

STRATEGIC FLOOD RISK ASSESSMENT ADDENDUM REPORT

Proposed Material Alterations to the Draft Naas Local Area Plan 2021-
2027

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Contents

1	INTRODUCTION	1
2	PROPOSED MATERIAL ALTERATIONS STUDY AREA	2
3	REVIEW OF RESIDUAL FLOOD RISK FOR GRANTED PLANNING	12
4	SUMMARY	13

Tables

Table 2-1	Proposed material alterations which have flood risk implications	3
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Figures

Figure 2-1	Proposed Material Alterations relating to Land Use Zoning	2
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Appendices

Appendix A	Land Use Zoning Map Material Alterations Naas FRA Overlay	14
Appendix B	Justification Tests	15

1 INTRODUCTION

The Draft Naas Local Area Plan 2021-2027 (Draft LAP) was placed on public display from Tuesday 9th March to Wednesday 21st April 2021. The Chief Executive's Report on submissions and observations received in respect of the Draft Plan was submitted to the Members of Kildare County Council for their consideration on 31st May 2021 (including Errata issued the 8th June 2021).

Having considered the Draft Naas Local Area Plan and the Chief Executive's Report, it was resolved by the Members at a Special Meeting of Elected Members of Kildare County Council on Monday 5th July 2021 to alter the Draft Naas Local Area Plan, and that these alterations constitute a material alteration to the Draft Plan.

KCC commissioned RPS Consulting Engineers to carry out an Addendum to the Strategic Flood Risk Assessment report, in accordance with the requirements of The Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014) referred to hereafter as "The Guidelines". This report reviews the proposed Material Alterations and their impact on flood risk and makes recommendations for inclusion in the final SFRA report.

Table 2-1 Proposed material alterations which have flood risk implications

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
12 to 16 (inclusive)	<p>Investigate the feasibility of:</p> <ul style="list-style-type: none"> a greenway/cycleway link between the towns of Naas and Newbridge, to provide for safe active travel, subject to environmental assessments. of providing an active transport route (walking and cycling) to link both Naas and Sallins to Kerdiffstown Park, subject to environmental assessments. of a greenway/cycleway link between the town of Naas and the Naas Rugby Club at Forenaughts to provide for safe active travel, subject to environmental assessments. of providing a walking and cycling link through site C (19) zoned 'New Residential' adjacent to the Sallins Road as part of any new development on this site, subject to detailed impact assessments on built and natural heritage and road safety. the feasibility of a safe pedestrian and cycle route through Millennium Park to Leinster Mills that avoids conflict with HGVs in co-operation with landowners. 	All feasibility studies for greenway/cycleway links, transport routes and pedestrian/cycleway links should examine flood risk for any potential routes and the routes/links should be developed in accordance with the Guidelines.	The SFRA does not require any material change to address these proposed material alterations. General development in Naas should follow the requirements of the Guidelines and the LAP policies and objectives to manage flood risk appropriately.
21	Insert additional text under Objective MTO 3.2 (and any consequential amendments) as follows: (vii) Possible future route through the lands at Jigginstown.	The feasibility study for the potential future road should examine flood risk for all potential routes and the route should be developed in accordance with the Guidelines.	The SFRA does not require any material change to address this proposed material alteration. Road schemes in Naas should follow the requirements of the Guidelines and the LAP policies and objectives to manage flood risk appropriately.
22	To comprehensively re-examine the design of the Gallops Avenue (R410 to R445 - Blessington Road to Dublin Road). The focus of the redesign would be on providing a route which focuses on green initiatives such as expanded footpaths and cycle ways, providing a safe route for pedestrians and cyclists. The new route would	The redesign should incorporate SuDS drainage solutions (e.g. permeable paving, tree pits, swales etc.) in order to manage runoff volumes and flow rates as well as to improve water quality (reducing pollution from runoff).	The SFRA does not require any material change to address this proposed material alteration. General development in the Naas should follow the requirements of the Guidelines and the LAP policies with regards to surface water runoff

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
	be designed to have the have the appearance of a street, avenue or boulevard which would provide a generous tree lined verge, including segregated cycle lanes and pedestrian paths in accordance with the Principles of Sustainable Safety to offer a safe environment for all road users including cyclists.		management in particular Planning Objectives NE 3.1, IO2.1, IO2.2 and IO2.3.
23	Investigate the feasibility of an Outer Relief Road.	The feasibility study for the potential future road should examine flood risk for all potential routes and the route should be developed in accordance with the Guidelines.	The SFRA does not require any material change to address this proposed material alteration. Road schemes in Naas should follow the requirements of the Guidelines and the LAP policies and objectives to manage flood risk appropriately.
24	<p>Insert additional text under paragraph one, Section 6.4.2 Northwest Quadrant (NWQ) as follows:</p> <p>A masterplan is required for the overall land bank in the Northwest Quadrant (see Section 10.7). Kildare County Council will prepare the masterplan which will be finalised once the Flood Relief Scheme for the area is complete. The masterplan will then be integrated into the local area plan by way of a statutory amendment under Section 20 of the Planning and Development Act (as amended) (Objective NWQ 1.1 refers).</p>	This is a positive change to confirm that no development will take place until the updated Naas Flood Mapping (to be produced as part of the initial stages of the Naas Flood Relief Scheme) has been completed to confirm the flood extents in the NWQ. The Flood Mapping will inform the final masterplan for the area.	<p>The final SFRA and Justification Tests covering the NWQ will be updated to note that no development will take place until the updated Naas Flood Mapping (to be produced as part of the initial stages of the Naas Flood Relief Scheme), has been completed.</p> <p>NOTE: It is recommended that should PMA No. 24 be adopted, it should be subject to the following text change for clarity:</p> <p><i>'A masterplan is required for the overall land bank in the Northwest Quadrant (see Section 10.7). Kildare County Council will prepare the masterplan which will be finalised once the updated Flood Mapping for the area is complete, to be produced as part of the initial stages of the Naas Flood Relief Scheme'</i></p>
38	To prioritise and progress the delivery of pathways, public amenities and facilities to enable the use by the public of lands in Oldtown Demesne to realise the vision	This is a positive change to improve and increase green infrastructure and open	The SFRA does not require any material change to address this proposed material alteration.

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
	for these lands as a future park and green infrastructure corridor adjacent to the route of the canal and the Sallins to Naas greenway.	spaces in Naas. Green infrastructure helps to reduce the surface water runoff.	
42	<p>Amend Objective IO 3.1 as follows:</p> <p>IO 3.1 (a) Ensure all development proposals within the areas identified as 'Flood Risk Assessment' on LUZ SFRA Map 9.1, where Justification Tests have been carried out as part of the Strategic Flood Risk Assessment and where residual flood risk remains, are the subject of a site specific flood risk assessment appropriate to the nature and scale of the development being proposed.</p> <p>(b) Flood Risk Assessments for such developments must assess climate change scenarios in accordance with the allowance outlined in the OPW Flood Risk Management Climate Change Sectoral Adaptation Plan 2019.</p>	<p>This is a positive change which makes it clearer to applicants when an FRA is required. It also reinforces that FRAs must assess and consider climate change scenarios.</p>	<p>The final SFRA will include the updated policy objective</p>
43	<p>Amend Objective IO 3.4 as follows:</p> <p>IO 3.4 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</p>	<p>This is a positive change which reinforces utilisation of the sequential approach from the Guidelines for sites in Naas. It promotes the principle of avoidance as the first priority. It also ensures development should be avoided in flood zones and developments should designate any flood zones within the site as open space, therefore avoiding encroachment on them which would reduce the available natural flood storage for the area.</p>	<p>The final SFRA will include the updated policy objective. The final SFRA will be also updated to include reference to this positive approach which ensures compliance with the Guidelines.</p>

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
	that appropriate flood mitigation and management measures are put in place.		
45	Amend Objective NWQ 1.1, as follows: vi. A surface water management plan, to review the storm water network and identify areas for SuDS solutions	This is a positive change to ensure that Northwest Quadrant Masterplan incorporates a surface water management plan and the final development will include SuDS in order to manage runoff volumes and flow rates as well as to improve water quality (reducing pollution from runoff).	The final SFRA will include the updated policy objective.
49	<p>Amend the Urban and Regeneration Strategy to provide support for the Naas Town Renewal Masterplan, (and any other consequential amendments) as follows:</p> <p>Insert the following new text as section 10.5: 10.5 Naas Town Renewal Plan A critical element which will underpin the regeneration of Naas Town Centre over the longer term will be the preparation of a dedicated Town Renewal Plan (TRP) by Kildare County Council. Whilst the TRP will focus on the Core Regeneration Areas of the Town Centre identified in this chapter, it will also examine other areas of potential within Naas. This will involve a detailed health check, further urban design and spatial analysis and an audit of assets and opportunities. Such survey work will inform the production of a masterplan which will detail a series of transformational regeneration projects.</p> <p>It intended that the TRP will act as a guide to steer the long term rejuvenation of the town whilst also assisting the Council in the preparation and presentation of funding applications to the Irish Government's €2 billion Urban Regeneration and Development Fund along with other potential funding streams.</p>	<p>A TRP should be developed in accordance with Circular PL2/2014 of the Guidelines. Any areas identified for regeneration should carry out a FRA to the risk of flooding. A Justification Test should be undertaken if any of these areas lie within flood zones.</p>	The SFRA does not require any material change to address this proposed material alteration. Regeneration areas in Naas should follow the requirements of the Guidelines and the LAP policies and objectives to manage flood risk appropriately

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
53	Amend the zoning at Junction 9 (Maudlins) KDA to 'T: Mixed Use' and all associated consequential amendments.	The change in zoning does not change the vulnerability of the zoning with respect to the Table 3.1 of the Guidelines. The proposed zoning is considered less vulnerable development. There is no material change to the content of the SFRA as the analysis will be the same as the existing zoning is also considered less vulnerable development.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
57	Amend site Q (3) on Map 11.1 Land Use Zoning to reflect areas identified as Flood Zones A and B as 'F: Open Space' and any consequential amendments.	This is a positive change which implements the LAP Objective IO 3.4 to implement the principal of avoidance as the first priority. It also ensures development will be avoided in the flood zones and avoids encroachment on them which would reduce the available natural flood storage for the area.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
58	Amend site H (4) on Map 11.1 Land Use Zoning to reflect areas identified as Flood Zones A and B as 'F: Open Space' and any consequential amendments.	This is a positive change which implements the LAP Objective IO 3.4 to implement the principal of avoidance as the first priority. It also ensures development will be avoided in the flood zones and avoids encroachment on them which would reduce the available natural flood storage for the area.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
59	Amend site C (3) on Map 11.1 Land Use Zoning to reflect areas identified as Flood Zones A and B as 'F: Open Space' and any consequential amendments.	This is a positive change which implements the LAP Objective IO 3.4 to implement the principal of avoidance as the first priority. It also ensures development will be avoided in the flood zones and avoids encroachment on them which would reduce the available natural flood storage for the area.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
60	Amend site 'Existing Residential lands' on Kilcullen Road on Map 11.1 Land Use Zoning to reflect areas identified as Flood Zones A and B as 'F: Open Space' and any consequential amendments.	This is a positive change which protects the designated flood storage area for the housing development by ensuring that development and encroachment will be prevented in the it.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
61	<p>(a) Amend Land Use Zoning Map 11.1 to reflect the following zoning objectives: This proposed Material Alteration refers to lands (as outlined in yellow in the image above) located within the Northwest Quadrant. The proposed material alteration includes the changing of the zoning objective of these lands from 'SR: Strategic Reserve' to:</p> <ul style="list-style-type: none"> • C: New Residential Phase 2. • F: Open Space and Amenity • K: Commercial/Retail • E: Community & Education (2.2 ha site). <p>The 'E: Community & Education' proposed material alteration is recommended in response to the submission from the Department of Education.</p> <p>(b) Include new 2nd paragraph as follows under Section 3.5.2: In relation to the Council owned land north of Finlay Park (associated with the old wastewater treatment plant), the CFRAM flood risk area is shown running through this site. Subject to the planned and detailed review by the OPW of all flood risk areas in Naas and specifically the North West Quadrant, it is planned that this area would be specifically assessed with a view to ensuring that a compensatory area of flood risk/attenuation would be provided immediately west of the existing stream in this area (that bounds the eastern boundary of the site) where a linear park is proposed. This would allow a coherent urban form and urban design solution associated with the planned strategic bus-only route (that is proposed to run from the Canal Harbour area to Junction 9A and that is proposed to align with the western side of the site) and which is intended to be designed as a boulevard with a strong urban edge and building form.</p>	<p>The zoning change is contradictory to the previous precautionary zoning of Strategic Reserve. Strategic Reserve was chosen previously such that these lands could be recognised in the LAP as potential future zoned lands but also being cognisant that detailed zoning could not yet be applied as the flood risk of these lands is uncertain. Detailed zoning would be applied subject to the completion of the updated Naas flood mapping and implementation of the sequential approach from the Guidelines. This would allow the most appropriate zoning to be applied to the lands with respect to their flood risk.</p> <p>It is noted however that the residential element in this proposed material alteration is Phase 2 which would not normally be delivered during the lifetime of the plan (notwithstanding footnote No. 59 -PMA No. 62). Should any school or commercial proposals come forward during the lifetime of the Plan on lands zoned 'E' and 'K', these will be subject to a site specific flood risk assessment. It is also noted that it is proposed to zone a strip of land as 'Open Space' to the east of the Phase 2 New Residential land to compensate for the flood zone located within the Phase 2 land.</p>	<p>It is recommended that the current zoning of Strategic Reserve is maintained until completion of the updated flood mapping and the sequential approach can accurately be applied.</p>

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
63	Amend Land Use Zoning Map 11.1 by changing the zoning of the area outlined in yellow in the image below from 'B: Existing Residential' to 'K: Commercial / Residential' and any consequential amendments.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
64	Amend Land Use Zoning Map 11.1 by changing the zoning of the area outlined in yellow in the image below from 'B: Existing Residential' to 'R: Retail / Commercial' and any consequential amendments.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
65	Amend Map 11.1 Land Use Zoning Map (and any consequential amendments) by replacing the Open Space and Amenity and Strategic Reserve zoning to B: Existing Residential for the subject lands to reflect planning permission 18/1189 only.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
66	Amend Map 11.1 Land Use Zoning Map and Plan boundary (and any consequential amendments) to include strip of lands within the Plan boundary and zone H: Industry and Warehousing.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
67	Amend land use zoning Map 11.1 Land Use Zoning Map and LAP boundary (and any consequential amendments) to include the Industry and Warehousing zoning under site identified H (5).	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
68	Amend Map 11.1 Land Use Zoning Map (and any consequential amendments) on site identified as H (3) on Monread Road from B: Existing Infill/Residential to H: Industry and Warehousing.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
69	Amend Map 11.1 Land Use Zoning Map (and any consequential amendments) for site on the Dublin Road (opposite junction with Blessington Road) from 'C: New Residential' to 'B: Existing Infill/Residential' and reflects the established use of the site which has been developed for residential purposes.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
70	To amend Map 11.1 by changing the zoning objective of C (11) from New Residential Phase 2 to 'I: Agriculture'.	There is no fluvial risk identified in this area. However, any agricultural developments will be required to be built in accordance in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
71	Amend Land Use Zoning Map 11.1 to change from Q: Enterprise and Employment to C: New Residential C (12) and F: Open Space and Amenity and all other consequential amendments.	The proposed residential area lies in Flood Zone C and is suitable for development. The Open Space lies within Flood Zones A and B, which is a positive change which implements the LAP Objective IO 3.4 to implement the principal of avoidance as the first priority. It also ensures development will be avoided in the flood zones and avoids encroachment on them which would reduce the available natural flood storage for the area.	The zoning change is deemed suitable and the final SFRA will be updated to note as such. This will require an alternation to a Justification Test for the area to ensure this zoning is included in the test.
72	Amend the Land Use Zoning Map 11.1 (and any consequential amendments) to extend the Open Space and Amenity zoning F (4) with the specific objective to provide for a Centre of Excellence for equine or sport.	This is a positive change which will protect an existing open space area and ensure that no inappropriate development is carried out on.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.

Proposed Material Alteration	Type of Change	Implications on Flood Risk	Comments
73	Amend the Land Use Zoning Map 11.1 (and any consequential amendments) to change C (5) from C: New Residential Phase 2 to C: New Residential.	The change in zoning does not change the vulnerability of the zoning with respect to the Table 3.1 of the Guidelines. The proposed zoning is considered highly vulnerable development. This is no material change to the content of the SFRA as the analysis will be the same as the existing zoning is also considered highly vulnerable development.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
74	Amend Land Use Zoning Map 11.1 (and any consequential amendments) to change land zoned 'I: Agriculture' to 'P' Data Centre (12 hectares) and 'F' Open Space (12 hectares).	<p>There is no fluvial risk identified in the proposed data centre area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.</p> <p>This is a positive change which will protect an existing open space area and ensure that no inappropriate development is carried out on.</p>	The zoning changes are deemed suitable and the final SFRA will be updated to note as such.
75	Amend Land Use Zoning Map 11.1 (and any consequential amendments) to reduce land zoned for E: Community and Education to include for zoning for C: New residential Phase 2 and a N: Neighbourhood Centre.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.
76	Amend Land Use Zoning Map 11.1 (and any consequential amendments) to change land zoned F: Open Space and Amenity, to B: Existing / Infill Residential.	There is no fluvial risk identified in this area. However, all developments will be required to be built in accordance with SuDS principles and in compliance with the surface water and drainage policies of the Naas LAP and Kildare County Development Plan.	The zoning change is deemed suitable and the final SFRA will be updated to note as such.

3 REVIEW OF RESIDUAL FLOOD RISK FOR GRANTED PLANNING

It is stated in the Chief Executive's report on submissions/observations received to the Draft Naas Local Area Plan 2021-2027 (dated 31st May 2021) that:

A review of the Site Specific FRA for developments currently under construction/granted planning permission (identified in the SFRA) will be undertaken and published with the SFRA Addendum Report with the PMAs to assess if there is any residual risk associated with increasing flooding to other areas.

Therefore a review of the residual risk associated with potential increasing flooding to other areas for submitted Site Specific FRAs (SSFRA) for the following planning permissions was undertaken:

1. Justification Test 14 – Blessington Road (Planning Permission 15/1060)

A review of the SSFRA for the proposed development along the Blessington Road showed that the consultants considered potential residual risk flooding to the development itself and also the downstream area, namely the Mountain View housing estate. Their hydraulic modelling indicates that there is no increase of flooding depths downstream of the development and also no alternation of the overland flow path. Therefore the flood risk downstream of the development doesn't change due to the construction of the housing development and their proposed flood mitigation measures. The proposed flood mitigation measures for the development include setting finished floor levels above the 1000 year storm event (including an allowance for freeboard) and also provide flood attenuation storage for the 100 and 1000 year events in excess of the existing flooding scenario.

Their assessment did conclude that there is potential for increased flooding if a 60% blockage was to occur at R410 culvert at the downstream part of the development. However the risk of this is minimized by having a regular landscaping maintenance regime as part of the development management.

2. Justification Test 15 – Kilcullen Road (Planning Permission 16/635)

A review of the SSFRA for the proposed development showed that the consultants considered potential residual risk flooding. There is no alternation of the existing overland flow paths and the primary mitigation measure is an attenuation area which will contain Flood Zones A and B and which will not increase flood levels downstream. The proposed attenuation area coincides with part of the existing SFRA flood zones and will form part of the proposed flood zones. The proposed flood mitigation measures for the development also include setting finished floor levels above the 1000 year storm event (including an allowance for freeboard). Any risk of blockage for the culvert under the disused railway will be minimised by having a regular landscaping maintenance regime as part of the development management.

3. Justification Test 17 Community College – (Planning Permission 16/434)

A review of the SSFRA for the proposed development showed that the consultants considered potential residual risk flooding. The SSFRA undertook hydraulic modelling and assessment to identify proposed flood zones to reduce the flood risk to the future development. The proposed mitigation measures will remove the flood zones from the site and divert them to flood storage downstream. They also considered the finished floor levels, culvert blockages and overland flow paths and their assessment found that is no residual risk to the proposed school or the surrounding area. Any risk of blockage for the culverts will be minimised by having a regular landscaping maintenance regime as part of the development management.

4 SUMMARY

RPS have reviewed the proposed material alterations with respect to the Guidelines and analysis is provided in **Table 2-1** above. We conclude that the proposed alterations are deemed suitable from a flood risk management perspective with the exception of Proposed Material Alteration No.61. It is recommended that the previous proposed zoning of Strategic Reserve is maintained for Proposed Material Alteration No.61. The final SFRA report will be updated with commentary on the flood risk for proposed changes.

Appendix A shows the Land Use Zoning Map overlaid with the proposed material alterations, the flood zones and also where a SSFRA is required.

Appendix B refers to revised Justification Tests. These revised tests are included in response to submissions received to the Draft Naas Local Area Plan 2021-2027 from the Office of the Planning Regulator (OPR) and the Office of Public Works (OPW), as set out in the Chief Executive's Report. Please note the zoning changes proposed as part of the material alternations are not shown on the figures in the Justification Tests but the final adopted material alterations will be included in the Justification Tests for the Final SFRA.

These represent an update to Justification Tests No. 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 14, 16, 17, 18 and 21, as published in the SFRA with the Draft Naas Local Area Plan 2021-2027 (9th March 2021) and are published here for clarification purposes only. Additional text in the updated tests is shown in red for ease of reference.

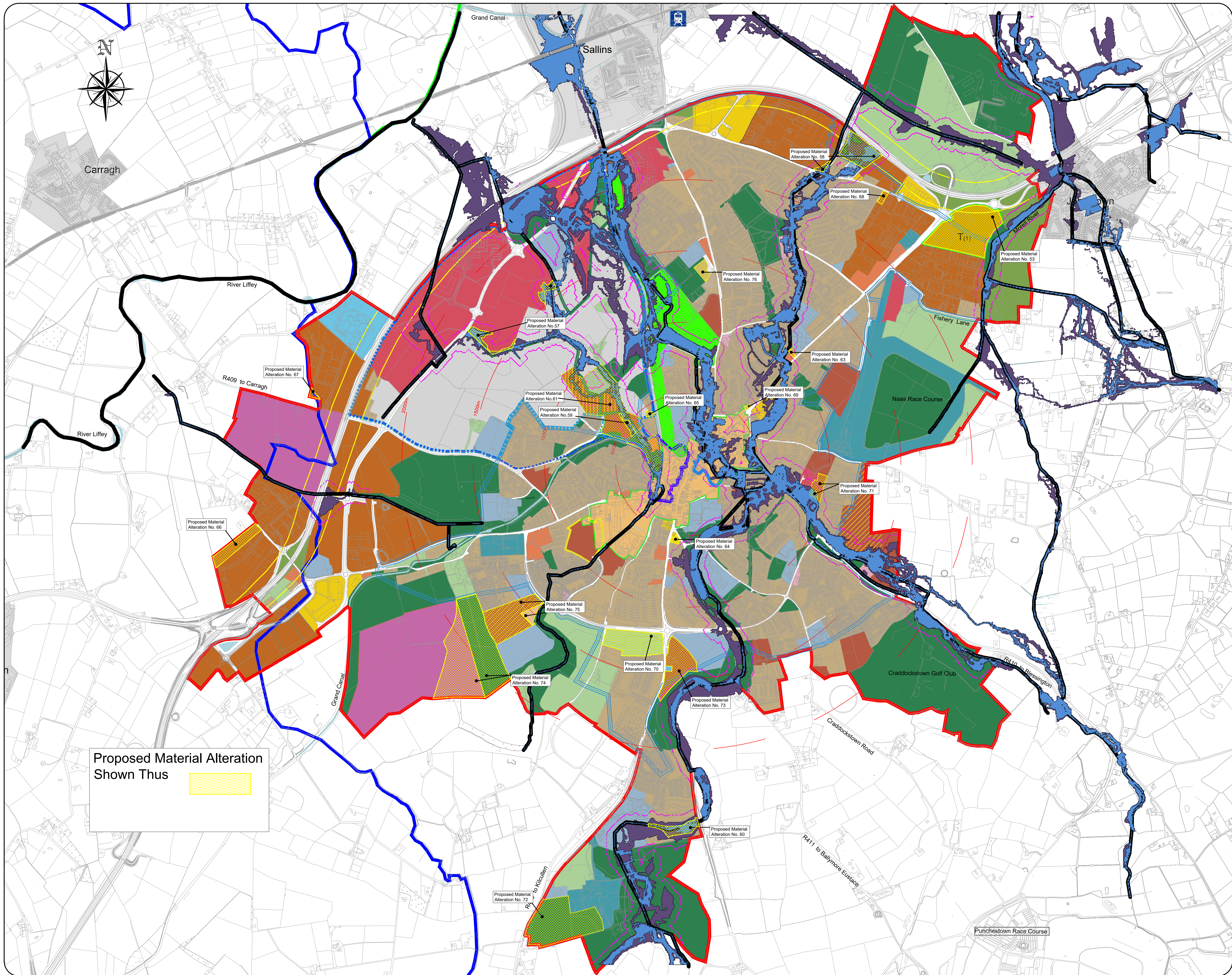
The Justification tests not included in Appendix B are:

- a. Tests for sites to which the Proposed Material Alterations refer to (i.e. Sites No. 12, 15, 19, 20, 22). These are considered in the main part of this Addendum Report only. Should these Proposed Material Alterations not be adopted, new/updated Justification tests will be prepared where required.
- b. Tests No. 3, as no change is currently suggested. Note, there is no test no. 13.

Appendix A

Land Use Zoning Map

Material Alterations Naas FRA Overlay



Draft Naas Local Area Plan
2021 - 2027

- Legend :
- Local Area Plan Boundary
 - CSO Settlement Boundary 2016
(centered on middle line)
 - A: Town Centre (M2)
 - B: Existing / Infill Residential (R2.6)
 - C: New Residential (R1.6)
 - C: New Residential Phase 2 (R1.6)
 - E: Community & Education (S1,S2,S6)
 - F: Open Space & Amenity(G4, G3)
 - F2: Strategic Open Space (G1: G3:)
 - G: Green belt (G4, G3)
 - H: Industry & Warehousing (C2.2)
 - I: Agricultural (P1)
 - K: Commercial / Residential
(Mixed Use) (M1)
 - L: Leisure & Amenity (C5)
(Tourism & Related)
 - N: Neighbourhood Centre (M3)
 - P: Data Centre/Warehouse (G4)(C7)
 - Q: Office, Enterprise & Employment (C3)
 - R: Retail / Commercial (C1.1)
 - SR: Strategic Reserve
 - T: Mixed-Use (C6)
 - U: Utilities / Services (N)
 - Approximate Line of Setback of
Development From M7
 - 500m Intervals From The Town Centre
 - River/Canal/Lakes
 - Key Development Areas
 - Regeneration Lands
 - MD Boundary Naas/Kildare-Newbridge
 - MD Boundary Naas/Clane-Maynooth

Flood Risk (SFRA) Provided by RPS Consulting

Flood Risk (SFRA)

Flood Zone A - 1% AEP Flood Event
(1 in 100 chance in any given year)

Flood Zone B - 0.1% AEP Flood Event
(1 in 1000 chance in any given year)

Flood risk assessment

Watercourses

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Stage	Date	Description
Material Alterations	07/07/2021	Report on Material Alterations & Motions Received
Draft PMA	02/03/2021 31/05/2021	Draft Plan Draft of Proposed Material Alteration

Proposed Material Alteration to
LUZ SFRA Data Map
Material Alterations

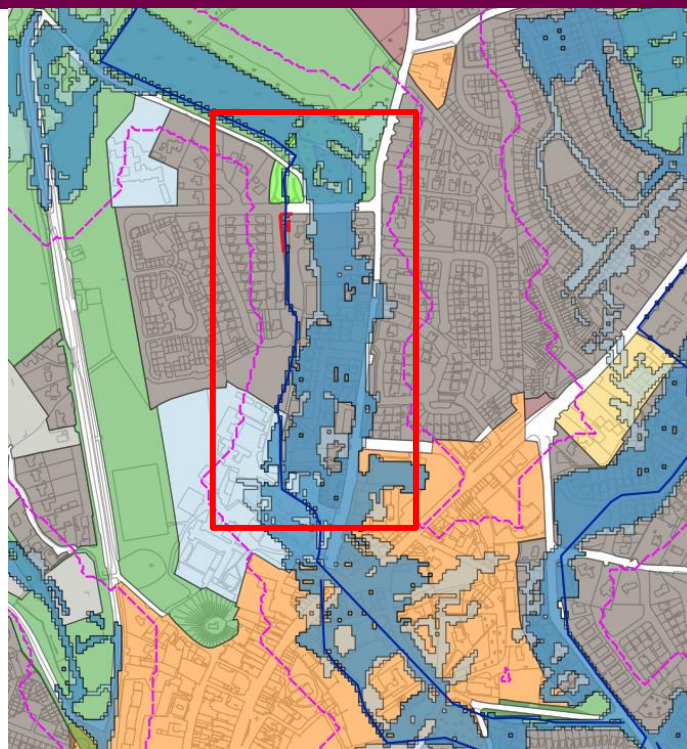
Scale:	N.T.S.	Map Ref.:	9.1
Date:	July 2021	Drawing No.:	200/20/1110

Drawn by: D H Dolan Date: 07/07/2021	Checked by: L Crawford Date: 09/07/2021	Approved by: N Curran Date: 09/07/2021
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This drawing is to be read in conjunction
with the written statement

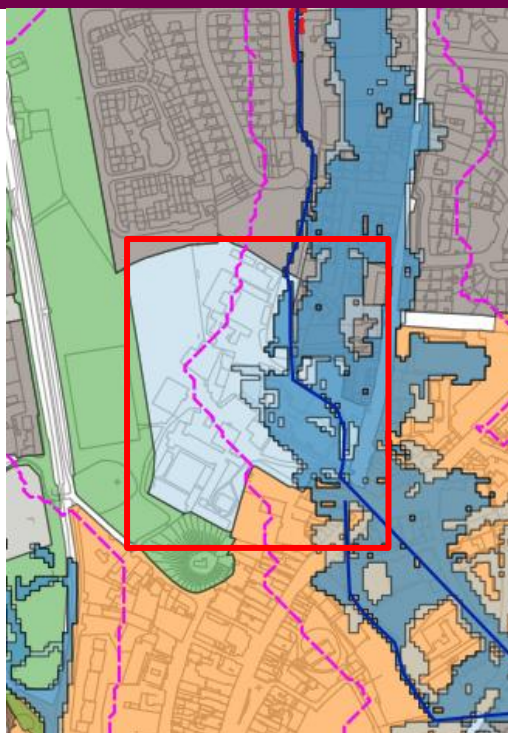
Appendix B

Justification Tests



<p>1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).</p>	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
<p>2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Land Zoned: B - Existing Residential & Infill</p> <p>Lands are in located within and adjoining the town centre, zoning is required to maintain the proper planning and development of Naas</p>
<p>(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,</p>	<p>Lands in the Millbridge Residential Estate are already developed for residential use. The zoning of the land for 'Existing Residential & Infill' will allow for infill development, where appropriate, subject to a detailed site specific Flood Risk Assessment, to consolidate the urban settlement and prevent urban sprawl.</p>
<p>(ii) Comprises significant previously developed and / or underutilized lands,</p>	<p>Yes, comprises significant previously developed lands</p>
<p>(iii) Is within or adjoining the core of an established or designated urban settlement,</p>	<p>Yes, is within the established designated urban settlement</p>

(iv) Will be essential in achieving compact and sustainable urban growth, and	<p>Whilst lands in the Millbridge Residential Estate are already developed as residential use the zoning objective allows for appropriate consolidation and infill development, where appropriate and subject to normal planning assessments including SSFRA. This aligns with achieving compact and sustainable urban growth within the urban settlement, in accordance with NSO 1 'Compact Growth' of the NPF.</p>
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	<p>Millbridge Residential Estate is already developed as residential use. Having regard to the developed nature of lands it is considered reasonable to retain the use subject to a stipulation that any development within the areas of the flood risk zone include measures to mitigate against flooding. Therefore, prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.</p>
<p>3A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>The flood mapping indicates that certain parts of Millbridge Residential Estate are within Flood Zones A and B. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Bedrooms should be located in the upstairs of two-storey buildings, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed the Naas Flood Relief Scheme (FRS) which would protect the Millbridge residential area against the 1% AEP event. The FRMP also proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>



1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).

Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas

The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.

2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:

Land Zoned: E - Community & Educational

(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,

The site adjoins lands that are within a proposed Regeneration Area, as identified in the draft Naas LAP. **The zoning of this land for Community & Education purposes would facilitate the continued use, and potential intensification, of these centrally located lands for C&E purposes, which is essential to the vitality of the town centre and urban settlement.**

(ii) Comprises significant previously developed and / or underutilized lands,

Comprises significant previously developed lands – existing established schools and church.

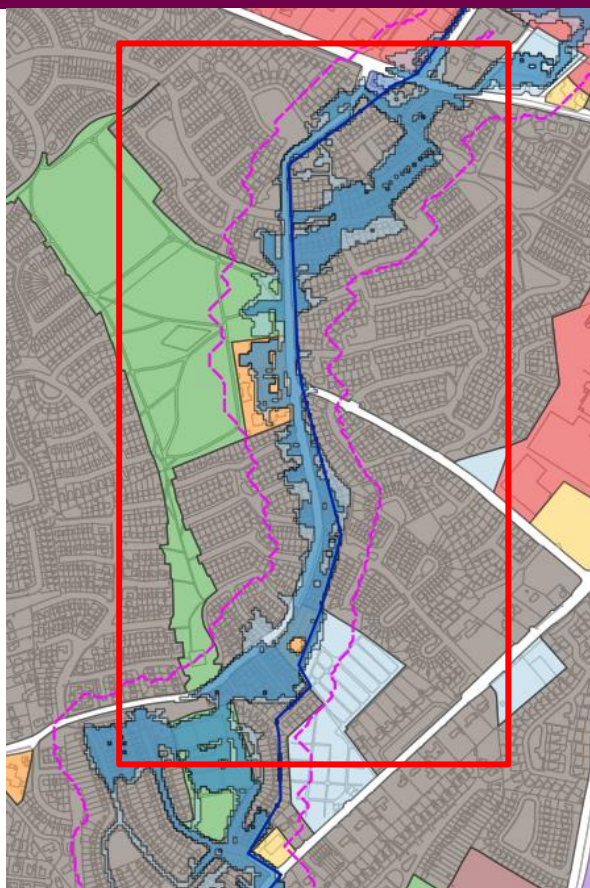
(iii) Is within or adjoining the core of an established or designated urban settlement,

Is within the established designated urban settlement and adjoins the core of the settlement.

(iv) Will be essential in achieving compact and sustainable urban growth, and

Yes, Mercy Convent school being redeveloped into a three storey 32 classroom presently.

<p>(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>Having regard to the developed nature of lands it is considered reasonable to retain the use subject to a stipulation that the areas within the flood risk zone include measures to mitigate against flooding. Prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.</p>
<p>3A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>The flood mapping indicates that certain parts of Mercy's Convent Primary School and St Mary's Secondary School are within Flood Zone B. St David's Church is within Flood Zone A. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed the Naas FRS which would protect the church and schools against the 1% AEP event. The FRMP also proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>



1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).

Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas

The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.

2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:

Land Zoned: B - Existing Residential and Infill

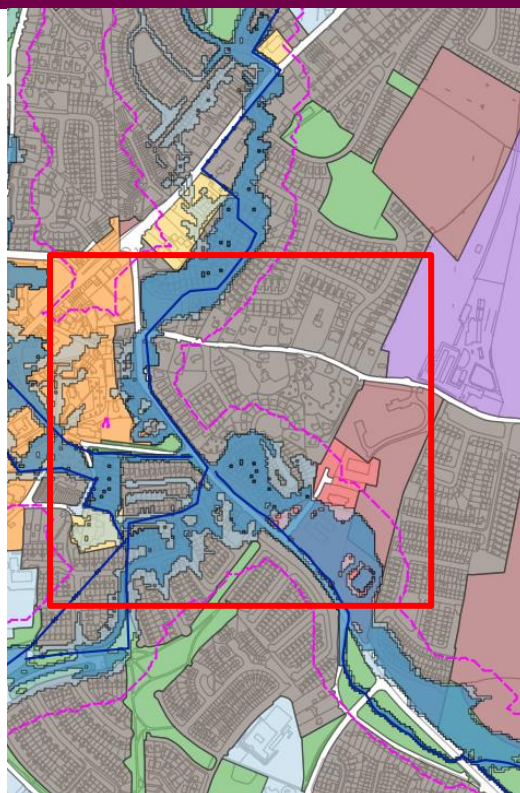
(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,

Lands at Monread Avenue are already developed for residential use. The current zoning objective allows infill development where appropriate, which will facilitate compact urban growth within the CSO town boundary, to provide opportunity to consolidate the urban settlement and prevent urban sprawl.

(ii) Comprises significant previously developed and / or underutilized lands,

Yes, comprises significant previously developed lands for residential use, with support facilities such as open space.

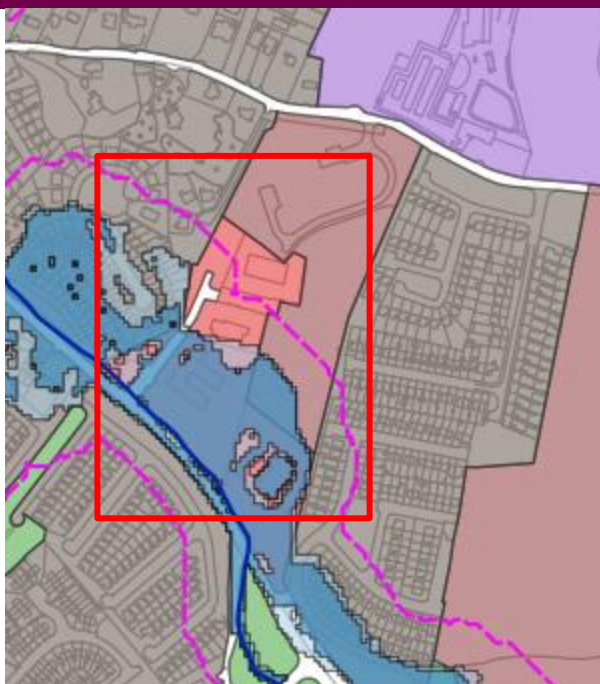
(iii) Is within or adjoining the core of an established or designated urban settlement,	Yes, is within the established designated urban settlement.
(iv) Will be essential in achieving compact and sustainable urban growth, and	Whilst lands are already developed as residential use, the zoning objective allows for appropriate consolidation and infill development, where appropriate and subject to normal planning assessments including SSFRA. This aligns with achieving compact and sustainable urban growth within the urban settlement, in accordance with NSO 1 'Compact Growth' of the NPF.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Monread Avenue residential estates are already developed for residential use. Having regard to the developed nature of lands it is considered reasonable to retain the use subject to a stipulation that development of areas in the flood risk zone include measures to mitigate against flooding. Therefore, prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.
3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the residential estates adjacent to Monread Avenue are within Flood Zone A. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <p>Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain.</p> <ul style="list-style-type: none"> • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Bedrooms should be located in the upstairs of two-story buildings, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed the Naas FRS which would protect the Monread area against the 1% AEP event. The FRMP also proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval</p>



Note: This Justification test refers to the 'Existing Residential & Infill' zoning only.

<p>1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).</p>	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
<p>2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Land Zoned: B - Existing Residential and Infill.</p>
<p>(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,</p>	<p>Lands comprising of residential estates at Dublin Road and Blessington Road are already developed for residential use. The current zoning objective allows infill development where appropriate, which will facilitate compact urban growth within the urban settlement and CSO town boundary, to align with the strategic outcomes of the NPF.</p>
<p>(ii) Comprises significant previously developed and / or underutilized lands,</p>	<p>Yes, comprises significant previously developed lands for residential use, with support facilities such as open space.</p>

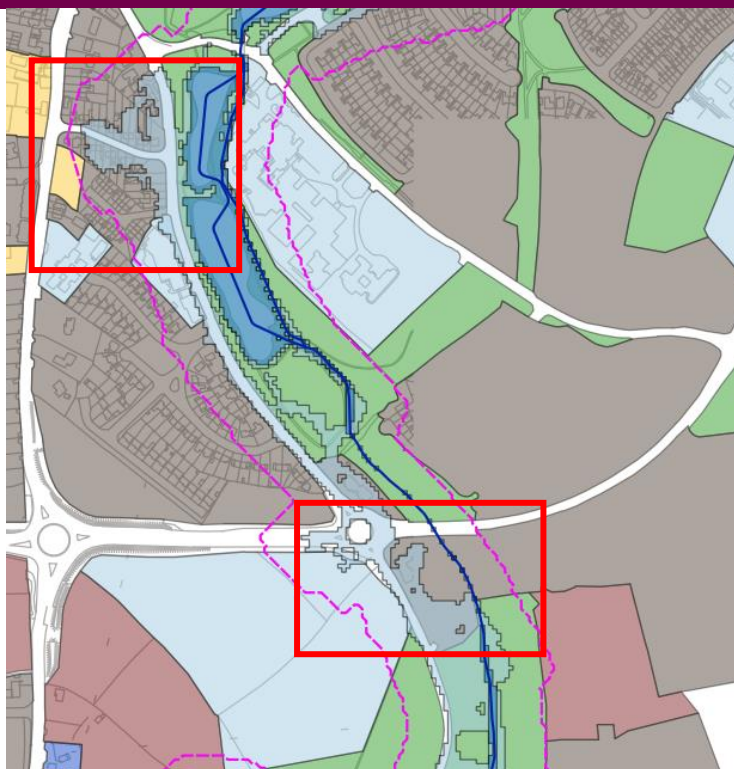
(iii) Is within or adjoining the core of an established or designated urban settlement,	Yes, is within the established designated urban settlement
(iv) Will be essential in achieving compact and sustainable urban growth, and	Whilst lands are already developed as residential use, the zoning objective allows for appropriate consolidation and infill development, where appropriate and subject to normal planning assessments including SSFRA. This aligns with achieving compact and sustainable urban growth within the urban settlement, in accordance with NSO 1 'Compact Growth' of the NPF.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Residential areas on Dublin Road and Blessington Road are already developed for residential use. Having regard to the developed nature of lands it is considered reasonable to retain the use subject to a stipulation that any development of the areas within the flood risk zone include measures to mitigate against flooding. Therefore, prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.
3A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the residential estates adjacent to Dublin Road and Blessington Road are within Flood Zone A. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <p>Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain.</p> <ul style="list-style-type: none"> Should address climate change scenarios in relation to FFLs and potential mitigation measures, Finished floor levels should be above the 0.1% AEP level, Bedrooms should be located in the upstairs of two-story buildings, Flood resilient construction materials and fittings should be considered, and Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed the Naas FRS which would protect the properties in these residential areas against the 1% AEP event. The FRMP also proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval</p>



Note: This Justification test refers to the 'Q' zoning only.

1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:	Land Zoned: Q - Enterprise and Employment.
(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,	Lands occupied by Blessington Road Business Park are already developed and are located within the CSO boundary of the town. The current zoning objective facilitates the appropriate consolidation and expansion of existing enterprise and employment uses which is essential to the vitality of the urban settlement.
(ii) Comprises significant previously developed and / or underutilized lands,	Yes, comprises significant previously developed lands for business / employment use.
(iii) Is within or adjoining the core of an established or designated urban settlement,	Yes, is within the established designated urban settlement.
(iv) Will be essential in achieving compact and sustainable urban growth, and	Lands are already developed for business/employment use. It is considered that the current zoning objective allows for appropriate consolidation, providing employment opportunities, close to the

	town centre and residential areas, and facilitates compact urban growth, to align with national strategic outcomes of the NPF.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	The lands occupied by Blessington Road Business Park are already developed. Having regard to the developed nature of lands it is considered reasonable to retain the use subject to a stipulation that further development of areas within the flood risk zone include measures to mitigate against flooding. Therefore, prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.
3A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the Business Park are within Flood Zone A and B. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed the Naas FRS which would reduce risk to the commercial properties in these areas against the 1% AEP event. The FRMP also proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval</p>



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2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:

Land Zoned: B - Existing Residential and Infill.

(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,

Lands at the Ballymore Eustace Road are already developed for residential use. **The current zoning objective would facilitate appropriate infill development within the CSO settlement boundary.**

(ii) Comprises significant previously developed and / or underutilized lands,

Yes, comprises significant previously developed lands for residential use, with support facilities such as open space.

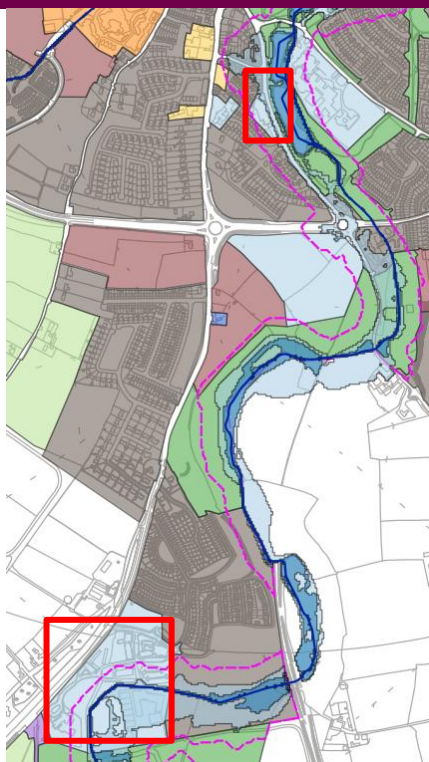
(iii) Is within or adjoining the core of an established or designated urban settlement,

Yes, is within the established designated urban settlement.

(iv) Will be essential in achieving compact and sustainable urban growth, and

Lands are already developed as residential use. **The zoning objective would allow for appropriate infill development within the**

	CSO town boundary which would promote compact urban growth and align with NSO 1 'Compact Growth' of the NPF.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Ballymore Eustace Road residential estates are already developed for residential use. Having regard to the developed nature of lands it is considered reasonable to retain the use subject to a stipulation that further development of lands within areas subject to flood risk include measures to mitigate against flooding. Therefore, prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.
3A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the residential estates adjacent to Ballymore Eustace Road are within Flood Zone B. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Bedrooms should be located in the upstairs of two-story buildings, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed the Naas FRS which would protect the properties in these residential areas against the 1% AEP event. The FRMP also proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>



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Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas

The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.

2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:

Land Zoned: E - Community & Educational

(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,

Lands are significantly developed already, comprising the Vista Primary Care Centre and Piper's Hill College. **The zoning objective would facilitate appropriate consolidation / intensification of existing community facilities at these two locations, adjacent to established residential areas within the urban settlement.**

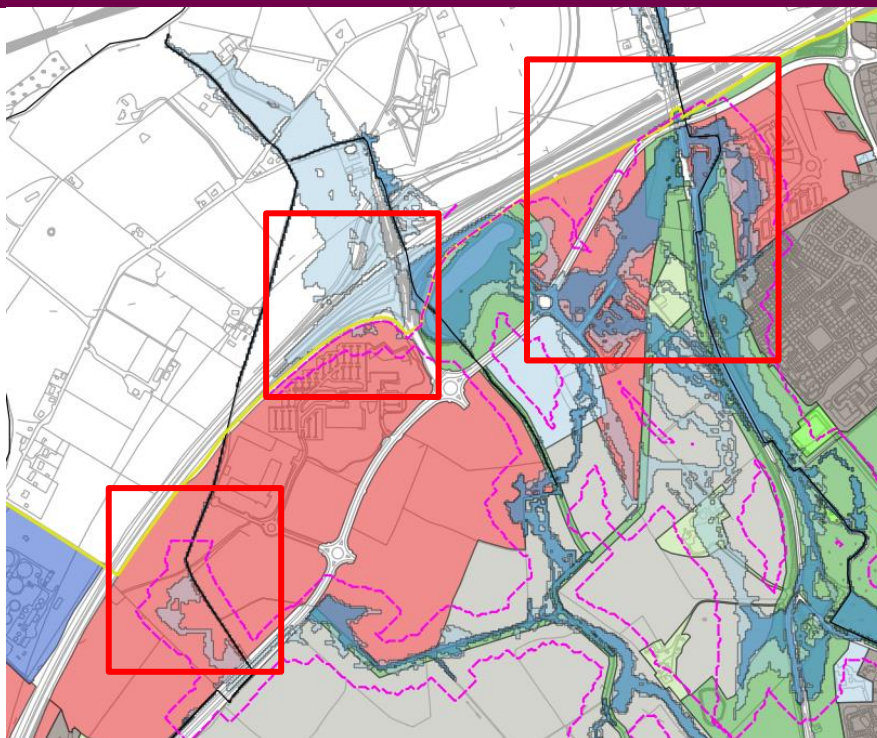
(ii) Comprises significant previously developed and / or underutilized lands,

Comprises significant previously developed lands, Vista Primary Care Centre and Piper's Hill College.

(iii) Is within or adjoining the core of an established or designated urban settlement,

While neither site is within the core of Naas, the Vista Primary Care Centre, to the north, is within an established designated urban settlement, while Piper's Hill College, site to the south, adjoins established designated settlement.

(iv) Will be essential in achieving compact and sustainable urban growth, and	Whilst these lands are already developed, the zoning of the lands for Community & Education purposes would facilitate the consolidation of the existing established uses, subject to a SSFRA, and avoid a further expansion of the urban settlement for community services at a peripheral location.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Having regard to the developed nature of lands it is considered reasonable to retain the use subject to a stipulation that any development within the areas in the flood risk zone include measures to mitigate against flooding. Therefore, prior to any further development being permitted on the site a SSFRA should be undertaken to the satisfaction of Kildare County Council.
3A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the two community infrastructure areas adjacent are within Flood Zone B. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Bedrooms should be located in the upstairs of two-story buildings, • Flood resilient construction materials and fittings should be considered, • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and • There is potential for flood storage to be provided in the Pipers Hill playing pitches. This could be explored during the updated hydraulic analysis. <p>The FRMP also proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>



<p>1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).</p>	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
<p>2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p> <p>(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,</p>	<p>Land Zoned: Q - Enterprise & Employment</p> <p>Whilst lands that are undeveloped will facilitate expansion of the urban settlement, the lands will not facilitate regeneration, as they are neither greenfield in nature, nor have they been recently developed. However, Millenium Park is acknowledged in RPO 4.51 of the Regional Spatial and Economic Strategy (RSES) for the Region which is an objective to strengthen the local employment base through the development of <i>inter alia</i> Millennium Park. These lands are also located within the Northwest Quadrant which is acknowledged in the Draft Plan as providing a unique opportunity to provide a sustainable urban district and decarbonized zone in proximity to the town centre.</p>

(ii) Comprises significant previously developed and / or underutilized lands,	Comprises significant underutilised lands (Greenfield in nature), though also contains some areas of significant development to the east of the 'E' Community and Education lands.
(iii) Is within or adjoining the core of an established or designated urban settlement,	Is proximate to the designated urban settlement but lands are not within the core of Naas. These lands form part of a strategic land bank that is of significant importance to the consolidation and orderly growth of Naas town to prevent urban sprawl, to promote compact growth and achieve sustainable mobility, all national strategic outcomes of the National Planning Framework.
(iv) Will be essential in achieving compact and sustainable urban growth, and	Development of these lands, where they remain to be developed will be essential in achieving sustainable and connected urban growth. Development here will assist in consolidating the urban form of Naas, allowing connection of the core to Naas periphery.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There are other suitable alternative lands for employment use in areas at lower risk of flooding. These lands however will allow for a connection of the employment arc at Millennium Park with the core of Naas. Having regard to the semi-developed nature of lands it is considered reasonable to zone the lands subject to a stipulation that any development within the area in the flood risk zone include measures to mitigate against flooding. Therefore, prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.
3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the Millennium Link Business Park are within Flood Zone A and B. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Flood resilient construction materials and fittings should be considered, • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and <p>There are no flood defence works proposed in the FRMP to protect developments within Millennium Link Business Park against the 1% AEP event. Hence the flood extents may be subject to change due to FRMP recommendations for the updated hydraulic analysis for Naas. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of that project a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>

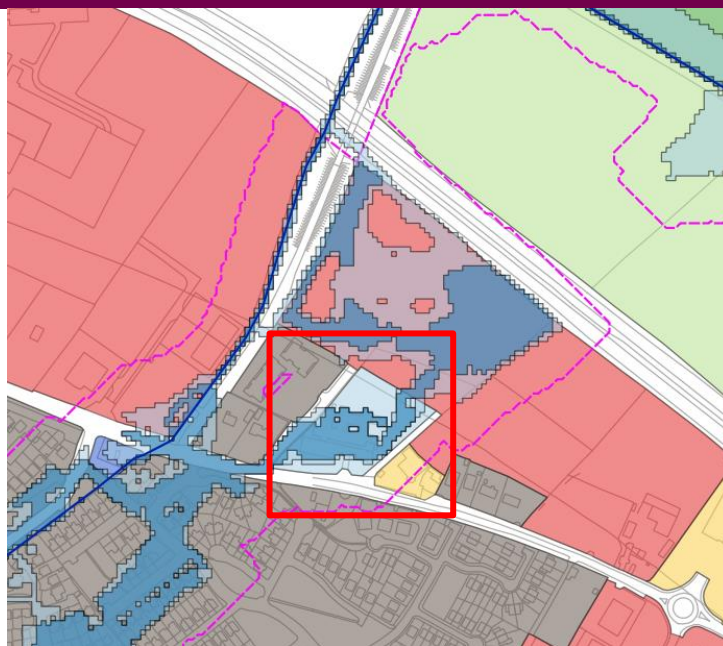
10 Naas Local Area Plan 2021-2027

Monread Avenue & Blessington Road Neighbourhood Centres



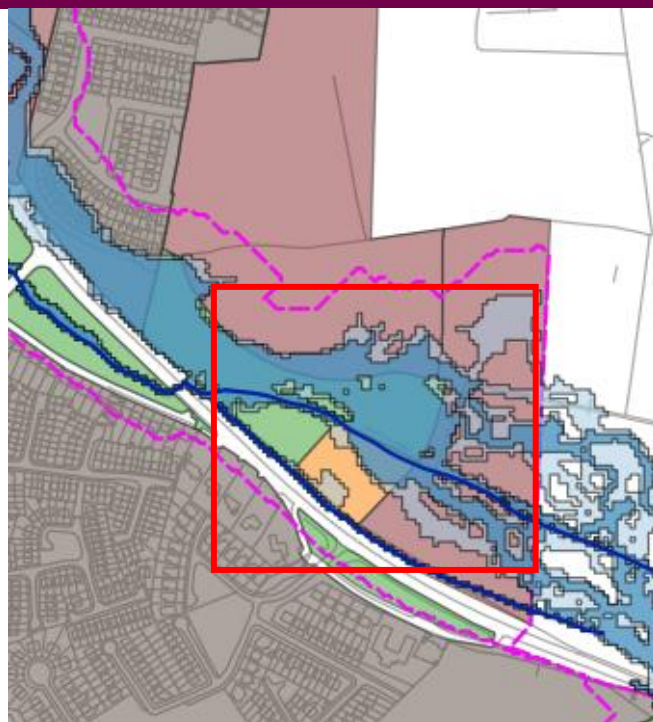
<p>1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).</p>	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
<p>2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p> <p>(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,</p> <p>(ii) Comprises significant previously developed and / or underutilized lands,</p>	<p>Land Zoned: N - Neighbourhood Centre.</p> <p>The lands at Blessington Road are considered essential to facilitate expansion of the centre of the urban settlement the land was previously zoned for residential use and there is an extant permission for a neighbourhood centre at this location. The planning application was subject to a detailed Flood Risk Assessment, which proposed mitigation measures through design. Development has commenced on foot of this planning permission, Ref. 15/1060 (ABP PL09.247411). An application has also been received to extend the duration of this permission Ref. 21/20.</p> <p>The lands at Monread Ave are previously developed.</p> <p>The lands at Blessington Road comprise significant underutilised lands that were zoned for residential use in the last Plan. Permission was granted for a housing scheme including a neighbourhood centre; and a detailed flood risk assessment formed part of the planning application.</p>

	The two neighbourhood centres located on Monread Ave have previously been developed.
(iii) Is within or adjoining the core of an established or designated urban settlement,	The lands at Monread Ave are within the established / designated urban settlement of Naas; the lands on the Blessington Road were previously zoned for residential development, have extant permission which was subject to a detailed FRA.
(iv) Will be essential in achieving compact and sustainable urban growth, and	Yes undeveloped lands at Blessington Road will be essential in achieving compact and sustainable urban growth
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Lands are either developed or have extant permission. It is considered reasonable to zone the lands subject to a stipulation that any development within areas in the flood risk zone include measures to mitigate against flooding. Therefore, prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.
3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the two community infrastructure areas adjacent are within Flood Zone B. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Bedrooms should be located in the upstairs of two-story buildings, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>



1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:	Land Zoned: E - Community & Educational
(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,	Larchfield Nursing home already in-situ.
(ii) Comprises significant previously developed and / or underutilized lands,	Comprises significant previously developed lands in the form of the nursing home.
(iii) Is within or adjoining the core of an established or designated urban settlement,	The nursing home is within the established and designated urban settlement
(iv) Will be essential in achieving compact and sustainable urban growth, and	The nursing home is already developed, there are no additional lands zoned for Community use at this location. The zoning of land for this purpose will facilitate appropriate intensification of existing established uses, subject to all normal planning assessments, including SSFRA, which will consolidate existing uses and avoid potential sprawl outside of the LAP boundary.

<p>(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>The nursing home is already developed and there are no additional lands zoned for Community use there. It is considered reasonable to zone the lands subject to a stipulation that the areas within the flood risk zone include measures to mitigate against flooding. Prior to any further development being permitted on the site a SSFRA should be undertaken to the satisfaction of Kildare County Council</p>
<p>3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>The flood mapping indicates that certain parts of the site are within Flood Zone A and B. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>

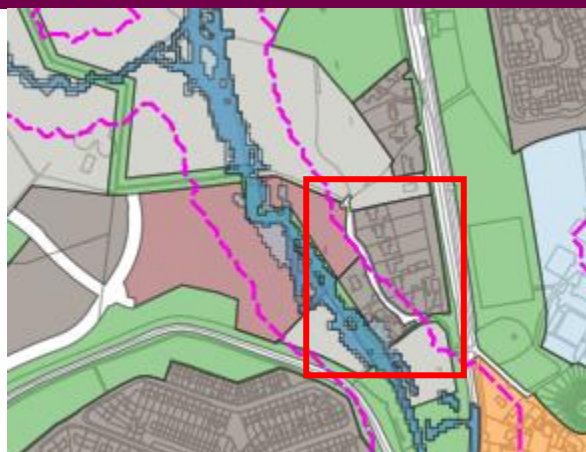


<p>1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).</p>	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
<p>2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p> <p>(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,</p> <p>(ii) Comprises significant previously developed and / or underutilized lands,</p>	<p>Land Zoned: C – New Residential</p> <p>These lands are considered appropriate expansion of the urban settlement (Blessington Road). The lands were previously zoned for residential use in the Naas Development Plan 2011 – 2017. There is extant permission on the lands for a neighbourhood centre and residential units. The planning application was subject to a detailed flood risk assessment, and permission was subsequently granted subject to the recommendations of the FRA. The permission granted reflects the areas identified as at risk of flooding.</p> <p>Comprises significant underutilised lands. The lands were previously zoned for residential units in the Naas Development Plan 2011 – 2017. There is extant permission on the lands for a neighbourhood centre and residential units. The planning application was subject to a detailed flood risk assessment, and permission was subsequently granted subject to the recommendations of the FRA. Development has commenced on</p>

	foot of this planning permission, Ref. 15/1060 (ABP PL09.247411). An application has also been received to extend the duration of this permission Ref. 21/20.
(iii) Is within or adjoining the core of an established or designated urban settlement,	Is within an established urban settlement of Naas and forms a logical and sequential extension of the town.
(iv) Will be essential in achieving compact and sustainable urban growth, and	Development of the lands will be essential in achieving compact and sustainable urban growth of Naas, as these lands form a logical and sequential extension of the town.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There are other suitable alternative lands at lower risk of flooding, however these lands were the subject of a detailed Flood Risk Assessment as part of the planning permission for houses on this site. These lands have extant permission for residential units. It is considered reasonable to retain the zoning on the lands subject to a stipulation that the areas within the flood risk zone include measures to mitigate against flooding. Prior to any further development being permitted on the site a SSFRA should be undertaken to the satisfaction of Kildare County Council.
3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the site are within Flood Zones A and B. The site was subject to a FRA for a planning application which recommended a series of flood risk mitigation measures including setting minimum floor levels above design flood waters, installation of flow control devices and construction of compensatory storage areas. The proposed attenuation area coincides with part of the existing SFRA flood zones and will form part of the proposed flood zones. The SSFRA reviewed the residual flood risk for the development / surrounding area and concluded the proposed development also does not increase flooding depths downstream and does not alter existing overland flow paths. There is limited risk due to blockages but that can be minimised by having a regular landscaping maintenance regime as part of the development management.</p> <p>These mitigation measures have not been included in the CFRAM flood zone mapping as it was generated prior to any development on the site. The construction of the development should follow the recommendations of the FRA in terms of FFLs and proposed mitigation measures.</p> <p>The pre-existing zoning should be retained but future development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>As the development has not yet been completed, the CFRAM flood zones have been adopted as the SFRA flood zones to reflect the existing flooding scenario. KCC has zoned the proposed attenuation area as part of the application as open space to recognise this area as a designated floodplain location for the future development.</p> <p>The FRMP proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed</p>

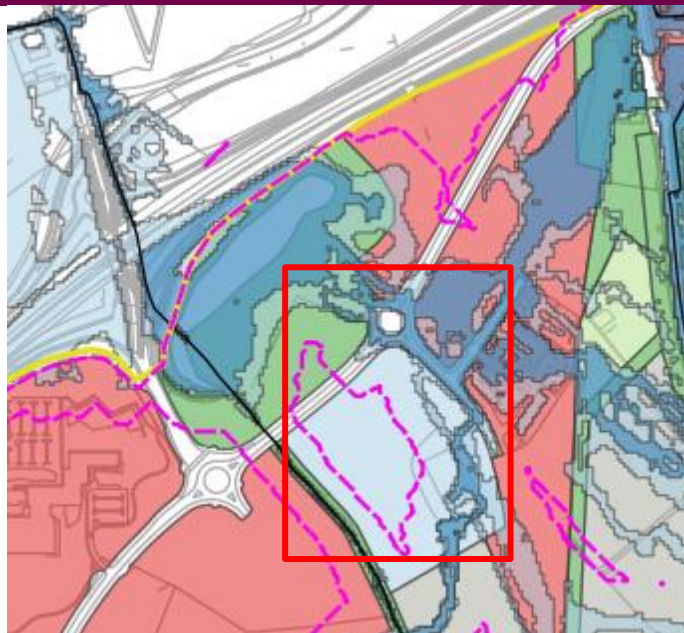
a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.

The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.



1	The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:	Land Zoned: B - Existing Residential & Infill
	(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,	Lands in the Abbey Bridge Residential Estate are already developed as residential use. The current zoning objective would facilitate infill development, where appropriate, adjacent to the centre of the urban settlement.
	(ii) Comprises significant previously developed and / or underutilized lands,	Yes, comprises significant previously developed lands
	(iii) Is within or adjoining the core of an established or designated urban settlement,	Yes, is within the established designated urban settlement
	(iv) Will be essential in achieving compact and sustainable urban growth, and	Lands in the Abbey Bridge Residential Estate are already developed as residential use. The zoning objective would allow for appropriate consolidation and infill development, where appropriate and subject to normal planning assessments including SSFRA. This aligns with achieving compact and sustainable urban growth within the urban settlement, in accordance with NSO 1 'Compact Growth' of the NPF.
	(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Abbey Bridge Residential Estate is already developed as residential use. Having regard to the developed nature of lands it is considered reasonable to retain the use subject to a stipulation that any development within the areas of the flood risk zone include measures to mitigate against flooding. Therefore, prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.

<p>3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>The flood mapping indicates that certain parts of Abbey Bridge Residential Estate are within Flood Zones A and B. The pre-existing zonings should be retained but future significant development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Bedrooms should be located in the upstairs of two-story buildings, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>The FRMP proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>
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<p>1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).</p>	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
<p>2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Land Zoned: E - Community & Educational</p>
<p>(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,</p>	<p>This site is not essential to facilitate regeneration or expansion of the centre of the urban settlement. However, construction has commenced on a 1000 pupil post primary school on these lands (Ref. 16/434) which will improve the vitality of the area in close proximity to the centre of the urban settlement and assist in linking this strategic area to the town centre in the future.</p>
<p>(ii) Comprises significant previously developed and / or underutilized lands,</p>	<p>The lands could be stated to comprise significant underutilised lands; however a new school is under construction.</p>
<p>(iii) Is within or adjoining the core of an established or designated urban settlement,</p>	<p>The lands are located within the Northwest Quadrant area, which is acknowledged in the Draft Plan as having a unique opportunity to provide a sustainable urban district and decarbonized zone in proximity to the town centre.</p>

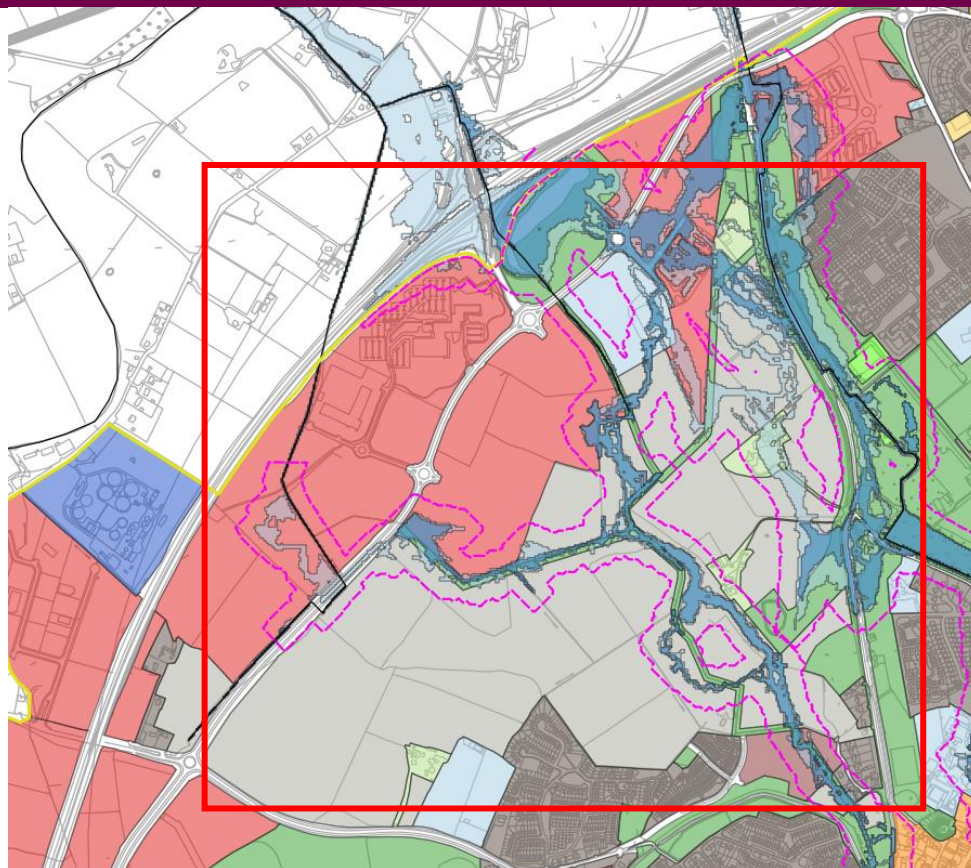
(iv) Will be essential in achieving compact and sustainable urban growth, and	The development of these lands will assist in achieving sustainable urban growth as development of these lands will connect the established core of Naas with the periphery of Naas.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	There is extant permission for a secondary school, which is currently under construction, on lands the proposed to be zoned 'E Community and Education'. The Planning application considered the issue of flood risk and detailed responses to flood risk assessment were submitted and assessed by KCC. It is considered reasonable to zone the lands subject to a stipulation that the areas within the flood risk zone include measures to mitigate against flooding. Prior to any further development being permitted a SSFRA should be undertaken to the satisfaction of Kildare County Council.
<p>3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>The flood mapping indicates that certain parts of the site are within Flood Zones A and B. The site was subject to a FRA for a planning application which recommended a series of flood risk mitigation measures. These mitigation measures have not been included in the CFRAM flood zone mapping as it was generated prior to any development on the site. The construction of the development should follow the recommendations of the FRA in terms of FFLs and proposed mitigation measures. The proposed mitigation measures will remove the flood zones from the site and divert them to flood storage downstream. The SSFRA also considered culvert blockages and overland flow paths and their assessment found that is no residual risk to the proposed school or the surrounding area. Any risk of blockage for the culverts will be minimised by having a regular landscaping maintenance regime as part of the development management</p> <p>The pre-existing zoning should be retained but future development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Flood resilient construction materials and fittings should be considered, and • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas. <p>As the development is still under construction, the CFRAM flood zones have been adopted as the SFRA flood zones to reflect the existing flooding scenario.</p> <p>The FRMP proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The</p>

revision of the predicted flood extents will be subject to KCC approval.

18

Naas Local Area Plan 2021-2027

Strategic Reserve – Northwest Quadrant



(Note: This Justification test refers to the 'Strategic Reserve' zoning objective only)

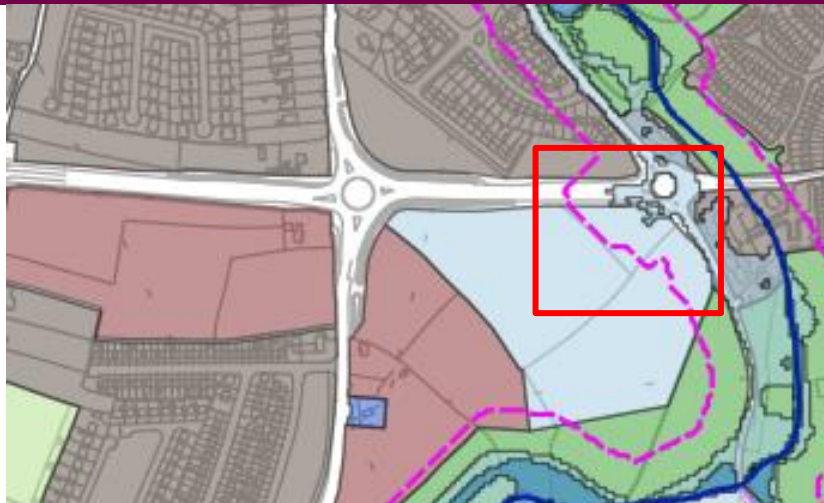
<p>1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).</p>	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
<p>2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Land Zoned: SR – Strategic Reserve</p>
<p>(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,</p>	<p>This site is not essential to facilitate regeneration or expansion of the centre of the urban settlement. However, this strategic land bank is of significant importance to the consolidation and orderly growth of Naas</p>

	town to prevent urban sprawl, to promote compact growth and achieve sustainable mobility, all national strategic outcomes of the NPF.
(ii) Comprises significant previously developed and / or underutilised lands,	The lands could be stated to comprise significant underutilised lands;
(iii) Is within or adjoining the core of an established or designated urban settlement,	The lands are not within or adjoining the core of an established or designated urban settlement.
(iv) Will be essential in achieving compact and sustainable urban growth, and	The development of these lands will assist in achieving sustainable, connected urban growth as development of these lands will connect the established core of Naas with the periphery of Naas.
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These lands allow for a connection of the employment arc at Millennium Park to the town centre of Naas through the development of a low carbon community. It is considered reasonable to zone the lands subject to a stipulation that the areas within the flood risk zone include measures to mitigate against flooding. These lands will be subject to the preparation of a masterplan which will be informed by the updated Flood Risk Study for Naas.
3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment	<p>The flood mapping indicates that certain parts of the lands are within Flood Zone A and B. The proposed zonings can be allocated but future development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Flood resilient construction materials and fittings should be considered, • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and • The Strategic Reserve Area also be subject to a SFRA, following completion of the updated modelling exercise, which will examine the flood zones in further detail and lead to the zoning being refined to follow the sequential approach. • The lands designated as strategic reserve are also be subject to masterplan with associated objective to ensure that no development will be progressed until the masterplan is complete & integrated into the LAP by way of a statutory amendment following the completion of the updated modelling exercise. <p>The FRMP proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate</p>

the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.

21 Naas Local Area Plan 2021-2027

Craddockstown Community Zoning



<p>1 The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the planned direction for growth within the Greater Dublin Area up to 2022 by giving regional effect to national planning policy under the National Spatial Strategy (NSS).</p>	<p>Naas is one of two Key Towns in Co. Kildare as identified in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. Key Towns are defined in the RSES as large towns which are economically active towns that provide employment for their surrounding areas. They have high quality transport links and the capacity to act as a regional driver to complement Regional Growth Centres. The designation of Naas as a Key Town is reflective of its county town status. The RSES recognises that there are strong links between Naas and the nearby settlements of Sallins and Newbridge, with a strong interrelationship of services, employment and education between Naas and Newbridge. The RSES also states that consolidation and the regeneration are key development priorities for Naas</p> <p>The RSES provides regional level strategic planning and economic policy in support of the implementation of the NPF and provide a greater level of focus around the National Policy Objectives and National Strategic Outcomes of the NPF.</p>
<p>2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Land Zoned: E - Community & Educational</p>
<p>(i) Is essential to facilitate regeneration and / or expansion of the centre of the urban settlement,</p>	<p>No, this site is not essential to facilitate regeneration or expansion of the centre of the urban settlement.</p>
<p>(ii) Comprises significant previously developed and / or underutilized lands,</p>	<p>The lands could be stated to comprise significant underutilised lands;</p>
<p>(iii) Is within or adjoining the core of an established or designated urban settlement,</p>	<p>The lands are not within or adjoining the core of an established or designated urban settlement.</p>
<p>(iv) Will be essential in achieving compact and sustainable urban growth, and</p>	<p>The development of these lands will assist in achieving sustainable, connected urban growth as development of these lands will connect the established core of Naas with the periphery of Naas.</p>
<p>(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>There are other suitable alternative lands for Community employment use in areas at lower risk of flooding, however these lands will allow for the provision of essential community facilities in the future within the LAP and settlement boundary. These lands however will allow for a connection of the</p>

	<p>employment arc at Millennium Park to the centre of Naas. It is considered reasonable to zone the lands subject to a stipulation that the areas within the flood risk zone include measures to mitigate against flooding. Prior to any further development being permitted on the site a SSFRA should be undertaken to the satisfaction of Kildare County Council.</p>
<p>3 A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>The flood mapping indicates that a small area of the site overlaps with Flood Zone. The proposed zonings can be allocated but future development in this area should be subject to a SSFRA. SSFRAs should address the following:</p> <ul style="list-style-type: none"> • Apply sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain, • Should address climate change scenarios in relation to FFLs and potential mitigation measures, • Finished floor levels should be above the 0.1% AEP level, • Flood resilient construction materials and fittings should be considered, • Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and <p>The FRMP proposed further hydraulic analysis to be undertaken as a first phase of the Naas FRS to refine defences and improve understanding of the flooding mechanisms. KCC have appointed a consultant to complete the FRMP measures identified for Naas and following the completion of the flood mapping stage of the FRS a review of the flood extents will be undertaken and if required KCC will carry out an update to the SFRA and an amendment of the LAP. Any FRA should be cognisant of these proposed flood defences for Naas.</p> <p>The flood extents may be subject to change due to FRMP recommendations outlined above. Therefore in the interim if a SSFRA were to re-evaluate the predicted flood extents for a proposed development site a hydraulic model of an appropriate scale is required to be constructed. The outputs from the hydraulic model will be expected to consist of sufficient detail and analysis to demonstrate the revised Flood Zone A and B flood extents. The revision of the predicted flood extents will be subject to KCC approval.</p>