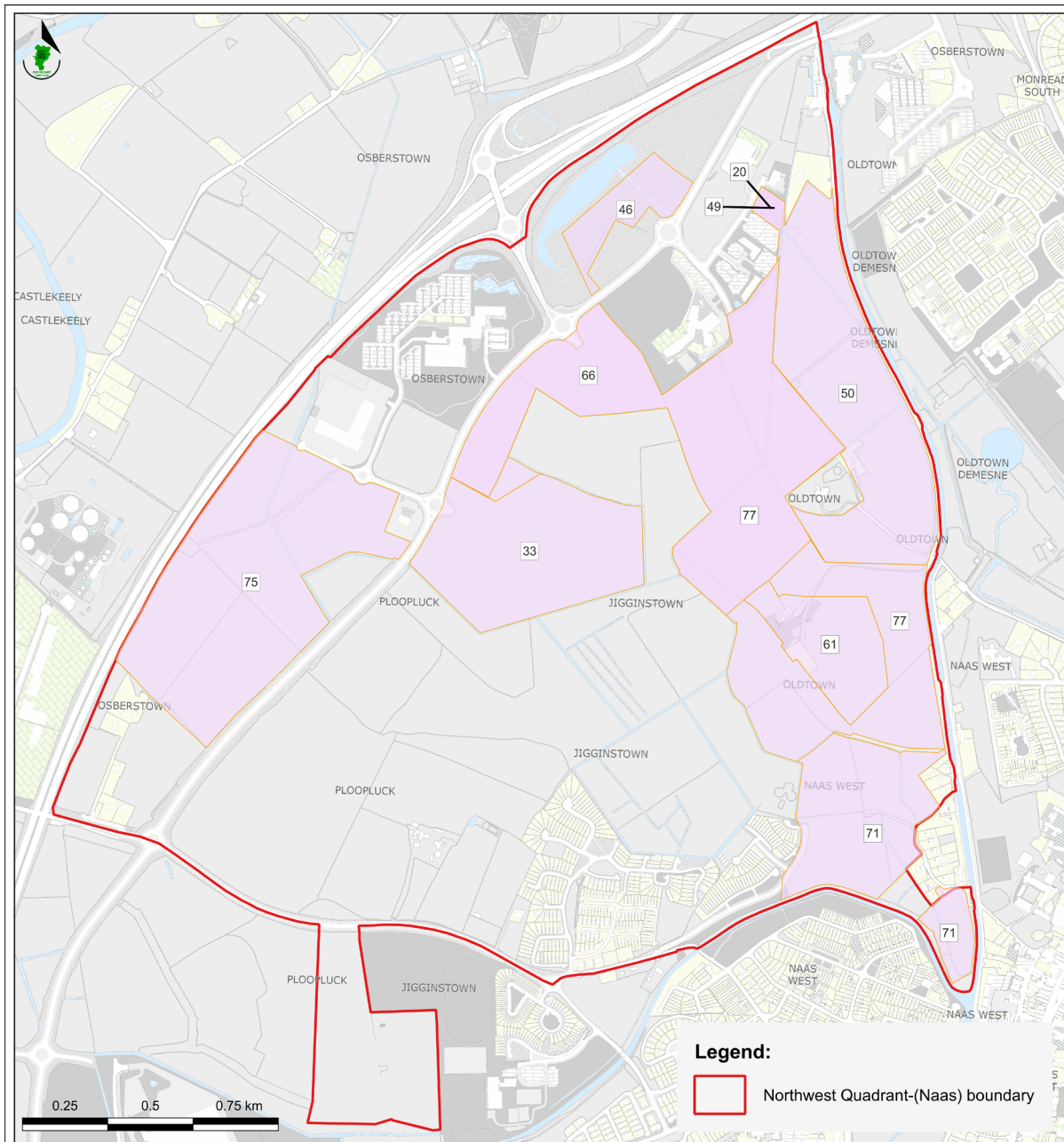
The submissions received from landowners (or those with a significant interest) relating to landholdings in the Northwest Quadrant lands are included in this section.

Ten submissions have been received from landowners (see Table 6.1 and Map 6.1 opposite illustrating sites referred to in the submissions):

Submission No.	Who from	Land use zoning objectives	Other objectives
20	Boran Packaging Limited	Yes	No
33	Glenveagh Limited	No	Yes
46	Millennium Falcon Holdings Limited	Yes	No
49	Millennium Falcon Holdings Limited	Yes	No
50	Aravonian Limited	Yes	Yes
61	Christine Mahoney	Yes	Yes
66	Millennium Falcon Holdings Limited	No	No
71	Westar Group	Yes	Yes
75	ALDI Stores (Ireland) Limited	No	Yes
77	Evara Developments Limited and Millennium Falcon Holdings Limited	Yes	Yes

Chief Executive's Report on Proposed Variation 5
of the *Kildare County Development Plan 2023 – 2029* (as varied)

Map 6.1: Sites relating to landowner submissions received



Submission Number

- 20 Boran Packaging LTD
- 33 Glenveagh Homes Ltd
- 46 Millennium Falcon Holdings Ltd,
- 49 Millennium Falcon Holdings Ltd,
- 50 Aravonian Limited
- 61 Christine Mahoney
- 66 Millenium Falcon Holdings Ltd
- 71 Westar Group,
- 75 Aldi Stores (Ireland) Ltd
- 77 Evara Developments Limited and Millennium Falcon Holdings

This section is divided into two sub-sections:

- Land use zoning objective requests;
- Requests relating to other objectives.

6.1 Land use zoning objective requests

Submission No. 20 – Boran Packaging Limited

Land parcel

This submission relates to the right-hand side land parcel annotated “15” in the land parcel diagram (left) and indicatively indicated in the aerial photo (right).



Issues Raised

Item request	Map Ref	Proposed Variation	Submission request	Ownership of submitter
Allocate site for employment focused use to reflect established use of Millennium Park	1	C – New Residential	Non-residential use: • Q – <i>Enterprise and Employment.</i> • H (5) <i>Light Industry and Offices; or</i> • Other non-residential	N

	Non-residential use
<i>Proposed Variation Land use zoning objectives</i>	<i>Submission request</i>

Land use zoning objective assigned to site adjacent to Boran Packaging Limited

It is submitted that the site outlined in red (above) should not be given a C – New Residential Land use zoning objective on the grounds that the proposed “isolated” residential use for the land parcel would not be a use compatible with Boran Packaging and surrounding employment uses. The proposed residential use sits between three employment sites / operations. Previously the site benefitted from an employment Land use zoning objective. It is considered that a sensitive residential use would compromise the plan-led employment role of Millennium Park and introduce a foreseeable operational conflict.

The submission requests that consideration be given to whether the land could be given an alternative employment targeted Land use zoning objective to protect established business operations, such as:

- Q – Enterprise and Employment; or
- H (5) Light Industry and Offices; or
- A suitable non-residential land use.

Furthermore, the submission proposes the following rationale for amending the Land use zoning objective from New Residential to an employment focussed land use zoning objective:

- Avoiding land use conflict;
- Protecting an established employer / business operation
- Avoiding poor residential amenity
- Maintaining the employment and innovation role of Millennium Park

- Plan consistency and coherent placemaking
- Avoiding fragmentation and precedent for a “conflict-prone land-use pattern” along Millennium Park Road.
- No material loss to housing delivery.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

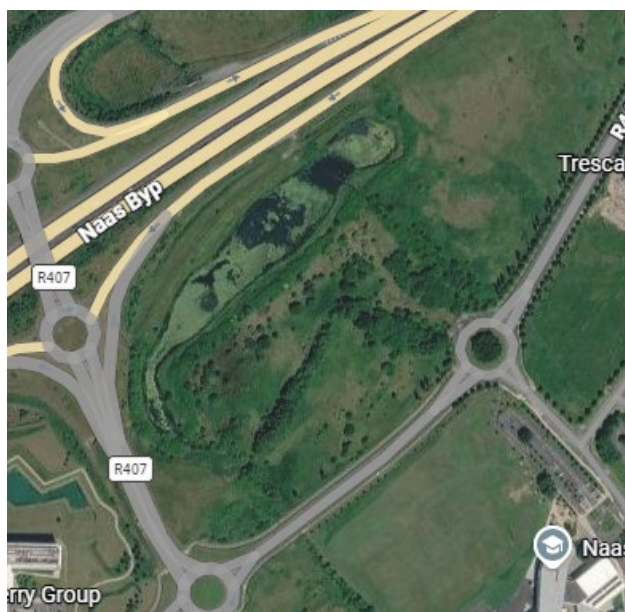
Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 46 – Millennium Falcon Holdings Limited

Land parcel

This submission relates to the land parcel annotated “1” in the land parcel diagram (left).

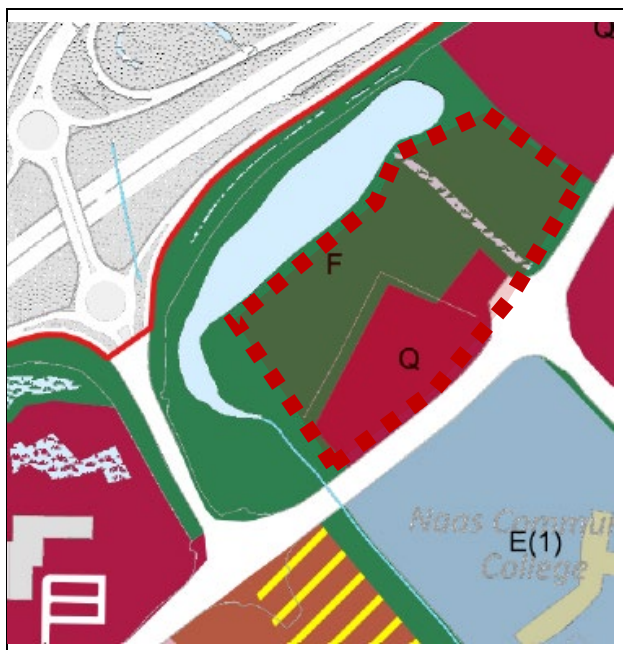


Issues Raised

Item request	Map Ref	Proposed Variation	Submission request	Ownership of submitter
Increase size of land parcel allocated for	2	F- Open Space and Amenity	Q – Enterprise and Employment.	Y

employment purposes				
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The submission requests that the land use zoning objectives be amended as illustrated below:

	Q – Enterprise and Employment
<i>Proposed Variation Land use zoning objectives</i>	<i>Submission request</i>

The submission requests that KCC consider reviewing the extent of F- Open Space and Amenity on their client's site adjacent to the Osberstown Attenuation Pond, with a view to increasing the portion of the site allocated for the purposes of Q – *Enterprise and Employment*.

The submission seeks this change on the grounds that:

Despite the open-water appearance of the Osberstown Attenuation Pond, this is a critical civil infrastructure element, not a natural parkland feature.

Planning Considerations – Inappropriate Location for Open Space and Amenity

The delivery of high-quality open space for the enjoyment of the public is critical infrastructure for towns and villages in County Kildare. These services significantly enhance the quality of life of the citizens of Kildare. Policy SC P2 of the *Kildare County Development Plan* is to:

“Require the delivery of a range of universally accessible, integrated, and well-connected social, community, cultural, and recreational facilities, close to the communities they serve through the designation and safeguarding of specific land uses at appropriate strategic and optimised locations in settlement plans and mandatory Local Area Plans in County Kildare.”*

*Our Emphasis

The subject lands are not considered to accord with this policy. The location of the park and green space off Millennium Park Road, a busy distributor road linking directly to the

M7 via the Millennium Park Interchange and c. 100m from the motorway, is suboptimal in terms of accessibility, safety, and overall placemaking. The lands are somewhat remote from residential zoned lands within the NWQ and existing residential development within Naas more generally. The location is essentially surrounded by lands proposed to be zoned enterprise and employment and accommodating existing and planned civil infrastructure including the existing Osberstown Attenuation Pond and a proposed 38kV substation.

Proposed LAND USE ZONING OBJECTIVE inconsistent with NWQ Statement

It is noted that there is very limited clarity or detail of the role of the open space at this location. The Draft NWQ Statement does not in Section 11 provide any detail on this open space and its purpose or role. *Table NWQ16A: Urban Recreation and Amenity / Schedule of Key Open Spaces* does not provide any guidance on what is proposed here or any synergies with other land uses. The *Site-Specific Development Objectives Map* which includes key parks and open spaces does not include the subject lands.

It is also noted that within the NWQ Character Guidance the subject lands, as shown in Figure 3 below, appear to form part of the “eastern office district” (7):

“Two employment zones: the eastern office district and the western light industry and logistics hub, with complementary mixed-use light industrial, offices and residential zone on southern side of Millennium Park Road.”

The intent that this area be developed as an office district means the zoning of a significant portion of the lands at the centre of the site as “Open Space and Amenity” is not appropriate and is contrary to this objective.

Benefit in Zoning Enterprise and Employment

The NWQ Statement has as a key priority the generation of employment. Indeed, one of the only 8 no. objectives is “*Promoting employment opportunities and supporting innovation*” There is a target that c. 5,000 jobs be generated onsite. In order to meet these objectives and targets and objectives it is crucial that supporting land zonings are provided. The zoning of the subject lands for Enterprise and Employment has a number of key benefits:

- Provides a more consistent urban form and setback addressing the M7 corridor;
- Uses more appropriately lands proximate to the Osberstown Attenuation Pond;
- Better enables the NWQ deliver the targeted employment growth in accordance with the NWQ Statement; and
- Delivers a more coherent Eastern Office District in accordance with the NWQ Statement



In this regard Millenium Falcon Holdings Ltd (MFHL) requests that the subject site benefit from an increase in the area allocated for the purposes of Q - Enterprise and Employment to the extent indicated in the diagram below.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

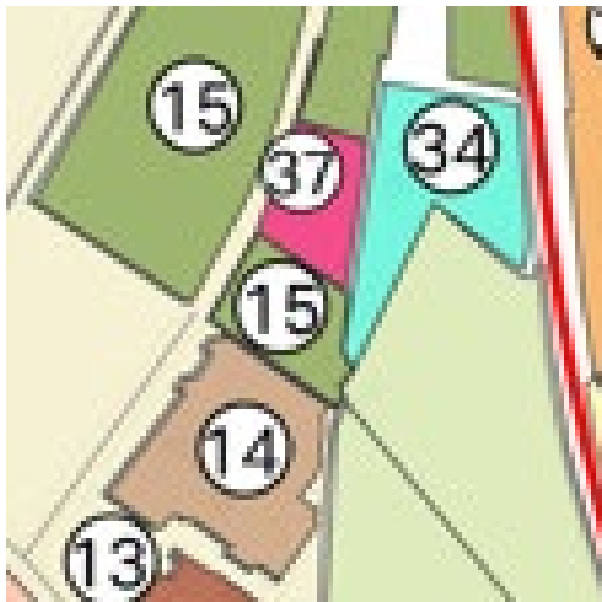
Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 49 – Millennium Falcon Holdings Limited

Land parcel

This submission relates to the right-hand side land parcel annotated “15” in the land parcel diagram (left) and indicatively indicated in the aerial photo (right).



Issues Raised

Item request	Map Ref	Proposed Variation	Submission request	Ownership of submitter
Allocate site for employment focused use to reflect established use of Millennium Park	1	C – New Residential	Q – <i>Enterprise and Employment</i> . H (5) Light Industry and Offices Other non-residential	N

Millennium Park Road / Eastern Office District / Non-compatible residential use

The submission makes a similar request to Submission 20. The submission requests that consideration be given to whether the subject site identified in the map below could be given an alternative employment targeted LAND USE ZONING OBJECTIVE that would enable a suitable employment use (e.g. office, R+D, laboratory, light industry), such as:

- Q – Enterprise and Employment; or
- H (5) Light Industry and Offices; or

- A suitable non-residential land use.

Furthermore, the submission proposes the following rationale for amending the LAND USE ZONING OBJECTIVE from C - New Residential to an employment focussed land use zoning objective:

- Maintaining the employment and innovation role of Millennium Park and the employment ambition set out in the NWQ Statement.
- The subject lands are suitable for employment-generating uses, including offices, laboratories, R+D, light industry, etc.
- The proposed residential land use is not consistent with the adjacent land uses within Millennium Park / adjacent operational businesses in the employment sector and does not provide a coherent land use strategy for the area.
- The proposed residential use could have an adverse impact on the operation of existing adjacent employment uses (e.g. those in the industrial sector).
- The proposed residential use could have an impact on the developability of adjacent sites for employment use,
- The proposed residential use will not be proximate to the town and bus service;
- Significant provision is already made elsewhere for residential development, and there are more coherent and suitable locations within the NWQ to accommodate high quality housing. The amendment sought is therefore limited, site-specific, and according with sustainable planning and clear objectives of the NWQ Statement to deliver employment opportunities and high-quality housing

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 50 – Aravonian Limited

Land parcel

The submission relates to the following lands.

Figure 1: Subject Site (Boundary indicative only)

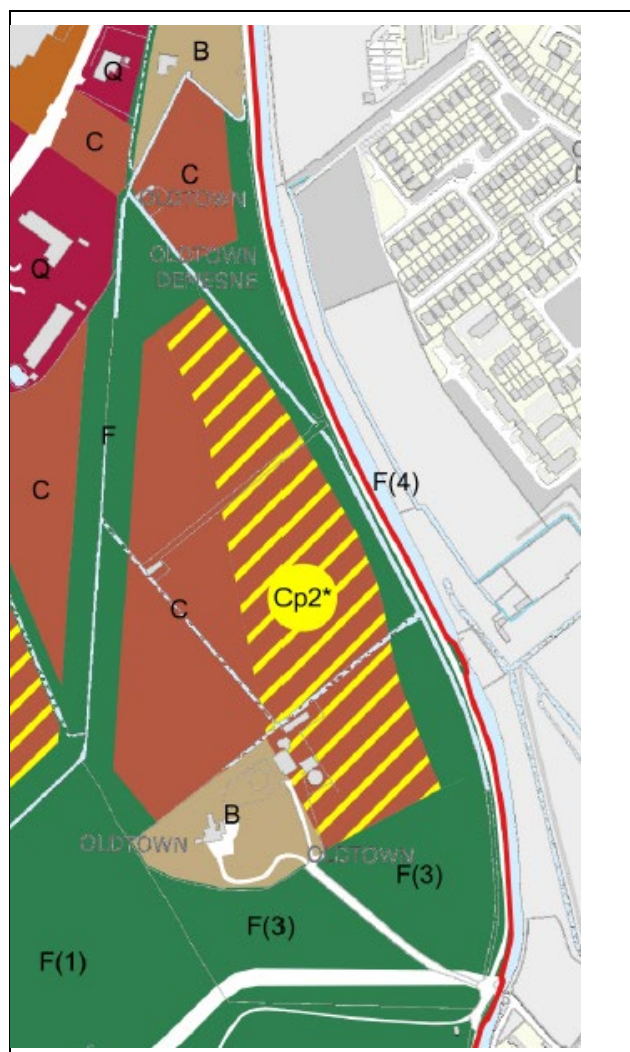
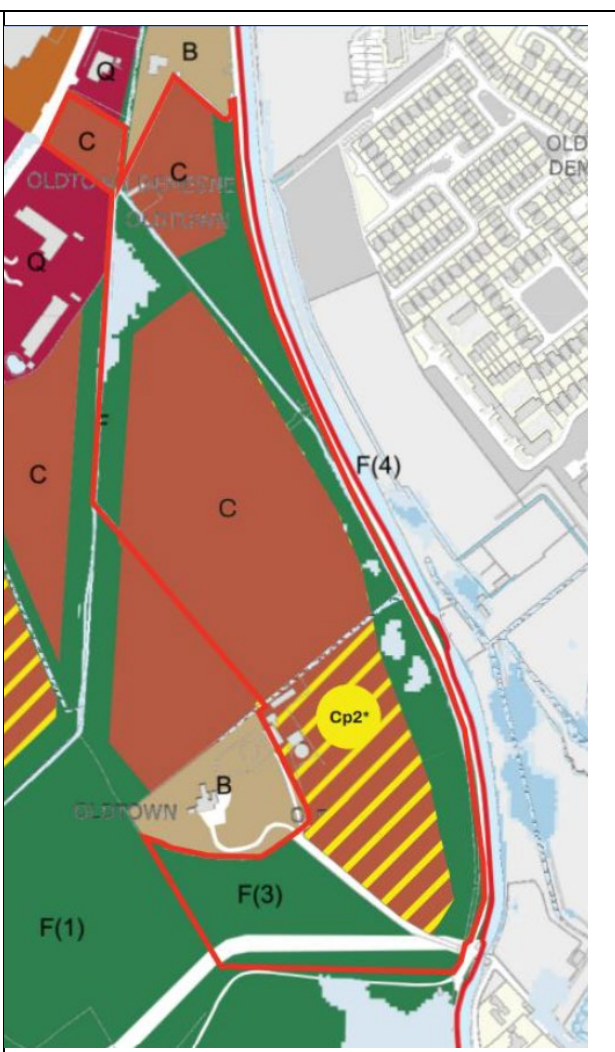


Issues Raised

Land use zoning objective Request

Item request	Map Ref	Proposed Variation	Submission request	Ownership of submitter
Northern parcels – no request	1	C – New Residential	(no change)	Y
Central parcel – bring forward whole land parcel as part of Phase 1	2	C – New Residential and CP2* - Phase 2 Residential with residual mitigatable flood risk	C – New Residential	Y
Southern parcel – omit 1.8 hectares of land from Main Park and allocate for residential use	3	F – Open Space and Amenity	CP2* - Phase 2 Residential with residual mitigatable flood risk	Y

The submission requests that the land use zoning objectives be amended as illustrated below:

	
<i>Proposed Variation Land use zoning objectives</i>	<i>Submission request</i>

Central land parcel

The submission requests that the land use zoning objective for the northern lands (north of Keredern House) zoned for the purpose of CP2* should be amended to C – New Residential. This proposed change would allow the lands in question to be brought forward as part of Phase One, rather than Phase Two. The submission asserts that the lands are highly suited to delivery in the short term on the basis that:

- They are close to the existing Naas footprint;
- Achieve alignment with the Character Area Guidance and the delivery of the Northern Neighbourhood.
- Help achieve a critical mass to support the proposed Landen Park Bridge plaza Focal Point;

- The site will be serviced by Phase One infrastructure provided by the development (via the site currently zoned C – New Residential adjacent to Boran Limited).
- The site will be accessible from Millennium Park Road / pedestrian and cycle network and the proposed Landen Park Bridge corridor when it is delivered.
- The northern block will help to deliver the Landen Park Bridge plaza.

Southern land parcel

The size of the major park should be reduced by 1.8 hectares to enable the extension of the residential land use allocation to increase the area of land available for development on the landholding from c.9.1 hectares to 10.84 hectares, whilst maintaining the Canalside buffer linear open space (rezone land from F – Open Space and Amenity to CP2* - Phase 2 Residential with residual mitigatable flood risk). The submission states that the proposed change is considered moderate in the context of the wider site and the Northwest Quadrant. The submission links this request to the Naas Local Area Plan land use strategy (zoning the land Strategic Reserve), the Keredern House avenue configuration (see below) and the absence of historic landscape / mature trees remaining on the eastern side of the landholding adjacent to the canal. The submission also asserts that the open space provided on the adjacent site (in separate landownerships) provides ample open space for the needs of the Northwest Quadrant Main Park.

The submission also states that bringing the area of residential development southwards to the Keredern House avenue enables its frontage / residential development location to be proximate to the proposed bus stop location (indicated in the Public Transport diagram) and provide an activity “focal point” adjacent to that bus stop.

The submission also suggests that the extension of the residential land use allocation would:

- Enable coherent development in alignment with Objective NWQ O1.7 Coherent Development.
- Accelerate the provision of Canalside Open Space;
- Help the Tandy's Bridge Focal Point.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

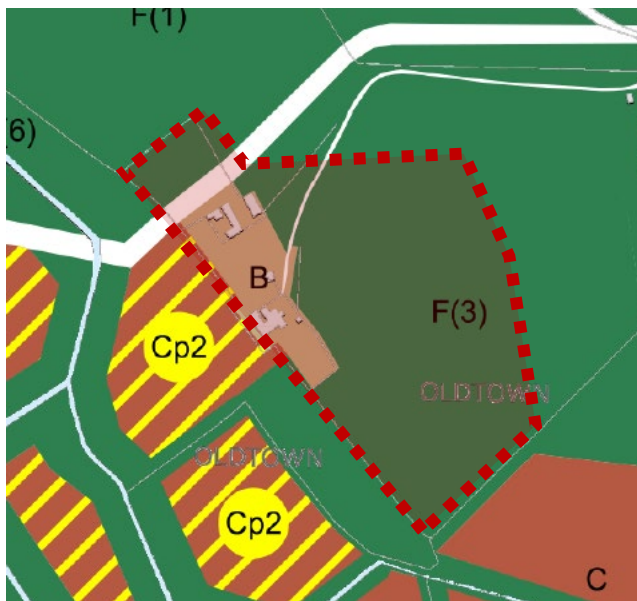
Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 61 – Christine Mahoney

Land parcel

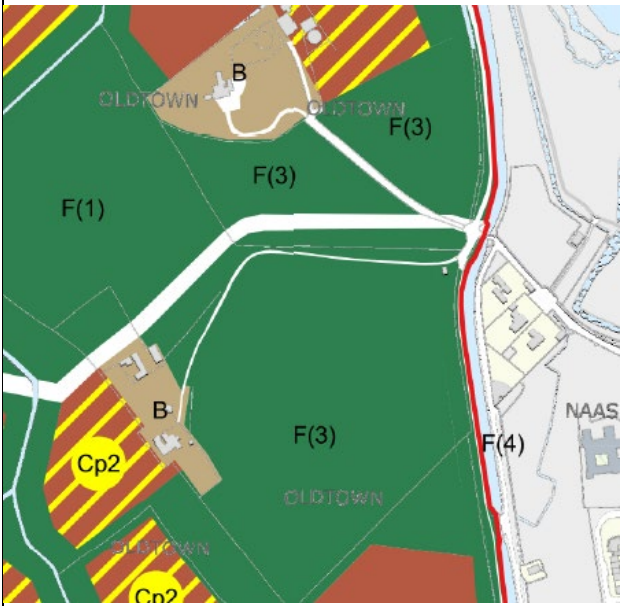
This submission relates to NWQ land parcel annotated “17” (left) and an indicative boundary on the aerial photo (right).



Issues Raised

Land use zoning objective Request

Item request	Map Ref	Proposed Variation	Submission request	Land parcel ownership
Northern field – omit sports grounds	1	F – Open Space and Amenity	I – Agriculture	Y
Northern field – omit transport corridor	2	Transport Corridor (no LAND USE ZONING OBJECTIVE)	I – Agriculture	Y
Knocks House	3	B – Existing Residential	I – Agriculture	Y
Paddock – retain as paddock	4	F – Open Space and Amenity	I – Agriculture	Y
Land parcel to west of Knocks House	5	Cp2 – Phase 2 New Residential	Not defined (flood compatible use)	N

	I - Agriculture
<i>Proposed Variation Land use zoning objectives</i>	<i>Submission request</i>

The submission from Christine Mahoney, owner of The Knocks house, farm outbuildings, and associated land. The wider (immediately adjacent) “Knocks lands” were sold in 2023 to Millennium Falcon Holdings Limited. The site is surrounded by land

in the ownership of Millennium Falcon Holdings that is being progressed towards development in partnership with Evara.

The submission sets out that the treatment of The Knocks in the proposed Framework Masterplan does not have the agreement of the landowner, who contends that the plan is “ill considered” as it relates to this landholding. More specifically:

Proposed development of land at The Knocks for Main Park and Sports Grounds

The submission objects to the proposed development of land in the ownership of The Knocks for public access in the form of sports grounds and open space (the Main Park) with pedestrian / cycle routes on the basis that:

- The family have resided at The Knocks for over 100 years;
- The land is not for sale; and
- The proposed use would have an adverse impact on privacy and the ability to maintain livestock and wildlife on the land.

Public Transport Corridor

The submission objects to the proposed public transport corridor bisecting The Knocks house from its farm buildings, which would be inappropriate.

Land to the west of The Knocks house

The development of this site for residential use is not considered appropriate as this will reduce natural light to the Knocks house and has also been subject to flooding (at times the field has been submerged in flood water).

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 71 – Westar Group

Land parcel

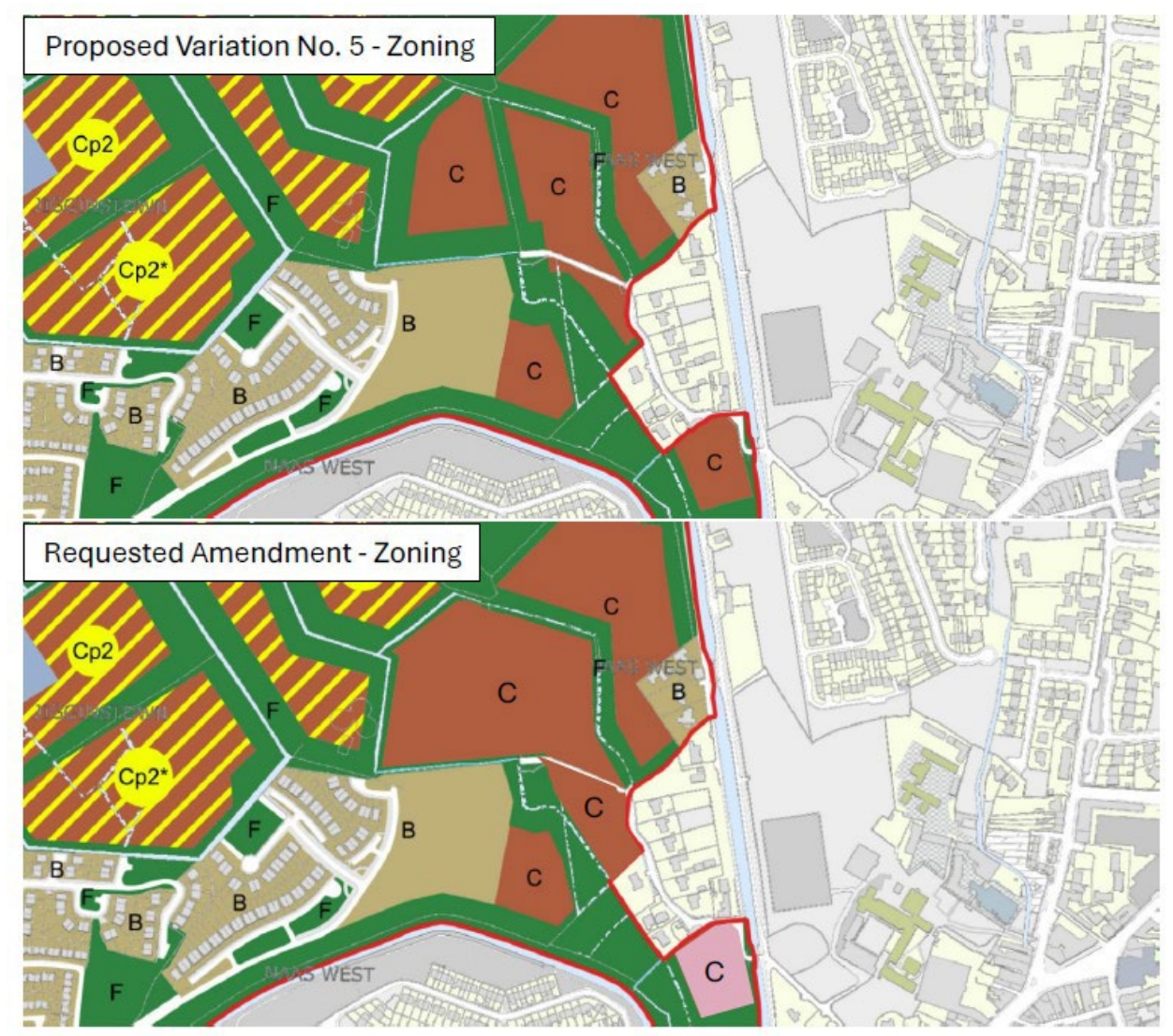
This submission relates to the land parcels annotated “10” (left) in the land parcel diagram and indicative boundary is shown on the aerial photo (right).



Issues Raised

Land use zoning objective Request

Item request	Map Ref	Proposed Variation	Submission request	Land parcel ownership
A – Zoning of Lands termed Finlay Park 'Phase 3'	1	F – Open Space and Amenity	C – New Residential	Y
B – Zoning of Lands termed Finlay Park 'Future Phases'	2	F – Open Space and Amenity	C – New Residential	Y
F: Zoning at Field Boundaries & Connectivity	n/a		F: Open Space - LAND USE ZONING OBJECTIVE matrix to include reference to access and other exceptions to enable land parcels to be developable	Y
F: Zoning at Field Boundaries: Corridor widths	n/a		If green hedgerow corridors are to be zoned then they should be consistent corridor widths across the whole NWQ lands.	Y



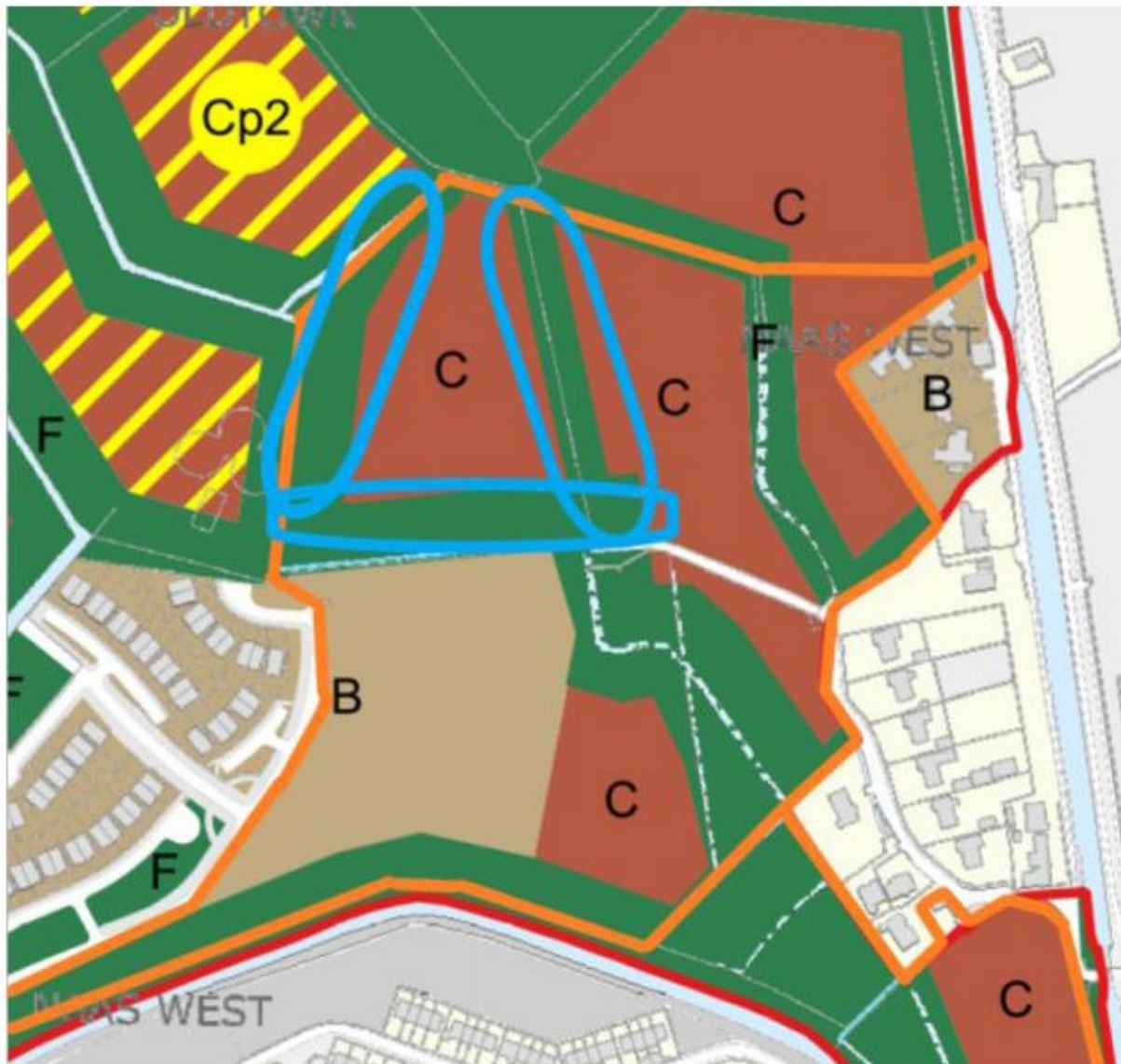
A – Zoning of Lands termed Finlay Park ‘Phase 3’

It is submitted that for Finlay Park ‘Phase 3’ including Harbour Public Park and Canal Crossing to progress planning and delivery, the zoning of lands here should revert to the previously agreed outline for ‘Phase 3’, that being the land parcels zoned in the Naas Local Area Plan . This is to enable the developer the ability to submit development proposals for planning permission based on those parameters.

B – Zoning of Lands termed Finlay Park ‘Future Phases’

The submission requests that the areas highlighted within the blue oval shapes / lines should on the map below (the site boundary being defined by an orange line) be considered for a C – New Residential LAND USE ZONING OBJECTIVE on the grounds that:

- The areas along the watercourse are not at fluvial or pluvial flood risk;
- The area on the eastern side of the block is referred to below (under F: Zoning at Field Boundaries: Corridor widths)



It is submitted that provision for public open space accounted for within C zoned areas through the planning process and in the normal fashion.

F: Zoning at Field Boundaries & Connectivity

We note in the Draft Variation No 5 Zoning Map, the inclusion of F:Open Space zoning at all field boundaries within the NWQ. This zoning in effect land-locks each field within the NWQ and raises concern regarding connectivity from one side to the other.

If these boundaries are to remain, the submission requests that the NWQ Masterplan must offer very clear direction and leave no doubt that roads, pathways and other service may pass through F zoned lands subject to receipt of the necessary planning permissions.

F: Zoning at Field Boundaries: Corridor widths

We submit that F: Zoning is not required at all hedgerow and that a more desirable built-form and interlinked green corridors would be better provided through more regular C: zoning areas. Furthermore, we submit that at minimum and where the Chief Executive

deems that F: zoning be retained at Hedgerows, a consistent set back from hedgerows should be provided for within Variation No 5 maps and that maps would be supported by policy direction which would require site specific surveys and protection of hedgerows in line with National Policy.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

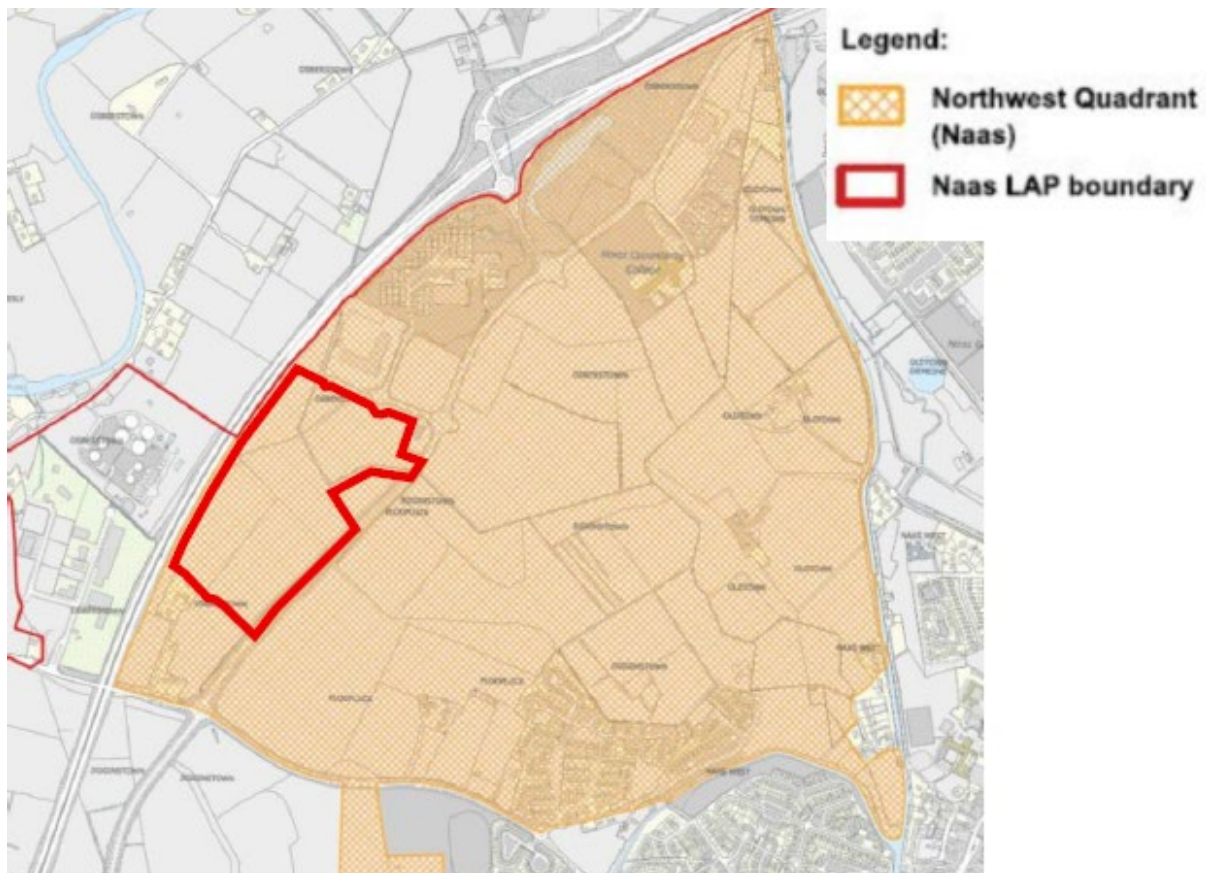
Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 74 – ALDI Stores (Ireland) Limited

Land parcel

The submission relates to the land parcel illustrated below that is in the ownership of ALDI Stores (Ireland) Limited.



Chief Executive's Report on Proposed Variation 5
of the *Kildare County Development Plan 2023 – 2029* (as varied)

Item request	Map Ref	Proposed Variation	Submission request	Land parcel ownership
A – Zoning of Ploopluck Stream corridor	A	White – no LAND USE ZONING OBJECTIVE on alignment of Ploopluck Stream	H -Light Industry and Warehousing	Y

	H -Light Industry and Warehousing on alignment of Ploopluck Stream
<i>Proposed Variation Land use zoning objectives map excerpt for subject site</i>	<i>Submission request</i>

Land use zoning objectives for site

- The submission notes a small portion of the landholding is not zoned or identified in white which appears to align with a hedgerow/ditch.
- To align with future development proposals, the submission requests that this portion of land is also zoned H: Light Industry/Warehousing as part of the final variation.
- The submission also suggests the insertion of suitable text which clarifies the position in relation to the development of this land, similar to a specific provision contained in the Dublin City Development Plan 2022 – 2028 (Section 14.3.2).

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 77 – Evara Developments Limited and Millennium Falcon Holdings Limited

Land parcel

This submission relates to the land parcel illustrated in Figure 3.1 (from submission) below. Millennium Falcon Holdings are the owners of the land and give permission to Evara permission to make representations to Kildare County Council regarding the lands.



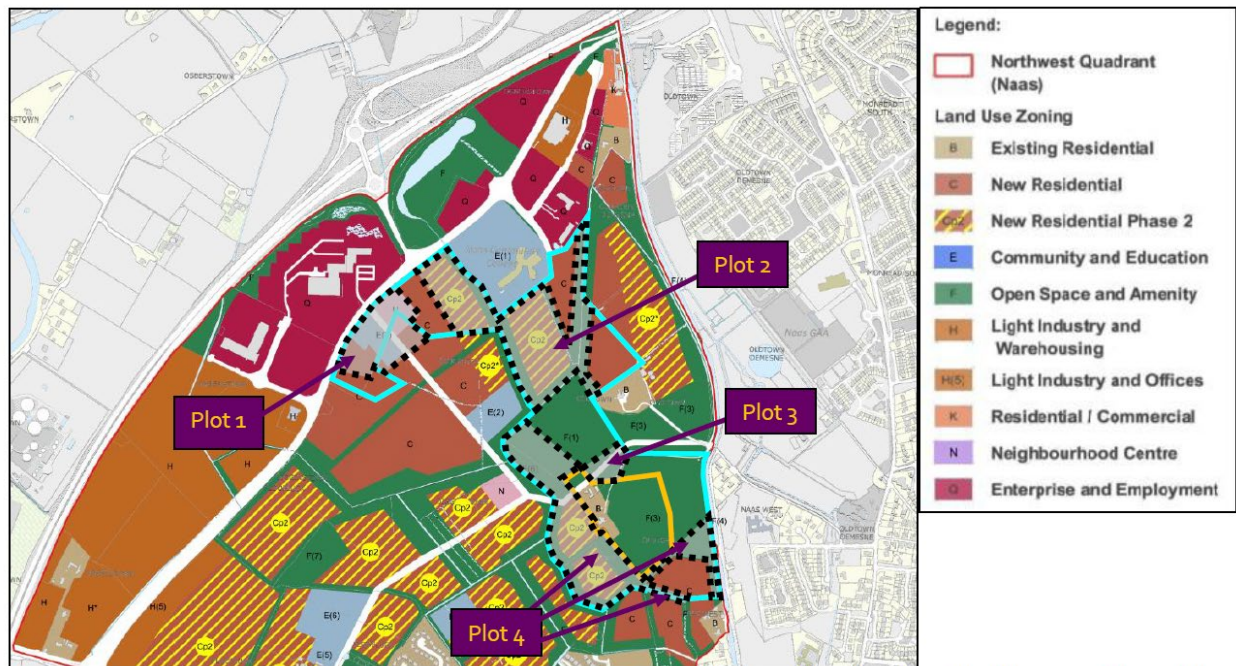
Figure 3.1: Location of the subject lands (outlined in red) with the existing dwelling and grounds not forming part of the submission (outlined in blue)

Issues Raised

LAND USE STRATEGY AND ZONING AMENDMENT REQUEST

Amend the land-use zoning of the subject lands, most notably converting Cp2 and select F-zoned parcels to C zoning, to reduce fragmentation and reflect a more coherent, deliverable development layout.

Chief Executive's Report on Proposed Variation 5
of the Kildare County Development Plan 2023 – 2029 (as varied)



Plot 1:

The submission requests that consideration be given to moving the Neighbourhood Centre westwards based on the presence of the overhead 110kV overhead power lines and uncertainty regarding their relocation. Requiring reconfiguration of land uses to accommodate this switch.

Plot 2

The submission requests that consideration be given to bringing the development of this site forward to Phase One on the basis to enable immediate delivery / critical mass to kick-start the NWQ's construction. It is requested that the land owned F – Open Space and Amenity within the land parcel be zoned for the purposes of C – New Residential, meaning that hedgerow protection can be resolved at development management stage.

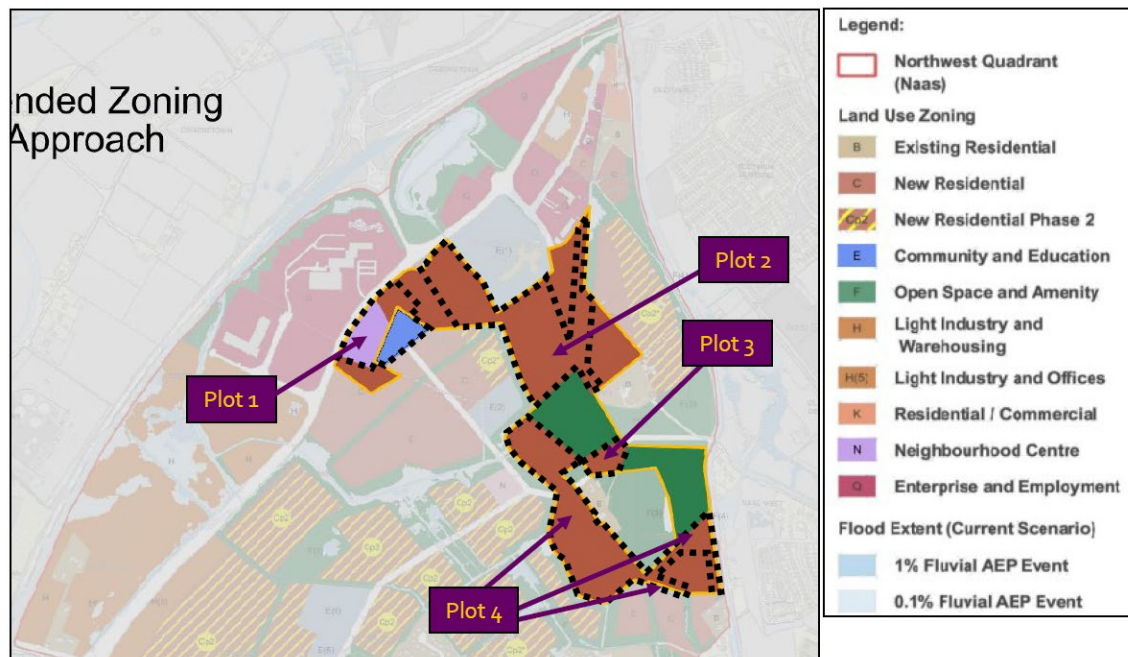
Plot 3

The submission requests that consideration be given to amending the land use strategy for this area of the subject lands by allocating sites for housing development that (C – New Residential) from F – Open Space and Amenity (see open space distribution among landholdings rationale below). It is also proposed to move the public transport link to the canal bridge northwards, creating a pocket of housing land.

Plot 4

The submission requests that consideration be given to amending the land use strategy for this site to create additional C – New Residential lands by reallocating CP2 – New residential / F – Open Space and Amenity lands on the basis of increasing Phase One delivery to fund infrastructural and non-residential inputs, and equity across landholdings (see open space distribution among landholdings rationale below). Like Plot 2 – the submission proposes that land parcels in their entirety be zoned for a specific land use and green infrastructure (hedgerows / treelines) be resolved at development management stage.

The diagram below synthesises these requests into a proposed land use zoning objective diagram for the subject lands.



PHASING

The submission requests that the size of Phase 1 be increased to include lands in the ownership of Evara on the following grounds:

- To provide for the accelerated delivery of housing on lands deliverable in terms of ownership, serviceability, accessibility, and availability.
- This will provide the critical mass to support the development of the neighbourhood centre, otherwise it will be in a “shell and core” condition until much of phase 2 is built out (35.4% of housing and 50.4% of non-residential floorspace).
- Evara’s intention is to lodge an LRD application for the entire landholding.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

6.2 Landowner requests relating to non-land use zoning objectives

Submission No. 33 – Gleanveagh Limited

Issues Raised - #33.1

Framework Masterplan Layout

Glenveagh suggest that the following footnote is included in the Final Framework Masterplan (no rationale provided).

“The NWQ Design Frameworks should be seen as an overarching guide to assist key stakeholders in the development management process and must be read in conjunction with the accompanying Design Brief and is not prescriptive”

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised - #33.2

Land Use Zoning

Our client supports and welcomes the inclusion of their lands within the first phase of New Residential development which underpins the subject land's suitability to deliver much needed housing in the short term on lands which are fully serviced.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised - #33.3

Access – Primary Street

- Glenveagh fully support the delivery of the Primary Street; However, it is important that its delivery does not unintentionally hinder or delay sites to come forward in the short term. It is submitted that a planning application can be progressed on Glenveagh lands through the inclusion of an additional access point from the

Millenium Park Road, which will link into the proposals to deliver the Primary Street and increased permeability.

- A small element of the Primary Street traverses the Glenveagh landholding, which they are keen to progress with Kildare County Council. Glenveagh also note an interim strategy is possible comprising a temporary access point to their lands that could revert to an active travel access point in due course upon completion of the Primary Street and Public Transport Corridor.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised #33.4

Density Dwelling Typologies and Mix

- Flexibility is sought by Glenveagh to ensure densities and placemaking objectives can be achieved without imposing overly rigid requirements on heights and apartments that would affect deliverability.
- The framework's average density target of 50 dwellings per hectare can still be achieved through lower-rise development rather than unviable large apartment schemes.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised - #33.5

Open Space Provision

Glenveagh respectfully requests that the significant areas of F-zoned Open Space and Amenity lands within the NWQ count towards the overall public open space requirement for residential schemes. It is submitted that this approach is supported by the Compact Settlement Guidelines (Policy and Objective 5.1 - Public Open Space) & the Kildare County Development Plan 2023-2029 (as varied).

Chief Executive Response

- This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised - #33.6

Infrastructure & 'F: Open Space and Amenity' zoned lands

Glenveagh are seeking policy support for ancillary residential infrastructure within F-zoned lands. Specifically, it requests that the Framework Plan acknowledge the potential need for access roads/utilities through open space lands, avoiding future planning conflicts and providing clarity for decision-makers.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised - #33.7

Phasing

Glenveagh lands are located within 3 no. phases (phases 2 and 3 relate to open space). We respectfully request that the entire landholding is designated as phase 1 lands so as to ensure the delivery of our client's lands in a single application or as an alternative a footnote in the phasing strategy and Figure 44 could be included as follows:

"that open space designated as phase 2 or 3 lands can be included in a planning application on phase 1 residential lands."

Chief Executive Response

- This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised - #33.8

Development Contributions Scheme

Glenveagh acknowledges the need for Kildare County Council to raise funds to deliver necessary infrastructure in an equitable and transparent manner, and our client commends Kildare County Council's successful application for significant Housing

Infrastructure Investment Fund IIIF in particular Naas and the NWQ where the Naas Harbour pedestrian bridge and link to Naas Northwest Quadrant has been identified.

Glenveagh requests that a future scheme be designed to avoid undermining the viability and delivery of much-needed housing and that sufficient flexibility be maintained within the Framework Plan.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 50 – Aravonian Limited

Issues raised #50.1

Request for F – Open Space and Amenity Lands to contribute towards Open Space of Residential Development

This submission requests that this Masterplan adopts a plan-led approach to public open space provision in the case of the subject site, by allowing part of the F zoned lands to make up part of the public open space required by the CDP, or at the very least to allow for this potential flexibility during the planning application / development management assessment process. This is in alignment with Policy and Objective 5.1 – Public Open Space of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* states:

"In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area"

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues raised #50.2

Changes Requested to Phasing Map in Framework Masterplan & Written Statement

The submission seeks for the Framework Masterplan / Land Use Zoning Objective to be consistent with the phasing strategy set out in the Framework Masterplan. Should the

Land Use Zoning Objective requests above be adopted then this would require consequent amendments to the Phasing Strategy.

Alternatively, if this map should not be updated as requested above, it is requested that the phrasing of the following statement on page 1 of the Written Statement is amended to clarify which maps are being referred to, and that the maps included in Appendix A of the Written Statement shall take precedence over maps in the Framework Masterplan Report and Character Area Guidance. The proposed additions/amendments to the below statement are set out in **green**:

*“The Northwest Quadrant (Naas) Plan comprises a written statement, mapped objectives (Appendix A), and a suite of supporting documents. The written statement and **supporting maps included in Appendix A: Mapped Objectives of the Written Statement** shall take precedence over maps in any other supporting documents should any discrepancy arise between them.”*

Chief Executive Response

- This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues Raised #50.3

Changes Requested to **Objective NWQ O1.2** in Written Statement pertaining to the release of Phase 2 and Phase 3 Residential lands at the Northwest Quadrant

The submissions requests greater flexibility in the release of Phase 2 and Phase 3 lands in line with *Section 6: Phasing of the Written Statement* that states:

“The development trajectory (indicative annual housing output) is a forecast only based on past trends and is not a constraint. If the annual rate of housing delivery exceeds the target, then this will be considered favourably if the appropriate enabling and supporting infrastructure is provided and / or clearly programmed / under construction.”

The submission requests the following amendments .

Objective NWQ O1.2: Release of Phase 2 and Phase 3 Residential lands at the Northwest Quadrant

- The Core Strategy supports the orderly phased release of lands within the Northwest Quadrant according to the Phasing Strategy defined in the Framework Masterplan Report and summarised in Table NWQ17 and the Infrastructure Delivery Plan.
- Lands with Phase 2 New Residential lands and Phase 2 New Residual with residual mitigatable flood risk LAND USE ZONING OBJECTIVE will be safeguarded from inappropriate development to preserve their strategic function for the growth of Naas beyond the current development plan period.

- ~~The completion of the delivery of~~ The 'substantial development' of Phase 1 will enable progression to Phase 2 without the need for a Variation to the development plan.
- ~~The completion of the delivery of~~ The 'substantial development' of Phase 2 will enable progression to Phase 3 without the need for a Variation to the development plan.
- ~~The completion of the delivery of~~ The 'substantial development' of Phase 2 will enable progression to Phase 3 without the need for a Variation to the development plan.
- Kildare County Council will collaborate with state and semi-state agencies (infrastructure and utility providers) to ensure that land can be categorised as Tier 1 in time for the commencement of coherent phasing packages.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 61 – Christine Mahoney

Issues Raised

Proposed development of land at The Knocks for Main Park and Sports Grounds

The submission objects to the proposed development of land in the ownership of The Knocks for public access in the form of sports grounds and open space (the Main Park) with pedestrian / cycle routes on the basis that:

- The family have resided at The Knocks for over 100 years;
- The land is not for sale; and
- The proposed use would have an adverse impact on privacy and the ability to maintain livestock and wildlife on the land.

Land to the west of The Knocks house

The development of this site for residential use is not considered appropriate as this will reduce natural light to the Knocks house and has also been subject to flooding (at times the field has been submerged in flood water).

Public Transport Corridor

The submission objects to the proposed public transport corridor bisecting The Knocks house from its farm buildings, which would be inappropriate.

Traffic to Sallins Road from Northwest Quadrant

The submission has concerns that the Sallins Road will need upgrading to accommodate the additional traffic from the Northwest Quadrant.

Access to The Knocks: Land around The Knocks was recently sold by the owner to Millennium Falcon Holdings. Access to The Knocks has been maintained via a "right of way" along the historic Avenue. The submission seeks to ensure that access to The Knocks from Tandy's Bridge will be maintained in any development of the site. The

submission also seeks to ensure that access across Tandy's Bridge will be maintained in any redevelopment.

Tandy's Bridge

The submission considers that Tandy's Bridge is not suitable for public transport as it is a very old bridge.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 71 – Millennium Falcon Holdings Limited

Issues Raised – 71.1

Strengthen the Masterplan Through a More Permeable Urban Fabric

The submission requests that consideration is given to amending the *Sustainable Mobility Strategy* and *Appendix A (Mapped Objectives)* within Variation 5 to provide clearer guidance on the structure of the primary and secondary internal street networks to ensure that they the street hierarchy is connected, cohesive, and logical avoiding layouts that rely too heavily on disconnected or cul-de-sac-based arrangements. This would help reduce delivery risk, improve route choice, support efficient servicing and emergency access, and provide a stronger foundation for sustainable mobility as the area develops over time. The Masterplan, while a blueprint of intent, should give the flexibility of this to be developed further at a detail planning stage.

The submission suggests that active travel / utility / servicing networks should be continuous and benefit from dedicated / filtered permeability networks.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues Raised – 77.2

Securing Boundary Connections to Support Phased Development

The submission requests that consideration is given to the coordination of the delivery of the 300-hectare Northwest Quadrant, it is respectfully suggested that Variation No. 5 include clearer guidance requiring road, cycle, active travel and utility networks to

extend to the boundaries of adjoining lands where future connections are anticipated. This would help ensure that each phase of development can connect effectively with neighbouring landholdings as they come forward, reducing uncertainty and avoiding the need for later retrofitting or complex interventions. By establishing this principle at masterplan stage, the Council can provide greater confidence for landowners, infrastructure providers and delivery partners, while supporting the timely delivery of a seamless, legible and resilient urban framework across the wider area.

Chief Executive Response

- This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues Raised – 77.3

Recommendation 3- Supporting Utility Resilience Through Looped Infrastructure

The submission requests that consideration is given to the need to support the long-term resilience and efficient management of critical services within the Northwest Quadrant, it is respectfully suggested that Variation No. 5 include clearer guidance on the provision of looped utility infrastructure. Primary and secondary internal road corridors should, where practicable, be planned to accommodate ring-main or looped networks for key services such as water supply, power and telecommunications. This would help avoid over-reliance on linear or dead-end service runs, improve operational flexibility, support service continuity, and reduce potential issues associated with terminal pressure, water quality and long-term maintenance.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

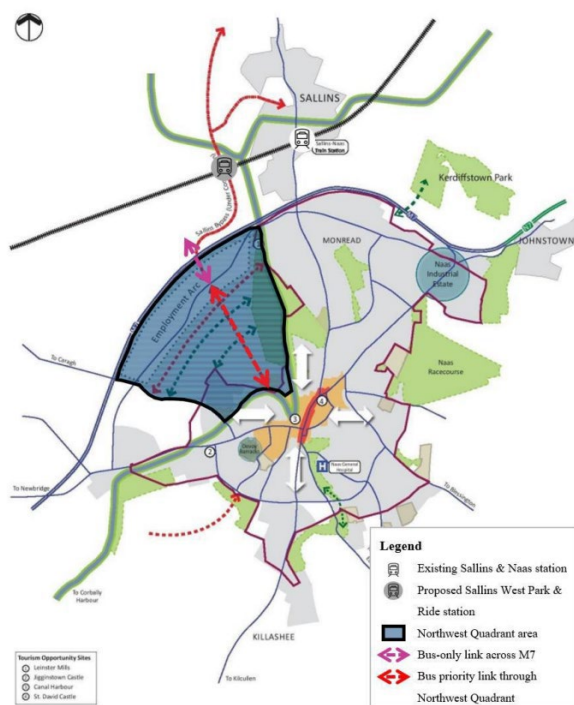
The Chief Executive is making no recommendation at this time.

Issues Raised – 77.4

Recommendation 4; Aligning Public Transport Provision and Corridor Safeguarding with the TOD Ambition

The submission requests that further consideration is given to reserving a public transport corridor in the Framework Masterplan. The submission requests that the public transport corridor included in the Northwest Quadrant isn't **sufficiently scalable** to provide for a growing urban centre such as Naas. More specifically it doesn't include the indicative connection from the "West Sallins Park and Ride Station" to Naas Town

Centre via the Northwest Quadrant. The submission seeks for a corridor to be reserved to provide the connection envisaged when the *Naas Local Area Plan* was prepared.



Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues Raised – 77.5

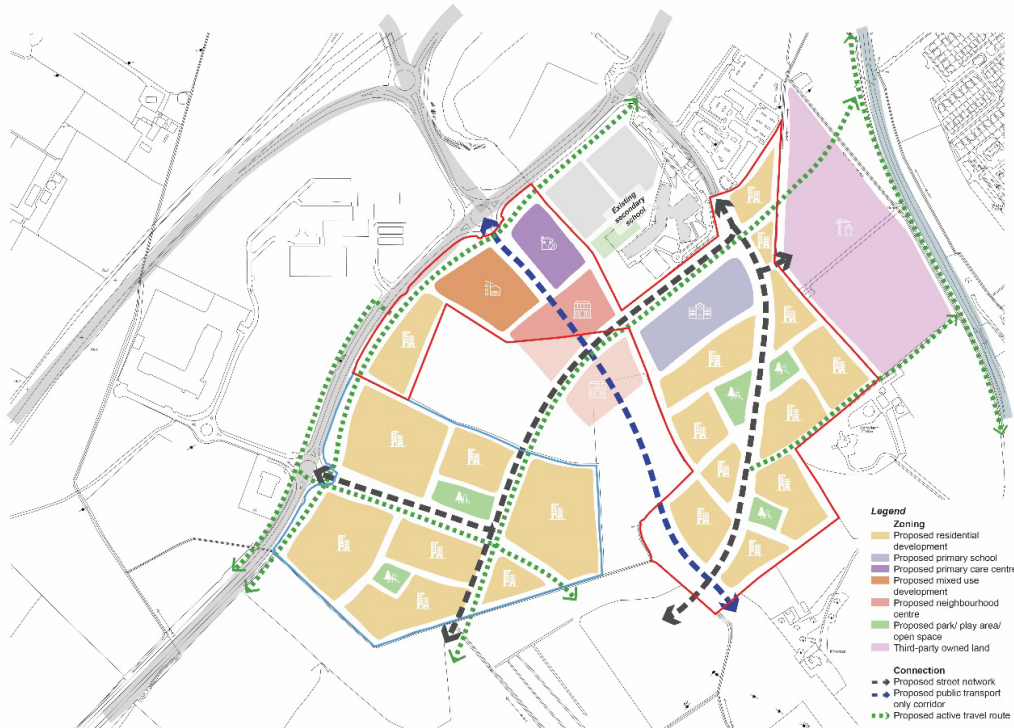
Phase 1 Street Network

The submission requests that the Framework Masterplan and Sustainable Mobility Strategy provide clearer guidance on the street structure to be delivered within Phase 1. The first phase will set the physical and operational pattern for the wider Northwest Quadrant, it is important that it establishes an open, connected and permeable urban framework from the outset. This would help ensure that early development does not become isolated from future phases, and that subsequent lands can connect into a coherent wider movement network as they come forward. This would also provide for co-ordinated utility corridors.

Within this context, primary and secondary routes in Phase 1 should, where practicable, be designed to provide continuity to adjoining lands and future development areas. This does not preclude the creation of quieter residential streets or low-traffic neighbourhoods; rather, it suggests that these should be achieved through careful street

design, filtered permeability, traffic calming and local access management, rather than through layouts that sever the broader movement structure.

The submission requests that consideration be given to the creation of an additional vehicular street running broadly parallel to the existing Millennium Park Road as a 30 km/h inner street (see diagram below). This would connect existing access points to the Northwest Quadrant lands developed in 2007 and create east-west vehicular / utility / active travel permeability.



Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 71 – Westar Group

Issues Raised

Density and Building Height

We submit that Variation No. 5 once finalised should not seek to introduce new limitations on building height (in the density / building height strategy) and should instead remain consistent with directions of Chapter 14 of the Kildare CDP 2023-2029 and maintain the advised 'contextual approach to building height'. We note contents of table 14.4 of the Kildare CDP included below in Figure 6 overleaf which directly speaks

of the Naas NWQ and guides that, subject to 'design and planning considerations, building height of 6 stories + can be permitted'. We also note the existing permitted 5 storey development at Harbour Gate, Finlay Park.

The submission notes that the Framework Masterplan document sets out a guiding density of 50-60 dph for the submission lands. We would highlight the proximity of the site to the centre of Naas as well as the availability of existing amenities and services which will serve future residents of the submission lands and consider this density range to fall significantly below the suitable density range for the site. Furthermore, we would note that under the *Compact Settlements Guidelines for Planning Authorities* (2024), Naas is categorised as 'Key Towns and Large Towns', which are further categorised hereunder, with the subject site being classified as a 'Centre and Urban Neighbourhood' in Table 3.5 of the Guidelines. The centre and urban neighbourhood category notes the following:

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

It is therefore submitted that the density range as set out for the submission lands in the Proposed Variation No. 5 should reflect this to ensure an appropriate form of development, in close proximity to the centre of Naas, and in keeping with national planning guidelines.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Submission No. 77 – Evara Developments Limited and Millennium Falcon Holdings Limited

Issues raised – 77.1

RESIDENTIAL DENSITY STRATEGY: FLEXIBILITY

The submission requests that consideration be given to address a broader concern about the density strategy. The submission proposes adding greater flexibility provisions to allow for a 'blended approach' to the delivery of density and height in response to the "overly granular", near block-by-block level, which the submission considers to be overly prescriptive. The 'blended approach' would allow density/height to be transferred between development sites as detailed design progresses so that higher and lower densities can be transferred in appropriate circumstances.

Rather than rigidly applying the highly prescriptive densities of the Framework Masterplan, greater flexibility should be applied to 'push' and 'pull' these concentrations as proposals advance through detailed design and respond site-specific constraints. Without this blended approach, Evara question the viability of some of the individual plots. The submission points towards a similar approach in the Adamstown Strategic Development Zone Planning Scheme (2014) (as amended), whereby:

- (1) Residential densities of proposal within individual Development Areas can be within a specific percentage the below or above the density range for same; and
- (2) Up to 20% of a Development Area's maximum housing yield can be transferred to an adjacent Development Area.

Such an approach provides both latitude and clarity for developers and the Council alike and can be defined within the detail of the Written Statement and Framework Masterplan.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

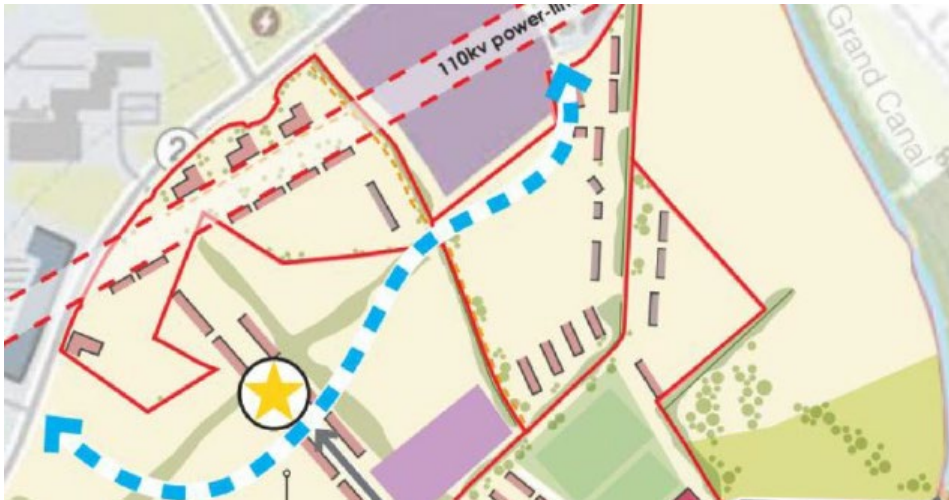
The Chief Executive is making no recommendation at this time.

Issues Raised 77.2

ALTERNATIVE MASTERPLAN CONFIGURATION

The submission considers that a number of changes are required in response to the fragmented land ownership and site constraints (e.g. overhead cables):

- An arcing vehicular corridor is considered appropriate to link two existing access points to the NWQ lands, without the requirement for a new access to the lands (see blue dotted line below), which reduces dependency on third party lands.
- The relocation of the neighbourhood centre in a south-easterly direction in response to the overhead cables (see illustration below).and "be more centrally located", "be more proximate to the playing pitches", "synergise with the adjacent primary school", and tie into the vehicular corridor.



The submission refers to several masterplan proposals that would complement the proposed amendments (illustrated above), such as: greater density at the Millbridge Crossing, strong built frontage interfacing with the playing pitches, and removing dependency on third-party lands.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues raised – 77.3

PHASING

The submission requests that the size of Phase 1 be increased to include lands in the ownership of Evara on the following grounds:

- To provide for the accelerated delivery of housing on lands deliverable in terms of ownership, serviceability, accessibility, and availability.
- This will provide the critical mass to support the development of the neighbourhood centre, otherwise it will be in a “shell and core” condition until much of phase 2 is built out (35.4% of housing and 50.4% of non-residential floorspace).
- Evara’s intention is to lodge an LRD application for the entire landholding.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues raised 77.4

OPEN SPACE

Stated Area of Open Space

This matter is addressed in relation to submission 33 (above).

Total Area of Open Space required of development parcels / Counting Amenity Open Space towards (at least) 15% provision

This matter is addressed in relation to submission 33 (above).

Disproportionate Allocation of Open Space

The Framework Masterplan has been prepared **land ownership blind** to develop the best outcome for the Northwest Quadrant. There are differences in percentages of land available for housing development across different landholdings due to the method for preparing the masterplan. In the main this results from the proportions of sites allocated for the Key Open Spaces – which are strategic and for the benefit of the whole Northwest Quadrant. Responsibility for providing these strategic spaces will be with Kildare County Council.

All sites have amenity open space that relates to the landscape / GBI assets on sites, tempered by flood risk mitigation. Most sites (especially in Phases 1 and 2 to the east of the Northwest Quadrant) have very similar quantum of amenity open space.

KCC has made additional land available for development (see LAND USE ZONING OBJECTIVE amendments (above)).

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues raised 77.5

ANCILLARY DEVELOPMENT AND PUBLIC OPEN SPACE

Issue is summarised under #38 Uisce Eireann (and cited by other developers)

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised 77.6

CHARACTER AREA GUIDANCE

The submission requests that the Character Area Guidance be “radically” simplified and shortened on the basis that that:

Housing Typologies – On pages 26–27 of the *Character Area Guidance*, there are references to 9 No. different housing typologies. Whilst variation and optionality provide flexibility for design, delivery and placemaking, they also risk confusion and conflict within the built environment. Adding to this, Evra are concerned that certain typologies may not be (a) viable to construct or (b) desired by purchasers. In particular, this applies to the ‘back-to-back’ dwellings, which are a relatively new and unique residential form in the Irish context. The submission suggests that if the Framework Masterplan is to be successful, the *Character Area Guidance* document needs to be substantially amended to allow for housing typologies that are appropriate for the Irish market.

Multi-Storey Car Parking – see 77.11, below.

Retail floorspace – Evra considers it crucial that a quantitative assessment of retail ‘need’ for the NWQ and retail ‘impact’ on Naas is conducted. The submission requests that the guidance should be simplified and condensed, shifting it towards principle-based rather than prescriptive guidance, including greater flexibility on housing typologies to ensure viability and deliverability in response to the known preferences of the Irish market.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issue raised 77.7

AVERAGE HOUSEHOLD SIZE (AHS) ASSUMPTIONS

The submission requests that Reconsider the household size assumptions underpinning the Core Strategy and housing targets, that being based upon the CDP AHS assumption of 2.75. Evra requests that the Council recognises the shortcomings of the methodology employed and, in their opinion, the need to identify greater areas of lands to:

- (1) Increase overall housing delivery.
- (2) Accommodate greater population, but also smaller household sizes.
- (3) Generate the critical mass and scale required to sustainably develop the NWQ and deliver its required infrastructure.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

Issues Raised 77.8

URBAN DEVELOPMENT ZONE (UDZ) DESIGNATION

The submission requests that the possibility of pursuing a UDZ designation for the NWQ is removed from the Variation and the applicant “commits to its delivery via the masterplan as an integral part of the Development Plan and ‘standard’ planning application route.”

The submission considers that given the advanced stage of masterplanning already undertaken and the need to bring development forward in the short term. The time period and risk involved in entering a UDZ process would bring considerable uncertainty to landowners / developers, as well as introduce further complexity to the process of delivering the Northwest Quadrant and its constituent land parcels. The submission considers that the Framework Masterplan (with the refinements proposed in the submission) can provide a clear and practical vision for the landbank's development. Replacing the Masterplan with a new UDZ would be an unnecessary further intervention in the planning system.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

CAR PARKING

Issues Raised 77.9

The submission requests that maximum car parking standards for 1 and 2 bedroom apartments are amended and that the mandatory reliance on multi-storey car parking is removed.

Maximum Car Parking Standards

The submission requests that Figure 4.8 is amended to reflect the following:

1. For 1-bedroom apartments, the maximum car parking standard should be increased to 1 No. space per unit in “NWQ Accessible locations”, as this will less than one space per unit will reduce the market attractiveness of new homes developed.

2. For 2-bedroom apartments, the maximum car parking standard should be increased to 1.5 No. spaces per unit to provide consistency between apartments / duplexes and houses.

Multi-Storey Car Parking “over reliance”

The submission requests that the requirement for a Multi-Storey Car Park in the Millennium Park Road Neighbourhood Centre and New Caragh Road Local Centre should be removed based on the increase in construction cost / purchase price / viability.

The submission suggests that where a developer can demonstrate that they can provide the quantitative car parking requirement for a proposed mix of uses and scale of development without the need for a multi-storey car park, they should be permitted to do so. Requiring the inclusion of such a structure when it can be successfully ‘designed out’ with high-quality urban design strategies / proposals is unnecessary.

Chief Executive Response

- This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.

CHILDCARE

Issue raised 77.10

Refine the methodology and floor area standards applied to childcare provision and remove the 'waiting list' surplus requirement.

Childcare A: Floor Area Requirements

C1 of Figure 4.6 specifies 6m per child / 600sqm for 100 place creche. Whilst operational childcare floor area requirements are based on ‘clear floor space’ for children by their age, the widely adopted approach to ensuring that adequate space is provided during design and planning is 5 sq.m per child. This is adequate to provide the clear floor space needed for children of various ages and for different service types, plus a contribution of space ‘per child’ to management, operations and circulation areas. Submission requests that this be corrected.

Childcare B: Demographic Methodology for Calculating Childcare Demand

Whilst Evra accepts the need to deliver childcare as part of creating sustainable and attractive communities, the method of estimating the requirement needs to be further refined to take account of.

- (1) Average household size (2.75 No. persons) remains the same up to 2040.
- (2) The proportion of the population aged 0–4 years (55.45%) remains the same up to 2040.

(3) Dwelling sizes and typologies in the NWQ will be the same as those in Naas in 2022.

(4) Does not take account of Specific Planning Policy Requirement (SPPR) 1 in relation to dwelling mix of the *Planning Design Standards for Apartments: Guidelines for Planning Authorities* (2025).

(5) Does not account for the discounting of studio and 1-bedroom units from contributing to childcare requirements, as permitted by *Planning Design Standards for Apartments: Guidelines for Planning Authorities* (2025).

Childcare C: Childcare Waiting Lists: It is requested that the 'waiting list' spaces added to the childcare requirement for the NWQ be removed.

Childcare D: Uncertainty with Delivering Childcare in Tandem with Residential Developments: Greater clarity with respect to the responsibility of delivering childcare is ultimately required to provide certainty for all parties: the Council, landowners, developers and the public. Childcare is indicated for delivery under Ref. Nos. C4 and C5 – i.e. within residential and commercial/employment locations respectively. With regard to C4, uncertainty arises regarding how many places need to be provided and when. This is of relevance in the context of approximately 50% of childcare places coming forward within the Neighbourhood and Local Centres and the NWQ consisting of multiple landowners and developers. For example, if Evava deliver the Neighbourhood Centre and its 100 No. childcare places, can it 'take the benefit' of the corresponding number of residential units – i.e. one sixth of all units (based on 100/600 childcare places), thus approximately 687 No. units.

Chief Executive Response

This issue will be considered in the preparation of the revised variation.

Chief Executive Recommendation

The Chief Executive is making no recommendation at this time.



Appendix A: Copy of submissions

received from the Office of the Planning
Regulator (OPR) and the National Transport
Authority (NTA) to *Proposed Variation No.5*
statutory consultation process under
the *Planning and Development Act 2024*

Northwest Quadrant (Naas)

5 August 2026



Comhairle Contae Chill Dara
Kildare County Council



Comhairle Contae Chill Dara,
Áras Chill Dara, Páirc Uí Dhubhuí, An
Nás, Co. Chill Dara, W91 X77F
Kildare County Council, Áras Chill Dara,
Devoy Park, Naas, Co. Kildare, W91 X77F

This document has been prepared by
Kildare Land Activation Office,
part of Kildare County Council's
Planning Department

3rd July 2026

Senior Executive Officer,
Planning Department,
Kildare County Council,
Áras Chill Dara,
Naas,
County Kildare.

**Re: Proposed Variation No. 5 to the Kildare County Development Plan 2023-
2029**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 5 (proposed Variation) to the Kildare County Development Plan 2023-2029 (Development Plan).

As Kildare County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has undertaken this evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

Overview

The proposed Variation integrates the Northwest Quadrant (Naas) Framework Masterplan into the statutory planning framework and includes a number of changes to Volume 1: Written Statement and Volume 2: Settlement Plans of the Development Plan.

The Office acknowledges and welcomes the preparation of the proposed Variation and its consistency with Variation No. 3 to the Development Plan, where it undertook to bring forward the Northwest Quadrant Masterplan into Volume 2 of the Development Plan in response to the NPF Implementation: Housing Growth Requirements (2025), and also its consistency with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area in accordance with section 58 of the Act.

The proposed Variation sets out a clear, detailed and phased development planning framework for the development of the area over the lifetime of the plan. The Office welcomes the focus on housing delivery at scale, sustainable mobility-led growth and the creation of complete neighbourhoods incorporating schools, services, employment and parks, which are embedded in the framework via land use zoning objectives and associated policies NWQ O1.1-O1.8.

In relation to sustainable mobility, the Office also welcomes the sustainable mobility strategy which prioritises walking, cycling and public transport over private car use, namely measures such as a dedicated bus corridor, enhanced pedestrian and cycle permeability, mobility hubs, reduced car dependency and accessibility-led development patterns.

The Office welcomes the green and blue infrastructure framework, which uses the Grand Canal, open spaces, green corridors and watercourses as key structuring elements of the masterplan, supporting climate adaptation, biodiversity, active travel and high-quality placemaking.

Notwithstanding the above, the Office makes one recommendation regarding flood risk management that requires further consideration prior to the adoption of the proposed Variation.

The following recommendation set out below is intended to support the Planning Authority in further strengthening the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Flood risk management	Recommendation 1	-

1. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) in accordance with National Policy Objective (NPO) 1 of the National Planning Framework First Revision (2025) (NPF) and the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

As part of the SFRA, Plan Making Justification Tests (Justification Test) have been undertaken for undeveloped lands that are proposed to be zoned as New Residential within Flood Zone B, and Light Industry and Warehousing within Flood Zone A. As highly vulnerable and less vulnerable uses, as defined by the Flood Guidelines, and that these lands are at the periphery of Naas, it is considered that they would not pass the Justification Test.

As such the Office considers that the Planning Authority should reassess these lands to ensure lands within Flood Zone A are not zoned for highly vulnerable or less vulnerable uses, and lands within Flood Zone B are not zoned for highly vulnerable uses. Instead, these lands should be avoided or zoned for a water-compatible use to ensure material consistency with NPO 1 and NPO 78 of the NPF and to demonstrate that due account has been taken of the Flood Guidelines.

Recommendation 1 - Flood risk management

Having regard to flood risk management, and having considered:

- NPO 1 of the NPF (ensure all plans are subject to relevant environmental assessment requirements, including Strategic Flood Risk Assessment);
- NPO 78 of the NPF (avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test);
- RPO 7.12 of the RSES (avoid inappropriate land use zonings and development in areas at risk of flooding);
- Policy Objective IN033 of the Kildare County Development Plan 2023-2029 (manage flood risk in the county in accordance with the sequential approach and requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) when preparing plans); and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) reassesses New Residential zoning within Flood Zone B and Light Industry and Warehousing within Flood Zone A; and
- (ii) if necessary, re-zone lands for an appropriate use in accordance with the Flood Guidelines.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

Summary

The Office requests that the Planning Authority addresses the recommendation set out above.

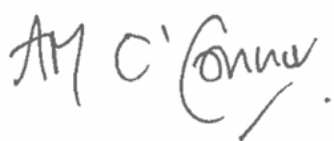
As part of this process, the Chief Executive's report to the elected members, prepared under section 58(11) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National Transport Authority during the plan preparation process, within **one week** of adoption;
- inform the Office, as soon as practicable, where it decides not to comply with a recommendation, including the reasons for this decision; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015

Senior Executive Officer,
Planning Department,
Kildare County Council,
Áras Chill Dara,
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3rd July 2026

RE: Kildare County Development Plan, Variation No. 5, Naas NWQ Masterplan

Dear Sir / Madam,

The National Transport Authority (the “NTA”) acknowledges receipt of notice and a copy of Variation No. 5 to the Development Plan from Kildare County Council under Section 58 (7) (a) (viii) of the Planning and Development Act (“PDA”). In accordance with Section 42 (8) (c) (iv) of the PDA, which states that in making of a Variation to a Development Plan, a planning authority shall take due account of any relevant transport strategy of the National Transport Authority (the “NTA”) which relates to all or any part of the functional area of the planning authority, the NTA makes the following observations and recommendations.

The *Greater Dublin Area Transport Strategy 2022-42* (the “GDATS”) was prepared under Section 12 of the Dublin Transport Authority Act and provides a long-term strategic planning framework for the integrated development of transport infrastructure and services in the GDA. For the purpose of Section 42 of the PDA, the GDATS comprises the relevant transport strategy for Kildare County Council.

1. Naas Town Bus Service

The NTA is planning for the delivery of the Naas Town Bus Service, which will be implemented when resources allow. The NTA has initially identified two potential routes which would provide connectivity through the town. As and when the Naas Northwest Quadrant is developed the NTA may consider serving this area with a third route subject to funding.

The NTA notes that the proposed Masterplan includes for a potential bus route through the site, crossing the canal at Tandy’s Bridge and Mill Lane and using the Sallins Road to access the town centre. It is noted in Section 4.4 of the Masterplan Report that an alternative bridge crossing point is indicated further south (Figure 45). The NTA envisages that these indicative routes (as far as the town centre) could form part of a bus route, as part of an expanded town service in the future.

It is noted that either of these routes would require the appropriate infrastructure to be in place, including a solution to the crossing of the canal and appropriate road widths to enable a bus service to be provided. The NTA notes that the Plan states the below (see quote) in relation to a potential bus service. It should be noted that the NTA does not operate town bus services with smaller buses, but rather regular single decker buses, regardless of the service frequency. These vehicles are likely to get larger as the fleet transitions to electric vehicles. Bus stops are currently being designed to

accommodate larger vehicles. Also, in terms of operation and maintenance for bus operators, it would not be practical to operate different vehicle types across the town network.

'The bus route identified in the Framework Masterplan via Tandy's Bridge is based on an assumed 30-minute frequency and the use of smaller bus vehicles. Tandy's Bridge is a narrow, historic bridge and is a protected structure. Its physical constraints mean that it cannot accommodate larger bus vehicles. In addition, due to its limited width, buses cannot operate concurrently with pedestrian and cycle movements, which further restricts its suitability for increased service frequency.' (Northwest Quadrant Framework Masterplan)

It should therefore be noted that unless the appropriate infrastructure is in place to support the use of a regular single decker (likely electric) bus, the NTA may not be in a position to deliver a service on this indicative alignment. However, the NTA supports this general alignment (crossing the canal) as the most appropriate to support the wider town service plan where the infrastructure is in place to allow for it.

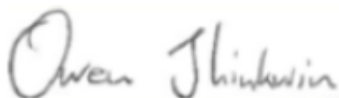
Recommendation

The NTA recommends that the planning authority ensures that a route is included and planned for that can accommodate a regular single decker electric bus in the first instance in order that the Northwest Quadrant can potentially be served as part of the Town Bus Service when resources permit.

Conclusion

The NTA has worked with the local authority to input into the preparation of the Masterplan and will continue to engage with Kildare County Council in the delivery of bus services to the town. I trust that the views of the Authority will be taken into consideration by Kildare County Council in the making of the proposed variation and look forward to further engagement.

Yours sincerely,



Owen Shinkwin
Senior Land Use Planner



Appendix B: Summary of Submissions

received, excluding those detailed under Sections 3, 4 and 6 of this report, to *Proposed Variation No.5* to the *Kildare County Development Plan 2023-2029* (as varied) under the *Planning and Development Act 2024*

Northwest Quadrant (Naas)

5 August 2026



Comhairle Contae Chill Dara
Kildare County Council



Comhairle Contae Chill Dara,
Áras Chill Dara, Páirc Uí Dhubhuí, An
Nás, Co. Chill Dara, W91 X77F
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This document has been prepared by
Kildare Land Activation Office,
part of Kildare County Council's
Planning Department

Appendix B: Summary of Submissions Received

The submissions summarised in Appendix B **exclude** the following:

- The submission from the Office of the Planning Regulator (see Section 3 of the Chief Executive's report)
- The submission from the National Transport Authority – NTA (see Section 3 of the Chief Executive's report)
- Submissions from other Prescribed Authorities (see Section 4 of the Chief Executive's report)
- Submissions from Landowners (see Section 6 of the Chief Executive's report)

Sub. No.	Name	Summary of Submission
1	Precious lindelwa Phiri	• The submission supports the overall objectives of the Variation and makes a number of recommendations for consideration to help ensure that NWQ becomes an inclusive, sustainable, and supportive community. Social and affordable housing • The tenure mix should include social and affordable housing to meet the needs of individuals and families across County Kildare. Community Facilities • Community facilities should include services that support older persons, people living with dementia / Alzheimer's disease and their families. Sustainable mobility • Priority should be given to sustainable mobility infrastructure for walking, cycling and public transport. Healthcare and wellbeing services • Healthcare and wellbeing services should form part of the long-term planning framework for the new community.

Sub. No.	Name	Summary of Submission
		Dementia-friendly infrastructure Consideration should be given to dementia-friendly infrastructure and age-friendly design principles.
2	Community Campaigner David Barton	Submission contains an attachment and the issues raised in the submission are as follows: • The submitter outlines his role as a community campaigner promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA) / Traditional Architecture as a key feature across UK-wide local authorities. States that the submission is considered to be consultation feedback who hopes that it represents an 'umbrella representation' for various merits outlined including Placemaking and Greenery Proposals. • Asserts that Traditional Architecture Design Codes should be a central component across this consultation and its various chapters and sections especially concerning new construction. Further asserts it performs strongly on economic, ecological and environmental grounds as can be attested to by academic studies and figures that corroborate this. • Submission outlines the background of the submitter including successful campaigns in the UK to promote and protect historic buildings. • States that the submission provides 32 Appendices. It is noted that these have not been included with the submission. However, hyperlinks to websites have been provided for the majority. • Submission calls for the establishment of design codes based on TVA principles and that local authorities should partner with key stakeholder organisations. Outlines a range of suggestions about to policy in this regard, including the non-demolition of pre-1950s buildings. • Regarding conservation areas, the submission outlines the need for enhanced conservation efforts in designated areas. Outlines a range of suggested actions including a streamlined process for listed building consent, the preservation of historic street furniture and financial incentives for maintaining/restoring buildings. • Highlights the role of historic buildings in combatting climate change and suggests a range of actions, including a focus on increasing the stock of carbon-rich old buildings, retrofitting historic buildings and financial incentives for the demolition of carbon poor contemporary buildings.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• Outlines actions that could be taken on historic buildings including the creation of a Designated and a Non-Designated Heritage Asset List and a scheme to rebuild long lost buildings. • Suggests a range of actions that can be taken to promote traditional value architecture. • Regarding to the planning system, the submission emphasises the need to identify applicants which have a history of harming civic heritage and states that this should be a consideration in the granting of permission. Requests Local Authorities to collaborate with the community and heritage bodies to give these people a voice. Submission concludes by identifying a range of miscellaneous issues which are aimed at supporting the historic built environment. These include support for well-designed car parking, the utilisation of specialist skills and the creation of a Top 10 Buildings at Risk Register.
3	Joseph Bergin	The submission identifies multiple issues relevant to the delivery of the Northwest Quadrant (Naas) and the Proposed Variation: • Land Assembly Risk: There is a real risk that the need to acquire land by CPO (rather than by agreement) could result in the phasing sequence being undermined. • Third-party infrastructure delivery risk – The Infrastructure Delivery Plan identifies responsibility for infrastructure delivery, including delivery a range of state and semi-state agencies without “binding commitments”. This presents a project risk for NWQ. • Unrealistic Delivery Timeline – The stated 2027 to 2040 timeline for delivery is overly ambitious and not realistic. • Infrastructure Cost – The Variation doesn't include the cost plan for the proposed infrastructure. • Funding Strategy – The financial viability of the scheme is deferred until after the statutory plan is adopted, meaning that the funding of infrastructure is not made clear, and decisions difficult for private sector investors; • Environmental Assessments of the Variation – The submission asserts that full SEA and AA are required for the proposed statutory land use plan, and that only undertaking screenings is open to challenge.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• Ecological surveys – The plan is based has been formulated based on desktop baseline data, rather than ecological surveys. This presents a risk should protected species or habitats be discovered at planning application stage. • Public transport – The NWQ is dependent on a bus-based transport corridor that does not benefit from any level of commitment from the NTA. Without this the sustainable mobility strategy is at risk and could mean the NWQ could become a standard car-borne development. • Potable Water / Wastewater – A capacity assessment by Uisce Eireann is required as an evidence-base for the Proposed Variation. • Financial Viability / Development Appraisal - There is no development appraisal demonstrating the scheme is financially deliverable. Infrastructure costs (likely hundreds of millions) are uncoded. There is no assessment of whether development levies, state funding, or developer contributions can actually fund the enabling infrastructure. • Social and affordable housing breakdown – The social and affordable housing targets and strategy to meet housing need is not included and this should be clearly set out as it is a key component of housing supply. • Land ownership – Information on landownership should be included in the Framework Masterplan. If there are likely to be windfall profits for a small number of landowners, this should be made clear in the public interest. • Detailed Traffic Modelling – A transport / traffic impact assessment is required as an evidence base to support the proposed development strategy. • Master Developer Model – The terms of reference / mechanism for establishing the master developer should be defined. This role is hugely significant in bringing forward the NWQ and will be is very powerful. • Consultant team concentration – The Framework Masterplan (and supporting documents) and Naas-Sallins Transport Strategy (2020) were both prepared by AECOM. There is no evidence of peer review of the outputs from a sole consultancy. AECOM have a financial interest in further stages in the project.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• Landowner windfall – Increases is land value need to be captured to fund the necessary infrastructure to support the development. A land value uplift mechanism needs to be defined to ensure that the benefits from the development are shared to benefit the common good, rather than the current landowners.
4	Sarah Walsh	Naas Infrastructure deficit: Parks It is submitted that Naas has a significant deficit in parks provision in terms of size and quality, and that the town needs a large park equivalent to other major urban parks (e.g. Marlay Park or Dodder Park). The submission acknowledges that the NWQ makes provision for some parks but the level of provision is not sufficient to meet the needs of Naas, and particularly Naas (West), and this should be addressed through Variation No.5: Northwest Quadrant (Naas). A large park should be provided to the west of K-Leisure.
5	Scott Walsh	Naas Infrastructure deficit: Multiple It is submitted that Naas suffers from a significant deficit in: • Parks provision; and • Sports grounds (e.g. pitches) provision. • Schools and childcare • Transport links around the town The proposed NWQ Framework Masterplan and urban extension development will not address existing deficits in the town and will compound the existing infrastructure deficit problem that exists in the town. Building homes without the necessary supporting infrastructure will not be acceptable. Character of Naas Harbour and Canal

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		The aesthetics of Naas harbour and canal will be “destroyed” by the proposed new development and the “concrete jungle” created by the new development.
6	Niall Bolger	Sustainable Mobility Strategy: Future rail connection from Naas Town Centre It is submitted that Kildare County Council should consider (in consultation with NTA, Irish Rail and Department of Transport) safeguarding lands within the Northwest Quadrant for a future rail-based public transport corridor between Naas Town Centre and the Dublin-Cork rail line to enable the option for the provision of a future rail line that could form part of the DART rail system on the grounds that: • Journeys involving transport interchange to the train service in Sallins (e.g. bus-to-rail) are inherently less attractive to customers and less likely to result in modal shift due to time / convenience costs. • Protecting this option would be consistent with national and regional planning objectives for compact growth, climate action; and a range of other policy. It is acknowledged that such a proposal does not form part of the All-Island Strategic Rail Review. • Support the long-term objective of expanding high-capacity public transport to growing settlements within the Greater Dublin Area (transport-oriented development). • Naas is one of the largest towns in Ireland without a central train station.
7	Conor Whelan	Northwest Quadrant Framework Masterplan Evidence base The submission seeks the publication of a number of supporting documents to the Variation to provide transparency on the evidence-base that underpins the Variation to enable the public to understand, evaluate and comment on their contents as part of the public consultation process. The following were required by the Naas Local Area Plan Objective NWQ 1.1 and should be published: • Transport Impact Assessment

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• Naas Flood Relief Scheme outputs (e.g. Hydrology and Hydraulic Modelling Report and climate change scenario mapping); • Water and Wastewater Capacity Assessment; • Infrastructure cost and funding assessments; In addition, the following are requested: • Associated Environmental Assessments and their environmental evidence; • Inputs to Naas Flood Relief Scheme regarding ground investigation, soil testing and infiltration testing; • Site-Specific Flood Risk Assessment to enable an understanding of the necessary flood relief measures. • Ecological, habitat and species surveys; • Supporting rationale for why no further environmental assessments are required. In responding to the above KCC is requested to consider and respond to: • Whether the documents have been completed / exist. • The sufficiency of the documents published in relation to the above. • Whether the documents will be published, when, and if not the rationale for this • Whether the Council considers any of the assessments unnecessary, and if so the rationale for this position. • Whether meaningful public consultation would require each of the above to be published as an evidence-base to be considered as part of the Variation statutory plan-making process.
8	Robert Fadden	Future rail connection to National Rail Network from Naas Town Centre It is submitted that Kildare County Council should consider (in consultation with NTA, Irish Rail and Department of Transport) safeguarding lands within the Northwest Quadrant for a future rail-based public transport corridor between Naas Town Centre and the Dublin-Cork rail line to enable the

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		option for the provision of a future rail line that could form part of the DART rail system on the grounds that: • Journeys involving transport interchange to the train service in Sallins (e.g. bus-to-rail) are inherently less attractive to customers and less likely to result in modal shift due to time / convenience costs. • Protecting this option would be consistent with national and regional planning objectives for compact growth, climate action; and a range of other policy. It is acknowledged that such a proposal does not form part of the All-Island Strategic Rail Review. • Support the long-term objective of expanding high-capacity public transport to growing settlements within the Greater Dublin Area (transport-oriented development). Naas is one of the largest towns in Ireland without a central train station.
9	John Murphy	Northwest Quadrant Flood Risk It is submitted that the <i>OPW Flood Risk Study</i> (full supporting evidence base on flood risk and flood risk management) should be published as an evidence-based document in support of the <i>Framework Masterplan</i> and its <i>Strategic Flood Risk Assessment</i> on the grounds that: • This would help citizens of Naas to understand the flood issues affecting the Northwest Quadrant and their interrelationship with other areas of the town (e.g. the Sallins Road, which has been subject to recent flooding), and whether development will pose a flood risk to adjacent areas of the town. • The preparation of the Study was a requirement of Objective NWQ1.1(b) of the Naas Local Area Plan, which states “<i>No masterplan shall be completed until the OPW Flood Study has been finalised for the lands in the Northwest Quadrant.</i>” • Climate change scenarios (Mid-Range and High-End Future Scenarios) need to be understood. • The OPR previously stated in their submission to the Local Area Plan process (25 May 2021) that the zoning of lands within the Northwest Quadrant was considered premature pending

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		completion of the further flood assessment work, and updated Strategic Flood Risk Assessment and the preparation of a detailed masterplan. The submitter requests that the following specific questions be addressed: Flood risk study methodology / detail • Have site-wide permeability testing, infiltration testing or groundwater investigations been completed? If so, can these be published? • If no tests have been completed how has this been considered in preparing the Framework Masterplan and if future tests are required how could this affect the development capacity of the Northwest Quadrant. Flood Risk Study • How future climate change flood risk scenarios affect the lands proposed for development. • What flood relief measures may be required for the Northwest Quadrant and who would pay for them. • Whether any flood relief measures for the Northwest Quadrant would affect other parts of Naas. • What impact the development of the Northwest Quadrant may have on existing communities already experiencing flooding problems. • Whether the requirements of Objective NWQ 1.1(b) in the <i>Naas Local Area Plan</i> have been fully satisfied.
10	Maritime Area Regulatory Authority	See Section 4.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
11	Housing Infrastructure Services Company (Niall Morrissey, CEO)	The Housing Infrastructure Services Company (HISCo) submit that they would be available to explore potential collaboration with Kildare County Council (and other partners) on the delivery of infrastructure in the Northwest Quadrant. HISCo's Guiding Principles are as follows: • Projects to be considered must be predominantly residential; however, there is recognition that most schemes will contain retail and/or commercial elements. • Schemes that contain a good mix of accommodation types and tenures will be welcomed. • Unit types and prices will be assessed in terms of marketability. • There must be an identifiable element of infrastructure that HISCo can deliver at a reasonable cost. • The scheme must have planning approval before being considered for final approval by HISCo (early discussion of projects is welcomed).
12	Paul Doyle	Northwest Quadrant Flood Risk The submission is concerned that the development of the Northwest Quadrant could lead to increased flood risk for other parts of Naas, as well as to flood risk within the Northwest Quadrant itself. It requests that the evidence-base that underpins the Framework Masterplan and the Strategic Flood Risk Assessment should be placed in the public domain for consultation to allow independent scrutiny and to demonstrate that a precautionary approach has been taken. Specific issues / questions are posed for response: • Have cumulative flood risk impacts been fully assessed in the masterplan and statutory plan - making process? • Have climate change scenarios been considered in determining the extent of land zoned for residential, educational and employment lands?

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• Have items been deferred to the planning application stage that would more appropriately be considered at the plan-making stage? If so, why? • Will public money is required to enlarge culverts (under Millennium Park Road and the M7)? • Will Kildare County Council publish a “<i>Flood Risk Transparency Statement</i>” before finalising the land use zoning framework? The submission requests that the following items be clearly set out and confirmed: • Climate change scenarios should be published, along with their assumptions, for the Naas Flood Relief Scheme hydraulic modelling. • Are any land parcels affected by flood risk in climate change scenarios, and can safe access and egress be maintained. • Is there reliance on future flood relief works; • Development phase delivery will not increase flood risk elsewhere (i.e. on other parts of Naas or the NWQ).
13	Mick O'Toole	Naas Active Recreational Infrastructure: Football facilities deficit: It is submitted that Naas has an existing active recreational infrastructure (ARI) deficit to meet the needs of the population, and more specifically Naas AFC do not have enough space to accommodate their existing or future needs. The submissions seeks for the Framework Masterplan to support the expansion of Naas AFC within the quadrant lands to assist the club and contribute to the achievement of the Northwest Quadrant ambition for sustainable mobility and providing synergies between schools and sports grounds. The submission requests four specific items be integrated into the statutory planning framework: Modify Objective NWQ O1.8

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		The submission requests that consideration be given to amending this objective to omit reference to the development of municipal sports grounds and “mandate a Partnership Lease / Shared Access Model” to benefit locally based clubs that already operate in the area. LUZO definition for F – Open Space and Amenity Amend Appendix Two (Objective F – Open Space and Amenity) to state that the expansion of contiguous volunteer-led sports grounds takes precedence over “generic, passive public parkland green spaces”. Phasing Strategy – Western Sports Grounds delivery The sports grounds “and associated extensions” should be delivered as part of Phase 1, rather than Phase 2. Development Contributions Scheme Include in the development contributions scheme a provision for capital grants for expanding the physical footprint of volunteer sports clubs situated inside the quadrant.
14	Naas Town Strategy Group	The Naas Town Strategy Group support the development of the Northwest Quadrant in principle and consider that the Framework Masterplan contains a compelling vision but that there are several additional items required to underpin the vision for this very significant urban extension before Kildare County Council should adopt the Framework Masterplan into the statutory planning framework. The submission contends that the adoption of the NWQ Framework is premature until a wider evidence base has been completed, published and scrutinised, and integrated into the land use strategy and its supporting infrastructure delivery plan. The implications of the Framework will be significant for the Northwest Quadrant, Naas, County Kildare and the County Council, as well as for the scale, form, capacity, phasing, infrastructure and

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		deliverability of the NWQ and constituent development projects. The submission seeks additional supporting documents / evidence base to address critical issues regarding the following items: Transport Impact Assessment The Framework documents have not demonstrated that the proposed movement strategy works or is realistic by means of a Transport Impact Assessment. should be carried out <i>prior</i> to adoption of the Framework, as it has the potential to materially influence development capacity, movement strategy, infrastructure requirements and phasing and parking standards – and thus material impact the Framework in a substantive way. These are core Framework assumptions rather than implementation details and should therefore be tested before they are embedded within planning policy. Objective NWQ 1.1. part C states that the masterplan will include a transport impact assessment. The submission proposes that the scale of the urban extension is sufficient to warrant an Area-Based Transport Assessment. This would enable the key question to be answered = How will the entire town of Naas function as a transport system as it develops over the coming decades? Naas Town Centre The Framework documents have not demonstrated that the NWQ development will strengthen the town centre rather than undermine it. The submission expresses concern that Naas Town Centre is in decline and has lost its vitality, and that there is a significant suburban retail offer that undermines the town centre. A Town Centre First approach is essential. The way the Northwest Quadrant is connected to the existing town therefore matters greatly. If successful, it has the potential to strengthen the town centre by increasing footfall, supporting local businesses and reinforcing the role of the town centre as the primary focus for retail, services, employment and community activity. If unsuccessful, there is a risk that existing trends towards peripheral and out-of-town destinations could be reinforced.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		The submission is concerned that the sustainable mobility strategy doesn't allow vehicular traffic direct access to the town centre, which will undermine the economic basis and role of the town centre. The submission identifies that all car trips are routed to the peripheral road network (Millennium Park Road / New Caragh Road), which means that the NWQ could function as a substantial self-contained new urban district entirely disconnected from the town centre from a movement and urban centre and retail spend perspective. The Transport Impact Assessment would be a key way to provide the evidence base for the Northwest Quadrant underpinning the town centre, and its movement strategy and how this will influence shopping patterns, service usage, employment trips or town centre activity. Infrastructure Delivery Plan and supporting Funding Strategy The Framework documents define an extensive Infrastructure Delivery Plan, including enabling and supporting infrastructure, that will cost many millions of euros to deliver. However, the Infrastructure Delivery Plan does not include the enabling infrastructure outside of the Northwest Quadrant boundary that will be required to support the Quadrant. In particular, the absence of a Transport Impact Assessment means that the upgrades to the street network outside of the NWQ lands are not properly understood and have not been included in the Infrastructure Delivery Plan. Thus, the costings for this infrastructure are not understood and provision has not been made for their funding. This means raises legitimate questions about how the unquantified enabling infrastructure can be funded, who will be responsible for their delivery, when it is required, and whether the Northwest Quadrant is viable. This will impact on the timeline for the delivery of housing and the assumptions included in the Framework Masterplan. More widely the delivery, funding and financial strategy for the NWQ Infrastructure Delivery Plan are not yet developed. This presents a risk to the deliverability of the Northwest Quadrant, its viability and ability to accelerate housing delivery and achieve the defined housing trajectory. The delivery

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		pathway for the Northwest Quadrant has not been prepared. The submission considers that this affects the credibility of the Framework. Flood risk, Climate Resilience and Self-Sufficiency The Framework documents have not demonstrated that the land is suitable from a flood risk perspective as some land parcels are subject to further investigation regarding flood mitigation works. The submission suggests that if additional flood risk assessment is required then the elected members and the public should not be expected to determine whether the proposed development capacity, land-use allocations, infrastructure requirements and phasing strategy are appropriate. The submission is particularly concerned that it has not yet been demonstrated that the Northwest Quadrant can be developed in a manner that is self-sufficient from a flood management perspective. If future development capacity is dependent upon strategic flood interventions elsewhere within the wider catchment, then those interventions should be clearly identified, assessed and publicly available before the Framework is adopted. The Group considers that the proper planning sequence is straightforward. Firstly, flood risk should be fully assessed. Secondly, any mitigation measures, infrastructure requirements and development constraints should be identified. Thirdly, the Framework should be prepared having regard to those findings. The issue is not whether flood risk can ultimately be managed. The issue is whether sufficient information currently exists to justify embedding the proposed development framework into the statutory planning policy of the County Development Plan. The flood risk evidence base to inform decisions should be made available to inform any decisions and public scrutiny. Naas Growth Strategy The Framework documents have not proven that the growth strategy is the right one for Naas. A <i>Settlement Capacity Audit</i> and <i>Social Infrastructure Audit</i> would normally be prepared in support of

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		settlement plans to assess the capacity of each settlement to accommodate future growth and identify infrastructure requirements arising from that growth. No equivalent evidence appears to have been prepared in support of the Northwest Quadrant. This is particularly important given that the Framework is being advanced <i>in advance of the preparation of the new Naas Settlement Plan</i>. The Group would have expected strategic questions relating to growth distribution, infrastructure capacity, social infrastructure provision, environmental constraints and long-term settlement structure to be informed by a comprehensive evidence base before decisions regarding the scale and location of growth are embedded within statutory planning policy. The submission notes that the Variation states that it is providing for the needs of the Northwest Quadrant and not the wider Naas infrastructure requirements. The submission seeks the settlement-wide analysis of Naas's infrastructure capacity to accompany the publication of the Northwest Quadrant Framework Masterplan. Not that it expects the Northwest Quadrant to solve all of Naas's problems but that it expects the assessment to accompany as an evidence-base to underpin the Variation / Framework Masterplan process, in accordance with the approach KCC has taken to other plan-making processes. Evidence base to justify schools, recreation and community infrastructure The Framework documents have not proven that the schools, recreation and community infrastructure will be sufficient for the area nor that they will be delivered in a timely fashion. The Group is particularly concerned regarding school provision. The Framework identifies several school sites and states that Kildare County Council will "continue to engage" with the Department of Education regarding future educational requirements. The practical reality is this: the delivery, capacity and timing of these schools remain uncertain.

Sub. No.	Name	Summary of Submission
		Additionally, the submission contends that the proposed Oldtown Park should be delivered in Phase 1. If Oldtown Park is intended to form a key part of the identity of the Northwest Quadrant and act as an important connection between the new development and the existing town, why is it not being delivered from the outset? Particularly as the Park is a key placemaking component of the Northwest Quadrant. The Park would also benefit the wider Naas town and provide a key integration component for the Quadrant. The submission considers that key community infrastructure should be linked to development phases to ensure that population growth is matched by the timely delivery of supporting facilities. The submission considers that this is a fundamental issue that should be addressed prior to adoption as this will impact on the quality of place and the ability of the NWQ to function as a sustainable community from the outset. WAY FORWARD The submission proposes that adoption of the Framework be deferred pending completion and publication of the key technical assessments proposed above to inform it and the recommendations of those assessments built into the Framework and Land use strategy. Alternatively, where the Council decide to proceed with adoption now (prior to issuing all missing assessments) a series of amendments and additional objectives are proposed to strengthen the Framework and increase the likelihood that the Northwest Quadrant develops as a genuinely integrated, sustainable and successful extension of Naas. Objectives relating to Transport Impact Assessment, Movement Strategy & Public Transport Four linked transport objectives (with draft wording) are proposed. • Transport Impact assessment should be completed. • The preferred public transport route should be identified. • The Public transport corridor should be safeguarded

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		- The wider implications of the Northwest Quadrant and other strategic transport projects should be assessed through an Area-Based Transport Assessment for Naas as part of the next Settlement Plan process. Proposed Town Centre First Integration and Connectivity objectives: objectives are proposed to address concern around the development of the urban centres in the Quadrant and how they might compete with the town centre, as well as the ability of the Northwest Quadrant to integrate with Naas town centre in terms of movement and access. - Proposed <i>Infrastructure Delivery, Funding and Viability Strategy</i> objective. - Proposed <i>Housing Delivery and Build-Out Review</i> objective. - Proposed <i>Critical Infrastructure</i> objective. - Proposed Northwest Quadrant Monitoring and Delivery Review objective Flood Risk, Climate Resilience and Self-Sufficiency - Completion and Publication of Flood Risk Assessments objective - Flood mitigation and infrastructure transparency objective - Flood risk self-sufficiency Review objective (for each development proposal) objective. Evidence-Based Growth Strategy - Settlement Capacity Assessment for Naas objective - Social Infrastructure Audit objective - Evidence Review and Framework Update Mechanism objective Community Infrastructure - Community Infrastructure Delivery Plan objective - Infrastructure Delivery Triggers objective

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		Early Delivery of Oldtown Park objective
15	C Murray	Residential density The submission suggests that the Northwest Quadrant be developed to higher densities with apartments house types suited to its location within the Greater Dublin Area, rather than terraced / semi-detached housing. Public spaces Parking to serve public space / parks and sports areas should not be surface parking but should be provided within reasonably priced multi-storey car parks that generate revenue for the Council and be well-connected through sustainable mobility networks to avoid the need for people to drive to them. Public spaces should include well-maintained facilities / equipment to ensure that they are of a high quality. There is a wider deficit of public spaces in Naas to meet the needs of the town currently. NWQ Business developments The submission supports the proposed mix of non-residential employment uses in the Northwest Quadrant in principle. However, it would also like to see an emphasis on commercial development opportunities for small businesses and that consideration be given to tax reliefs to incentivise set-up investment. Commercial uses to include health services (medical / dental) with pharmacies, mini supermarkets / convenience stores, restaurants / creches, etc. Schools (Primary & Post-Primary) The submission suggests that the typical / average timeline for delivering a school is c.10 years. It recommends that school sites are large enough to accommodate school extensions as these are a pragmatic / quick response to increase school capacity. It also recommends that primary and post-primary schools co-locate adjacent to each other.

Sub. No.	Name	Summary of Submission
		Health services The submission identifies that the significant growth in Naas will require commensurate increases in the provision of health services, including hospital, GP care, and recommends that a facility be developed within the Northwest Quadrant. Case Studies The submission recommends that KCC consider the Singapore model for urban planning.
16	Ricardo Paco	The submission supports the objective of planned and sustainable growth in Naas. However, it seeks reassurance that the Northwest Quadrant will ensure that infrastructure, transport and community facilities are delivered in tandem with development and that the interests of existing residents are fully considered throughout implementation. The submission seeks the following: Transport and Traffic Infrastructure The submission requests that KCC demonstrate the traffic impact on the street and road network and identify the measures that could be deployed to manage traffic. Infrastructure delivery and phasing The provision of infrastructure should be subject to robust phasing arrangements linking residential development to the provision of supporting and enabling infrastructure to give confidence that infrastructure will not lag behind housing delivery. Protection of existing communities The Masterplan should seek to ensure that the transitions between existing and future development are managed appropriately, including consideration of density and building height; residential amenity; integration of communities; and high-quality public realm and open space. Monitoring of cumulative impacts of development

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		The Council / body responsible for monitoring the cumulative impacts of the Northwest Quadrant development, including consideration of transport services; infrastructure provision and capacity and community services.
17	Anisha Khazanchi	Impact of the Northwest Quadrant on Naas: Existing infrastructure and service deficits It is submitted that Naas currently suffers from infrastructure deficits that will be made worse by the Northwest Quadrant unless services scale first in advance of the supply of new development, including: Road network – the main routes (like N9/N7) are already congested and the NWQ will lead increased congestion and slower commutes. The roads can't be widened quickly. Parking – Town Centre car parking is finite and there will be increased pressure for the use of those spaces. The same principle applies to existing residential streets. Schools – Schools are currently at capacity and new schools are needed. Childcare – There is an existing shortage of creches / after school places with waiting lists and high prices driven up by demand. Healthcare and GP visits – There is a shortage of GPs and space on practice patient lists. Utility infrastructure capacity – The development of the Northwest Quadrant could lead to potable water pressure drops, drainage issues and service interruptions (e.g. electricity / broadband). Greenspace and amenities- Naas has limited green space per person / amenities, which will be put under even more pressure by the proposed development. It is submitted that this will overall lead to a worsening of quality of life for existing people.
18	Cian McGuire	Good urban design and planning principles

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		The submission is generally supportive of the proposed amendment to the CDP, and its evidence-based analysis regarding urban design and planning principles. Public Transport: Naas Town Centre Train Station It is submitted that KCC should push for an extension to the DART+ from Sallins to a Naas Town Centre Terminus to provide for the needs of the current Naas residents and the Northwest Quadrant. Urban densities The submission proposes that greater densities should be permitted, where possible, and particularly around the neighbourhood centres and at Naas Harbour to extend Naas Town Centre. If better public transport were provided this would also justify increased densities.
19	Robert Power	Public Transport: Naas Town Centre Train Station The submission asserts that a Naas Town Centre train station should be provided at Abbey Bridge (with a spur from the mainline crossing the Northwest Quadrant) on the grounds that Naas will be one of the largest towns in Ireland without a central train station to provide a high-quality public transport option to cause a real modal shift away from car usage. The train station is also considered to be a “once in a lifetime” opportunity and necessary to reduce congestion in the town centre. Active Travel Measures should be found to make the cycle network better and encourage a reduction in car usage. The bridges over the Grand Canal should be prioritised as they are urgently needed. The submission suggests that one option for this would be the introduction of a one-way system into the town (presumably to provide more space for non-vehicular movement).

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
20	Boran Packaging Limited	See Section 6.
21	Gavin Barnes	Active Recreational Infrastructure / Naas AFC and the K-Leisure / Naas Sports Centre complex The submission highlights that existing active recreational infrastructure at the Naas AFC grounds are at capacity and that new capacity is required to meet the needs of the club its members and wider community for reasons of sport, community, health and much more. The submission suggests that the new community from the Northwest Quadrant will not be able to join Naas AFC because it does not have capacity to accommodate demand from this new development. The submission requests that the focus for the NWQ lands should be meeting the existing ARI infrastructure deficit in Naas and not for meeting the needs of the NWQ. Sports-related car parking provision The submission objects to the proposed maximum car parking standard of 10 car parking spaces per pitch (Table NWQ13) on the grounds that Naas AFC has a wide catchment and people generally drive to deliver children and kit to their sports ground. The submission suggests that there will be overspill from sports parking areas if the standard isn't adjusted. It is requested that consideration be given to adjusting the maximum car parking standards to allow additional car parking provision. Phasing of Active Recreational Infrastructure / Facilities The submission suggests that the western sports ground / K-Leisure extension should be delivered as part of Phase One on the grounds that residential development forming part of Phase 1 will not have sufficient sports facilities / grounds.

Sub. No.	Name	Summary of Submission
		Operational model for Western sports ground at New Caragh Road The submission requests that the Municipal Pitch Model outlined in NWQ 01.8 be amended to a “long term lease” model for established sports clubs.
22	Christine Finn	Traffic and Transport Links Improved transport connections to a range of places need to be provided from Naas to ensure that the development is sustainable, including: Citywest, Parkwest, Clondalkin, Lucan, Maynooth and the City Centre. This could include improved train services, improved buses to Sallins-Naas Train Station, improved bus network; a link to the LUAS with a Park and Ride, extension of the LUAS to Naas, extension of train line to Naas with a park and ride. Community infrastructure and services: Education and childcare The plan needs to ensure that there will be “concrete provision” of a range of community services, including: • Schools provision. • Childcare provision. • GP clinics and healthcare. Utility services KCC should ensure that there are upgrades in network / sufficient capacity in water, wastewater and electricity to meet the needs of the proposed development. Bottle banks and recycling points Multiple locations are required for these facilities within NWQ.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		Green areas Existing green areas should be kept intact in the development of the NWQ.
23	Sally J Byrne	Pause Northwest Quadrant plan-making process to enable supporting documents to be completed It is submitted that KCC should pause the plan-making process to enable the completion of the following outstanding supporting work packages: • A Transport Impact Assessment to demonstrate that the receiving environment can accommodate the proposed development, including public transport otherwise many more trips than envisaged would be made by car. • Greater clarity on the proposed public transport strategy / route / bridge requirements is required, including who will fund it and when it will be delivered. • Flood Risk Relief Works – these have not been defined or finalised as the scheme is still at Options Assessment Stage until after the next major public consultation stage programmed for September 2026 (Note of Dail Eireann question / response included). The evidence base for the Naas Flood Relief Scheme should be published with the Strategic Flood Risk Assessment. • Infrastructure Delivery Plan – clear sight of who will be responsible for delivering the infrastructure packages to ensure that the plan is more than just a vision. • Funding Strategy and Financial Strategy – clear sight of how much the infrastructure will cost and how this will be funded, and financial planning for when funds will be required for each project and the source of that funding • Establish meaningful educational infrastructure triggers and “binding commitments” to ensure that educational infrastructure will be provided when it is required rather than rely purely on the zoning of sites for the purposes of schools. A letter is appended relating to Saint Corban's School being requested to accommodate an additional classroom without an additional teacher.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		The Northwest Quadrant could address wider Naas infrastructure deficits (e.g. active recreational infrastructure). Phasing The proposed main park at Knocks / Keredern should be included in Phase One of the proposed development.
24	Ger Ui Chongaile	The Proposed Northwest Quadrant Framework Masterplan asks residents to accept significant risks based on promises that many essential elements will be delivered in the future, including: Traffic and Transport Traffic and transport certainty regarding the capacity of the street and road network in Naas, as well as reliance on public transport services that currently don't exist or have any level of commitment. This is particularly in the context of peak traffic to schools in and around the Sallins Road and town centre areas. Naas Infrastructure and Services Deficit There is a shortage of the following in Naas to serve the existing population with clubs and activities tend to have long waiting lists): - Safe recreational spaces - Sports facilities - Youth amenities - Accessible play areas Timing of NWQ Infrastructure delivery

Sub. No.	Name	Summary of Submission
		The submission asserts that residents should not have to “wait years after moving into a new community before essential facilities become available”. Certainty around NWQ Infrastructure Delivery Plan The Infrastructure Delivery Plan sets out a wide range of responsibilities to state and semi-state agencies, including the Department of Education, the HSE, Uisce Eireann, ESB Networks and the National Transport Authority. The submission requests that clear and binding commitments are provided by these organisations prior to the approval of this large-scale development. Funding Strategy It is submitted that the infrastructure delivery plan requires costings and a funding strategy to demonstrate that the infrastructure can be delivered in a timely manner. Environmental assessment The submission queries the lack of detailed environmental assessment and ecological surveys to underpin the proposed development. Utility capacity The submission seeks confirmation that the development can proceed without having an adverse impact on existing users of water, waste water and electricity in Naas. Pause in Variation process The submissions requests that greater detail, certainty and accountability are required before the Variation should be adopted with regard to the range of issues highlighted..
25	HSE Environmental Health	See Section 4.

Sub. No.	Name	Summary of Submission
26	Minister James Lawless TD	Vison for Northwest Quadrant This proposal represents a significant opportunity to deliver well-planned and sustainable growth for Naas and County Kildare. The scale and ambition of the masterplan are welcomed, particularly the integrated approach to housing, employment, transport, community facilities, green infrastructure, and public services. As well as the commitment to the provision of enabling and supporting infrastructure to meet the needs of the development and to ensure that existing infrastructure is not placed under undue pressure as the area grows. Sustainable Mobility Strategy The submission supports the ambition for the Northwest Quadrant and its focus on sustainable mobility and the provision of safe and attractive walking / cycling routes within the Quadrant. The submission strongly encourages Kildare County Council to work with national transport agencies to explore the potential for a second train station west of Sallins to serve the Naas-Sallins area as the population grows. Should a second station site be identified then this would require protecting and planning. While the existing Sallins and Naas Railway Station provides a valuable service, the scale of future growth envisaged within the Northwest Quadrant, combined with the continued expansion of Naas and surrounding settlements, will place increasing demands on transport infrastructure. A second rail station would represent a strategic investment in the long-term future of the area. It would provide improved access to public transport for thousands of current and future residents, encourage a shift away from private car use, reduce traffic congestion on local and regional road networks, and support national climate and sustainability objectives. It would also strengthen connectivity between Naas, Dublin, and other regional centres, enhancing the attractiveness of the area as a place to live and work.

Sub. No.	Name	Summary of Submission
27	Diarmuid Parker	Transport Capacity deficit The submission identifies that the Framework Masterplan has a Sustainable Mobility Strategy that has a reliance on the <i>Naas-Sallins Transport Strategy 2020 (NSTS 2020)</i>, which is outdated. The impact of the proposed Northwest Quadrant on the traffic and transport network requires assessment over and above that previously assessed in the NSTS 2020. Future Public transport The submission suggests that the NWQ Framework and its Sustainable Mobility Strategy is reliant on the Sallins-Naas Train Station and a non-existent bus-based service. It is proposed that the strategy be augmented by either: • A second station to the west of Sallins (park and ride); or • Extension of the DART to Sallins (with associated electrification / quad track). Electricity capacity deficit The submission requests that the Framework Masterplan be amended to be stronger on the requirements for solar or self-sustainable energy production for the Northwest Quadrant. The submission asks that the Vauban urban extension in Freiburg is used as a case study for solar communities. The request is in the context of challenges in electricity supply and the development of data centres across Ireland and their consumption of 20% of national capacity. Schools Capacity Deficit The submission acknowledges the proposed schools' provision within the Northwest Quadrant but queries whether the wider capacity challenges in Naas have been considered. The submission queries the phasing / delivery of schools in the Northwest Quadrant whereby schools would be provided after homes have been delivered. Developer-led development

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		The Northwest Quadrant appears to be develop-led without foresight to existing or future issues, or a co-ordinated strategy for development. Environmental Impact Assessments An environmental impact assessment should be prepared.
28	An Post (RMLA on behalf of)	An Post supports the strategic objectives of the Northwest Quadrant (Naas) Framework Masterplan and welcomes the delivery of a significant new residential and employment area for Naas. However, given the scale of population and employment growth envisaged, it is important that postal services and associated infrastructure are recognised as an integral component of the essential services required to support the creation of sustainable and complete communities. In particular An Post requests that the following are considered in delivering the Northwest Quadrant: • Postal infrastructure and services are recognised as essential supporting infrastructure within the Framework Masterplan. • Advance notification and consultation procedures are established regarding any planned road closures, access restrictions or traffic management measures; • Provision is made to facilitate the future extension, expansion or upgrading of existing An Post facilities where required to meet future demand; • Provision is made to facilitate new facilities where required to meet future demand; and • Opportunities for the incorporation of post boxes and associated postal facilities within new neighbourhood and local centres are considered as part of detailed design proposals.
29	Office of Public Works	See Section 4.
30	Mike Baker	Landen Park Bridge

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		The submission objects to the proposed Landen Park Bridge as it would provide direct access from the main enclosed green space in Landen Park (for the benefit of Landen Park) to the canal. This is considered to be undesirable on the following grounds: • The bridge would lead to the green space within Landen Park being connected to the canal; • The connection to the canal would mean that the estate / green space would not be self-contained. This could lead to risks for children / people resident in Landen Park relating to water safety, antisocial behaviour and perceived safety.
31	Caragh Court Residents Association	The submission raises the same issues as submission No.3 made by Joseph Bergin. The tagline for the submission is: who pays, who owns the land, who builds the infrastructure, and whether the environment can absorb it. More specifically the submission identifies multiple (15) issues relevant to the delivery of the Northwest Quadrant (Naas) and the Proposed Variation, including: • Land Assembly Risk: There is a real risk that the need to acquire land by CPO (rather than by agreement) could result in the phasing sequence being undermined. • Third-party infrastructure delivery risk – The Infrastructure Delivery Plan identifies responsibility for infrastructure delivery, including delivery a range of state and semi-state agencies without “binding commitments”. This presents a project risk for NWQ. • Unrealistic Delivery Timeline – The stated 2027 to 2040 timeline for delivery is overly ambitious and not realistic. • Infrastructure Cost – The Variation doesn't include the cost plan for the proposed infrastructure. • Funding Strategy – The financial viability of the scheme is deferred until after the statutory plan is adopted, meaning that the funding of infrastructure is not made clear, and decisions difficult for private sector investors; • Environmental Assessments of the Variation – The submission asserts that full SEA and AA are required for the proposed statutory land use plan, and that only undertaking screenings is open to challenge.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		• Ecological surveys – The plan is based has been formulated based on desktop baseline data, rather than ecological surveys. This presents a risk should protected species or habitats be discovered at planning application stage. • Public transport – The NWQ is dependent on a bus-based transport corridor that does not benefit from any level of commitment from the NTA. Without this the sustainable mobility strategy is at risk and could mean the NWQ could become a standard car-borne development. • Potable Water / Waste Water – A capacity assessment by Uisce Eireann is required as an evidence-base for the Proposed Variation. • Financial Viability / Development Appraisal - There is no development appraisal demonstrating the scheme is financially deliverable. Infrastructure costs (likely hundreds of millions) are uncoded. There is no assessment of whether development levies, state funding, or developer contributions can actually fund the enabling infrastructure. • Social and affordable housing breakdown – The social and affordable housing targets and strategy to meet housing need is not included and this should be clearly set out as it is a key component of housing supply. • Land ownership – Information on landownership should be included in the Framework Masterplan. If there are likely to be windfall profits for a small number of landowners this should be made clear in the public interest. • Detailed Traffic Modelling – A transport / traffic impact assessment is required as an evidence base to support the proposed development strategy. • “Master Developer” Model – The terms of reference / mechanism for establishing the master developer should be defined. This role is hugely significant in bringing forward the NWQ and will be is very powerful. • Consultant team concentration – The Framework Masterplan (and supporting documents) and Naas-Sallins Transport Strategy (2020) were both prepared by AECOM. There is no evidence of peer review of the outputs from a sole consultancy. AECOM have a financial interest in further stages in the project.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		Landowner windfall – Increases in land value need to be captured to fund the necessary infrastructure to support the development. A land value uplift mechanism needs to be defined to ensure that the benefits from the development are shared to benefit the common good, rather than the current landowners.
32	Fionnula Nevin	Landen Park Bridge The submission objects to the proposed bridge as it would provide direct access from the main green space in Landen Park to the canal. This is considered to be undesirable on the following grounds: • The bridge would lead to the green space within Landen Park being connected to the canal; • The connection to the canal would mean that the estate / green space would not be self-contained. This could lead to risks for children / people resident in Landen Park relating to water safety, increased footfall, speed of cycles / scooters, and antisocial behaviour. • The submission considers that a more suitable location for a bridge across the canal would be from the DeBurghs estate and Millenium Park as these areas already provide public access. The submission acknowledges that the bridge is already an adopted objective in the Naas Local Area Plan.
33	Glenveagh Homes Limited	See Section 6
34	Paul O'Brien	The submission requests that Kildare County Council gives particular consideration to addressing a number of issues to help ensure that Naas continues to grow in a balanced, sustainable and well serviced manner for the benefit of current and future generations.:

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		- Delivering additional sports and recreational facilities in line with population growth as existing facilities are at or near capacity, and demand continues to grow. Provision should be made for facilities and funding mechanisms for this infrastructure. - Working with the Department of Education to address secondary school capacity through the extension of Naas Community College and/or the planning and delivery of a new secondary school. Public Transport and sustainable connectivity: Improving connectivity between Sallins Railway Station and Naas through enhanced public transport, including the examination of a dedicated bus-only route or bus priority corridor. - Embedding a plan-led approach so that essential infrastructure is delivered alongside, or ahead of, new residential development.
35	Department of Education and Youth	See Section 4.
36	Mark McDaid	Naas Sports Centre (NSC) Campus (K-Leisure and three sports clubs) Naas Sports Centre was built in 2001 with enough capacity to accommodate growth in Naas for c.20 years. This foresight / infrastructure-led development approach is now required to enable the NSC to be enlarged so that it can meet existing and future need. The submission outlines that the Naas Sports Centre does not have capacity to accommodate additional growth or sufficient capacity to accommodate the existing levels of demand for the facilities / club and struggles to accommodate the existing levels of activity with regard to accessibility, car parking provision, and facilities. The inability to accommodate new families that move to Naas (including the Northwest Quadrant) into sporting clubs will have an adverse impact on the ability of Naas to be socially integrated and for new families to be socially integrated into Naas.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		The constraints on capacity inhibit the ability of the sports clubs to accommodate tournaments / regional competitions. The submission requests that consideration be given to the following: • The enlargement of the Naas Sports Centre should be included in Phase One to accommodate the existing needs of Naas, as well as Phase One. • Separate to Northwest Quadrant - a comprehensive review of the Naas Sports Centre and its parking / access with a view to investment in the short term; • Recognition in Variation No.5 that the NSC site (and its resident clubs) can not absorb significant extra demand without investment; • The review process to be collaborative and include engagement with those who use the NSC.
37	EirGrid	See Section 4.
38	Jennifer Yates	Infrastructure: existing deficits and future provision The submission notes that Naas has significant infrastructure deficit challenges, and requests that the Proposed Variation is not supported OR that significant amendments are included that ensure infrastructure delivery precedes residential expansion to ensure that the quality of life for existing Naas residents is not diminished by the proposed urban extension. Education: Additional primary and secondary school capacity for the Northwest Quadrant is planned and funded, and subject to a binding commitment for school places and associated staffing from the DE&Y. Existing schools in and around Naas are at or close to capacity. Creche and childcare: Sufficient childcare should be incorporated into the development to avoid placing pressure on existing providers, which are already at capacity / have waiting lists.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		Public transport: Significant improvements to public transport capacity are committed and delivered to reduce dependence on commuting by car (and the M7/N7) for Naas and wider need (e.g. park and ride facilities), as well as the / Northwest Quadrant. Local street network: Any necessary improvements are committed and delivered, including cycle and pedestrian infrastructure. Utility infrastructure (water, wastewater and electricity): Upgrades completed and verified as sufficient to support the proposed population. Phased approach: The phasing approach is adopted whereby housing delivery is directly linked to the completion of supporting infrastructure.
39	Councillor Bill Clear	Public Transport / Strategic rail infrastructure It is submitted that the Sustainable Mobility Strategy relies too heavily on buses. The Framework misses a significant opportunity by failing to protect and plan for a future rail station serving the Northwest Quadrant and western Naas. Kildare County Council should safeguard a transport corridor that • would allow for: ° A future Naas railway terminus. ° A connection to the Dublin–Cork railway line. ° Potential future extension of DART+ services. Schools and Education Existing school capacity shortages in Naas must be recognised. A Schools Capacity/Impact Assessment should be completed before residential development proceeds. Schools should be delivered early in the development rather than years after residents move in. Funding and delivery mechanisms should be clearly identified.

Sub. No.	Name	Summary of Submission
		Phasing of Housing and Infrastructure The Northwest Quadrant development should be infrastructure-led rather than housing-led. Homes should not be occupied until transport, schools, childcare, healthcare, community facilities and recreation have been delivered. Childcare The childcare system is at capacity. A community childcare facility should be provided as part of the Framework Masterplan, and its provision should be supported by development levies. Community Infrastructure Existing shortages in facilities for children and young people must be addressed. Existing clubs already experience waiting lists. Community infrastructure should be delivered before demand exceeds capacity and early in the development. The development should include: Community centres; Men's Shed facilities, Women's Shed facilities, youth facilities, playgrounds, MUGAs, basketball courts, pump tracks, walking and cycling facilities, sports pitches, well-equipped public parks Public Open Space The submission requests that the quantity of public open space be increased and be of a high quality in terms of their facilities and their connection to other places via walking and cycling and public transport. Avoid large surface car parks beside public open spaces. Walking and cycling The pedestrian and cycle network should connect all key destinations within the Northwest Quadrant and to adjacent areas via new bridges, including: schools, parks, sports facilities, community facilities, existing neighbourhoods, Naas town centre and transport hubs.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		Impact on existing communities Development should respect the quality of the amenities of existing residents (e.g. at Abbey Bridge) by ensuring appropriate transitions between existing areas and new development (e.g. in terms of building heights / privacy / public realm and landscaping) as well as social integration. Grand Canal Corridor protection New development should preserve the character of the canal corridor, biodiversity, and provide green buffer behind existing canal-side homes. Environmental Protection More detailed ecological and environmental assessments should be completed before development progresses.
40	Sophie Bouré	The submission asks Kildare County Council to ensure that essential infrastructure, including roads, public transport, schools, childcare and community facilities are delivered in parallel with housing, rather than after residents have moved into the area. Only by investing in infrastructure alongside development can the Northwest Quadrant become a sustainable and well-serviced community for both existing and future residents. The submission identifies that Naas's infrastructure and services are already under pressure: Congestion on the street network: Peak commuting hours have traffic congestion throughout Naas and Sallins, including access to Sallins-Naas Train Station. Improved bus services to the train station are essential to reduce car dependency and ease congestion and will require bus services for existing and future housing areas. Public transport: Public transport capacity does not match existing demand (e.g. trains from Sallins are overcrowded). Train and bus capacity should be improved before additional development is brought forward.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		Schools: There is already a shortage of places in local primary schools (particularly at Junior Infants entry) in the Naas SPA (Naas and Sallins area). Childcare (afterschool): There is a shortage of places in the Naas and Sallins area. Additional facilities / places should form part of the development. Community infrastructure: New homes should be delivered alongside a range of community infrastructure to ensure the creation of a sustainable community, including: parks; sports facilities; healthcare services; walking and cycling routes.
41	Ray O'Byrne	NWQ Infrastructure Delivery Plan The submission asks Kildare County Council to ensure that essential infrastructure, including public transport, healthcare, educational and community facilities are delivered in advance, or concurrently with, residential development. Only by investing in infrastructure alongside development can make the Northwest Quadrant become a sustainable and well-serviced community for both existing and future residents. The submission identifies that Naas's infrastructure and services are already under pressure: Public transport: There is a need for a strategic transport intervention (e.g. bus rapid transit (BRT) on a dedicated corridor) to make the Northwest Quadrant work, linking it to Naas Town Centre and the Sallins-Naas Railway Station. Without this there is a significant risk of new development being reliant on private cars, placing pressure on the N7 corridor, local roads and the surrounding communities. Transport / Traffic impact assessment / Congestion on the street network: The Council should clearly demonstrate how the cumulative traffic impacts of this development (combined with existing approved and completed developments) have been assessed and how the existing street and road network will accommodate the substantial increase in vehicle movements.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		Healthcare, Education and Community Infrastructure The Council should clearly demonstrate how healthcare services, schools, childcare facilities, and community facilities will be expanded to support both existing and future residents. Protection of Green Space, recreational facilities, sports facilities and Quality of Life Sustainable communities require far more than housing. They require accessible parks, recreational facilities, sports amenities, open spaces and green areas that contribute to the health, wellbeing and quality of life of residents. Planning should seek to ensure the liveability of Naas and the Northwest Quadrant, and that meaningful parks, recreation and sporting facilities are provided, whilst protecting valued green areas. Infrastructure-led development Naas has an existing infrastructure deficit across multiple sectors (see above). The issue is whether the infrastructure required to support that growth is available, funded and capable of being delivered in advance of, or within the same timeframe as, the proposed housing. Traditionally this hasn't happened. Will this be the case for the Northwest Quadrant and to meet the needs of existing residents to ensure quality of life?
42	Transport Infrastructure Ireland (TII)	See Section 4.
43	Abbey Bridge and Canal Residents Group	Abbey Bridge and the Grand Canal area The submission requests that consideration be given to the following:

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		Abbey Bridge cul-de-sac is a private street: The current street network is privately owned and not taken in charge. The residents do not want the Abbey Road street opened to traffic on the grounds of a “severe detrimental impact” on Abbey Bridge itself and traffic impact. Abbey Bridge area Biodiversity: the streams adjacent to Abbey Bridge have a significant eel population. The area west of existing homes should be considered for a green environmental corridor / wildlife sanctuary. Abbey Bridge area hydrology: There are a number of underground streams in the area that should be taken into account. Canalside Traffic: The residents consider that there are traffic and health and safety issues on Abbey Road, Abbey Bridge and Canal Road. They request that the Green Route be retained and the canal remains traffic free (apart from for local access). Canal Bridges: The residents oppose new bridges over the canal, “as accepted KCC in previous development plans”. Canalside amenity and special character: the area has a unique environment. This should be respected in any development of the Northwest Quadrant, including preservation and protection of Abbey Bridge and the Grand Canal. Pre-planning engagement: The residents association would welcome future engagement in advance of future planning applications.
44	Aimee Byrne	Landen Park Bridge The submission objects to the proposed bridge on the grounds that the pedestrian and cycle connection to the proposed bridge through Landen Park will: • Affect the safety of children playing in the estate by opening the estate to the canal and risks of water safety;

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• Increase the number of people coming to the estate. • Increase the risk of antisocial behaviour in the estate; and • Bring movement conflicts between people (e.g. children) living in the estate and cyclists and scooters. The submission requests that KCC consider accessing the canal away from the Landen Park estate and via: • The “Millennium Park side of the famine wall”, which borders Landen Park. or • The De Burghs estate.
45	Caithlin Craig	The submission seeks that infrastructure provision should keep pace with housing delivery and not be a future aspiration. The submission requests that Kildare County Council: • Infrastructure Phasing: Phase housing delivery in line with the provision of childcare, education, healthcare and transport infrastructure. There is a current infrastructure / services deficit and people shouldn't have to fight for everyday needs. • Binding commitments on infrastructure: Secure binding commitments from the relevant Government departments and agencies regarding the funding and timely delivery of schools, healthcare facilities and transport improvements. • Timing of facilities and infrastructure operation: Ensure that essential infrastructure is operational before, or at the same time as, residential occupation rather than several years afterwards. • Continue to monitor infrastructure capacity throughout the development to ensure that services keep pace with population growth.
46	Millennium Falcon	See Section 6

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
	Holdings Limited	
47	Tesco Ireland Limited	Tesco Ireland Limited request that consideration be given to amending the Framework Plan to provide greater flexibility regarding retail floorspace within the Local Centres, subject to the Sequential Approach and the Retail Planning Guidelines. The following specific amendments are requested: • Reviewing the 200 sq.m net retail cap within the Local Centres (a Footnote to the Land Use Zoning Matrix) to allow for the delivery of a viable local/neighbourhood supermarket of an appropriate scale, subject to the Sequential Approach and retail impact assessment where required; and • Advancing the delivery of a neighbourhood centre along New Caragh Road to ensure that retail infrastructure keeps pace with population growth and provides an appropriate and balanced distribution of convenience retail across the Northwest Quadrant and the town of Naas. • Amending the proposed phasing strategy to allow for the New Caragh Road (neighbourhood) centre to be delivered under phase 1. The submission recognises the intention of provisions to maintain an appropriate retail hierarchy, the restriction of 200 sq.m net retail floorspace per unit is considered to be overly restrictive. In practical terms, this floorspace is “insufficient to accommodate even a modest local shop/neighbourhood supermarket” capable of providing a meaningful range of convenience goods. Units of this size are generally limited to “small confectionary shops or specialist outlets and cannot function as a convenience store capable of serving the needs of a growing residential neighbourhood, even for a basket shop.” Consequently, the current restriction significantly limits the ability of the Local Centres to evolve into genuine neighbourhood destinations and risks increasing reliance on private car trips to existing supermarkets elsewhere in Naas and further afield. Tesco Ireland Limited consider that the 200sqm

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		cap is counterproductive in that it would only provide for small local convenience stores to meet local need and wouldn't provide for the needs of the Northwest Quadrant. The reclassification of the New Caragh Road centre as a Neighbourhood Centre (rather than a Local Centre) would enable the delivery of an appropriately sized supermarket at the New Caragh Road location that would also reduce the need for residents to travel across the town for day-to-day shopping, provide a good distribution of supermarkets across Naas, and thereby promote sustainable travel patterns, reducing unnecessary vehicle trips and ensuring that retail infrastructure is delivered in tandem with the significant residential and employment growth envisaged for the Northwest Quadrant. Provision of the New Caragh Road centre as part of Phase 1 would support a balanced distribution of centres for planning reasons and reinforce the sequential approach by directing appropriately scaled retail development to a location closer to the existing town centre.
48	Uisce Éireann	See Section 6.
49	Millennium Falcon Holdings Limited	See Section 6.
50	Aravonian Limited	See Section 6
51	Office of Public Works (OPW)	See Section 4

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
52	Lorraine Benson	The submission is supportive of other submissions that seek for the alignment of supporting services and amenities for the Northwest Quadrant (e.g. sustainable transport, education, sport, green space, and community centres). The submission makes two specific points for the consideration of KCC: Ecological impact The Northwest Quadrant Framework Masterplan and subsequent planning applications should be subject to ecological impact assessment with surveys completed for all seasons so that habitat / species are fully understood to inform development proposals. This will be over and above Appropriate Assessment requirements. A recent case in point was Site 35 Rowan Tree Road, Momentum Logistics Park, Ladytown, Naas, Co.Kildare where information on habitat holding rare breeding birds was overlooked and not included in the planning application. High voltage Kildare-Meath Interconnector The co-location of land uses that would utilise this high voltage network, such as data centres, should not be allowed within the Northwest Quadrant, which will be a predominantly residential urban extension. Other uses incompatible with residential use should not be permissible (e.g. fossil fuel energy intensive, water use intensive or noise and odour emitting facilities).
53	John Kavanagh	Implications of demographic profile of the Northwest Quadrant The submission sets out the demographic profile of the Northwest Quadrant based upon the trends established by the Census 2022 relating to the areas adjacent to the area. The submission requests that KCC consider the implications of the population profile in planning for infrastructure and services. The submission suggests some key services and identifies that all age groups will have travel demands.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission				
		Age cohort	Percentage	Population	Key services	Trips
		0-4	9%	990	Childcare / health services	
		5-12	14%	1540	Primary School	
		12-19	9%	990	Secondary school	Public transport
		19-24	8%	880	3 rd level / apprenticeships	Public transport
		25-66	50%	5550	Employment	
		66)	10%	1110	Health services	
		Harbour Bridge The submission points out that there was a proposal for a pedestrian bridge 41 years ago connecting the town centre to the proposed new park. The submission hopes that the bridge will be built as part of this plan. Infrastructure delivery alignment with housing The submission requests that the necessary infrastructure and services be delivered in alignment with the development of the housing in the Northwest Quadrant. This will include those identified above plus the playgrounds, parks and sports grounds. Watersports				

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		The submission proposes that a watersports hub be provided as part of the Northwest Quadrant to provide for boat storage and docking (there used to be a canoe club at the harbour). Corbally Canal The submission outlines the huge opportunity that the Corbally Canal presents to Naas and the Northwest Quadrant. The canal corridor presents an amenity corridor for walking, running, and more, as far as the Corbally Harbour. A bridge at the Newbridge Road would enhance this offer. District Heating / circular environment The submission proposes that a district heating system be included to provide energy for public buildings (e.g. the swimming pool, schools, Kildare County Council, and others). Energy The submission proposes that the Framework Masterplan goes further than the Building Regulations and requires solar panels on all buildings to provide energy, including on non-residential building elevations. The submission considers this will be essential if data centres are developed. Utility infrastructure The submission requests that KCC engage with Uisce Eireann to confirm water and waste water capacity.
54	Naas Town Team	Northwest Quadrant Character Area Guidance The submission considers that the aspiration to be an exemplar urban extension has been watered down due to the level of design coding in the Character Area Guidance, that will mean that developers can deliver generic suburban developments with impunity. More specifically, the submission recommends:

Sub. No.	Name	Summary of Submission
		• Urban Design Guidance is very schematic when compared to other key development areas (e.g. Adamstown and Dublin Docklands). Urban (architectural) grain is not addressed. The challenge of making good streets is not addressed, including . • Urban structure: There is a lack of spatial legibility and urban coherence in how the macro diagrams convey core elements of the urban structure. A key urban structure diagram is required, supported by a legibility study and a public realm strategy to prioritise a legible pattern of public streets and key public spaces. Naas Harbour area / Northwest Quadrant and Naas Town Centre The submission considers that a core objective of the Framework Masterplan should be the successful relationship between Naas Town Centre and the Northwest Quadrant. The submission considers that this challenge has been sidestepped and that the opportunity to create an urban character at Naas Harbour (the nub of the two canals) has been missed. The submission considers that a new vision is required for this area to make it very active and include a mix of uses that drives this (e.g. housing, cafes, recreational uses inspired by landscape architecture and waterside pavilion structures).
55	Nicolu Wojewoda and Isobel Byrne	The submission supports the overall vision for the Northwest Quadrant and requests that a number of issues are given further consideration in finalising the Framework Masterplan, and to ensure that the ambition is converted into material binding commitments / targets to ensure that delivery matches the project objectives. Infrastructure capacity The submission requests that Objective NWQ O1.9 -)1.11 that addresses phasing, infrastructure delivery and funding be reinforced to be provide stronger binding language in the context of the significant infrastructure deficit in Naas. More specifically the submission requests that an explicit “infrastructure first” sequencing rule is applied.with no residential phase occupied until the enabling and social infrastructure serving it is demonstrably in place or contractually committed.

Sub. No.	Name	Summary of Submission
		The submission also proposes that it should be a precondition that Uisce Eireann confirm capacity for each phase prior to planning being granted. Sustainable Mobility Strategy / Modal shift targets - The submission requests that the modal shift targets for Naas included in the strategy should not form the basis for the strategy without commitments for investment in public transport. The submission requests that each phase / homes should not be occupied until public transport services and active travel infrastructure are operational to reduce dependence on the car. - The submission requests that an updated transport assessment be undertaken with Transport Infrastructure Ireland on M7 / N7 junction capacity,. Climate and energy: Ensure “low carbon” The submission requests that the “low carbon” branding be met with binding standards. The submission suggests: - Energy and fabric standards demonstrably above current building regulations, with an on-site renewableenergy requirement and an embodied-carbon limit. - A district-heating / low-carbon energy network feasibility and delivery requirement tied to the Phasing Strategy, rather than left to individual developers’ discretion. Nature and biodiversity The submission requests that the following measurable targets are included in the Variation, in addition to the general commitments on GBI corridors, SuDS and biodiversity net gain: - Set a defined minimum biodiversity net gain measured on a recognised metric, with baseline survey, monitoring and reporting.

Sub. No.	Name	Summary of Submission
		• Adopt a tree-canopy-cover target, require retention of existing hedgerows and mature trees, and protect and enhance the Grand Canal corridor as the spine of the green network. Economic strategy: What kind of economy? The submission notes the jobs target for the Northwest Quadrant of 5000 jobs is useful but that there is no shape on the kinds of jobs that will be created and whether low employment uses (such as data centres and logistics) will be considered positively. The submission requests that the Variation: • Positively prioritise SMEs, cooperatives, social enterprise, the circular economy and the care and creative sectors, and require affordable and flexible workspace to make room for them. • Explicitly identify data centres and large standalone logistics/warehousing as inappropriate uses here, given their high land and energy demand and low employment density. Arts, culture, community and family life The submission expresses concern that the infrastructure delivery plan is not binding and that there are deficiencies in the strategy to meet the needs of the proposed community. The following are requested: • Commit to a dedicated cultural and community facility (not merely a feasibility study), and to affordable space to seed community and cultural life from the outset. • Require childcare, school places and play/amenity space to be delivered with the homes they serve in each phase, and design genuinely child- and family-friendly public realm with safe routes to school and play on the doorstep.
56	Sheelagh Pentonyon (on behalf of Caragh Court	The submission is submitted on behalf of the Caragh Court Residents Association and expresses concern that the Framework Masterplan is ambitious without clear and binding commitments to provide key infrastructure and services that are required to meet the needs of the new community. The submission seeks the following to support the adoption of the Variation:

Sub. No.	Name	Summary of Submission
	Residents Association)	Public transport provision / traffic impact assessment The Northwest Quadrant is reliant on a proposed high-capacity bus corridor to which the NTA have not committed. Without a binding commitment the Northwest Quadrant risks being a highly car dependent development adjacent to the M7/N7 corridor as the existing bus services are limited and car parking at the Sallins-Naas Station at capacity. The submission requests that a Traffic Impact Assessment (with traffic modelling / junction modelling) be completed for the Northwest Quadrant to assess the impact on the surrounding network, including the N7 / M7. Third party delivery of infrastructure The <i>Infrastructure Delivery Plan</i> appears to rely heavily on agencies that Kildare County Council does not control, including the Department of Education, ESB Networks, Uisce Éireann, the HSE, the NTA, and KWETB. Each of these bodies has its own capital programme, priorities, and timelines. The phasing tables refer to these bodies as delivery lead partners, but this does not appear to amount to a fixed or binding commitment from any of them. This is concerning because residents in Naas have often seen new estates built while the associated services and infrastructure either do not materialise or are delivered to a less than satisfactory quality or timeline. The existing residents of Naas do not want to be adversely affected by the Northwest Quadrant and failures in delivery of infrastructure in accordance with the phasing plan and therefore binding commitments are considered essential. Funding is undefined and financial viability is unclear The submission requests that the Costings for the Infrastructure Delivery Plan as well as a Funding Strategy should be prepared and published with the Variation to enable public scrutiny and ensure that the public interest is maintained, including how commercial interests associated with the plan will be independently scrutinised with regard to the funding strategy. The submission is concerned that the infrastructure may not be deliverable and that a Funding Strategy should be published that sets out how the infrastructure will be funded. This should include

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		contributions to be made by the State (KCC, central government and other), semi-state agencies, development levies, developer contributions to demonstrate that these funding sources can realistically fund the enabling and supporting infrastructure. Environmental screenings The submission considers that the SEA and AA screenings prepared in support of the Proposed Variation are insufficient to properly assess the environmental impact of the proposed urban extension, considering proximity to heritage assets and the ecological sensitivity of the canal corridor. The submission requests that the Council reconsider whether a full assessment is required before the Variation is adopted. Reliance on the County Development Plan SEA and AA is questioned as the urban extension and its scale of development / infrastructure wasn't defined at that stage. Utility infrastructure / capacity Demonstration that water and wastewater capacity is required to allow for the development of the Northwest Quadrant.
57	Padraig Franklin (on behalf of Caragh Court Residents Association)	This submission is identical to submission #56.
58	Naas Access and Disability Group	Naas Women's Shed (NWS) At present Naas Women's Shed don't have a permanent home and request that consideration be given to accommodating them in the Northwest Quadrant.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		The NWS have 140 members and 70-80 meeting regularly in spaces rented from other organisations. This leads to disruption in meetings during July and August when community spaces (e.g. at Naas GAA Club) are used for summer camps for children and young people during the school breaks.
59	Stephen Cooney	Naas Town Centre Rail Station Population targets in the development plan for Naas are around 40-50 thousand by 2040. This will make Naas the largest town in Ireland without a train station. Whilst there are no current projects to connect Naas to the rail network, this master plan should consider including a corridor that could facilitate and safeguard a future connection of Naas to Sallins train station. Not to do so would be shortsighted.
60	Ciara Doyle	Strategic Environmental Assessment The submission questions the conclusion of the SEA Screening and its conclusions. The submission considers that there will be significant impacts on the environment. Mill Lane / Tandy's Bridge and access to homes The Sustainable Mobility Strategy proposes that Tandy's Lane / Mill Lane be used for a bus route, and that upgrades will be provided to enable buses to navigate the route. How will this affect the level of access to homes on Mill Lane and across the bridge. Tandy's Bridge is a beautiful, protected structure that should not be negatively impacted by large vehicles (lorries have previously been stuck on the bridge). The upgrades to Mill Lane will be challenging to enable it to accommodate buses. Development of private land The submission contends that land shouldn't be zoned for development against the will of private landowners who do not wish to see their land developed, as this is unfair and intimidatory. This

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		includes The Knocks lands, that are proposed for development (park and bus route) against the will of the landowner. The land is used for agriculture and also has great biodiversity value. Canal bridges The canal is a place of natural beauty and has existing bridges that serve Naas and provide for pedestrians and cyclists. The introduction of three new bridges across the canal seems unnecessary. The submission identifies the conflict between the protection of views from Tandy's Bridge and the proposed Millbank Way Bridge. Cycle network The submission supports the development of a cycle network to serve the area but considers that a cycle network across private agricultural land would not provide value for money / could duplicate existing routes. Flood risk Fields around The Knocks and Keredern House regularly flood and this should be taken into account in any development.
61	Christine Mahoney	See Section 6
62	Maxine McClean	The issues raised in the submission are as follows: Infrastructure Delivery Plan The submission refers to existing local services such as healthcare and childcare, including road infrastructure and inadequate public transport services which are unable to meet the needs of the current population.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		- States the proposed growth of the Northwest Quadrant (NWQ) will place further strain on services which are already at capacity. - The submission asserts that the town requires massive infrastructure upgrades prior to delivery on any further housing.
63	Berenice Galvan	The issues raised in the submission are as follows: Community Infrastructure - The submission notes existing constraints relating to school places, open space provision, GP services including ongoing deficits in community policing with An Garda Síochána in the town. Infrastructure Delivery Plan - States existing transport provision for people in the area is poor and notes ongoing traffic congestion between Naas and Sallins. - States that Sallins Train Station is at capacity with parking provision a big issue every day. - The submission states the quality of life in the area is being destroyed and requests the council to focus on how to improve the lives of the existing population before creating further growth and chaos.
64	Bob Quinn	The issues raised in the submission are as follows: Framework Masterplan – Naas Town Centre - The submission objects to the Masterplan as it risks drawing movement, trade, services and investment away from the town centre whilst asking the community to carry the pressure of growth before the necessary infrastructure is in place. - States the town currently has unresolved issues in relation to congestion, public transport, public realm, town centre vitality, school capacity, healthcare access and walkable infrastructure which everyday issues for the existing community.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		- States the Northwest Quadrant (NWQ) should not be leapfrogging the existing deficits and infrastructure constraints that exist, where these should be made the starting point rather than afterthought. - The submission refers to unresolved issues in the town centre, specifically the Naas Plaza and the level of vacant retail floorspace that is unfilled. States that the council should clearly demonstrate how the existing core retail area will be strengthened before planning the development of new peripheral district. - Refers to the recent Petrogas planning application (ref: 26/60228) and change of use to open a drive thru restaurant, which was refused by the council due to the unknown impacts on the town centre. - If the council are willing to refuse such a development due to the lack of a proper assessment, then surely consistency demands a more comprehensive assessment of the impact that the NWQ can have on the core retail area in Naas. - Refers to the Office of the Planning Regulator's (OPR) submission to the Draft Naas Local Area Plan 2021-2027 which identified the core challenge and issue facing Naas which was the development pattern (peripheral arc) being shaped by the M7 Motorway leading to a detachment from the town centre. - States the Masterplan still raises the same concern which will ultimately pull Naas outwards towards the M7 rather than integrate and strengthen the historic town centre. - Requests that the council undertake a proper town centre and community impact assessment to understand how the NWQ will support the town centre without creating a competing edge district, whilst demonstrating how the future population and workforce will access the necessary local services and social infrastructure without a reliance on the private car. NWQ Vision - Refers to the previous vision contained in the 2007 NWQ Masterplan and notes that much of the language remains the same. Whilst major emphasis was placed on a new public transport

Sub. No.	Name	Summary of Submission
		corridor linking to the town centre, circulation improvements and integration measures for the town centre, none of the these have been delivered to make the vision a reality. Sustainable Mobility Strategy • Refers to the evidence base provided to support the proposed mobility strategy which highlights the challenges relating to a significant level of car dependency, coupled with a very low public transport usage. States this should not be accepted as the local reality, rather it should be designed out. • States that the bus route options proposed are identified by the council and are proposals intended as inputs into a separate National Transport Authority (NTA) process which are not established, funded or committed to. • States the use of Tandy's bridge to cater smaller bus vehicles is fragile based on its condition and form, and notes that if a higher-capacity and higher frequency service is required, this route and bridge will no longer be appropriate highlighting a major weakness. • States that a public transport system which has not yet been settled and is so heavily constraint, is not infrastructure led and will result in public transport playing catch up. Naas Canal Harbour • States the Naas Canal Harbour connection should be treated as essential strategic infrastructure to connect/stitch this new district with the town centre, rather than an optional public realm enhancement. • The Masterplan identifies the need to connect the area with the heart of Naas, but it does not identify a secure connection that is deliverable or enforceable. Legally binding phasing strategy for Canal Quarter • The submission requests the council provide a legally binding phasing strategy for the delivery of the necessary public transport, active travel, public realm and social infrastructure, alongside the completion of the Canal Quarter.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
65	Phoebe and Aonghus Dillane	The issues raised in the submission are as follows: Framework Masterplan - Green and Blue Infrastructure • Submission notes to the proposed residential zoned lands adjacent the canal between lock No.4 and lock no.5 and refers to the 100-metre set back previously identified in the local area plan and the county development plan to preserve the riparian corridors. • States the proposed Masterplan contradicts this extended variable buffer of 80 to 100 metres from the high-water line in order to segregate housing and development. • Recommends that these wildlife corridors need to remain uninterrupted to safeguard protected species and protect landscape value of the Grand Canal. • Notes the presence of bats, hedgehogs, dormice and frogs in the area, along with the presence of wetlands and large trees at The Knocks which need to be safeguarded and made a mandatory requirement in adherence to local planning policy.
66	Millennium Falcon Holdings Limited	See Section 6
67	M. Donovan	The issues raised in the submission are as follows: Public Consultation • States the public consultation period of 4 weeks is not sufficient for the promoters of the plan to engage with the public or local representatives and encourages the council to engage with local stakeholders in a more meaningful way before going forward. Delivery and Funding of Enabling and Supporting Infrastructure

Sub. No.	Name	Summary of Submission
		- Considering the scale of investment required, the submission states that developers should be forced to invest in the necessary infrastructure (parks, green spaces, schools, healthcare utilities, traffic solutions) first before developing housing. - Notes that the existing infrastructure provision is at capacity with no room for further growth. Low Car Neighbourhoods - Submission welcomes the vision of creating low-car neighbourhoods, however it notes that people will ultimately want to use their cars and avail of the M7 Motorway considering its proximity. - States the Masterplan should not be blind to this fact and make adequate provision for appropriate parking instead. Sustainable Mobility Strategy - States that public transport plans need to be more ambitious as the Sallins Train Station is at capacity and has its own limitations in terms of not servicing other parts of County Dublin, including capacity constraints in terms of car parking. - States existing train services in terms of frequency and capacity need to be addressed before the problem is exacerbated. - In order to create low car neighbourhoods, the council need to consider linking the town centre to the train station, including the development of a new train station within the Northwest Quadrant (NWQ). - Recommends that the council consider planning for an additional station at Caragh (between Naas and Newbridge) to serve the local community and future residents on the west of the NWQ, whilst presenting the opportunity for a park and ride facility. Low Carbon District / Data Centre conflict

Sub. No.	Name	Summary of Submission
		- Whilst the Masterplan seeks to create a low carbon district through the reduction of car use, it suggests that the council should reflect on the carbon emissions created from the proposed data centre adjacent the NWQ. Urban Density Strategy - The submission notes the canal boundary for the NWQ and states that high rise buildings should not be permitted along the canal to respect its natural landscape. Urban Recreation and Amenity - States there is not enough green space or parks identified within the NWQ and recommends that all recreational space including site F(2) adjacent the K-Leisure are expanded even further in the Masterplan. - Recommends that the council engage with local sporting organisations to ensure the provision of additional open space allows them to adequately function and serve existing members.
68	Brian McGrath	The issues raised in the submission are as follows: Sustainable Mobility Strategy - The submission states that no development should take place in the NWQ until the transport infrastructure for Naas is fit for purpose. Pedestrian and Cycle Movement - Landen Park Bridge - The submission supports the proposed pedestrian bridge over the canal leading to Landen Park. Framework Masterplan - Canal Buffer - Requests that a green buffer (set back) is identified along the canal to replicate lands to the southeast in Oldtown and Oldtown Demesne. States that no development or the delivery of

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		overground electrical infrastructure should take place within this green buffer, supported by the necessary zoning amendments where required.
69	Paul Monahan	The issues raised in the submission are as follows: Pedestrian and Cycle Movement – Landen Park Bridge • The submission objects to the proposed pedestrian/cycle bridge crossing the canal into Landen Park, providing direct access into the existing green open space. • States the existing green space will no longer be self-contained for kids of the estate, which also provides dangerous access for children to the canal and open water. • Refers to tragic incidents involving young children and open water and is worried about the risks and dangers associated with the proposed connection. • The submission notes this is the only new connection proposed along the canal, raising safety concerns about the increased pedestrian, cyclist and e-scooter traffic this will bring due to the large surrounding catchment along the Sallins Road and Monread areas. • Refers to reports of anti-social behaviour in the trees along the canal bank which has the potential to rise with increased footfall which is a concern for residents and the safety of children. • Recommends that alternative crossing points should be considered into public areas/sites such as the De Burgh's Estate or Millenium Park which would serve the community much better, whilst protecting the residents and children of Landen Park. • Requests that consideration is given to placing the proposed bridge crossing between the canal road and Millenium Park on the other side of the famine wall. It states this alternative route can provide the same connection whilst also diverting traffic away from Landen Park. • The submission urges the council to consult with the residents of Landen Park or the Landen Park Owner Management Company to understand the concerns of residents before proceeding with such a proposal.

Sub. No.	Name	Summary of Submission
70	Cllr Seamie Moore	The issues raised in the submission are as follows: Framework Masterplan • The submission states the proposed Masterplan is weak in its approach and preparation to link the Northwest Quadrant with community and town of Naas. • Requests that all elected members are brought on a one-day tour/site visit of similar urban extension (Adamstown/Clonburris) to understand their connection with surrounding areas and the level of infrastructure or community facilities required before approving this significant growth. Sustainable Mobility Strategy • Refers to the proposed vehicle movement connections within the NWQ and notes there is only one direct 'bus-only-route' linking to the town over the canal, which fails to create strong links or tie ins with the town, resulting in the NWQ becoming isolated. • States the proposed walking/cycling network within the NWQ is great, however some areas could be 3km from the town centre which may be beyond the capabilities for individuals and families. • States there should be more eastern boundary vehicle routes identified to allow and encourage contact and connection with the town centre, including the integration of vehicle access to the proposed social/community facilities will be crucial to their promotion to the wider community. • States the existing proposals are limited and requests that two additional vehicle bridges are identified at the Naas Canal Harbour and below the northern side of the 4th lock on the Naas Canal. • Refers to Adamstown and Clonburris examples which are rail-based developments with the addition of bus transport services. States the residents of the NWQ will still require a transport link to Sallins Train Station or the proposed new station in order to transfer them on the first stage of their journey/commute to Dublin.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• States the proposal of local bus service will not be acceptable to support these trips and will not appeal to modern, time conscious workers who require more reliable, accessible and more frequent services. • States that the NTA must give a commitment that the public transport service proposed can be delivered prior to the Masterplan being adopted by the elected members. • The proposal to route bus only services over incident prone canal bridges is a challenge and states the preferred route over the Poopluck Bridge should be re-considered due to previous safety concerns resulting in its closure to traffic. • States the impact to the Sallins Road will further compound the bottleneck and congestion problems on this route, particularly the Monread Avenue junction (Oldtown House) which will require significant upgrade to facilitate further growth. • States the bus only route via the Canal Side bridge crossing is weak and will not be sufficient to promote the strong connectivity and excellent service proposed. This presents minimal choice resulting in people utilising the peripheral routes thereby weakening the link with the town. • Recommends the identification of alternative bridge locations at Naas Canal Harbour and the lower section of the 4th Canal Lock to ensure strengthened connections and social development of both the NWQ and Naas Town. Community Infrastructure – Social Infrastructure Audit • States the exclusion of a Social Infrastructure Audit (SIA) in respect of Naas is unacceptable and refers to a recent Active Recreational Infrastructure Study (ARIS) completed by the council, and states the findings and existing deficits should have been revealed and highlighted alongside this Masterplan. • Notes the identification of a hybrid model for social infrastructure within the NWQ without these findings is very worrying and this is a shortcoming of the proposed Masterplan. • Refers to historical attempts by other local authorities to implant social infrastructure in new urban areas which has never been successful and has resulted in greater anti-social behaviour.

Sub. No.	Name	Summary of Submission
		• States that without the examination of an SIA and existing capacity, the decision to proceed with a hybrid model has no merit, where local knowledge would disagree that there is any spare capacity in existing facilities for youth and sporting activities. • Recommends that the approach to social infrastructure should include the proposed range of new schools, identify the activity, existing provision, capacity, future needs, proposed location, infrastructure provider and timescale. F(2) Southern Sports Grounds • Refers to the 10-hectare site adjacent KLeisure and questions the inclusion of these lands in phase 3 which are in the ownership of a reluctant seller and has repeatedly been included in development plans for over 25 years without any such progress. • States the identification of this site is high risk which could lead to a significant deficiency in social infrastructure provision for the NWQ, placing further pressure on the wider town. • Requests the clarification of the land procurement facilitator for the 10-hectare sports land, alongside the phasing of this delivery to be included in phase two. Placemaking Strategy – Naas Canal Harbour • The submission notes there is no noteworthy treatment to the promotion of the land opposite the Canal Harbour, stating the current map drawings and lack of visual presentation of the water crossing represents a poor design finish to a high-profile site. • States the lack of contemporary language and reference to the Canal Harbour is a missed opportunity to display architectural skills and a modern vision for an amazing waterfront. • States the potential higher density development of Basin Street and Court System Buildings could relegate the NWQ lands as an unfinished and unrelated area of poor design to the rest of the town. • The submission states these lands should include an outstanding building or set of buildings alongside a vehicle crossing point to form a statement feature.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		- Without such a finish and cross water linkage to the town, alongside contemporary architectural language to create the vision, the NWQ will be flawed. SFRA - States the Mill Lane Road (outside the NWQ boundary) is a serious flood risk due to a build up of silt in the long pond in Oldtown Woods that will be located alongside the proposed bus corridor. - States this pond is the sink for two local rivers, namely The Ballymore River (Hospital Lakes) and The Tipper River (Seven Springs). - Requests for a programme of silt removal to at least define the water channel and allow a better flow into the Naas Canal. SWMS - States there is no mention of fish/salmon spawning sites in the streams flowing into the River Liffey and no evidential recommendations or commitments to remove pollution from drains or streams. - The submission requests engagement with Inland Fisheries Ireland to agree and ensure mitigation measures to prevent polluted run-off to the River Liffey are in place. Cultural Heritage - States that a cultural heritage centre should be established in the Leinster Mills (Former Odlum's) to showcase merits of the industrial and social history of the Grand Canal and its many heritage features/assets in the immediate area from buildings to bridges and blue infrastructure. - Refers to the little cottage at Tandy's Bridge at the entrance of the Knocks which has deep routed history, and states this should be restored and utilised as potential trail head for the Naas Sallins Greenway and Oldtown Woods.
71	Westar Group	See Section 6.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
72	Amit Gujar	The issues raised in the submission are as follows: Community Infrastructure - The submission states that the current provision and deficits in school places and childcare provision is scary and needs to be addressed. Sustainable Mobility Strategy - States that Naas requires a new train station or Luas connection which can be effective and reliable, whilst providing an alternative public transport option to existing bus services which are not efficient. - The submission recommends that the council should consider linking the town centre to Sallins Train Station including the delivery of proper traffic management measures if they are serious about promoting efficiency and facilitating future growth in Naas.
73	Birdwatch Ireland Kildare Branch	This submission is prepared by Neil J Bourke on behalf of Birdwatch Ireland Kildare Branch and the issues raised in the submission are as follows: Osberstown Attenuation Pond The submission relates specifically to the attenuation pond (see map excerpt below) and lands surrounding it between the M7 Motorway and the R445 (Millenium Park), where recording and observations have been undertaken at the site for up to 10 years, namely Birdtrack and the National Biodiversity Data Centre.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		 • States there are currently five waterbirds breeding successfully at the site, namely little grebe, moorhen, coot, mute swan, mallard and is also used by a variety of gulls. • States the site is used by the redshank staging post in spring migration and is a very important wintering area for the common snipe (35 recorded), including the woodcock in winter. • States the site has monitored a total of 69 species from 1277 records, from 46 complete lists made over 10 years and includes a full list of the birds observed. • It further states that otter and freshwater crayfish have been observed at the site. • States the site has a variety of small ecosystems, ranging from dry to wet, rushes, grasses, and a wide variety of wildflowers that include orchids, pyramidal orchid, spotted orchid and the broad leaved hellborine (Epipactis helleborine) which has 240 records on the National Biodiversity Data Centre Site. • States that the rare Blue Fleabane plant (Erigeron acris) can be found at the site which is also listed on the 'rare plant' monitoring list in Ireland.

Sub. No.	Name	Summary of Submission
		- Notes there were only 10 populations of the Blue Fleabane recorded in Ireland in 2024 for the 'rare planting monitoring scheme'. This population has recorded a strong increase in the number of plants from 2024 – 2025. - The submission requests that this precious biodiversity area will be given the due care and attention it deserves when considering future development that may impact on the diverse wildlife flourishing in this undisturbed attenuation pond.
74	Inland Waterways Association of Ireland	Framework Masterplan - The submission welcome's the Northwest Quadrant (NWQ) Masterplan and the physical, social and economic potential of the canal to future visitors and residents. - Recommends that the moorings at Naas Harbour are recognised for tourism and leisure development (similar to Leinster Mills) which was previously identified in the vision for the Naas Canal Quarter Masterplan. - States the Naas Harbour has the potential to offer a range of wonderful experiences to tourists and residents, whilst becoming the focal point on which people travel along the Grand Canal Greenway, Naas-Sallins Greenway, The Corbally Canal and Liffey Valley Corridor and the Barrow Blueway. - States the inclusion of vital facilitates for visiting boats, liveaboards and all users of Naas Harbour must be considered as essential for the NWQ Masterplan and its potential to animate the waterfront. - States the success/failure of returning the Naas Harbour to a vibrant destination will depend on the council's vision to expand the Naas Canal line towards the Corbally Canal and Harbour by developing a bridge over the R445 (Newbridge Road) to reinstate previous passage. - States the IWAI celebrate the industrial history of the canals and would encourage placemaking to root the NWQ to such heritage features. - Refers to examples of waterside communities in Holland that have animated navigations by drawing tourists and residents looking for connections to natural and biodiverse features.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• States that the Naas and Corbally Canals/Harbours are manmade leisure and recreational assets that can meet the need of all age groups and a wide range of activities. • The submission requests that the following waterside aspects of the canal system are developed in tandem with the NWQ, ensuring recreational and liveaboard boaters have direct access in Naas Harbour to the following: ➤ Water taps ➤ Pump-out for waste tanks of boats ➤ Service block in the harbour for visitors and residents, including service to all potential waterway activities. ➤ Jetties which can facilitate visitors and support water-based activities, including the objectives of the Kildare Sports Partnership and its water activity hub. • To sufficiently cater the liveaboard communities, there must be a wide section on the canal for turning which is only available at Jigginstown culvert. • Supports the idea of increasing the size of the proposed recreational park at KLeisure which could facilitate a bridge in later years, providing safe access to boaters, cyclists and walkers along the Corbally Canal and future greenway. • The inclusion of jetties/moorings and berths at the harbour has the potential to support short stay tourism with direct links between Shannon, Dublin and the southeast. • Notes that boating communities are low-carbon communities with no demand on the electrical grid compared to conventional housing. • The submission believes there is a lack of serviced harbours for recreation and liveaboard uses on the canal system and states the NWQ provides an excellent opportunity to show off the Naas Harbour along with essential services and amenities being delivered for the NWQ. Pedestrian and Cycle Movement – Permeability

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		- The submission supports the proposed crossing points/permeability connections at Landen Park, Millbridge and the Canal Harbour which can provide short and direct links to the canal and their natural/biodiverse features. - Requests that proposed bridge connections conform to design standards to allow free passing of barges.
75	ALDI Stores (Ireland) Limited	See Section 6.
76	Electricity Supply Board (ESB)	See Section 4.
77	Evara Developments Limited and Millennium Falcon Holdings Limited	See Section 6.
78	Jakub S	The issues raised in the submission are as follows: Infrastructure Delivery Plan The submission welcomes the proposed Masterplan but states this additional housing cannot happen in isolation as the scale of development will fundamentally reshape the wider town and place additional pressures on existing roads, public transport and social infrastructure provision.

Sub. No.	Name	Summary of Submission
		- States if existing infrastructure shortfalls in the town are not identified and resolved, the town will continue to face severe congestion issues which ultimately will impact the success of the Northwest Quadrant (NWQ). Sustainable Mobility Strategy - States Naas is an outlier in the Greater Dublin Area (GDA) with no proper integration with Dublin City and is heavily reliant on bus services with no dedicated bus lanes. States the town has no meaningful connection to the Luas network (Citywest) and remains excluded from the DART+ program. The submission welcomes the proposed sustainable mobility strategy (bus corridor, active travel, mobility hub, reduced parking and new train station) which pledges to reduce car dependency, however the current state of public transport in Naas puts the deliverability into question. - Requests the council to ensure major public transport projects for Naas are fast tracked before construction starts on the NWQ, noting a 'low car' development will not succeed without a high-quality public transport service for the wider town. - States the new train station will not be fully utilised if the DART+ program is not extended to Naas. - States the council need to strongly advocate for this service to be extended to Naas to strengthen connectivity to the city centre which will be vital to sustain projected growth. - States that existing bus services to the city centre are regularly delayed by congestion and do little to support local travel and commuting. - Recommends that the council engage with the NTA to redesign how bus services operate within Naas and how they will be integrated with the NWQ in the future. - States the main street needs to be redesigned with bus priority lanes and segregated cycle lanes, with on street parking removed where appropriate to facilitate meaningful transport improvements. - States that a local bus loop should be implemented to service Naas, Kill, Sallins (including Sallins Train Station) and Johnstown as a matter of priority. The council must ensure this service acts

Sub. No.	Name	Summary of Submission
		like an urban bus network similar to Dublin Bus and BusConnects services which can be expanded to facilitate the NWQ. • Cycling infrastructure identified should incorporate the Dublin Road and Sallins Road using the NWQ as the catalyst for a town wide active travel network. Current Road Infrastructure • Recommends a review of the Dunnes Stores junction and the impact the site has on the towns traffic flow and congestion. States the existing 'no right turn' restrictions are not being followed and recommends the relocation of the store in the long term. • Opening of the Corban's Lane/Murtagh's Corner route at One New Row. • Visibility at the taxi rank should be improved where sightlines are obstructed by large coaches and buses. • Pedestrian crossings without traffic light dependency along the Dublin Road for easier/safer navigation. • Greater collaboration between the council and An Garda Síochána regarding traffic enforcement to ensure active travel infrastructure is not impeded and normal traffic rules are adhered.
79	Anthony Egan	The issues raised in the submission are as follows: Naas Town Centre • The submission objects to the proposed Masterplan as it risks drawing movement, trade and services away from Naas Town Centre, whilst adding extra pressure on the town before necessary infrastructure is delivered. Infrastructure Deficit in Naas • States the town already suffers from unresolved issues relating to poor public transport, congestion, school capacity and access to healthcare which should not be leapfrogged by the NWQ.

Sub. No.	Name	Summary of Submission
		Infrastructure Delivery Plan • States the Masterplan is front loaded with ambition and risk, whilst representing a framework for developers and investors rather than a plan tailored to support existing residents of Naas. • Infrastructure delivery is fully reliant on external agencies, however there is no evidence of binding capital commitments or aligned timelines given. • States the delivery of 300 homes per year on greenfield sites is exceptionally ambitious, where the written statement concedes this may not be achievable where no planning permissions have yet been sought. Delivery, Funding and Financial Strategy • Refers to the concept of a 'Master Developer', who would have control over the delivery of roads, open spaces and utility provision. States this model is not defined in planning law and its selection process is undescribed with no governance structure to safeguard public interest. • Notes concern regarding the financial viability of the NWQ vision due to the lack of capital costings and budget estimates required for the delivery of supporting infrastructure and community services. • It notes concern with the lack of analysis provided in respect of development levies, state funding or developer contributions that can realistically enable infrastructure delivery. • Raises concern with the omission of a wastewater capacity assessment for an incoming population of over 11,000 people, considering the well documented capacity constraints across the GDA. Framework Masterplan • States the council must demonstrate how the existing retail core area in the town will be rejuvenated and protected prior to the development of another peripheral district. Including a more comprehensive assessment of how the NWQ will impact the town centre. Sustainable Mobility Strategy

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• Raises concern with the sustainable mobility strategy which is fully dependent on a priority bus route linking Naas Town Centre to Sallins Railway Station. States the NTA have not committed to delivering this route/service which will leave the entire NWQ fully dependent on car-based travel. • States the sustainable mobility strategy remains aspirational in the absence of appropriate traffic modelling and a traffic impact assessment to understand the impacts on the M7 Motorway, Sallins Road and surrounding region. • Refers to the OPR submission in 2019 which warned against consolidating a peripheral arc along the M7/Millennium Road which will detach growth from the town core resulting in greater car dependency. • States the polished language contained in the Masterplan remains identical to failed promises of the 2007 iteration. SEA and AA Screening • States that the delivery of 4,000 homes on a 300-hectare greenfield area that borders an ecologically sensitive canal, goes well beyond a high-level assessment under the County Development Plan. This leaves the Masterplan open to judicial reviews by environmental groups. Environmental Assessments • Refers to the lack of environmental assessments to understand the potential impacts on biodiversity and ecological assets which should be provided prior to adoption. Housing • States the Masterplan lacks clear detail in respect of the provision of Part V housing, cost rental and the broader housing mix which is a glaring omission. Landownership • States there is no transparency provided in terms of land ownership and title boundaries to show the public which private landowners stand to gain from this zoning exercise.

Sub. No.	Name	Summary of Submission
		- States the assembly of 300 hectares across multiple landowners is a complex task, where the reliance on compulsory purchase orders (CPOs) is slow and legally contested, resulting in the risk of a single landowner disrupting the entire phasing. Consultancy Team - The submission notes concern with the absence of an independent peer review on consultancy outputs which is a significant governance risk. Delivery and Funding of Enabling and Supporting Infrastructure – Land Value Capture - States the Masterplan fails to capture or outline the mechanism for the windfall or a land value capture scheme to secure public benefit for the delivery of public infrastructure. States that landowners currently remain the primary beneficiary of the Masterplan.
80	Office of the Planning Regulator (OPR)	See Section 3.
81	T. James Kinlough	The issues raised in the submission are as follows: Sustainable Mobility Strategy - States the existing transport infrastructure and services in the town are too weak to support a development of this scale, where the town suffers from a car dependency culture. - Notes the pattern of periphery development in the town has led to a lack of centralised commercial zones, pedestrian infrastructure and a poor local bus service for the town. - Refers to the town's exclusion from recent Greater Dublin Area (GDA) transport projects such as DART+ and BusConnects, which further compounds the issue and reliance on the private car.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• It states that all enabling infrastructure should be provided in advance of the NWQ becoming a reality, ensuring quality of life, congestion and accessibility are not impacted any further. • States the NWQ needs to become the catalyst for delivering a quality public transport system and active travel network which Naas has lacked for decades. • Concerned that the planning framework appears to be advancing faster than the transport system required to support the creation of this urban district which will ultimately impact the quality of life for the current population. • States there should clearer responsibility identified for all objectives and measures outlined in the implementation of the sustainable mobility strategy. • States that Naas should be treated as a major commuter town and employment centre within the GDA, where a transport system is planned on that basis, rather than dealing with local traffic issues that may arise from the NWQ. • The Masterplan should include stronger commitments on how public transport will actually operate, whilst identifying routes and streets that need protection for future bus priority infrastructure. • If bus priority/public transport is to be attractive, the Masterplan must provide key corridors, appropriate road design and supporting infrastructure which ensures this service is direct and that it can distinguish itself from local services. • The submission recommends the planning of a local bus network for Naas/Sallins/Johnstown/Kill, treating it as one functional area alongside the NWQ, not after this population has arrived. • It states the plan should include mode-share targets and monitoring. • Suggests examining the application of service road infrastructure in Spain which allows roads to flow freely with limited junctions. • Develop an urban re-design plan for Naas in advance, which seeks to implement public transport infrastructure and active travel measures, drawing on similar projects implemented in Spain and France.

Sub. No.	Name	Summary of Submission
		- Removal of more on street parking in the town centre which can be relocated to multistorey car parks. DART+ Extension - The submission recommends that the council use the NWQ Masterplan to strongly support and accelerate the case for the extension of DART+ services to Sallins Train Station. - States the Masterplan should actively safeguard the conditions required for improved bus-rail interchange, active travel measures to the station, including the potential for an additional station or park and ride facility with feeder bus service located within the NWQ study area. - The submission states that a proposal for an additional station must be linked to clear DART+ service requirements which includes its ability to support additional capacity and greater frequency. - Recommends a formal commitment to integrate the Masterplan with the DART+ extension, including the assessment of a second rail station and park and ride facility. Infrastructure Delivery Plan - States the Masterplan should include binding phasing requirements with clear delivery triggers, rather than the use of loose phrases such as; transport infrastructure will 'keep pace' with development. - Recommends the insertion of text which states no residential development beyond the initial phase should commence until walking, cycling and public transport, bus priority and interchange infrastructure to serve this phase are delivered and operational. - Recommends that public transport infrastructure that includes a dedicated bus corridor and bus priority with direct links to Naas and Sallins Train Station should be treated as key enabling infrastructure and not as a service that needs to be added once demand exists. - Recommends the inclusion of a stronger implementation framework that involves the council, the National Transport Authority (NTA), Transport Infrastructure Ireland (TII), Irish Rail, relevant government departments and developers.

Sub. No.	Name	Summary of Submission
		- States that Naas should not continue to sit outside the scope of major transport infrastructure projects, while expecting to absorb major population growth. The Masterplan should include a comprehensive package of transport measures such as DART+, BusConnects, new rail station, including appropriate funding to deliver objectives and the vision of the NWQ mobility strategy. Character Area Guidance - The submission requests that the movement character of each area is included in the Character Area Guidance, where each area specifies speed limits, type of traffic permitted, vehicle priority, parking strategy, servicing approach, school access, public realm and visual landscape and junction treatments. - It states that varying street types and function within the NWQ should have different rules and design priorities set out. - The provision of parking should not be oversupplied or poorly managed but linked to the provision and delivery of key public transport and movement infrastructure. - States the NWQ should support and encourage pedestrian-priority plazas, traffic calming streets, and reduced on street parking which allows the area to be linked to the wider Naas Town. Character Area Guidance - Pedestrian and Cycle Links - States the Masterplan should ensure the delivery of continuous, segregated cycling infrastructure along key routes, safe routes to schools and junction priority over cars. - States Masterplan should also include direct cycle links to Naas Town Centre, Sallins Train Station, employment centres, social infrastructure, bus stops, mobility hubs and local services. - Prioritise filtered permeability ensuring streets are safe and designated for walking, cycling and public transport only. The identification of streets and neighbourhoods where car movement is restricted should be designed in from the outset.

Sub. No.	Name	Summary of Submission
		SEA and AA Screening • The submission refers to the SEA and AA screenings which identifies no significant environmental effects, however the submission states the Masterplan is likely to have major consequences if the area generates high levels of traffic. • It notes such consequences as increased emissions and congestion, noise pollution, poor air quality including greater land take for roads and parking. • It requests that climate and environmental objectives should be linked to measurable transport outcomes and not just design aspirations.
82	Pat Kane	The issues raised in the submission are as follows: Framework Masterplan: Evidence base and adoption • The submission questions whether sufficient evidence is available to justify the incorporation of the Masterplan Framework as the principal long term growth strategy for Naas. • It further questions if sufficient evidence is available to deliver the statutory, financial and implementation mechanisms of the Masterplan vision. • The submission concludes that the evidence base supporting the Masterplan Framework needs to be more robust and strengthened before incorporation into the CDP and states that the elected members should be satisfied that the planning model, transport strategy, delivery pathway and the enabling infrastructure have all been demonstrated through clear, transparent and an evidence-based process. Framework Masterplan: Transport • The submission notes that the NWQ will not be a TOD due to its inability to meet specific criteria, and questions why the planning model is informed by comparator developments which are using materially different transport characteristics. It further states that this issue has not been comprehensively addressed in the Masterplan Framework.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• It states that transport underpins many of the assumptions contained throughout the framework, particularly the following: ○ Development density ○ Travel behaviour ○ Parking provision ○ Community design ○ Infrastructure planning ○ Climate objectives ○ Housing delivery • It states if the transport proposals and delivery mechanisms outlined prove to be optimistic, the consequences of increased pressure on transport, infrastructure and public services will extend beyond the NWQ to existing communities in Naas and Sallins • The submission concludes that the evidence base supporting the Masterplan Framework needs to be more robust and strengthened before incorporation into the CDP and states that the elected members should be satisfied that the planning model, transport strategy, delivery pathway and the enabling infrastructure have all been demonstrated through clear, transparent and an evidence-based process. Urban Development Zone (UDZ) Process • The submission refers to Variation No.3 of the CDP which identified a two-stage implementation process for the Northwest Quadrant (NWQ) and notes the second stage of the process which is the commencement of the UDZ process. • States the Masterplan does not provide a clear explanation of how the UDZ process will operate, how the overall statutory delivery mechanism will function, or how the wider vision and housing strategy will be protected if implementation does not progress in accordance with the programme schedule.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		• The submission acknowledges the recent funding received for the pedestrian bridge linking the NWQ to the town, however this should not be regarded as demonstrating the comprehensive funding and implementation framework required to deliver the entire NWQ. • If the UDZ designation and associated delivery mechanism has changed since the adoption of Variation No.3, it requests the council to explain what mechanism has replaced this and why it is considered capable of delivering a project of this scale. • It asserts the statutory delivery pathway is fundamental to the credibility of the overall housing strategy for not only the NWQ, but for a substantial proportion of future housing in the town. • It states the overall delivery schedule is unclear in the Masterplan and notes that if development cannot realistically proceed until the UDZ mechanism is in place, then the elected members should understand how this will affect the delivery programme and the wider housing strategy for Naas. • It states the Masterplan should clearly demonstrate how piecemeal or out of sequence development will be avoided and what mechanism will enable the council to review the wider housing strategy for Naas if the NWQ does not progress. Sustainable Mobility Strategy • Refers to comparative development models outlined in the Masterplan which are served by an integrated rail, metro or tram system. It notes that these examples are not comparable as the Sallins Train Station is located outside the NWQ and not within convenient walking distance. • It further notes that the NWQ will be reliant on future bus services, however no evidence has been published confirming the proposed routes, service frequency, funding or implementation program. • The submission highlights that no Transport Impact Assessment has been prepared as part of the consultation process which makes it difficult to assess the traffic generated, modal split assumptions, impact of the surrounding road network and surrounding neighbourhoods. • The submission requests that a Transport Impact Assessment and appropriate transport modelling are completed and published prior to adoption.

Sub. No.	Name	Summary of Submission
		Community Infrastructure • The submission refers to the Department of Education and Youth submission which states that new schools are only provided where a demographic need has been established, or planned housing has already been completed. • It queries how the pressure placed on existing schools in Naas and Sallins will be managed in the meantime? • The submission requests the council to demonstrate clearly how schools and their enabling infrastructure will be funded, coordinated and delivered alongside housing rather than placing pressure on existing communities.
83	Kildare Green Party	The issues raised in the submission are as follows: Environmental Impact Assessment (EIA) • The submission requests the preparation of an Environmental Impact Assessment (EIA) to determine what habitats, flora and fauna may be lost and what mitigations can be made. • The submission states that the text of the Masterplan fails to protect the town's environmental baseline and is at risk of being lowered rather than being enhanced. Community Infrastructure The submission requests that the following social infrastructure and community services be included in the Framework Masterplan: • More appropriate education services to what is proposed • Community garden / allotments for nature in the harbour area • Public basketball courts • Rowing club at the Naas Harbour • Urban density that leads to biodiversity gain through compact residential units with larger spaces for biodiversity and woodlands around each cluster

Sub. No.	Name	Summary of Submission
		• Monument to Wolfe Tone in the Naas Harbour • Rowing club at the Naas Harbour • Community energy bank battery reserve in built into the plans which is paid by developers. Sustainable Mobility Strategy The submission requests that the following public transport infrastructure/services be included in the Framework Masterplan: • Rail terminus between Sallins and the Naas Harbour including tram service • New bus route connecting Caragh to the NWQ and to the Main Street • Segregated bike lanes and bike sharing stations throughout the NWQ that connects the canal to the main street, Newhall and Sallins Placemaking Strategy The submission requests that the following issues be included in the Framework Masterplan: • Making the area a tourist attraction for hotel business • Naming the streets school competition with 2 out 4 thousand new units to have logainmneacha (Irish placenames) • A water plaza adjacent the Eircom building • Increasing urban density to ensure people are in homes close to everyday services that have capacity and where people can move unencumbered without traffic disruption. • Solar street lighting Adjacent land uses – Data Centres • It notes the potential for two hyperscale data centres to be built adjacent the NWQ lands which could have a negative impact on the surrounding landscape with windowless warehouses and high/heavy fencing.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		- Refers to a submission from Belmont Data Centres in 2021 to the Draft Naas Local Area Plan 2021-2027 which outlined inflated figures in relation to employment growth as a result of data centre development. It notes concern that this submission from Belmont devoted considerable space to the economic benefits of data centres while making no substantive engagement with the energy realities. - States the Morrell River or any other water body in the region cannot afford to be strained by the resources required for data centre development due to domestic water shortages. - It states that Kildare's wetland habitats, bog systems and spring-fed fens are currently under pressure where large-scale industrial water abstraction can result in a compounding threat. - Refers to the Pollardstown Fen (SAC) which is currently closed to the public and is under threat from water extraction from the Curragh aquifer which illustrates the importance of prioritising clean water supply for our ecosystems and our health. Land Use Strategy - The submission strongly opposes the potential development of data centres within the NWQ which has the potential to outpace Irelands energy capacity and hinder the construction of much needed housing. - States the NWQ should be a vibrant and aesthetically pleasing district, in contrast to bleak overbearing warehousing which poses the question of what will happen to these facilities if the Artificial Intelligence (AI) bubble busts. - Refers to employment projections outlined for the industrial sector (Table NQW6), and states these are not realistic if the projections relate to data centre development. Asserts these uses only produce short term employment and are not labour intensive once operational. - It states that a data centre in the NWQ would increase pressure on the existing grid capacity requiring additional generating infrastructure within its own environmental footprint. - Refers to the submission made by Eirgrid in respect of the Kildare-Meath Grid Upgrade Project which is located in the NWQ. The submission notes the consultant's report which

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub. No.	Name	Summary of Submission
		describes the project as an opportunity for co-location of utilities in the area, a recommendation which is not shared/consented by the utility service at this time. - States climate action and carbon emission targets would be at risk if an energy intensive data centre was to be located within the NWQ. Phasing / Infrastructure Delivery Plan - The submission supports the delivery of housing with the condition that all supporting services are delivered in advance of phase 1, and no data centre development is permitted within the Northwest Quadrant (NWQ). - The submission requests the council not to adopt the Masterplan Framework until it has evaluated how the proposed 4,000 homes will intersect with the energy demands from adjacent ICT infrastructures. - It also requests that vital infrastructure is in place prior to the delivery of phase 1 (1,400 units) as outlined in the Masterplan.
84	National Transport Authority (NTA)	See Section 3.
85	Robbie Doyle	The issues raised in the submission are as follows: Sustainable Mobility Strategy - Proposed Bus Corridor - Objects to the Masterplan, specifically the proposed road and public transport corridor which traverses the historic Oldtown and Knocks/Keredern area. - Whilst the Plan recognises the Knocks and Keredern houses as heritage assets, including surrounding tree lined avenues and historic field boundaries, it is inconsistent in its objectives to protect the historic landscape due to the proposed bus route passing through the lands.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		• It raises concerns in respect of Tandy's Bridge and its capacity to facilitate bus traffic, noting its current form and track record of damage from large vehicles. • It states that appropriate action is to avoid damage of the existing landscape through careful route selection, rather than mitigating risk after an indicative route has been incorporated into the statutory plan. • It states the exclusion and deferral of supporting ecological and habitat assessments in the Masterplan is a significant weakness. It also states that once a transport corridor is identified as an objective, subsequent surveys may only influence its detailed design rather than its impacts on the landscape. • It requests the council to complete the following assessments prior to identification of the final proposed bus route: • Arboriculture survey and tree constraints plan • Ecological and hedgerow surveys • Archaeological and historic landscape assessment • Architectural heritage impact assessment • Landscape and visual impact assessment • Transparent appraisal of alternative routes • The submission acknowledges the Masterplans commitment to retention of mature trees, hedgerows and woodland. However, replacement planting will not replicate the heritage and ecological value and requests the council to apply a mitigation hierarchy by considering alternative route options where required. • It states the proposed route will impact a number of agricultural landholdings which will impact on the loss of grazing, safe access, animal interference/welfare, stock proof boundaries and the risk of trespassing/anti-social behaviour. • It notes that while the Masterplan considers bus routes, bridge options, vehicle sizes and service frequency, it does not specify its operational requirements.

Sub. No.	Name	Summary of Submission
		- It states the identification of land acquisition to facilitate a proposed route should not be included without site specific assessments to understand if a transport corridor is necessary, have alternative route options been explored and has the amount of land required been minimised. The submission requests the following amendments in respect of the proposed bus corridor: - Realign or remove the proposed public transport corridor through Oldtown/Keredern historic landscape and avoid the displacement of mature hedgerows, tree lines and field boundaries. - Site specific objective to protect the landscape and its relationship with the Grand Canal and Tandy's Bridge. - Where no route has been justified, identify a route as indicative subject to further assessment, rather than a fixed objective. - Further states that the proposed route is premature in its present alignment and requests that this is removed until proper site assessments are carried out with less damaging alternatives. Pedestrian and Cycle Movement - Landen Park Bridge - It states the proposed Landen Park bridge connection will further alter and urbanise the sensitive landscape, noting the cumulative effect of increased traffic in the area which has not been adequately justified.
86	Green Project Management	The issues raised in the submission are as follows: Sustainable Mobility Strategy - The submission seeks clarity on how the proposed movement network in the Northwest Quadrant (NWQ) will integrate with the wider town, and how does it reflect the strategic connectivity principles identified in the Naas/Sallins Transport Strategy? - States there is insufficient detail on how the proposed connections will integrate with Naas Town Centre, surrounding residential areas and Sallins as part of one coherent transport network.

Chief Executive's Report on Proposed Variation No. 6
(Sallins Settlement Plan) of the Kildare County Development Plan 2023 – 2029 (as varied)

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		- The submission notes the main principles of the Naas/Sallins Transport Strategy and states the importance of planning Naas as a connected town which should continue to inform the long-term future development of the area. - The submission states that Masterplan should be strengthened to include a more comprehensive connectivity strategy demonstrating how the NWQ will be fully integrated with the surrounding urban areas through direct pedestrian, cycle and public transport links.
87	Cllr Ger Dunne	The issues raised in the submission are as follows: Sustainable Mobility Strategy – Second Rail Station - The submission requests the inclusion of a new train station or park and ride facility to reduce the traffic impact on the M7 Motorway. Community Infrastructure - The submission requests the council to provide the necessary community infrastructure and facilities to cater the growing memberships of the Men's and Women's Shed groups, including the growing memberships of local sporting organisations. - It also requests the council to provide all the necessary school, medical, childcare and recreational facilities in advance of developing 4,000 new homes.