

# Planning Statement

Proposed Part 8 Development at 13 & 18 Sallins Road,  
Beaufort Cottage and Beaufort, Sallins Road, Naas West,  
Naas, Co. Kildare.

on behalf of McAuley Place & Kildare County Council.

March 2026



McCutcheon Halley  
CHARTERED PLANNING CONSULTANTS

# Document Control Sheet

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# 1. Introduction

This Planning Statement has been prepared by McCutcheon Halley Chartered Planning Consultants (MHP) on behalf of Nas na Riogh Housing Association CLG t/a McAuley Place (the Applicant) in partnership with Kildare County Council in respect of a Part 8 application to Kildare County Council (KCC) to deliver a residential development catering specifically for older persons at 13 & 18 Sallins Road, Beaufort Cottage and Beaufort, Sallins Road, Naas West, Naas, Co. Kildare (The Site).

The development proposes to deliver a residential development specifically for older persons, with approximately 44 units provided across three interconnecting blocks, extending to a maximum height of 4 storeys. The Site is situated on the western side of Sallins Road, directly opposite Naas Town Centre, approximately 165m from the intersection of North Main Street and Poplar Square.

The proposed development incorporates a 0.48 hectare strategic infill site to facilitate senior housing supply within the immediate vicinity of Naas Town Centre. The proposal provides for the efficient use of residential and community zoned land and will deliver much-needed older persons housing for the area.

A full description of the proposed development is set out in Section 4 of this report. Briefly:

The development comprises the construction of a residential development for older persons consisting of 44 residential units located at 13 & 18 Sallins Road, Beaufort Cottage and Beaufort, Sallins Road, Naas West, Naas, Co. Kildare. Beaufort (house) is proposed to be retained and repurposed to facilitate a community room for the proposed residents and the demolition of the non-original fabric alterations and additions is proposed. Demolition of the three existing terraced cottages fronting Sallins Road is proposed.

Overall, the proposed development is consistent with the principles of proper planning and sustainable development. The design rationale is to create and deliver a high-quality, sustainable residential development for older persons that respects its setting and surrounding built heritage and maximises the site's natural attributes while achieving maximum efficiency of its central location and extension to existing age-friendly facilities.

The proposed site layout and design rationale are set out in the Architectural Design Statement accompanying this Part 8 application.

## 2. Site Context & Location

The subject site, known as ‘Beaufort Naas’ is situated along Sallins Road, approximately 165m north of the intersection of North Main Street and Poplar Square (see **Figure 1**). The Site is located within Naas Town Centre and is surrounded by predominantly low-density residential development to the north and south. Sycamore Springs is located to the north of Beaufort House, which provides a two-storey apartment development. The Mill Race Canal runs along part of the western boundary and the site fronts Sallins Road to the east. Naas Town Shopping Centre lies directly east of the site, on the opposite side of Sallins Road, and accommodates a range of retail and service uses, including a multi-storey car park. The Mercy Convent School and the Luaine Centre is located further west of the site.

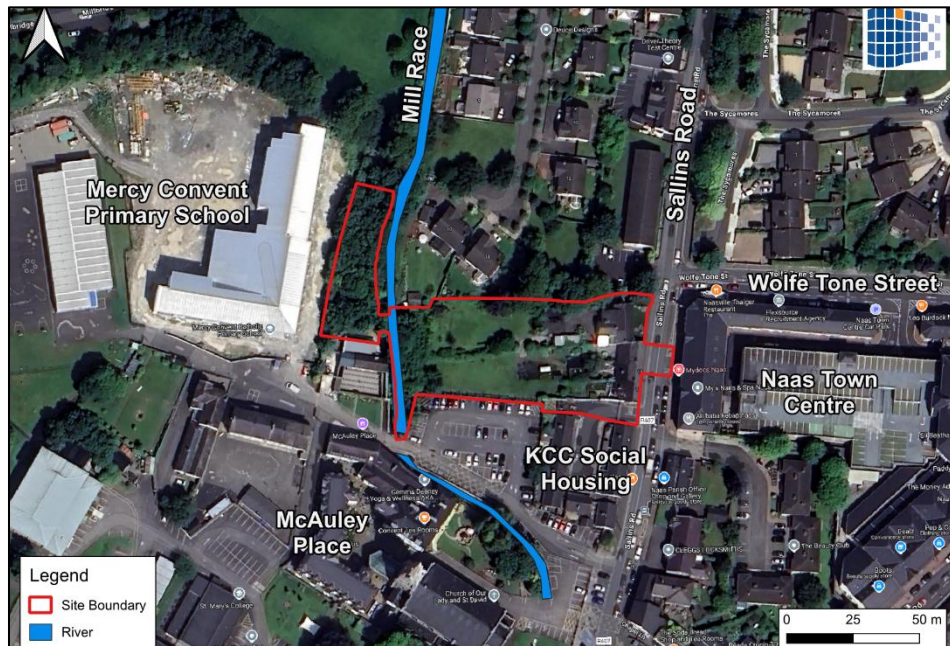


Figure 1: Local context map (Source: Google Maps, updated by MHP)

Two detached two storey dwellings are located to the northwest of the site, forming part of the wider Spring Gardens residential development. A Kildare County Council housing development known as Father Murphy’s Place is located to the south comprising a mix of terraced and semi-detached single storey dwellings.

The established receiving context comprises a varied mix of building heights, including single and two-storey detached dwellings, a two-storey apartment block, and single-storey residential units. Naas Town Shopping Centre presents a two-storey frontage along Sallins Road, with building heights gradually increasing to three storeys along Wolfe Tone Street and the Dublin Road. To the west of the site, the Mercy Convent Primary School extends to a height of three storeys with upper roof level windows appearing as a four-storey structure. Further south, notable community and institutional uses include the Church of Our Lady and St. David of Naas and McAuley Place, which provides both a community centre, tea rooms and residential accommodation for older persons.

Existing pedestrian and vehicular access to the Site is located along the north-eastern boundary of the Site, along the northern boundary of Beaufort House, see **Figure 2**.

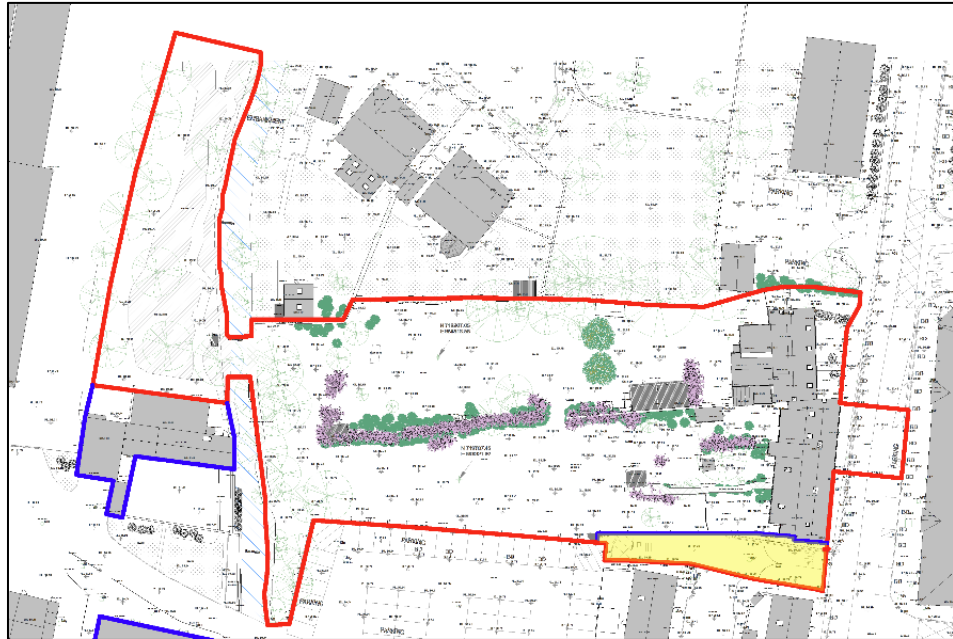


Figure 2: Existing Site Layout (Source: MDO)

There are numerous bus services operating in the area, providing connectivity to Dublin City Centre, Dublin Airport, Newbridge, Kildare, Portlaoise, Athy, and Clonmel, including routes 125, 126, 130, 726, and 717. The Sallins and Naas train station is located approximately 3km north of the site, offering additional regional and commuter rail services.

### 3. Planning History

A desktop search of Kildare County Council's online planning register highlights the most recent planning history for the Site and the surrounding area and are presented in **Tables 1** and **2** below.

Table 1: Planning History of Subject Site

Planning No.	Location	Development Description	Decision
Reg. Ref: 18480	McAuley Place, Sallins Road, Naas, Co. Kildare.	Extension of Duration of Planning Ref. No. 12/500070 - extension and alterations to existing two storey convent structures (adjoining Nuns' graveyard a protected structure NS19-205 RPS Ref. No. 11814115) to construct a single storey structure to north and west of existing buildings and storage yard around graveyard, to refurbish and re-slate/re-roof the existing two storey stone structures for use as a health through learning centre; incorporating community workshops and exhibition use, storage and boiler house to western elevation. The first floor of existing structure is to be converted to a single bedroom studio and bathroom, with adjoining storage mezzanine and dormer with lancet light facing south towards parish hall, to the rear of the Mercy Nuns' graveyard,	20 <sup>th</sup> June 2018 Granted
Reg. Ref: 12500070	McAuley Place, Sallins Road, Naas, Co. Kildare.	Extension and alterations to existing two storey convent structures (adjoining Nuns' graveyard a protected structure NS19-205 RPS Ref. No. 11814115) to construct a single storey structure to north and west of existing buildings and storage yard around graveyard, to refurbish and re-slate/re-roof the existing two storey stone structures for use as a health through learning centre; incorporating community workshops and exhibition use, storage and boiler house to western elevation. The first floor of existing structure is to be converted to a single bedroom studio and bathroom, with adjoining storage mezzanine and dormer with lancet light facing south towards parish hall, to the rear of the Mercy Nuns' graveyard,	10 <sup>th</sup> June 2013 Granted
Reg. Ref: 8869	Beaufort, Sallins Road, Naas, Co Kildare	Extension to house at Beaufort, Sallins Road, Naas, Co Kildare.	15 <sup>th</sup> March 1988 Granted

Table 2: Planning History surrounding the Site

Planning No	Location	Development Description	Decision
Reg. Ref: 2460940	Naas Parish Office, Sallins Road, Naas, Co. Kildare	The construction of a single storey extension to Naas Parish Office which shall comprise of the following works: A) Partial demolition of the single & two storey extensions to the rear & side of the Parish Office building. B) Construction of a single storey extension (132 m2) to the front, side & rear of the existing Parish Office building consisting of double-height atrium & foyer (70 m2), offices, consultation rooms, kitchen & WCs. C) All ancillary site development works	9 <sup>th</sup> January 2025 Granted
Reg. Ref: 22969	St. Mary's College, Sallins Road, Naas, Co. Kildare, W91 VW90	(1) the phased demolition of existing school buildings (2) the phased construction of a new two and three storey school building with a total gross internal floor area of 10,870m2 incorporating 37 general classrooms, a series of 20 support and specialist classrooms, a special needs unit, a library, PE hall, staff rooms and all ancillary accommodation including photovoltaic panels at roof level and separate external storage sheds (50m2) and refuse store (15m2), (2) to allow the school to remain operational during the construction period, the erection on site of new temporary school accommodation units along with the retention and relocation of the existing units and, on completion of construction works, the decommissioning and removal of all temporary school classrooms, (4) the erection, also on a temporary basis during the school construction period, of an airdome (1,050m2) on the proposed school ball courts, to be used for indoor sports use, (5) the school grounds will comprise the retained existing all weather pitch, 6no. ball courts, outdoor seating and breakout areas, sensory gardens, a covered construction store area, hard and soft landscaping throughout with footpaths, public lighting, landscaping and all associated boundary treatments. (6) the existing site access from Sallins Road is to be maintained, while parking and internal movement arrangements are to include modifications to the car and bus drop-off areas, 92no. car parking spaces, inclusive of 5no. disabled spaces and 2no. electric vehicle charge points, 40no. double stacked non sheltered bicycle stands and 85no. sheltered bicycle stands, together providing in total 330no. cycle parking spaces. (7) the proposal also includes new foul and surface water	2 <sup>nd</sup> March 2023 Granted

		drainage system works incorporating SUDS measures, attenuation, rainwater harvesting, a new substation (28m2), Liquid Petroleum Gas (LPG) and Air Source Heat Pump (ASHP) compounds and all other associated site and development works	
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## 4. Proposed Development

### 4.1 Development Summary

The proposed development incorporates a 44 unit development on a 0.48-hectare strategic infill site located to the west of Sallins Road, less than 200m north of the intersection of Dublin Road and Sallins Road, see **Figure 3** below..

The Site contains 4 existing dwellings as depicted in **Figure 2** above. Beaufort House fronts Sallins Road and the original fabric is proposed to be retained. The non-original fabric i.e extensions and additions are proposed to be demolished. Beaufort House is proposed to be repurposed to facilitate a community space associated with the proposed residential development. Three single storey terraced cottages (Beaufort Cottage, 13 & 18 Sallins Road) are located immediately adjoining Beaufort House to the south, fronting Sallins Road, all of which are proposed to be demolished.

The development proposes three apartment blocks providing 44 residential apartments for older persons, comprising 37 no. 1-bedroom apartments and 7 no. 2-bedroom apartments. The proposed apartment blocks will extend to a maximum height of 4 storeys.

A central courtyard area is proposed between both blocks which will provide car parking spaces, a communal open space area and entry to the apartment blocks. Vehicular access to the Site is proposed along the southern boundary via Father Murphy's Place, off Sallins Road. Pedestrian access will be catered for via the existing northern access, adjacent to Beaufort House, and the southern boundary via Father Murphy's Place. Pedestrian access will also be catered to the rear of the site, in the south-western corner to provide enhanced connections between the existing McAuley Place residential care and community facility and the Site.

Residential amenities are proposed to the rear of the Site where a garden pavilion is proposed in the communal open space, adjacent to the Mill Lane canal. A bridge is proposed over the Mill Race Stream to the west of the garden pavilion to provide connectivity to the existing Luisne Sensory Gardens, enhancing connectivity between the green spaces.



Figure 3: Proposed Site Layout Plan (Source: MDO)

The distribution of public and communal open space is illustrated in **Figure 4** below. Communal Open Space (COS) is allocated to the area west of the rear block incorporating the existing mature trees along the Mill Lane Canal and the area to the rear of Beaufort House. To the rear of Beaufort House, the SUDS garden will provide a further 109sq.m of landscaped area. In total, it occupies 4469 sq.m.

The provision of a bridge from the rear COS area to the Luisne Gardens also provides connectivity to additional Public Open Space (POS) which provides an area of 945sq.m.

The design rationale is to create and deliver a high-quality sustainable residential development to support older people to live independently within an accessible location. Additional community facilities such as the garden pavilion and community amenity space will contribute to the overall well being of the future residents.

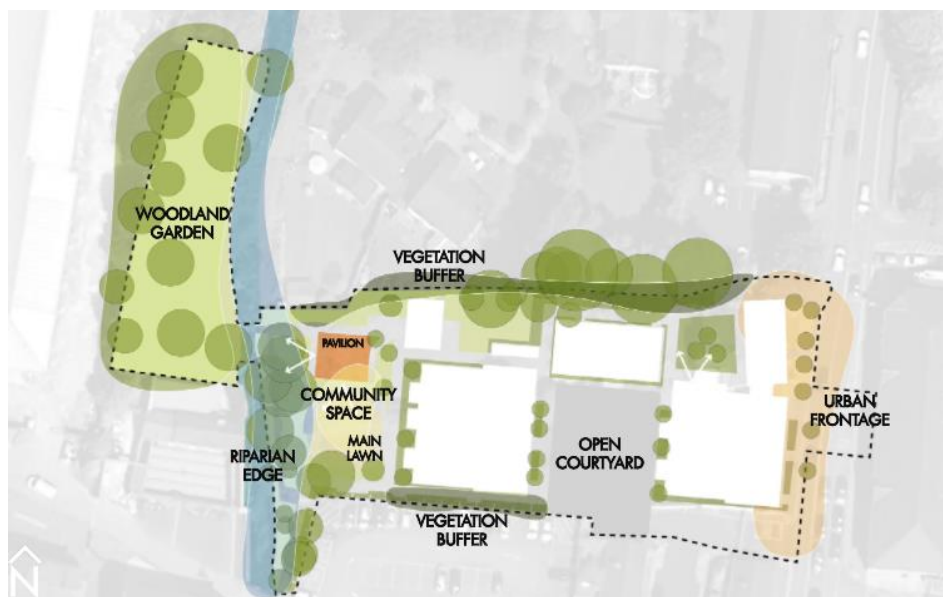


Figure 4: Proposed Public and Communal Open Space (Source: Simon Ronan Landscape Architects, SRLA)

The proposal seeks to balance the need to provide increased density in the form of housing for older persons on an accessible site while being conscious of the existing built heritage on and surrounding the Site.

## 4.2 Cultural & Built Heritage

The Site does not contain any Protected Structure listed on the Kildare County Council Record of Protected Structures (RPS) (Appendix 6 of the Development Plan). Beaufort House (Beaufort) is identified on the National Inventory of Architectural Heritage (NIAH) as being of 'Regional' significance (Ref. 11814097). Beaufort House is proposed to be retained and repurposed to provide a community room/amenity space for residents, together with the removal of non-original fabric and inappropriate alterations.

An Architectural Heritage Impact Assessment (AHIA) has been prepared by Flynn Architects and accompanies this Part 8 application.

The appraisal of the development provides the following description on the National Inventory of Architectural Heritage (NIAH):

*Beaufort (House) is a fine late nineteenth-/early twentieth-century house of balanced proportions that has been much renovated in the late twentieth century. The house incorporates decorative render work to the front (east) elevation, including moulded surrounds to openings, which is a good example of the high-quality craftsmanship in the locality. The house retains very little of its original features and materials, and the reinstatement of timber fenestration might restore a more accurate representation of the original appearance of the house. The house is an attractive feature of the streetscape of Sallins Road leading out of Naas to the north.*

It is understood that some extensions were added to the dwelling in the 1970s and the non-original fabric of Beaufort House is proposed to be demolished.

An Architectural Heritage Impact Assessment (AHIA) report was undertaken by FLYNN Architects for the subject site and is enclosed under separate cover.

The architectural significance of Beaufort is further assessed here, with reference to the methodologies described in the National Inventory of Architectural Heritage (NIAH) Handbook, May 2024. In accordance with the criteria outlined in the handbook, Beaufort is not of any identified special historical, archaeological, artistic, cultural, scientific, social or technical interest.

No. 13 and 18 Sallins Road and Beaufort Cottage are not included in the NIAH. They appear to correspond to buildings shown on the earliest detailed historic maps of Naas but have been altered both internally and externally resulting in a loss of character. They remain of some limited architectural and social interest, in terms of their contribution to the streetscape on approach to Naas Main Street.

Regarding the impacts of the proposed development, the proposed development seeks to repurpose Beaufort to provide community/amenity use for the residents. This will include removing existing modern extensions and reversing inappropriate alterations affecting the front elevation and roofscape. The proposed change of use, alteration and repair of Beaufort is considered to have a positive, significant, long-term impact.

The following commentary is provided in the accompanying AHIA report:

*Positive impacts are anticipated as a result of the expansion of the McAuley Place facility, which is an appropriate and community focussed use for the historic buildings of the former Convent of Mercy, ensuring that the buildings and the gardens are accessible to the people of Naas and maintained to a very high standard.*

*Significant positive impacts are also anticipated as a result of the proposal to restore Beaufort.*

*Moderate negative impacts are anticipated as a result of the proposal to demolish three cottages and their associated boundary features fronting onto Sallins Road. The cottages are historic but have been significantly altered in modern times. They have been fully recorded and appraised.*

*Moderate negative impacts are also anticipated on the setting of Naas ACA and on protected views identified in Naas Local Area Plan 2021-2027 (LAP), as a result of the proposed replacement of vernacular structures with a modern apartment building. These are in line with existing and emerging base-line trends.*

*The impact assessment has taken account of the magnitude of predicted impact, and the significance and sensitivity of the feature which has the potential to be impacted. No significant negative impacts were identified on the Architectural Heritage Resource of the proposed site as a result of the proposed development.*

The Cultural Heritage Impact Assessment (CHIA) prepared by Moore Group confirms that there are no recorded archaeological monuments within the boundary of the subject site; however, the subject site is partially located within the archaeological Zone of Notification (ZoN) for Naas (KD019-030—: Historic town). The nearest recorded monument is located c. 60 m to the south-east of the site (KD019-030058-: Font). The CHIA concludes that there will be no significant residual impacts on the archaeological resource, subject

to implementation of the mitigation measures set out within the report (including archaeological testing in advance of construction).

### 4.3 Flooding

A Flood Risk Assessment (FRA) prepared by Barrett Mahony Consulting Engineers (BMCE) in accordance with the Planning System and Flood Risk Assessment Guidelines for Planning Authorities accompanies the application.

It was noted during pre-planning discussions with Kildare County Council that predicted CFRAM flood maps are under review and hydraulic modelling has been undertaken in mid-2024 to determine more accurate maps for flood risk. Published results to date, issued as part of the Naas Flood Relief Scheme suggest that the risk of flooding in Naas and specifically, the subject site, are greatly reduced when compared with current CFRAM maps. Notwithstanding this the FRA was undertaken considering the more onerous **\*\*CFRAM\*\*** predicted levels.

The CFRAM Flood Extents Map for the 1% AEP fluvial flood event, highlight the presence of flooding on the site and as a result, the development is located in Flood Zone A, where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for tidal flooding). As the site is within flood zone A, the justification test for the proposed development has been completed and successfully passed.

The SSFRA concluded that the proposed ground floor level for the buildings on site has been set, having regard to the predicted 0.1% AEP flood level, and a greater than 500mm freeboard is proposed. In the event that the flood risk is reduced, as indicated by maps published to date as part of the Naas Flood Relief Scheme, the freeboard to predicted flood levels is likely to exceed 1000mm. In addition, further mitigation measures are proposed along the western boundary of the site, adjacent to the watercourse and as part of the site drainage design to further reduce the residual flood risk at the subject site.

Please refer to the SSFRA for further information.

### 4.4 Traffic and Transport

The Traffic Impact Assessment (TIA) and the Mobility Management Plan (MMP) prepared by BMCE have been submitted with this application.

Given the number of parking spaces proposed, traffic is not anticipated to be impacted by the proposal. Four (4) parking spaces are proposed within the Site, one of which will be Electric Vehicle (EV) parking spaces. Twenty parking spaces will also be made available to future residents within the existing three-story car park located immediately across from the Site in the Naas Town Shopping Centre.

The Construction and Environmental Management Plan (CEMP) prepared by Altemar submitted as part of this application confirms that construction site access will be provided via Father Murphy's Place off Sallins Road and movements will be managed to ensure minimal effects to adjoining residential dwellings occurs during the construction phase.

In terms of traffic management, all construction traffic will approach the site from the north via the M7 motorway, using either the R445 or R407 roads. This strategy has been adopted to avoid routing heavy construction vehicles through Naas town centre, thereby minimising disruption. In addition,

construction vehicle movements associated with peak activities such as soil and waste removal will be scheduled outside of peak commuting periods, including school opening and closing times, to further mitigate traffic impacts on the local road network.

The TIA has carried out a range of assessments for the existing situation, within the year of opening in 2027, and within 2032 (Design Year 1) and 2042 (Design Year 2). The TIA concludes that:

1. The site is well served by public transport, with regular bus services and located very close to the location of the proposed development.
2. The network analysis indicates that, for the existing critical junction in the vicinity of the proposed development: the Sallins Road / Wolfe Tone Street priority junction is busy but within capacity in late 2024, with a maximum RFC of 77% and a maximum queue length of 3 No. vehicles.
3. By 2027, the projected year of opening, with no development in place, the junction is predicted to have a minimum maximum ratio of flow to capacity of 83%, with queuing at a maximum of 4 No. vehicles. With the development in place, the maximum ratio of flow to capacity increases slightly to 84%, with maximum queue length remaining at 4 No. vehicles.
4. By 2032, the Design Year 1, with no development in place, the junction is predicted to have a minimum maximum ratio of flow to capacity of 90%, with queuing at a maximum of 6 No. vehicles. With the development in place, the maximum ratio of flow to capacity increases slightly to 92%, with maximum queue length increasing marginally to 7 No. vehicles.
5. By 2042, the Design Year 2, with no development in place, the junction is predicted to have a minimum maximum ratio of flow to capacity of 100%, with queuing at a maximum of 11 No. vehicles. With the development in place, the maximum ratio of flow to capacity remains at 100%, with maximum queue length remaining at 11 No. vehicles.
6. The report demonstrates that the critical adjacent junction at present works within capacity and is quite heavily loaded, as one would expect within a busy town centre. The detailed analysis within this report demonstrates that the junction will continue to work within capacity up until 2042. The proposed development is predicted to have an imperceptible impact on queuing and delays.

Furthermore, the MMP outlines a fully sustainable travel strategy, leveraging the site's proximity to Naas Town Centre, existing public transport links, and active-travel infrastructure. It also promotes cycling through the provision of secure on-site cycle parking and other incentives, ensuring that both residents and visitors have viable, low-carbon travel options.

## 4.5 Engineering Services

Please see the details below, which describe the capacity of existing/planned infrastructure to serve the proposed development.

### 4.5.1 Roads

According to the Design Manual for Urban Roads and Streets (DMURS) Compliance Statement prepared by BMCE and submitted along with this application, the internal access routes are designed as follows in **Figure 5**.



Fig.1.1 – Pedestrian, Cyclist and Vehicle access routes

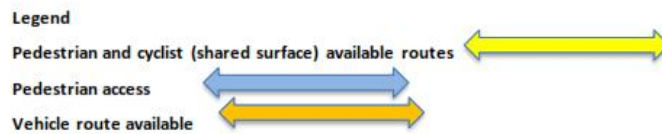


Figure 5: Pedestrian, Cyclist and Vehicle Access Routes (Source: DMURS)

Additionally, a pedestrian crossing is proposed at the front of the site, across Sallins Road to provide safe access to and from the site.

The DMURS concluded that the proposed development has been designed to achieve the objectives set out in DMURS and is consistent with the key design principles and requirements.

**4.5.2 Car Parking & Bicycle Parking**

Four (4) surface parking spaces are proposed within the Site, two of which will be Electric Vehicle (EV) parking spaces. 20 car parking spaces will also be made available to the future residents within the 3 storey car park located immediately across from the Site, in the Naas Town Shopping Centre.

It is proposed to provide 44 bicycle parking spaces across the Site.

**4.5.3 Surface Water**

With reference to Uisce Eireann records the subject site is not shown as being serviced by surface water drainage. It is noted that the existing houses along Sallins Road discharge surface water into the combined network which ultimately discharges to a 525mm diameter combined sewer which is located below the Sallins Road (R407) and running in a northerly direction from the site.

It is proposed to provide the following surface water design as part of the development:

- 2 of the 4 buildings on the site have will be provided with permeable paved finishes overlying a drainage board for interception storage

- and a blue roof storage facility for attenuation storage. Majority of the run-off from these buildings will be in effect attenuated at source.
- In the central courtyard area, the hard paved areas will be formed with permeable paved surfaces with underlying gravel sub-bases with sufficient voids to provide attenuation storage for these areas and any run off from the roofs not directed to blue roof. These areas will be provided with perforated overflow pipes which will discharge to the private surface water network before ultimately being discharged to the public drainage on the Sallins Road (R407).
  - Green area to the back of Beaufort house will be taken as a bioretention area with underlying gravel sub bases with sufficient voids to provide attenuation storage for these areas. Similar to the central plaza, areas of the roofs not directed to the blue roof will discharge to this bioretention area.
  - The remaining ground floor areas will be soft landscaped and, given the site's sloping topography towards the west, surface water runoff from these areas will continue to discharge naturally to the adjacent stream, and will therefore not be directed into the surface water drainage network.

The proposed development will be designed in accordance with the principles of Sustainable Drainage Systems (SuDS) as embodied in the recommendations of the Greater Dublin Strategic Drainage Study (GSDSDS) and will significantly reduce run-off rates and improve storm water quality discharging to the public storm water system. The GSDSDS addresses the issue of sustainability by requiring designs to comply with a set of drainage criteria which aim to minimize the impact of urbanization by replicating the run-off characteristics of the greenfield site. The criteria provide a consistent approach to addressing the increase in both rate and volume of run-off, as well as ensuring the environment is protected from any pollution from roads and buildings. These drainage design criteria are as follows:

- Criterion 1 – River Water Quality Protection
- Criterion 2 – River Regime Protection
- Criterion 3 – Flood Risk Assessment
- Criterion 4 – River Flood Protection

The requirements of SuDS are typically addressed by provision of the following:

- Interception storage
- Treatment storage (commonly addressed in interception storage)
- Attenuation storage
- Long term storage (not applicable if growth factors are not applied to  $Q_{bar}$  when designing attenuation storage)

The chosen SuDS measures have been analysed for various rainfall scenarios to ensure that all the SuDS design criteria are met an extensive range of SuDS measures are proposed with almost total coverage of the developed area of the site. It is concluded that SuDS measures are the most effective measures which can be applied to the site and these measures are effective in treating rainfall on the site to GSDSDS and CIRIA criterion.

Please refer to the Infrastructure Report & Surface Water Management Plan and associated drawings prepared by BMCE for further detail.

#### 4.5.4 Wastewater Drainage

The existing buildings on the site are currently serviced by a 300mm diameter foul sewer which runs in a northerly direction below the Sallins Road. The existing private foul network within the site boundary currently serves Beaufort house and the 3 other units that face onto the Sallins Road. A series of manholes and ICs collect the foul drainage at the back of the units and discharges to the public sewer on the Sallins Road.

It is proposed to remove the existing private foul drainage network on the site and construct an entirely new network to suit the new development. Foul drainage from the proposed development shall be drained by a completely separate system to that of the surface water drainage system until the last manhole that will be combined with the surface water and drain by gravity to the combined sewer within the Sallins road.

Engagement with Uisce Éireann will take place for the proposed development prior to commencement.

Please refer to the Infrastructure Report & Surface Water Management Plan and associated drawings prepared by BMCE for further detail.

#### 4.5.5 Water Supply

There is an existing Ø203mm diameter watermain below the Sallins Road.

The proposed development will be served by a 150mm diameter HDPE watermain connection, fed from the existing watermain pipe in the south eastern corner of the site. Details relating to the total average and peak demand water calculations is provided in the Infrastructure Report & Surface Water Management Plan prepared by BMCE.

## 5. Planning Policy Context

The following sub-sections outline the relevant national and local planning policy contexts for the proposed development.

### 5.1 National Planning Framework 2040

The Department of Housing Planning and Local Government, on behalf of the Government, prepared and published the finalised National Planning Framework (NPF) 2040 under Project Ireland 2040, the overarching policy and planning framework for the social, economic, and cultural development of our country.

The NPF's long-term vision aims to balance the provision of good quality housing that meets the needs of a diverse population by developing our cities, towns, and villages as attractive places to live both now and in the future. The plan embraces the principle of compact growth, promoting development that is within the existing built-up footprint of settlements or contiguous to existing developed lands. The target is for at least 50% of all new housing to be delivered within the existing built-up areas of cities on infill and/or brownfield sites. These include vacant and under-occupied buildings, with high housing and job densities, better serviced by existing facilities and public transport.

The following National Policy Objectives (NPOs) are of particular relevance to this scheme:

- Compact Growth (NPO 3)
- Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services (NPO 28, NPF)
- Age-Friendly Communities – Older People - Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans (NPO 30 NPF, & NPO 40, NPF First Revision).

Since its initial publication in 2018, the first revision of the NPF has been released which focuses on the need to update the Framework to appropriately reflect changes to government policy, such as demographics, climate transition, regional development, digitalisation and investment and prioritisation.

Generally, the NPF Revision retains the original NPF focus on a more balanced distribution of growth across all of Ireland's regions and a commitment to the promotion of city-based population and employment growth with a target of 50% of future population and employment growth to be focused in the existing five cities.

The Draft Revised NPF acknowledges that there is a need for approximately 50,000 additional households per annum to 2040. The ESRI projects that the

population of Ireland will increase by around one million people from 2022, to approximately 6.1 million people by 2040.

## 5.2 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (the Compact Guidelines) focus on sustainable residential development and the creation of compact settlements across Ireland. These guidelines replace the previous Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities issued in 2009, which seek to build upon and update the previous guidance to align with current policy directives of the Irish government. The 2024 guidelines reflect and address the economic, social, and environmental challenges which affect urban development within differing contexts.

Section 1.3.2 of the Guidelines relating to Compact Growth states the following:

*'priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out. There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens.'*

Section 1.3.2 further states that:

*'In order to achieve compact growth, we will need to support more intensive use of existing buildings and properties, including the re-use of existing buildings that are vacant and more intensive use of previously developed land and infill sites, in addition to the development of sites in locations served by existing facilities and public transport.'*

The Guideline supports the development's principles of location, density, accessibility, and local character. Situated within a residential land use zone and embodying the '15-minute city' concept, the Site benefits from proximity to various local services, amenities, and public transport bus options. The proposal includes reusing the existing Beaufort House for ancillary residential purposes to support a community facility.

The proposed density (net) of 89 units per hectare (uph) is therefore in accordance with this range.

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) in relation to the design of housing, such as:

- SPPR 1 - Separation distances

*'When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no*

*opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces. There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case by case basis to prevent undue loss of privacy.*

The proposed development provides for a minimum separation distance of 20 metres between Block 1 and Block 2, ensuring adequate privacy and residential amenity. Block 3 is located further north does not directly oppose either of these, thereby further minimising potential overlooking or overbearing impacts within the scheme. Block 3 does provide connections to the upper levels of blocks 1 and 2 thus creating for a more inclusive community, cognisant of the end user.

- SPPR 2 – Minimum Private Open Space Standards for Houses

*It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:*

- 1 bed house: 20 sq.m
- 2 bed house: 30 sq.m
- 3 bed house: 40 sq.m
- 4 bed + house: 50 sq.m

*A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves’.*

The proposal relates to apartment development and therefore, SPPR 2 is not applicable.

- SPPR 3 – Car Parking

*It is a specified planning policy requirement of these Guidelines that:*

*(i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*

*Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.*

The scheme provides a total of 24 parking spaces, equating to one space per 0.55 units. Of these, four spaces were proposed at the central courtyard with one EV Charging/Accessible parking space and twenty spaces are accommodated in the Naas Town Centre car park, situated opposite the site on Sallins Road, connected via a new pedestrian crossing.

The Kildare Development Plan or Naas LAP does not specify a car parking requirement for age-friendly residential units. Additionally, the Clúid organisation, who manage a number of age-friendly residential developments in Ireland, use a figure of 1 space per 7 residents.

If one assumes for the 1-bedroom units (37), an average occupancy of 1.35 people per unit (midpoint of 1.2 - 1.5), one can estimate 37 No. units  $\times$  1.35 people/unit  $\approx$  50 residents. For the 2-bedroom units (6), if one assumes an average occupancy of 2 residents per unit (midpoint of 1.8 - 2.2), one can estimate 6 units  $\times$  2 people/unit  $\approx$  12 residents. This provides a total figure of 62 residents. Therefore, the Clúid Guideline would translate into a requirement of  $62 \div 7 = 9$  No. car parking spaces. The planned provision is 267% greater than the Clúid requirement.

It is considered that the proposed 24 car parking spaces are more than adequate to meet the needs of 44 older person residential units.

- SPPR 4 – Cycle Parking and Storage

*It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:*

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

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

It is proposed to provide 44 spaces across the Site.

### **5.3 Sustainable Urban Housing: Design Standards for New Apartments 2025**

The Planning Design Standards for New Apartments' 2025 (amended July 2025) provides guidance in relation to the provision of new apartments. The Guidelines state that Planning Authorities must prioritise the objective of more effective usage of existing underutilised accommodation. The Guidelines note that Local Authorities determine suitable locations for the provision of apartments, having regard to a broad description of proximity and accessibility considerations.

The Guidelines outline Specific Planning Policy Requirements (SPPRs) to guide the development of apartments. Section 4.23 discusses 'Intermediate Urban Locations' and outlines that planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard. Appendix 1 of this document sets out minimum floor areas and standards for apartment development and the proposal intends to

comply with these requirements which the proposed development complies with.

## 5.4 Kildare County Development Plan & Naas Local Area Plan

The Site is located within Kildare County's functional area and is governed by the current Kildare County Development Plan 2023-2029 (CDP) and the Naas Local Area Plan 2021-2027 (LAP).

The LAP sets out an overall strategy for the proper planning and sustainable development of Naas and the vision of this LAP is:

*To ensure that the growth planned for the town up to 2031 and beyond occurs in a sustainable and sequential manner, while prioritising a low carbon, compact, consolidated and connected pattern of development.*

*To develop Naas as a vibrant and culturally rich town supported by an inclusive sustainable all-of-life residential community.*

*To create a distinct sense of place and community in which people will continue to choose to live, work, do business and visit. Movement, connectivity and permeability to key destinations within the town and wider region will be prioritised and a greater emphasis on safe active transport routes and an enhanced public transport network.*

Section 4.4.3 supports housing and longer-term residential care facilities or older people should be fully integrated into the local community. These facilities should be within walking distance of the town centre, key services, public transportation, car parking and public spaces set within a universally designed and age friendly public realm. McAuley Place has become a national exemplar model of housing for older people and there will be further opportunities for Naas to expand this supported housing market.

The proposed development is known as McAuley Place 2, which is a housing development for older people. This proposal is in line with the LAP objectives.

## 5.5 Land-Use Objectives

The Site is predominantly zoned 'Objective B – Existing Residential/Infill'. The objective of this zoning is: *'To protect and enhance the amenity of established residential communities and promote sustainable intensification.'* as shown in Figure 6 below.

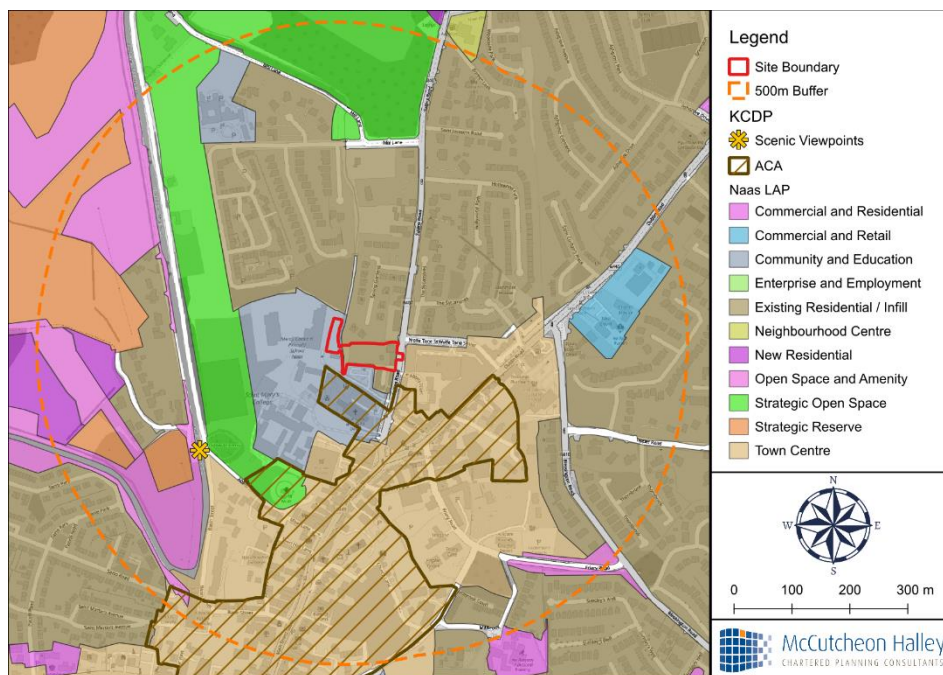


Figure 6: Zoning Map (Source: MHP GIS Team)

A small portion to the north-west and at the north-east of the site is zoned Objective E: Community & Education where it is sought “To provide for education, recreation, community and health.”

Under the land use zoning matrix, older people's homes are classified as Group/Special Needs Housing, which is permitted development under Objective B zoned land. The area located to the west which is zoned Objective A will continue to provide public open space (Luisne Gardens and connections to this space will be catered for via a proposed bridge across the Mill Race stream).

Under Policy I3 – Flood Risk Management, objective IO 3.4 states:

*‘all development proposals should apply the use of the sequential approach in terms of the site layout and design. If there is a proportion of the site at risk of flooding, the sequential approach must be applied to ensure that there is no encroachment onto, or loss of, the flood plain. Only water compatible development such as Open Space should be permitted for the lands which are identified as being at risk of flooding within that site. This shall ensure that flood risk on sites can be managed through the sequential approach only, without the requirement for further mitigation measures. If this cannot be achieved the applicant must clearly show that the sequential approach cannot be followed, they must satisfy all the criteria of the Justification Test and demonstrate that appropriate flood mitigation and management measures are put in place.’*

As the site is located in flood zone A, a Flood Risk Assessment (FRA) has been carried out by BMCE and submitted with this planning application, as discussed in Section 4.3 above.

## 5.6 Applicable Development Plan Policies

The relevant sections of the County Development Plan included inter alia Chapter 2, *Core Strategy & Settlement Strategy*, Chapter 3, *Housing*, Chapter 5, *Sustainable Mobility & Transport*, Chapter 6, *Infrastructure & Environmental*

Services, Chapter 11, *Built & Cultural Heritage* and Chapter 12, *Biodiversity & Green Infrastructure*, Chapter 15, *Development Management Standards*. These are relevant to development proposals for residential zoned lands such as the subject development.

## 5.7 Assessment

### 5.7.1 Density

The Kildare CDP does not define its own quantitative density requirements and states that site coverage and plot ratios will be considered on a qualitative basis.

The Naas LAP acknowledges that, as a general principle, higher densities should be located in town centre infill locations and proximate to public transport.

For quantitative requirements the LAP refers to guidelines now superseded by the ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ (DHLGH, 2024) (“the SRDCS Guidelines”).

The determination of an “acceptable” density range for the proposed development under the SRDCS Guidelines is performed with respect to settlement size and area type.

The site is located within a “Centre” or “Urban Neighbourhood” location within a Key Town and, as such, a broad “acceptable” residential density range of 40-100 dwellings per hectare (dph) applies to the proposed development.

Further refinement based on the “accessibility” of the site identifies it as being located within a “Peripheral” location where densities below the mid-range of acceptable densities should be encouraged. However, the guidance within the SRDCS, which is stated to be non-exhaustive, does not account for access to the inter-urban bus services which are accessible from the site. The SRDCS Guidelines also outline that the appropriate site-specific density range must then be further refined with regard to the capacity of the receiving environment.

Based on the accessibility of the site, immediately adjoining Naas Town Shopping Centre, less than 200m from Poplar Square and c. 250m from Dunnes Stores Shopping Centre, the site is considered appropriate to facilitate the proposed density of 89uph.

Table 3: Density Ranges for Key Towns (Source: SRDCS Guidelines)

Location	Lower Bound	Mid-Range	Upper Bound
<b>Key Town - Centre &amp; Urban Neighbourhood Areas</b>	40 dph	70 dph	100 dph
<b>Key Town - Suburban / Urban Extension Areas</b>	30 dph	40 dph	50 dph

The acceptability of apartment units as part of a proposed development, with regards to site location and accessibility, is set out within the ‘Sustainable Urban Housing: Design Standards for New Apartments’ (DHLGH, July 2023) (“the Apartment Guidelines”).

As the subject site is within the immediate vicinity of Naas town centre, it is identified as being within an intermediate location under the Apartment Guidelines. As such, the Apartment Guidelines state that the site is generally suitable for either a smaller-scale, higher-density development that may wholly comprise apartments, or for a medium-high density residential development (>45dph) of any scale that includes apartments to some extent.

The proposed development, specifically for older persons, would provide a density of 89 uph. The proposal aligns with the national and local density policy and facilitates further compact growth within County Kildare, whilst maintaining a balance between the protection of existing built heritage. The proposed density is considered appropriate for the Site.

### **5.7.2 Building Height**

Specific Policy Planning Requirement (SPPR 1) of the 'Urban Development and Building Heights: Guidelines for Planning Authorities' (DHPLG, 2018) ("the Building Height Guidelines") prevents LAPs or CDPs from setting blanket height limits.

Naas LAP identifies the town centre as a possible location for taller buildings. Any development proposal for taller buildings is required to demonstrate that such a proposal is well-designed & well-sited and makes a positive contribution to an urban setting.

The Kildare CDP adopts a contextual approach to building heights from the now-revoked 'Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities' (DEHLG, 2009). Under this approach, the subject site is identified as being located within an "urban location outside town centres". Regarding such a location, the Kildare CDP states:

"The Guidelines seek to achieve prevailing building heights of at least three to four storeys, coupled with an appropriate density, in locations outside what would be defined as town centre areas, and in locations which would include suburban areas."

The proposed development seeks to provide 3 blocks of ranging in height to a maximum of 4 storeys, whilst also retaining the single storey Beaufort House.



Figure 7: Proposed Height Strategy (Source: MDO)

The layout has been carefully considered in relation to its existing site boundary, topography, street, trees, and neighbouring properties. It is proposed to optimise the site area and create a strong sense of place with active and attractive streetscapes. The scheme will benefit from its close proximity to Naas Town Centre and sufficient public transport links. The unique context of the site has been carefully considered, with both its constraints and opportunities informing the design.

The buildings step down toward the north and east, presenting a gradual decrease in height, keeping the height and value of Beaufort House in mind. They also step down toward Sallins Road, allowing them to remain considerate with Naas Shopping Centre.

The Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) (the Height Guidelines) state that it is Government Policy that building heights must be generally increased in appropriate urban locations and there is a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Section 3.2 of the Height Guidelines outlines that when submitting a planning application for increased height, the Applicant must demonstrate to the satisfaction of the Planning Authority that the proposed development satisfies a specific set of criteria at the scale of the city/town, at the scale of district/neighbourhood/street and at the scale of the site/building.

### 5.7.3 Unit Mix

The Kildare County Development Plan and Naas Local Area Plan do not set quantitative requirements for housing mix.

The Naas LAP requires that a “good mix” of housing types and sizes is provided. Specifically, Objective HCO 2.1 requires that a good mix of housing is provided, including the provision of appropriate supported housing and longer-term residential care solutions designed for older people and/or people with disabilities.

The proposed development is specifically designed to provide a development for older persons where 75% of the units will be transferred to Kildare County Council and 25% will remain in the ownership of McAuley Place. The residential development will be linked to the existing McAuley Place, which provides an alternative to institutional care, located within Naas Town Centre. The development supported by ancillary public and communal spaces facilities that promote social interaction, creativity, engagement, and a strong sense of community among residents. The McAuley Place model is one that creates a society for all ages. Given the targeted demographic, the proposed unit mix of 37 no. 1-bed units and 7 no. 2-bed units has been tailored to meet the particular needs of older persons and differs from that of general residential schemes.

It is acknowledged that the *Sustainable Urban Housing: Design Standards for New Apartments* (DHLGH, July 2023) (Apartment Guidelines) applies. Specific Planning Policy Requirement (SPPR) 1 of the Apartment Guidelines sets a maximum of 50% one-bed and studio units. However, Paragraph 2.21 of the Apartment Guidelines states that SPPR 1 does not apply to “certain social housing schemes, such as sheltered housing”. Therefore, the proposed unit mix is deemed adequate.

#### **5.7.4 Public and Communal Open Space**

The site falls under the “brownfield” classification in terms of public open space (POS) under the Kildare CDP, which seeks 10% of the total area of the site to be POS and a maximum 4% of which is provided for biodiverse spaces.

Where POS standards have been relaxed in this manner, or where there is a shortfall in the provision of open space due to the practicalities of the site, an equivalent monetary contribution in lieu of remaining open space provision will be required via the Kildare County Council Development Contribution Scheme (2023-2029).

Natural or semi-natural green spaces, incorporating the planting of native species and pollinator friendly areas which enhance biodiversity, may count towards these POS requirements up to a certain maximum.

The proposed development will provide 947 sq.m. POS which is approx. 20% of the total site area as illustrated in Figure 10 below. The proposal will also provide 380 sq.m. of communal open space (COS) for the community (see Figures 8 & 9 below).



Figure 8: Proposed Illustrative Landscape Masterplan (Source: Landscape Report, SRLA)



Figure 9: Open Spaces (Source: Landscape Report, SRLA)

### 5.7.5 Car and Bicycle Parking

Under Section 15.7.8 of the Kildare CDP, a maximum car parking provision for apartment units of 1.5 spaces per unit is applied, in addition to 1 visitor space per 4 apartments.

As a residential development within walking distance of a town centre, the proposed development should be designed to provide fewer parking spaces.

Given the proximity of the site to the town centre and the availability of car parking in the immediate vicinity, a lower level of parking is proposed.

Separately, the Kildare CDP also requires that visitor parking spaces be a minimum of 10% of the overall number of spaces provided in new residential developments.

Under Section 4.20-4.29 of the Apartment Guidelines the subject site is identified as an intermediate urban location, and so any proposed development must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard. The Compact Guidelines sets maximum car parking standards which include provisions for visitor parking. However, as the maximum requirements set out for Intermediate and Peripheral locations (2 spaces per unit) is greater than that provided within the Kildare CDP (1.5 spaces per unit), no conflict exists, and the maximum requirements of the Kildare CDP stand.

A total of 24 car parking spaces are proposed to serve the development. Of these, four spaces will be provided within the site boundary, including one combined Electric Vehicle (EV)/accessible parking space. The remaining 20 spaces will be allocated within the Naas Town Centre car park, located in close proximity to the site.

Given the nature of the proposed development as an older persons residential scheme, which differs from conventional residential developments, the parking provision is primarily intended for visitor use. In this context, the inclusion of EV charging infrastructure and accessible parking is considered appropriate and proportionate to the anticipated demand.

All development proposals are required to include provisions for clearly and exclusively designated electric car charging points. The Kildare CDP requires the installation of ducting infrastructure for each car parking space to enable the subsequent installation of EV charging points where proposed development include over 10 units.

New cycle parking is required to be designed in accordance with the "Cycle Design Manual" (NTA, 2023).

Under the Kildare CDP, a minimum of 1 cycle parking space per bedroom, in addition to 1 visitor space per 2 units is required for apartment units.

SPPR 4 of the SRDCS Guidelines requires that cycle storage facilities be provided in a dedicated facility of permanent construction. This should be within the building footprint or, where not feasible, within an adjacent/adjoining purpose-built structure. In this regard, SPPR 4 states that it is best practice that either a secure cycle cage/compound or, preferably, locker facilities are provided. Cycle parking and storage will be provided on site (resident and visitor) in accordance with applicable standards, including secure long-stay bicycle parking and visitor Sheffield stands at surface level.

#### **5.7.6 Daylight Sunlight**

A Daylight and Sunlight Assessment Report has been prepared by 3D Design Bureau (3DDB) for the proposed development. The assessment demonstrates that 95 habitable rooms achieve or exceed the target values for Spatial Daylight Autonomy (SDA), resulting in an overall compliance rate of 87%. This indicates a high level of daylight provision within the proposed scheme, contributing positively to residential amenity.

A sunlight exposure (SE) assessment has been carried out on all habitable rooms within the residential portion of the proposed development. The results shows that regardless of the effect of trees, 98% of the assessed units meet the sunlight exposure.

The Sun on Ground (SOG) to the proposed outdoor amenity areas highlight that all the open spaces within this proposed development are favourable from their orientation and unobstructed location. The assessment based on a 21<sup>st</sup> March model, highlights the SOG for the Communal Open Space 2 and Public Open Space reaches above approx. 72% of the space receiving at least two hours of sunlight, exceeding the 50% target required. However, the Communal Open Space 1 only have approx. 5% of the space receiving at least two hours of sunlight which does not meeting the guideline.

In relation to the neighbouring properties (11 Spring Gardens & 4 & 9 Father Murphy's Place), all of the windows in terms of vertical sky component, effect to sunlight received (both annual and winter) will result in a negligible impact. The SOG for the adjoining residential properties to the north (10 & 11 Spring Gardens) will also result in negligible impacts in terms of their rear gardens.

The report concludes that impact assessment studies are positive and the 'scheme is performing very favourably from a daylight and sunlight perspective.'

#### **5.7.7 Biodiversity**

In relation to biodiversity considerations, an Appropriate Assessment Screening Report (AASR) and an Ecological Impact Assessment (EclA) have been prepared by Altamar and accompany this application.

The AASR concludes that, in the absence of mitigation measures, no significant effects on European sites are likely, and no specific mitigation is required to prevent impacts on Natura 2000 sites. It further outlines that the proposed development would not give rise to any significant effects on designated sites and that neither the construction nor the operation of the development will adversely affect the conservation objectives or qualifying interests of any European site.

Similarly, the EclA finds that the proposed construction and operational phase mitigation measures are sufficient to address potential effects on terrestrial, mammalian, avian, and aquatic receptors, in accordance with established best practice. The report concludes that no significant impacts on biodiversity are anticipated, and that residual effects are likely to be low adverse, localised, short-term, and not significant. Over the long term, the development is expected to result in a neutral impact on biodiversity.

These findings collectively indicate that the proposed development will not result in significant adverse effects on ecological receptors or Natura 2000 sites.

#### **5.7.8 Visual Impact**

A Townscape and Visual Impact Assessment (TVIA) and accompanying photomontages have been prepared by Modelworks, while a comprehensive Landscape Report has been prepared by Simon Ronan Landscape Architects (SRLA). Both documents are submitted as part of this planning application to support the assessment of the proposed development's visual impact and landscape integration.

The proposed development has been designed considering its surrounding context. Its scale and massing relate appropriately to the area's existing architecture.

Block 1 is situated on the building line of the existing cottages (to be demolished, excluding Beaufort House), the footpath on the west side of the street would be widened, allowing for the planting of street trees. This also allows for a narrow private/privacy space to be provided in front of the ground-floor apartments, defined by a low wall and railing.

The communal open space is located in the western part of the site alongside the Mill Race stream. The garden includes a large lawn area, a retained stand of mature trees along the millrace, and a patio surrounding a resident's pavilion. A privacy strip of vegetation is proposed in front of the ground-floor apartments facing the garden.

A bridge is proposed over the mill race to provide direct access from the development to the Luisne sensory woodland garden. Although this is an existing open space and community and green infrastructure asset, by connecting the development's open space network to it, the extent and variety of open space amenities available to the community would be substantially increased. This is inspired by the two fundamental principles of green infrastructure planning, i.e. connectivity and multi-functionality to maximise the benefits derived from open space resources.

The verified photomontages provided to inform the TVIA as part of the application highlights the potential impact of the proposed development is generally positive, and the impact on historic buildings, streetscapes and townscapes would be minimal, its effect would be overwhelmingly positive. The TVIA concludes the following in relation to the proposed development:

*Finally, the analysis of the proposed development in Section 4, supported by the photomontages and CGI views, indicates that the proposed development is of high design and material quality. The buildings are attractive and distinctive. The communal open spaces are also of high quality and would contribute to a very high level of residential amenity afforded to the residents (complementing the accessible, town centre location) – as well as contributing to the local green infrastructure network. Although only a small part of the overall proposal, the widening of the public footpath along the site's Sallins Road frontage, and the planting of a row of street trees, would enhance the local public realm.*

*In conclusion, while the development would cause a significant impact on the townscape and views in the immediate environs, its effects would be overwhelmingly positive.*

Therefore, the proposed development will have a significant, long-term and positive effect on the Landscape and Visual Amenity.

### 5.7.9 Lifecycle

A Building Life Cycle Report (BLC) has been prepared by MDO Architects in accordance with Section 6 of the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020, as amended). This report accompanies the planning application and provides a comprehensive overview of the development's approach to energy efficiency, carbon emissions reduction, and long-term durability.

## Energy and Carbon emissions

The proposed development will incorporate a range of measures aimed at reducing energy demand and carbon emissions, delivering both environmental and cost-saving benefits to future residents. Key features include:

- **BER (BER) Certification:** Each residential unit will be provided with a BER certificate. The development aims to achieve a minimum A2 rating for all apartments.
- **Thermal Performance:** U-values for building components will comply with the standards set out in the current Technical Guidance Document Part L of the Building Regulations, ensuring a high standard of thermal insulation.
- **Energy-Efficient Appliances:** A package of energy-labelled white goods with high energy efficiency ratings will be provided for each apartment.
- **Sustainable Lighting:** Lighting will be designed in line with the landscaping plan, using photoelectric cell units (PECUs) to enable automatic operation. Warm white lighting will be utilised to reduce disturbance to local biodiversity, particularly bat species.
- **Ventilation Strategy:** Natural ventilation is being considered to minimise energy usage and noise emissions. In addition, mechanical heat recovery ventilation systems (MHRV) are under consideration to deliver efficient ventilation with minimal energy consumption.
- **Heating Systems:** The use of Air-to-Water Heat Pumps is proposed to provide low-energy, efficient space heating and domestic hot water.

## Materials

The BLC report outlines that: *Consideration has been given to the requirements of the Building Regulations particularly includes reference to BS 7543:2015, 'Guide to Durability of Buildings and Building elements, Products and Components', which provides guidance on the durability, design life and predicted service life of buildings and their parts.* All common parts of the proposed apartment buildings and, the durability and performance of this are designed and specified in accordance with Figure 10 below.

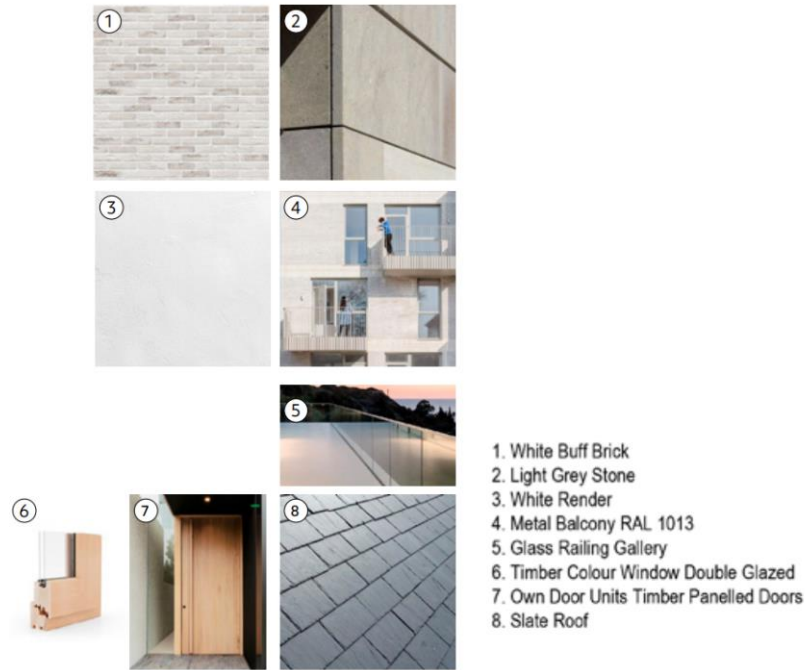


Figure 10: Materials (Source: MDO Architects)

### Landscape

Landscape plans and associated schedules, prepared by SRLA Landscape Architects, are included as part of this application. These documents provide a comprehensive breakdown of proposed materials and site levels, clearly delineating paving finishes, kerbing, benches, bollards, and all other hard landscape elements, ensuring a coherent and high-quality public realm.

### Waste Management

- A Construction Management Plan will be completed prior to commencement on site. The management plan will cover waste management, licensing etc.
- The apartments share a bin compound conveniently located within the development. Waste collection will be overseen by McAuley Place. An Operational Waste Management Plan will be on place to demonstrate how the scheme has been designed to comply with local, regional, and national waste legislation along with best practice.
- Inclusion of centralised waste storage areas, with enough space to accommodate a weekly/bi-weekly collection of bins.
- Domestic waste management strategy:
  - 1) Grey, Brown and Green bin distinction
  - 2) Competitive tender for waste management collection  
Organic waste bins to be provided in waste storage area.

### Health and Wellbeing

The scheme has been carefully designed to maximise natural daylight and sunlight through appropriate orientation, block layout, and generous separation distances between buildings.

All proposed units will be designed to comply fully with Building Regulations Parts M and K, ensuring accessibility and safety.

The layout incorporates passive surveillance, with all apartment block entrances and public open spaces overlooked to promote safety and a sense of community.

## 6. Conclusion

The proposed development will provide a high-quality Part 8 development for older persons consisting of 44 units on a site located on lands at 13 & 18 Sallins Road, Beaufort Cottage and Beaufort, Sallins Road, Naas West, Naas, Co. Kildare.

The proposed development will provide for the efficient use of this underutilised infill site and is consistent with the land-use zoning objectives as detailed in the Naas Local Area Plan 2021-2027 and the Kildare County Development Plan 2023-2029. Residential use and older person homes are permitted in principle under this zoning objective, and the development of the Site will contribute to the diverse housing mix for older people for both Naas, Kildare and the wider greater Dublin region.

The proposal promotes the principles of proper planning and sustainable development and is consistent with National Planning Policy objectives to consolidate existing urban areas as outlined in the NPF and Government Guidelines. As outlined in the NPF, a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located is supported.