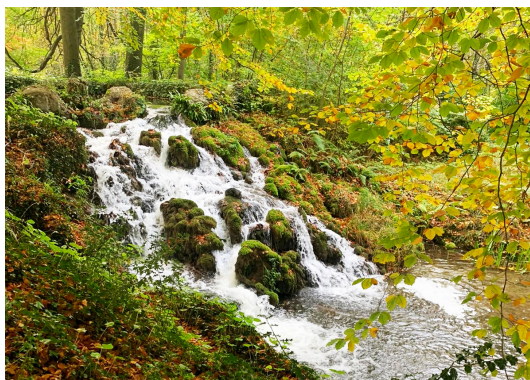


# Chief Executive's Report

On submissions/observations received to the  
Draft Naas Local Area Plan 2021 - 2027



Planning Department, Kildare County Council  
May 2021



Planning Department,  
Kildare County Council  
Áras Chill Dara, Devoy Park  
Naas, Co. Kildare W91 X77F

**Report date: 31<sup>st</sup> May 2021**

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## Glossary

|       |                                                                                 |
|-------|---------------------------------------------------------------------------------|
| AA    | Appropriate Assessment                                                          |
| CDP   | County Development Plan                                                         |
| CARO  | Climate Action Regional Office                                                  |
| DMURS | Design Manual for Urban Roads and Streets                                       |
| EMRA  | East and Midlands Regional Assembly                                             |
| HNDA  | Housing Needs Demand Assessment                                                 |
| LAP   | Local Area Plan                                                                 |
| NPF   | National Planning Framework                                                     |
| NSTS  | Naas/Sallins Transport Strategy                                                 |
| NTA   | National Transport Authority                                                    |
| OPR   | Office of the Planning Regulator                                                |
| OPW   | Office of Public Works                                                          |
| PPN   | Public Participation Network                                                    |
| P&D   | Planning and Development                                                        |
| RSES  | Regional Spatial and Economic Strategy                                          |
| SEA   | Strategic Environmental Assessment                                              |
| SFRA  | Strategic Flood Risk Assessment                                                 |
| SPPR  | Specific Planning Policy Requirements (as referred to in Section 28 Guidelines) |
| SuDS  | Sustainable Urban Drainage Systems                                              |
| TII   | Transport Infrastructure Ireland                                                |

## **1.0 Introduction**

This report relates to submissions and observations received from members of the public and prescribed bodies following the publication of the Draft Naas Local Area Plan 2021-2027 (the draft Plan) under Section 20 of the Planning and Development Act 2000 (as amended).

### **1.1 Legislative Requirements**

In accordance with Section 20 of the Planning and Development Act 2000 (as amended), the Chief Executive is required to prepare a report on the submissions and observations received during the public consultation period in respect of the draft Plan. This report should list the persons who made submissions and observations, summarise the issues, give the opinion of the Chief Executive in relation to the issues raised and make recommendations in relation to the draft Plan. The recommendations should take into account the proper planning and sustainable development of the area, the statutory obligations of the local authority and relevant policies or objectives of the Government or of any Minister of the Government.

### **1.2. Public Consultation**

The Draft Naas Local Area Plan 2021-2027 was placed on public display from Tuesday, 9<sup>th</sup> March 2021 to Wednesday 21<sup>st</sup> April 2021. The draft Plan and accompanying documents were displayed on the County Council's dedicated online public consultation portal at: <https://consult.kildarecoco.ie/en/browse>

The Draft Naas Local Area Plan 2021-2027 comprises a written statement with maps and is accompanied by:

- Sustainable Planning and Infrastructure Assessment (SPIA).
- A Social Infrastructure Audit (SIA).
- Statement of Character (SoC) for the Naas Architectural Conservation Area.
- An Environmental Report on the likely significant effects on the environment on implementing the Plan - pursuant to the Planning and Development (Strategic Environmental Assessment [SEA]) Regulations 2004-2011.
- An Appropriate Assessment (AA) Screening Report - pursuant to the EU Habitats Directive (92/43/EEC).
- A Strategic Flood Risk Assessment (SFRA) Report - pursuant to Section 28 of the Planning and Development Act 2000 (as amended).

A public notice was published in the Leinster Leader on Tuesday 9<sup>th</sup> March 2021 notifying members of the public that a Draft Local Area Plan would be placed on public display from the 9<sup>th</sup> of March to 21<sup>st</sup> of April 2021.

Submissions/Observations were invited over the public consultation period. Copies of the Draft Plan, associated documents and public notice were issued to prescribed bodies, including government departments and other agencies, as required by the Planning and Development Act 2000 (as amended).

Due to restrictions relating to the Covid-19 pandemic, no live public consultation events were held. However, members of the Planning Team fielded a number of calls from members of the public with queries on the draft Plan. Kildare County Council

Social Media channels (Facebook and Twitter) were used as mechanisms in promoting awareness of the draft Plan public consultation period.

### **1.2.1 Submissions and Observations Received**

In total 883 submissions/observations were received during the public consultation period, including 12 from prescribed authorities.

The Members are advised that submissions are available for public viewing at:

<https://consult.kildarecoco.ie/en/node/1069/submissions>

## **1.3. Content of the Chief Executive's Report**

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

|                    |                                                                                                                                                                                                                    |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Section 1:</b>  | Background.                                                                                                                                                                                                        |
| <b>Section 2:</b>  | List of persons or bodies who made submissions/observations.                                                                                                                                                       |
| <b>Section 3:</b>  | Summary of issues raised in submissions/observations from the Office of the Planning Regulator (OPR) and Prescribed Bodies and the Chief Executive's opinion and recommendations in response to the issues raised. |
| <b>Section 4:</b>  | Summary of issues raised in submissions and observations by themes from all other persons or bodies and the Chief Executive's opinion and recommendations in response to the issues raised.                        |
| <b>Section 5:</b>  | Clarification of Typographical Errors in the Draft Naas Local Area Plan and Chief Executive's Proposed Material Alterations.                                                                                       |
| <b>Section 6:</b>  | Recommended Material Alterations to Draft Naas Local Area Plan.                                                                                                                                                    |
| <b>Appendix 1:</b> | Detailed summary of submissions received (numbers 13 – 883) and excluding submissions seeking Zoning Requests (see Section 4)                                                                                      |
| <b>Appendix 2:</b> | Transport Modelling Report.                                                                                                                                                                                        |
| <b>Appendix 3:</b> | Proposed Alterations to Map 9.1 LUZ SFRA Data and Map 11.1 Land Use Zoning Map                                                                                                                                     |

## **1.4. Next Steps**

Within six weeks of receiving the Chief Executive's Report, the Elected Members of Kildare County Council must consider the Chief Executive's Report and the draft Plan. Following consideration, the Members may, as they consider appropriate, by resolution, make, amend or revoke the local area plan.

If the Members decide to materially alter the draft Plan, a further period of public consultation will be necessary and the planning authority must screen the proposed material alterations to determine if a Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) or both are required for any of the Material Alterations. This screening, and if necessary, the SEA or AA, must be carried out before proceeding to the public consultation period.

The public display period of any Material Alterations is a minimum of four weeks. Submissions or observations with respect to the proposed Material Alterations will be

taken into account, before the local area plan is made. The Elected Members must consider proposed Material Alterations to the local area plan, any environmental reports and the Chief Executive's Report on any observations/submissions received and decide whether to make the local area plan with or without the Material Alterations.

Section 20(3)(r) of the Planning and Development Act 2000 (as amended) states that the Members of the Council are restricted to:

- Considering the proper planning and sustainable development of the area,
- The statutory obligations of any local authority in the area; and
- Any relevant policies or objectives for the time being of the Government or any Minister of the Government.

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

## 2.0 List of Persons/Bodies Who Made Submissions

### 2.1. Submissions and Observations Received

During the public consultation period a total of 883 submissions and observations were received. Four submissions were received after the closing date and were not considered. The list of persons, prescribed bodies, groups and stakeholders who made valid submissions is listed in Table 2.1. It is important to note that some individuals made more than one submission and where possible these were combined and summarised under one submission reference number. However, given the large volume of submissions made not all such submissions were combined. Kildare County Council would like to take the opportunity to thank those who made written submissions on the draft Plan.

**Table 2.1: Persons/Organisations who made Submissions/Observations**

| No. | Name                                                                          | No. | Name/Organisation     |
|-----|-------------------------------------------------------------------------------|-----|-----------------------|
| 1   | Environmental Protection Agency                                               | 48  | Kevin Phelan          |
| 2   | Department of Environment, Climate and Communications - Waste Management Unit | 49  | Letitia Foley         |
| 3   | Transport Infrastructure Ireland                                              | 50  | Ann Crowley           |
| 4   | Department of Transport                                                       | 51  | Harry McAdam          |
| 5   | Eastern & Midland Regional Assembly                                           | 52  | Genevieve McAdam      |
| 6   | Health Service Executive - Environmental Health                               | 53  | Yvonne Mooney         |
| 7   | Office of Public Works                                                        | 54  | Raymond Keaney        |
| 8   | National Transport Authority                                                  | 55  | John Dowling          |
| 9   | Office of the Planning Regulator                                              | 56  | Karen McCarthy        |
| 10  | Irish Water                                                                   | 57  | Deirdre Vallely       |
| 11  | Department of Education                                                       | 58  | Liam & Angela O'Brien |
| 12  | Department of Tourism, Culture, Arts, Gaeltacht, Sport & Media                | 59  | Christopher Butler    |
| 13  | M Murphy                                                                      | 60  | Siobhan Boran         |
| 14  | Brian McAdam                                                                  | 61  | Aimee O'Beirne        |
| 15  | Ross McCarthy                                                                 | 62  | Seamus MacGabhann     |
| 16  | Joanne Pender                                                                 | 63  | Paul Murphy           |
| 17  | R Burke                                                                       | 64  | Ciara MacGabhann      |
| 18  | Noel Geary                                                                    | 65  | Deirdre Vallely       |
| 19  | Diarmuid Moran                                                                | 66  | Brian Byrne           |
| 20  | Ross McCarthy                                                                 | 67  | Libera Kavanagh       |
| 21  | Jacqueline Howley                                                             | 68  | Grainne McGee         |
| 22  | Rioghnaigh Bracken                                                            | 69  | Michael Corrigan      |
| 23  | Dwayne O'Connor                                                               | 70  | Frances O'Loughlin    |
| 24  | Brian Young                                                                   | 71  | John Hughes           |
| 25  | Diarmuid Moran                                                                | 72  | Catherine Corrigan    |
| 26  | Anthony McAllister                                                            | 73  | Carol Frost           |
| 27  | Bill Enright                                                                  | 74  | Ciaran O'Loughlin     |
| 28  | Maria Grogan                                                                  | 75  | Eddie Lenehan         |



|     |                             |     |                                                        |
|-----|-----------------------------|-----|--------------------------------------------------------|
| 29  | Ronan Joyce                 | 76  | Sheelagh Pentony                                       |
| 30  | James Donnell               | 77  | Dermot Ryan                                            |
| 31  | Joseph O'Beirgin            | 78  | James Foley                                            |
| 32  | David Egan                  | 79  | Deirdre Vallely                                        |
| 33  | Bryong Egan                 | 80  | Yvonne Codd                                            |
| 34  | John Coyne                  | 81  | Mark Domican                                           |
| 35  | Bernadette Coyne            | 82  | Joseph Byrne                                           |
| 36  | R Downey                    | 83  | Sheila Byrne                                           |
| 37  | Libera Kavanagh             | 84  | Claudia Stone                                          |
| 38  | Luke Freeley                | 85  | Avril Lysiak                                           |
| 39  | Paul Farrell                | 86  | Simon Sparrow                                          |
| 40  | Fiona Maguire               | 87  | Colin Burke                                            |
| 41  | R. Downey                   | 88  | Deirdre Curtin                                         |
| 42  | Gerald Kehoe                | 89  | Mill Lane Residents Association                        |
| 43  | Alistair Conway             | 90  | Ronan Quinlan                                          |
| 44  | Frank Butler                | 91  | Moiria Walsh                                           |
| 45  | Barry McCarthy              | 92  | Fitzpatricks Garage                                    |
| 46  | Deirdre O'Neill             | 93  | Gerard Donegan                                         |
| 47  | Brendan Kelly               | 94  | Fergus Barry                                           |
| 95  | Kathleen Moran              | 143 | Tom Gallagher                                          |
| 96  | John Kehoe                  | 144 | Ronan Elliffe                                          |
| 97  | Marian Stapleton            | 145 | Helena Hearne                                          |
| 98  | Nicola Gardiner             | 146 | Chris Bergin                                           |
| 99  | Pat Breen                   | 147 | Granis McElligott                                      |
| 100 | Bogdan Stef                 | 148 | Kevin O'Neill                                          |
| 101 | E O'Loughlin                | 149 | Yvonne Colclough                                       |
| 102 | Niall Purcell               | 150 | Anne Cosgrave                                          |
| 103 | Aine Kilduff                | 151 | Andrew McCudden                                        |
| 104 | Sean Roche                  | 152 | Joan Finn                                              |
| 105 | Aidas Cereska               | 153 | Ailbhe Gallagher                                       |
| 106 | Leanne Bright               | 154 | Carmel Gallagher                                       |
| 107 | Philip Bonner               | 155 | Miriam Cushen                                          |
| 108 | Zuzanna Ekiert              | 156 | Jackie Ronan                                           |
| 109 | Orlath Cahalan              | 157 | Geraldine Fitzpatrick                                  |
| 110 | Ruth Loughlin               | 158 | Vincent Kearns                                         |
| 111 | Bill McGrath                | 159 | Craddockstown Way, Rise and Park Residents Association |
| 112 | Mark McDaid                 | 160 | Ruth Neylon                                            |
| 113 | Stephen Ryan                | 161 | Lisa Murphy                                            |
| 114 | Liz O'Toole                 | 162 | Willi Curran                                           |
| 115 | Maria Hutchin               | 163 | Edmund Murphy                                          |
| 116 | Aisling & Anthony McCormack | 164 | Mark Neylon                                            |
| 117 | Tom Coyle                   | 165 | Burke Family                                           |
| 118 | John Kinchella              | 166 | Reid Family                                            |
| 119 | Rinske Wassenaar            | 167 | John McNally                                           |
| 120 | Keith Proctor               | 168 | Jane Durkan                                            |
| 121 | Marina Trishschenko         | 169 | David Boyse                                            |
| 122 | Marzena Kelleher            | 170 | Vincent Byrne                                          |
| 123 | Shane Blake                 | 171 | M Gleeson                                              |

|     |                             |     |                                  |
|-----|-----------------------------|-----|----------------------------------|
| 124 | Mike O'Halloran             | 172 | Sinead Prout                     |
| 125 | C E Mooney                  | 173 | Orla Mather                      |
| 126 | Brid Ryan O'Malley          | 174 | Norma Fitzpatrick                |
| 127 | David Proctor               | 175 | Thornbrook Residents Association |
| 128 | Joan Proctor                | 176 | Yvonne Clarke                    |
| 129 | Mary Byrne                  | 177 | Andy Ellard                      |
| 130 | Darragh Mulligan            | 178 | Michelle O Rafferty              |
| 131 | Meath County Council        | 179 | Niall Andrews                    |
| 132 | Claire O'Shea               | 180 | Yvonne McCormick                 |
| 133 | Ursula Ellard               | 181 | Joanne Finnegan                  |
| 134 | Stephen Power               | 182 | Roisin Stewart                   |
| 135 | Niamh Floyd                 | 183 | Breda Andrews                    |
| 136 | Cormac Ahern                | 184 | Sonya Hillis                     |
| 137 | Orla Ahern                  | 185 | Kevin Greene                     |
| 138 | Mary Garrick                | 186 | Daniel McTiernan                 |
| 139 | Christopher Foley           | 187 | Kevin Greene                     |
| 140 | Greg Hanlon                 | 188 | Annette Fadian                   |
| 141 | Gillian Quinn               | 189 | Alan Stewart                     |
| 142 | Kingsfurze Avenue Residents | 190 | Emma Fadian                      |
| 191 | Sarah Fadian                | 239 | John Murray                      |
| 192 | Aisling Byrne               | 240 | Joanna O'Byrne                   |
| 193 | Aoife Byrne                 | 241 | Paula Edgeworth                  |
| 194 | Carol Byrne                 | 242 | Ellen Creighton                  |
| 195 | Lynn Sparrow                | 243 | Lidon Group                      |
| 196 | Olivia Allen                | 244 | Brian Clohessy                   |
| 197 | Hugo Devine                 | 245 | Lidon Group                      |
| 198 | Steven Fadian               | 246 | Tanya Sweeney                    |
| 199 | Peter & Janet Conran        | 247 | Alessandra Cesari                |
| 200 | Robert Kennedy              | 248 | Sean O'Connor                    |
| 201 | Frank Fogarty               | 249 | Michael Meehan                   |
| 202 | Adrian Travers              | 250 | Liz Melia                        |
| 203 | Ian d'Alton                 | 251 | Thomas Size                      |
| 204 | Fiona Masterson             | 252 | Lena Lenehan                     |
| 205 | Carmel Geissel              | 253 | Joe McWilliams                   |
| 206 | Adrian Geissel              | 254 | Liz Dempsey                      |
| 207 | Sundays Well Res Assc       | 255 | Frank Butler                     |
| 208 | Rathasker Heights Res Assc  | 256 | Joan O'Dwyer                     |
| 209 | Paula Laffan                | 257 | Meadbh Gallagher                 |
| 210 | Lidon Group                 | 258 | Hollywood Projects Ltd           |
| 211 | Gerard Madden               | 259 | Louise Donnelly                  |
| 212 | Brian Kavanagh              | 260 | Castlekeel Ltd.                  |
| 213 | Fiona & Cathal Carville     | 261 | Jim O'Sullivan                   |
| 214 | Céire Walsh                 | 262 | Lorraine Benson                  |
| 215 | Tony Maher                  | 263 | Ruth & John Moloney              |
| 216 | Gavin McDermott             | 264 | Inland Waterways Association     |
| 217 | Simon Thomas                | 265 | Gerard Burns                     |
| 218 | Andrew Shirley              | 266 | Mary Taaffe                      |
| 219 | Doris Whelehan              | 267 | Patrick Murphy                   |

|     |                                |     |                                         |
|-----|--------------------------------|-----|-----------------------------------------|
| 220 | Karen Donoghue                 | 268 | Majella O'Keeffe                        |
| 221 | Alan Byrne                     | 269 | Rebecca Francis                         |
| 222 | Paddy Travers                  | 270 | John Walsh                              |
| 223 | Linda McDonald                 | 271 | Jim Gallagher                           |
| 224 | Emily O'Reilly                 | 272 | Donal Higgins                           |
| 225 | Niall Gallagher                | 273 | Colm Reid                               |
| 226 | Valerie Lemoisson Amand        | 274 | James Finn                              |
| 227 | Elizabeth Urell                | 275 | Fergal Gordon                           |
| 228 | David Muldoon                  | 276 | Mary Gordon                             |
| 229 | Rachel McDonald                | 277 | James Byrne                             |
| 230 | Brendan Kenny                  | 278 | Donal Bergin                            |
| 231 | Liam C                         | 279 | John Kelly                              |
| 232 | Mark Noonan                    | 280 | Aoife O'Donoghue                        |
| 233 | Anthony Gallagher              | 281 | Naas GAA                                |
| 234 | Sarah Flynn                    | 282 | David Martin                            |
| 235 | Camilla Foley                  | 283 | Amy Behan                               |
| 236 | Christine O'Sullivan           | 284 | Sarah Freeley                           |
| 237 | Claire Meehan                  | 285 | Jigginstown Green Residents Association |
| 238 | Paddocks Residents Association | 286 | Darren Lynch                            |
| 287 | Eoghan Redmond                 | 335 | Alan Cunniffe                           |
| 288 | Padraig Redmond                | 336 | Eva Walsh                               |
| 289 | CM Redmond                     | 337 | Evan Travers                            |
| 290 | Michelle Blake                 | 338 | Claire Walsh                            |
| 291 | Ivan Codd                      | 339 | Diarmuid Moran                          |
| 292 | Gerald Kehoe                   | 340 | John Johnson                            |
| 293 | Yvonne Codd                    | 341 | Brian O'Reilly                          |
| 294 | Louise Lynch                   | 342 | Davida Hulse                            |
| 295 | Donal Bergin                   | 343 | Emma Little                             |
| 296 | Cill Dara Le Gaeilge           | 344 | James Fleming                           |
| 297 | Leo Clancy                     | 345 | Marion Rackard                          |
| 298 | Origin Enterprises PLC         | 346 | DSV                                     |
| 299 | Michael O'Brien                | 347 | Phoebe Dillane                          |
| 300 | Dee Scallan                    | 348 | Brian O'Reilly                          |
| 301 | Annmarie Johnson               | 349 | Peter Kelly                             |
| 302 | Anthony McAllister             | 350 | Tracy Dwyer                             |
| 303 | Sheila Kavanagh                | 351 | Aonghus Dillane                         |
| 304 | Kay McKenna                    | 352 | Birdwatch Ireland (Kildare Branch)      |
| 305 | Ger Prenderville               | 353 | Spring Gardens Residents' Association   |
| 306 | Mark Graham                    | 354 | Liz Donohue                             |
| 307 | Geraldine Faherty              | 355 | Liebherr Construction Equipment Ltd.    |
| 308 | Fiona Maguire                  | 356 | Eimear Freeley                          |
| 309 | St. David's Church (Rev. Heak) | 357 | Colivet Family                          |
| 310 | Ruth Brennan                   | 358 | Colin O'Rafferty                        |
| 311 | Diarmuid Parker                | 359 | Cllr Bill Clear                         |
| 312 | S. Clancy                      | 360 | Treacy Group                            |
| 313 | Matthew Kelly                  | 361 | Sanctuary Landscapes Limited            |
| 314 | Maire Greevey                  | 362 | Alan Byrne                              |
| 315 | Stephanie McClintock           | 363 | Brendan Kenny                           |

|     |                                       |     |                                       |
|-----|---------------------------------------|-----|---------------------------------------|
| 316 | A Hennessy                            | 364 | Fiona Duigan                          |
| 317 | County Kildare Chamber                | 365 | Joanna O'Byrne                        |
| 318 | Diarmuid Parker                       | 366 | John Callaghan                        |
| 319 | Alan Devine                           | 367 | Cormac Ahern                          |
| 320 | Roche Group                           | 368 | Helen O'Leary                         |
| 321 | Swans on the Green                    | 369 | Yvonne Masters                        |
| 322 | Caitriona Callaghan                   | 370 | Anne Lawlor                           |
| 323 | Pat McCabe                            | 371 | Evelyn Hainsworth                     |
| 324 | H O'Connor                            | 372 | Desmond Murray                        |
| 325 | Leo Moore                             | 373 | John Byrne                            |
| 326 | Tony Gavin                            | 374 | Mishna Kowalczyk                      |
| 327 | Louise Hyland                         | 375 | Robert Finn                           |
| 328 | Aliyah Akano                          | 376 | Helen Coe                             |
| 329 | Kevin Greene                          | 377 | Mark Barrett                          |
| 330 | Mitu Rashid                           | 378 | Grace Keevans                         |
| 331 | Elma Flanagan                         | 379 | Enda Walsh                            |
| 332 | Ray O'Halloran                        | 380 | John Mulligan                         |
| 333 | Mary O'Halloran                       | 381 | Abbey Bridge and Canal Residents'     |
| 334 | J Murphy                              | 382 | Oak Park Resident's Committee         |
| 383 | John Kavanagh                         | 431 | Eamon Sinnott                         |
| 384 | John Collins                          | 432 | Landon Park Owners Management Company |
| 385 | Carraig Oscair Residents' Association | 433 | Liz Denieffe                          |
| 386 | Sheila Barrett                        | 434 | Roisin Leavey                         |
| 387 | Barbara Crawford                      | 435 | Rhonda Willoughby                     |
| 388 | Barbara Crawford                      | 436 | Alistair Conway                       |
| 389 | Corey Murphy                          | 437 | Mary Roche                            |
| 390 | Bridget Armstrong                     | 438 | Audrey Leavey                         |
| 391 | Maura Lam                             | 439 | Kings Court Residents Association     |
| 392 | Tricia Deegan                         | 440 | Joan Moran                            |
| 393 | Paul Crawford                         | 441 | Catherine Barry                       |
| 394 | Mary Phelan                           | 442 | Marie O'Neill                         |
| 395 | June Galligan                         | 443 | Sult na Sollan                        |
| 396 | Dave Shanahan                         | 444 | Social Democrats                      |
| 397 | Sharon Plant                          | 445 | Linda Doyle                           |
| 398 | Rosemarie Sheehan                     | 446 | Belmont Data Centres                  |
| 399 | John Lennon                           | 447 | Liam Grogan                           |
| 400 | Anthony Cross                         | 448 | Clyde Doyle                           |
| 401 | Orla Coleman                          | 449 | Marc Rogers                           |
| 402 | Christine Murray                      | 450 | Helen Coe                             |
| 403 | CJ Cullen                             | 451 | Jennifer Murphy                       |
| 404 | Fiona Lennon                          | 452 | Conor Winchcombe                      |
| 405 | Gail Mooney Collins                   | 453 | Declan Hayden                         |
| 406 | Daragh McKeivitt                      | 454 | Mary Roche                            |
| 407 | Richard Bridge                        | 455 | Brid Ryan O'Malley                    |
| 408 | Gráinne Duffy                         | 456 | Queally Group                         |
| 409 | Trevor Cowdell                        | 457 | Sherry Fitzgerald O'Reilly            |
| 410 | John Lennon                           | 458 | Niamh Cowdell                         |
| 411 | Conor Ó Mathúna                       | 459 | Fiona Uyema                           |

|     |                                      |     |                                          |
|-----|--------------------------------------|-----|------------------------------------------|
| 412 | Anne-Marie Freeley                   | 460 | Ian Folan                                |
| 413 | Declan McCormack                     | 461 | PJ McLoughlin                            |
| 414 | Derek O'Reilly                       | 462 | Alan Hyland                              |
| 415 | Elaine NiEochaidh                    | 431 | Eamon Sinnott                            |
| 416 | Ruairí Ó hAilín                      | 432 | Landon Park Owners Management Company    |
| 417 | Paula Somers-Kennedy                 | 433 | Liz Denieffe                             |
| 418 | Marie Daly                           | 434 | Roisin Leavey                            |
| 419 | Derek O'Reilly                       | 435 | Rhonda Willoughby                        |
| 420 | Ed Behan                             | 436 | Alistair Conway                          |
| 421 | Steven Laverty                       | 437 | Mary Roche                               |
| 422 | Michael Carroll                      | 438 | Audrey Leavey                            |
| 423 | Colm Byrne                           | 439 | Kings Court Residents Association        |
| 424 | Anne Marie Murray                    | 440 | Joan Moran                               |
| 425 | Robert Harrington                    | 441 | Catherine Barry                          |
| 426 | Hillside Drive Residents Association | 442 | Marie O'Neill                            |
| 427 | Kevin Greene                         | 443 | Sult na Sollan                           |
| 428 | Suzanne Murphy                       | 444 | Social Democrats                         |
| 429 | Kevin Maher                          | 445 | Linda Doyle                              |
| 446 | Belmont Data Centres                 | 494 | Alan Hyland                              |
| 447 | Liam Grogan                          | 495 | Shane Colclough                          |
| 448 | Clyde Doyle                          | 496 | Niamh Cowdell                            |
| 449 | Marc Rogers                          | 497 | Apple Green Service Areas Limited        |
| 450 | Helen Coe                            | 498 | Venturis Investment Group                |
| 451 | Jennifer Murphy                      | 499 | Niamh Parlon                             |
| 452 | Conor Winchcombe                     | 500 | Deirdre Parlon                           |
| 453 | Declan Hayden                        | 501 | Cllr Bill Clear                          |
| 454 | Mary Roche                           | 502 | Cllr Carmel Kelly                        |
| 455 | Brid Ryan O'Malley                   | 503 | Irene O'Neill                            |
| 456 | Queally Group                        | 504 | Millenium Properties Partnership Limited |
| 457 | Sherry Fitzgerald O'Reilly           | 505 | Eamon Sinnott                            |
| 458 | Niamh Cowdell                        | 506 | Crylock Developments LTD                 |
| 459 | Fiona Uyema                          | 507 | Megan Victory                            |
| 460 | Ian Folan                            | 508 | Glenveagh Properties PLC                 |
| 461 | PJ McLoughlin                        | 509 | Elaine Haskins                           |
| 462 | Alan Hyland                          | 510 | Eithne Ní Fhlathartaigh                  |
| 463 | Andrew Murphy                        | 511 | James Lawless TD                         |
| 464 | Dominic Mullaney                     | 512 | M Fogarty                                |
| 465 | Mary Wren                            | 513 | Bernadette Mooney                        |
| 466 | Ali Asghar Ismail                    | 514 | Deirdre Desmond                          |
| 467 | Cairn PLC                            | 515 | Vonnie Murray                            |
| 468 | Caroline Holden                      | 516 | Emma Fitzgerald                          |
| 469 | Dawn Holden Walford Holden Walford   | 517 | Claire Mahon                             |
| 470 | Elmwood Residents' Committee         | 518 | Christine Murray                         |
| 471 | Liz Dunbar                           | 519 | Inland Waterways Association of Ireland  |
| 472 | Caroline Holden                      | 520 | Ciaran Kelleher                          |
| 473 | Joseph O'Loughlin                    | 521 | Pamela Victory                           |
| 474 | Chris Conway                         | 522 | Tricia Madden                            |

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| 475 | Dawn Holden Walford Holden Walford        | 523 | Christine Murray                        |
| 476 | Sharyn McMenamin                          | 524 | Westar Group                            |
| 477 | David Buckley                             | 525 | Vincent Kelly                           |
| 478 | Michael Faherty                           | 526 | Kyran Hurley                            |
| 479 | Lynda Behan                               | 527 | Joan Branhall                           |
| 480 | Helen Coe                                 | 528 | Bob Quinn                               |
| 481 | Tom McParland                             | 529 | Susan McGrath                           |
| 482 | Larchfield Park Nursing Home -Sara Dillon | 530 | Naas Access Group                       |
| 483 | Kyran Hurley                              | 531 | Una Murphy                              |
| 484 | Deirdre Parlon                            | 532 | David Monaghan                          |
| 485 | Naas Sports Group Management              | 533 | Liam Greene                             |
| 486 | Novi-Welltel Group                        | 534 | Joseph O'Loughlin                       |
| 487 | Ann Gallagher                             | 535 | Gerard Byrne                            |
| 488 | Naas Town Team                            | 536 | Naas Tidy Towns                         |
| 489 | An Post                                   | 537 | Gerry Madden                            |
| 538 | Thomas James Kinlogh                      | 587 | Niall O'Dowda                           |
| 539 | Joan Bramhall                             | 588 | Breffni Carpenter                       |
| 540 | Niamh Skelton                             | 589 | North Kildare Branch of Social          |
| 541 | Margaret Greene                           | 590 | Rathasker Heights Residents Association |
| 542 | Michael Skelton                           | 591 | Thomas James Kinlough                   |
| 543 | Kate McCoy                                | 592 | John Miley                              |
| 544 | Yvonne Gill                               | 593 | Sean Cunnie                             |
| 545 | Emer Hynan                                | 594 | Richard Godsil RPS                      |
| 546 | Evie Sammon                               | 595 | Alan Duncan                             |
| 547 | Jackie Madden                             | 596 | Brendan Colivet                         |
| 548 | Ballymore Group                           | 597 | North Kildare Branch Social Democrats   |
| 549 | Geraldine Faherty                         | 598 | O'Reilly Family                         |
| 550 | Sean Murray                               | 599 | Edel Stewart                            |
| 551 | Colm Kenny                                | 600 | Christinah Jocklin                      |
| 552 | Conlon New Homes                          | 601 | Michael McElgunn                        |
| 553 | Declan Hayden                             | 602 | Anne and Larry Breen                    |
| 554 | Ben Doyle                                 | 603 | Megan Breen                             |
| 555 | Ailbhe Greene                             | 604 | Michaela Piare                          |
| 556 | Tesco Ireland                             | 605 | CLlr Anne Breen                         |
| 557 | IWAI Dublin                               | 606 | Francis & Stephanie Carolan             |
| 558 | David McElroy                             | 607 | Hector Ritchie                          |
| 559 | Reada Cronin TD                           | 608 | John Ward                               |
| 560 | Elaine McHale                             | 609 | Declan Curry                            |
| 561 | Donal Corcoran                            | 610 | Jim & Rosemary Bursey                   |
| 562 | Paul Sheridan                             | 611 | Kevin K Conroy                          |
| 563 | Ciara Hilliard                            | 612 | Mairin O'Malley Conroy                  |
| 564 | Gerard Victory                            | 613 | Caragh Court residents Association      |
| 565 | Anthony Egan                              | 614 | Joseph Leonard                          |
| 566 | Brian Smyth                               | 615 | John Kehoe                              |
| 567 | Kate Victory                              | 616 | Pat and Mary Courtney                   |
| 568 | Donal Knight                              | 617 | Kevin G. Conroy                         |
| 569 | Jacinta Gale                              | 618 | Deirdre O'Connell                       |
| 570 | Joseph o'Loughlin                         | 619 | John O'Connell                          |



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|-----|--------------------------------------|-----|---------------------------------|
| 571 | Bernie Lardner                       | 620 | Kathleen Ward                   |
| 572 | Elaine Devine                        | 621 | Charles Carri                   |
| 573 | Naas Rugby Football Club             | 622 | Ruby Gould                      |
| 574 | Conor Clavin                         | 623 | Lorna and Mark Walsh            |
| 575 | Ciara Breen                          | 624 | James and Mary Geraghty         |
| 576 | Debby Bernadette                     | 625 | Cormac O'Donovan                |
| 577 | Thomas James Kinlough                | 626 | Joe O'Donovan                   |
| 578 | Noel Skelton                         | 627 | Maureen Boylan                  |
| 579 | Liam Kenny                           | 628 | Orla Breen                      |
| 580 | Aidan McGovern                       | 629 | Cormac Breen                    |
| 581 | Cliona O'Brien                       | 630 | Mary Reid                       |
| 582 | Kuba Szynal                          | 631 | H. McAllister                   |
| 583 | Kildare Climate Action Linkage Group | 632 | Chris Glennan                   |
| 584 | Joseph O'Loughlin                    | 633 | Oilfield Solutions LTD.         |
| 585 | Andrina Faherty                      | 634 | Elma Flanagan                   |
| 586 | Riognagh Bracken                     | 635 | David and Barbara O'Brien       |
| 636 | John and Catherine Looby             | 685 | Catherine Corrigan              |
| 637 | Seamus Aldridge                      | 686 | Colivet Family                  |
| 638 | Norah and Liam Kennedy               | 687 | Mary Byrne                      |
| 639 | Ruby Hanley                          | 688 | Julie Byrne                     |
| 640 | Pat McCarthy                         | 689 | Alan Byrne                      |
| 641 | Barbara Hennessy                     | 690 | Ellen Byrne                     |
| 642 | Oliver Hennessy                      | 691 | Moya O'Donoghue                 |
| 643 | Aine Hennessy                        | 692 | O'Brien Fine Foods              |
| 644 | Sean O'Keeffe                        | 693 | Carmel O'Connor                 |
| 645 | Fiona O'Keeffe                       | 694 | Michael & Mary Nolan            |
| 646 | Springwood Limited                   | 695 | Mark & Fiona McCormack          |
| 647 | C Carroll                            | 696 | Anthony, Miriam & Philip Lawlor |
| 648 | Mary Gallagher                       | 697 | Larry Breen                     |
| 649 | Stephen Concannon                    | 698 | Cllr Anne Breen                 |
| 650 | Mary Concannon                       | 699 | Ines McCormack                  |
| 651 | Fidelma and Des O'Brien              | 700 | Brian O'Mullaney                |
| 652 | Gabriel and Ann Horan                | 701 | Cllr Fintan Brett               |
| 653 | Catherine Murphy T.D                 | 702 | Cllr Seamie Moore               |
| 654 | M and R O'Leary                      | 703 | Supervalu Sallins               |
| 655 | VEI Global                           | 704 | Tom O'Donovan                   |
| 656 | Joan Purcell                         | 705 | Patricia Gammell                |
| 657 | Fergus Phelan                        | 706 | Kieron Gammell                  |
| 658 | Glengolden Builders Limited          | 707 | Dolores Macken                  |
| 659 | Mae Leonard                          | 708 | Martin Waters                   |
| 660 | Mary Doyle                           | 709 | Nina Waters                     |
| 661 | Flannan Garry                        | 710 | Philip Cawley                   |
| 662 | D McNulty & E Doyle                  | 711 | A. Cawley                       |
| 663 | Mary Doyle                           | 712 | Margaret Mooney                 |
| 664 | Jim Doyle                            | 713 | Kathy Hannon                    |
| 665 | Declan McGovern                      | 714 | Teresa O'Neill                  |
| 666 | Naas Racecourse PLC                  | 715 | Emma Hannon                     |
| 667 | Joe, David and Robert Osborne        | 716 | Justin Garvey                   |
| 668 | Jimmy Kelly                          | 717 | Cathal Ruane                    |

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|-----|---------------------------------|-----|-------------------------|
| 669 | Geraldine Fox                   | 718 | Sinead Ruane            |
| 670 | Oisin Gill                      | 719 | Colm Byrne              |
| 671 | Mary Gill                       | 720 | Isabela Gjoreuolw       |
| 672 | Martin Gill                     | 721 | Dr. Keith Gardiner      |
| 673 | Moira O'Connell                 | 722 | Lisa Gardiner           |
| 674 | James McNamara                  | 723 | Niamh Greaney           |
| 675 | Springwood Limited              | 724 | Darren Greaney          |
| 676 | Dorothy Kinirons                | 725 | Nikolai Potapov         |
| 677 | SL & P O'Brien                  | 726 | Anastasiia Nadezhina    |
| 678 | Graeme and Margaret Beere       | 727 | Niamh Scanlan           |
| 679 | Clare Cleary and Family         | 728 | David & Daniel Scanlan  |
| 680 | Edevale Property Limited        | 729 | Blathnaid Harney        |
| 681 | Conor Prasad                    | 730 | Colm Dolan              |
| 682 | Munoo Prasad                    | 731 | Robbie Parsons          |
| 683 | Ravi Prasad                     | 732 | Angela Free             |
| 684 | Claire Prasad                   | 733 | Glen Blom               |
| 734 | Lindy Blom                      | 782 | Matthew McKeon          |
| 735 | Louise Reynolds                 | 783 | Bernadette Devine       |
| 736 | Mark Dillon                     | 784 | Gemma Byrne             |
| 737 | Ken Allen                       | 785 | William Dillane         |
| 738 | Laura Allen                     | 786 | Joan Butler             |
| 739 | Sinead Shannon                  | 787 | Eithne O'Reilly Higgins |
| 740 | Ruairi Hasson                   | 788 | James Higgins           |
| 741 | Graham N. Armstrong             | 789 | Ann O'Beirne            |
| 742 | Taram Davis                     | 790 | Eamon O'Brien           |
| 743 | Sinead Davis                    | 791 | Michael McCarthy        |
| 744 | Sharon Mc Eleney                | 792 | Lorna McCarthy          |
| 745 | Sean Mc Eleney                  | 793 | Paul Drennan            |
| 746 | Mark Bernard                    | 794 | Aine McDermott          |
| 747 | Gillian Cassidy                 | 795 | Jana Drennan            |
| 748 | Fiona Cashin & David Kiely      | 796 | Grainne MacGlinchey     |
| 749 | Dr. Gillian Lavelle             | 797 | Etienne Du Plessis      |
| 750 | Cian Butler                     | 798 | Emma McGrane            |
| 751 | Ricardo Paco                    | 799 | Paul McGrane            |
| 752 | Patricia Fernandes              | 800 | Mark Hendrick           |
| 753 | Ana Carolina Marcelino          | 801 | Aislinn De Debra        |
| 754 | Arom Rodrigues                  | 802 | Michael Quinn           |
| 755 | Derek Halvey                    | 803 | Marie Quinn             |
| 756 | Emily Spain                     | 804 | Shaun Malone            |
| 757 | Paul Fitzpatrick                | 805 | Francis Farrell         |
| 758 | Frankie Fitzpatrick             | 806 | Anne Farrell            |
| 759 | Sheena Breen & Peter Flanagan   | 807 | Teresa Behan            |
| 760 | Maximiliano De Aluzido Carvalho | 808 | N/A (duplicate)         |
| 761 | Cristhiane Oliveria Laima       | 809 | Imelda Behan            |
| 762 | Caroline & Herbert Croeza       | 810 | Les Harris              |
| 763 | Seamus Dolan                    | 811 | Sean Harris             |
| 764 | Linda Ryan                      | 812 | Rhona Harris            |
| 765 | Sanjay Murthy                   | 813 | Benjamin Harris         |
| 766 | Neha Redy                       | 814 | Bridget Geary           |

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|-----|------------------------|-----|-------------------------------|
| 767 | Vinicius Peres         | 815 | Antoinette Doorey             |
| 768 | Thais Almedia          | 816 | L Doorey                      |
| 769 | Nessa Hughes           | 817 | Kate Doorey                   |
| 770 | Pedro Innece           | 818 | Tara Doorey                   |
| 771 | Brendan Thereon        | 819 | Patrick Twomey                |
| 772 | Fran Thereon           | 820 | Aisling Twomey                |
| 773 | Chloe Connolly         | 821 | Molly Finnegan                |
| 774 | Sean Connolly          | 822 | Mark Finnegan                 |
| 775 | Gavin Haberlin         | 823 | Laura Deasy                   |
| 776 | Katrina Haberlin       | 824 | C. Deasy                      |
| 777 | Svetlana Mullaney      | 825 | Aoife Mason                   |
| 778 | Derek Leahy            | 826 | Neill Mason                   |
| 779 | Bernadette Bradley     | 827 | Niall Hynan                   |
| 780 | Kevin Bonner           | 828 | Grace Clancy Hynan            |
| 781 | Siobhan Hennelly       | 829 | A. Behan                      |
| 830 | J. K. Spring           | 857 | Jane McCoy                    |
| 831 | Marcella Sheehan       | 858 | Elizabeth Whelan              |
| 832 | Brian Flood            | 859 | Niamh Mahon                   |
| 833 | Bryan Flood            | 860 | Michael Mathimoe              |
| 834 | Megan Flood            | 861 | Teresa Halloran               |
| 835 | Joseph Keogh           | 862 | Siobhan & Noel O'Loughlin     |
| 836 | M Mahoney              | 863 | Dan & Olivia Byrne            |
| 837 | Vincent Walsh          | 864 | Christine Trundle             |
| 838 | Alasdair Sheridan      | 865 | Danny Trundle                 |
| 839 | Damien Breen           | 866 | Y Trundle                     |
| 840 | Robert Sheridan        | 867 | Ava Trundle                   |
| 841 | Oliver Leavy           | 868 | Debbie Trundle                |
| 842 | John Reynolds          | 869 | Mark Trundle                  |
| 843 | Jenny Reynolds         | 870 | Daniel Trundle                |
| 844 | Margaret Reynolds      | 871 | Anthony Leavy                 |
| 845 | Liz Donohue            | 872 | Phil Leary                    |
| 846 | Angela & Padraic Doyle | 873 | Joan Colfer                   |
| 847 | CA Hanrahan            | 874 | Patricia Goodwin              |
| 848 | Rita Byrne             | 875 | Rita Garvey                   |
| 849 | L Jones                | 876 | Angela Kavanagh               |
| 850 | Maureen Daley          | 877 | Paul Kavanagh                 |
| 851 | Sheila & Michael Moore | 878 | Angela Kelly                  |
| 852 | William Glennon        | 879 | Bryan J May & Adrienne Thomas |
| 853 | Breda McElroy          | 880 | Kate Solon                    |
| 854 | Tom Kiernan            | 881 | Patrick Solon                 |
| 855 | Sinead Leahy           | 882 | Margharita Solon              |
| 856 | Michael Grogan         | 883 | Gertrude Glennon              |

### 3.0 Issues Raised in Submissions/Observations from Office of the Planning Regulator & Prescribed Bodies and the Chief Executive's Opinion and Recommendations

Section 3.1 of this report sets out the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR), in accordance with Section 20(3)(c)(II)(B) of the Planning and Development Acts 2000 (as amended). The Chief Executive's opinion in relation to the issues raised by the OPR and recommendations in relation to the proposed Local Area Plan are also contained in this section.

Section 3.2 (Table 3.1) contains a summary of the 11 other submissions/observations received from prescribed bodies during the public consultation period. The Chief Executive's opinion and recommendation is set out under each submission which addresses the main issues raised in the submissions received and any recommended changes to the Draft Plan as a result. The Chief Executive's recommended deletions to the Draft Plan are shown in ~~striketrough blue~~ and recommended new text is shown in *italics red*.

#### 3.1 Submission from the Office of the Planning Regulator (OPR)

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| 9. | <b>Office of the Planning Regulator (OPR)</b> | <p><i>Issues Raised</i></p> <p>The submission from the Office of the Planning Regulator (OPR) acknowledges the considerable and evident work put into the preparation of the draft LAP against the backdrop of an evolving national and regional planning policy and regulatory context and the need to balance competing pressures within an increasingly complex system. The submission makes two recommendations and six observations. The OPR commends the Planning Authority on the quality of the draft LAP and for the comprehensive evidence base guiding the vision.</p> <p><b>Overview</b></p> <p>The OPR submission notes that the challenge for Naas is to control the pattern of development that has shifted towards the M7 Motorway, pulling the town in a northern direction and creating a peripheral arc which is detached from the established town centre and creates a disproportionate reliance on private transport modes. It noted that the draft LAP promotes notable and positive approaches to address this challenge.</p> |
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|  |  | <p>The OPR commends the Regeneration Strategy in Chapter 10 of the draft LAP and in particular notes the urban development frameworks, which demonstrate a strong commitment to delivering the growth enablers for the core region as set out in the RSES. It notes the supportive active land management measures such as site assembly and the use of Derelict Sites and Vacant Sites legislation.</p> <p>The OPR also commends the Naas/Sallins Transport Strategy which presents a comprehensive analysis of the current transport situation in Naas/Sallins and presents potential solutions to improve conditions for all modes of transport. It notes the Strategy seeks to deliver a connected and compact settlement at its core and also provides the evidential basis for zonings in relation to their impact on the motorway network and associated interchanges.</p> <p>The OPR notes that the zonings largely reflect existing development on the ground, with some infill, undeveloped sites benefitting from new zoning. The submission states that this is acceptable at this time, being mindful of RSES where the focus is on densification of the existing built urban footprint around existing public transport corridors. The OPR notes that the long-term plan for Naas, as detailed in the Transport Strategy, must continue to further consolidate urban zonings, to build a much stronger and vibrant town centre and to promote a pattern of development that is more conducive to public transport, walking and cycling modes.</p> <p>The OPR note that the general approach in the draft LAP is consistent with the RSES, the Core Strategy and provisions in the KCDP 2017-2023 and with the provisions of Sections 19(2) and 19(2B) of the Act.</p> <p><b><u>1. Population and Compact Growth</u></b></p> <p>The OPR submission notes that compact growth as a cross cutting theme is evident thought the draft LAP and also recognises the challenge of aligning residential land supply with population growth particularly with the high level of commencement and construction in the plan area. However, further information is required regarding the potential quantity of New Residential and Residential Phase 2 zoned land required to meet the housing supply targets as detailed in Table 3.3, including:</p> |
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|  |  | <ul style="list-style-type: none"> <li>• The projected residential yield from land zoned for mix of residential and other uses, as the draft LAP does not account for potential housing yield from existing residential/infill lands, town centre or commercial / residential zoned lands.</li> <li>• Densities are at variance to the <i>Sustainable Residential Development in Urban Areas Guidelines</i> and the <i>Sustainable Urban Housing: Design Standards for New Apartments Guidelines 2018</i>, including standards of between 35–40 and 35–50 uph on parcels of land within walking distance of existing and proposed bus routes. Particular reference is made to C (3) with a density of 40-60 uph at a location adjoining the defined town centre. The OPR notes that it is reasonable to have a tailored approach however, it is important that higher minimum residential densities within the ranges advised in the Guidelines to support national and regional policy objectives for compact growth are provided for.</li> <li>• The OPR submission notes the Sustainable Planning and Infrastructure Assessment report. However, the submission notes conflicts between the findings in the report and the zoning of lands. Reference is made to land zoned for Residential Phase 2 (C9 and C10<sup>1</sup>) as Tier 1 and land zoned New Residential (C8, C16, C12, C15, C10 and C7) are categorised as Tier 2. The OPR acknowledges that a sequential and balanced approach must be taken to the allocation of land, the approach must be rationalised and justified, particularly where a disconnect arises between the findings of the report and zonings in the Draft Plan.</li> </ul> <p><b>OPR Observation 1: Population and compact Growth</b><br/> The Planning Authority is requested to further rationalise and substantiate the extent of the New Residential and Residential Phase 2 zoned land to:</p> <ul style="list-style-type: none"> <li>(a) Quantify the provision of all zoned residential land, including land zoned for a mix of residential and other uses, to ensure that such provision aligns with the quantity of land necessary to accommodate housing supply targets.</li> <li>(b) Review density assumptions to estimate the quantity of zoned land.</li> <li>(c) Sequential approach to development must be applied in relation to New Residential and Residential Phase 2 lands. The findings of the SPIA should inform this approach such that</li> </ul> |
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<sup>1</sup> The site identifiers referred to were checked with the OPR and should have read C11 and C5.

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|  |  | <p>lands in proximity to the town core and categorised as Tier 1 lands are zoned for new residential use with residential phase 2 zoning afforded to Tier 2 sites where appropriate.</p> <p><b><u>2. Transport and Accessibility</u></b></p> <p>The OPR notes that the draft LAP has demonstrated consistency with the guiding principles expressed in the transport strategy for the RSES (RPO 8.1) and the Transport Strategy for the Greater Dublin Area 2016 – 2035. The Naas/Sallins Transport Strategy is referred to as a significant study presenting solutions and enhancing connectivity and compact growth. The OPR notes the importance of the N/M7 and its associated junctions being managed in terms of Government investment, in line with the relevant Guidelines, requiring the strategic function be protected and maintained. The submission notes Objective MTO 3.1(b) to safeguard the national road infrastructure however the OPR considers that the junctions should also be specified in the objective.</p> <p>Reference is made to MTO 4.1 concerning the implementation of parking standards in line with the CDP and Section 28 Guidelines but states the draft LAP should clarify that maximum limits apply in accordance with RPO 8.1.</p> <p><b>OPR Observation 2: Transport and Accessibility</b></p> <p>The Planning Authority is requested to:</p> <ul style="list-style-type: none"> <li>(a) Amend Objective MTO 3.1(b) to ensure that the development and carrying capacity of not only the M7 but also its junctions (9, 9a &amp; 10) are safeguarded.</li> <li>(b) Amend Objective MTO4.1 in the draft LAP to clarify that the residential car parking standards promoted are maximum limits for the purpose of consideration of residential applications in Naas.</li> </ul> <p><b><u>3. Climate Action</u></b></p> <p><b><u>3.1 Modal Share</u></b></p> <p>Climate mitigation and adaptation are well integrated throughout the draft LAP. Policy objectives should be climate proofed and contribute to the wider county objectives and further contribute to the national long-term goals of achieving net zero emissions by 2050. Following the CDP review additional targets and specific measures may need to be included in the LAP.</p> |
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|  |  | <p>The OPR would welcome the incorporation of modal share targets based on the implementation of the road and street network objectives, providing a means of monitoring the progress of actions and connectivity measures and assist in meeting the town's land use, regeneration, and related sustainability objectives.</p> <p><b>OPR Recommendation 1: Climate Action and Modal Share Targets</b><br/>The planning authority is required to include modal shift targets which will assist in measuring the outcomes of infrastructure measures promoting sustainable transport in the town.</p> <p><b>3.2 Data Centre Development</b><br/>The submission acknowledges that the draft LAP states that development of the Northwest Quadrant and sites identified for Data Centre developments could benefit from the roll out of a district heating network. Reference is also made to Objective WH 1.2 seeking to ensure that all significant development proposals on the sites, designated for Data Centres carry out an Energy Analysis and explore the potential for the development of low carbon district heating networks. The OPR submission states that this is supported by RPO 7.40 which promotes high levels of energy conservation, energy efficiency and the use of renewable energy sources in buildings.</p> <p>The OPR are concerned that the location of the data centre sites have not been considered in the context of developing a viable district heating network, in particular site P1 with the M7 creating a barrier.</p> <p>The submission states that consideration should be given to the use of heat mapping or other appropriate analysis, as supported in RPO7.38, thereby better connecting the need and the sources in order to reduce the cost of heat and greenhouse gases emissions.</p> <p><b>OPR Observation 3: Climate Action and Data Centre Sites</b><br/>The Planning Authority is requested to further rationalise and substantiate the spatial location of the two identified data centre sites (P1 &amp; P2) in the Draft Plan relative to future development and growth locations in Naas and with particular regard to the barrier created by the heavily trafficked M7 which is likely to complicate any District Heating implementation in the future. The use of heat mapping</p> |
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|  |  | <p>should be considered to inform the identification of sites for the provision of such high energy demand uses, in accordance with the provisions of Regional Policy Objective 7.38.</p> <p><b>3.3 Flood Risk Management</b></p> <p>The submission notes that there is high uncertainty regarding flood risk in Naas due to poor availability of model calibration events and possible interconnection between fluvial and surface water drainage and canal systems.</p> <p>The submission states that pending an update of the SFRA and a possible flood scheme for the town, as detailed in the FRMP, the Office considers that a precautionary approach to flooding should be adopted and that the zoning of undeveloped land that is subject to flooding, particularly on land removed from the town centre, is premature.</p> <p>The submission notes that Justification Tests were carried out for a number of sites, subject to flooding. It is suggested that a number of sites zoned within the Draft LAP do not comply with all of the criteria set out in Box 4.1 Justification Test of the Guidelines having regard to their position removed from the town centre, the non-essential nature of the sites for regeneration purposes, and the availability of alternative lands. The OPR states the zoning is considered premature pending the updated SFRA and masterplan for the NWQ.</p> <p>The OPR are also concerned over the zoning of attenuation/floodplain areas associated with and within the permitted residential lands at Tipper Road and new Residential lands at Kilcullen Road which would be more appropriately zoned for floodplain/compensatory storage, as a water compatible type, to reflect this use and prevent encroachment and/or loss of floodplain.</p> <p>Secondly the OPR state that it is unclear whether the SFRA has considered the implications for flood risk off site from flood mitigation measures forming part of permitted development/development under construction.</p> <p><b>OPR Recommendation 2: Flood Risk</b></p> <p>The Planning Authority, in consultation with the OPW, is required to:</p> |
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|  |  | <p>(a) Re-evaluate the findings of the Justification Test detailed in the Strategic Flood Risk Assessment and ensure that sites subject to flooding and identified for development purposes satisfy all of the criteria set out in Box 4.1 Justification Test.</p> <p>(b) Remove enterprise and employment zoning from land identified as Q2, Q3 and Q5 which is subject to flooding and reconsider identifying such land for water compatible uses, or as a Strategic Reserve for inclusion and consideration in the masterplan that is to be prepared following further flood analysis in the area.</p> <p>(c) Remove industry and warehousing zoning from land identified as H4 and residential land (including phase 2) identified as C (3) and C (8) which is subject to flooding and reconsider identifying such land for water compatible uses.</p> <p>(d) Zone attenuation / floodplain areas associated with within the permitted residential lands at Tipper Road and new Residential lands at Kilcullen Road for floodplain/compensatory storage, as a water compatible type.</p> <p>(e) Consider in the SFRA the potential for flood risk mitigation measures (as identified in SSFRAs carried out for developments currently under construction/granted planning permission), to increase flooding to other areas.</p> <p><b>4. Economy and Employment</b></p> <p>The OPR considers that the retail policies in the draft LAP could be strengthened. The Draft LAP does not address the provision of retail warehousing and specifically it is noted that retail warehousing is not listed as a land use within Table 11.3 Land Use Zoning Matrix.</p> <p>The Land Use Zoning Matrix provides limitations and restrictions in the size and quantum of retail floorspace to be accommodated on certain zoned lands. The OPR request in the interest of transparency and clarity that all retail floorspace restrictions should be incorporated as objectives into the draft LAP.</p> <p><b>OPR Observation 4: Retail</b></p> <p>Pending the preparation of a new Regional Retail Strategy and a new Development Plan for the County, the planning authority is requested to:</p> <p>(a) Make a distinction in retail policy terms between comparison shopping and retail warehousing and having regard to the provisions of the Retail Planning Guidelines 2012 carefully consider</p> |
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|  |  | <p>the provision of or need for any additional retail warehousing in locations outside of the defined town centre.</p> <p>(b) Translate the retail floorspace restrictions indicated in the Land Use Zoning Matrix into clear objectives in the Plan, thereby strengthening such provisions and ensuring their effective implementation.</p> <p><b>5. General and Procedural Matters</b></p> <p>The submission notes that it is not the role of the OPR to assess the Environment Report under article 6(4) of the SEA Directive or the Screening Report for Appropriate Assessment under Article 6 of the Habitats Directive and Part XAB of the Planning &amp; Development Act 2000 as amended. However, within the context of the Section 28 Guidelines it is appropriate and relevant for this Office to comment upon the environmental reporting.</p> <p>The OPR state that there are areas in the environmental report that require further consideration.</p> <ul style="list-style-type: none"> <li>• Flood risk assessments undertaken for plans should be integrated with the SEA process, Section 8.4.4, Summary of Potential Effects, does not comprehensively address proposed zoning in the context of the SFRA and the Justification Test undertaken. There are no strategic environmental objectives or monitoring measures proposed for flooding notwithstanding the ongoing studies in the town.</li> <li>• A Non-Technical Summary of the Environmental Report is required.</li> </ul> <p><b>OPR Observation 5 – Strategic Environmental Assessment</b></p> <p>The Planning Authority is requested to:</p> <p>(a) Better integrate the findings of the SFRA into the SEA and detail the potential effects arising from the zoning of lands based on the findings of the Justification Test. Strategic environmental objectives and monitoring measures should also be considered in the SEA for flooding.</p> <p>(b) Ensure that as/when material amendments arise in respect of the Plan that the environmental reporting is iterative and transparent with the decision-making process at that stage.</p> <p>(c) Prepare a Non-Technical Summary of the Environmental Report.</p> |
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|  |  | <p><b><u>Appropriate Assessment</u></b></p> <p>The OPR submission states that the recommended Source-Pathway-Receptor link approach was not used in the Screening Report for Appropriate Assessment. There is no opinion presented in Section 4 which would confirm/satisfy that the (European) sites selected (within the 15km radius of the settlement) are relevant for the purpose of the assessment, and why sites in excess of 15km have been ruled out. The OPR also advises that further detail should be provided in respect of the assessment of likely significant effects on relevant European sites, particularly relating to a description of individual elements of the plan (alone or in combination) including development objectives, zoning, and designations.</p> <p>The OPR notes that the terminology used in the Screening Determination is incorrect and references the legal test associated with conclusions arising from a Natura Impact Report (Stage 2) and not an AA Screening Report (Stage 1).</p> <p><b><u>Objective K (3) Cemex /Donnelly Mirrors</u></b></p> <p>The zoning of the site as Commercial / Residential is misleading as residential is not permitted and contrary to LAP Guidelines to be clear and concise.</p> <p><b>OPR Observation 5- land use zoning</b></p> <p>Reconsider zoning objective k (3) to exclude reference to 'residential' in the title to and with the wording for the objective.</p> <p><b>In Summary</b></p> <p>Arising from the foregoing evaluation and assessment of the <i>Draft Naas Local Area Plan 2021-2027</i>, the Office concludes that two recommendations are necessary to ensure that the Draft LAP is consistent with the RSES and the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).</p> <p>The submission also requests that the six observations outlined are also addressed.</p> <p><b>Chief Executive's Opinion</b></p> <p><i>Observation 1 – Population and Compact Growth</i></p> |
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|  |  | <p><b>Item (a)</b></p> <p><i>Potential Yield from Mixed-use and Existing Residential Sites</i></p> <p>It is accepted that no residential delivery capacity was allocated to the town centre sites which formed part of the Core Regeneration Areas in the Urban Regeneration Strategy. Section 3.5 of the draft Plan accepts this, and notes that there are issues around site amalgamation, access and building standards in terms of providing any substantial residential uses within these areas. Similarly, Section 3.5.1 of the draft Plan stated, that despite their obvious development potential, even through active land management these sites may not come on stream during the life of the Plan. Given the limited remaining target allocation and the high level of social housing required to meet the needs of existing residents, it was considered prudent to ensure that sites would be available for development to meet unit allocation to 2027. Nevertheless, the Council have amended Table 3.5 - Estimated Residential Capacity of Lands Zoned New Residential to assign capacity to the town centre sites.</p> <p>However, the Council have applied a 50% reduction to the target allocation to ensure a balance between providing for the existing unmet housing demand and urban regeneration. In this context, Objective CSO 1.2 refers, which provides that the Council will <i>'monitor the scale, type, tenure and location of constructed and permitted developments in Naas during the lifetime of the Plan and apply appropriate development management standards to ensure compliance with the Core Strategy to achieve the delivery of strategic plan-led and coordinated balanced development within the town'</i>.</p> <p>The draft Plan contained several sites zoned B: Existing /Infill Residential which have residential schemes which are nearing completion. In this regard, these units have already been taken into consideration under Table 3.4 Units Target (less developed/extant permissions). It is recommended that the base map of Map 11.1 Land Use Zoning Map is amended to reflect the units constructed on the relevant sites. A review of the land zoned B: Existing/Infill Residential have identified as having potential for minor development and will be reflected in the amended Table 3.5.</p> <p>Land zones for K: Commercial /Residential are not considered to have potential capacity for residential development given the established uses on sites or recent grants of planning permissions. Any future residential development of these sites in accordance with their land use zoning would be considered minor in nature.</p> |
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|  |  | <p><b>Item (b)</b><br/>The observation regarding the density assumptions has been noted and reflected in the amended Table 3.5.</p> <p><b>Item (c)</b><br/>As per NPO 72(a) of the NPF a tiered approach to zoning has been used in the draft Plan to differentiate between sites that are serviced and serviceable within the lifetime of the plan. The SPIA analysed in excess of the land required to meet the unit target required for the Plan. The approach to new residential land zonings was informed by the SPIA, extant permissions and lands in public ownership which were available to meet the unmet social housing need and sites which would assist in the delivery of key infrastructure as outlined in the Naas/Sallins Transport Strategy.</p> <p><i>Observation 2 – Transport and Accessibility</i></p> <p><b>Item (a)</b><br/>The observation to strengthen the provisions of the draft Plan by inserting additional text under MTO 3.1 (b) to safeguard the associated junctions along the existing M7 is considered acceptable to ensure carrying capacity of the junctions are also protected.</p> <p><b>Item (b)</b><br/>The Kildare County Development Plan 2017-2023 under Section 17.7.6 Car Parking, states that other than 'Residential', parking standards are maximum, which is in line with the Guiding Principles on the integration of land use and transport as detailed in the RSES. Furthermore, Section 1.2 of the draft Plan states that where conflicting objectives arise between the CDP and the LAP, the objectives of the CDP shall take precedence. The CDP is currently under review and any changes made to the car parking standards, once the Plan is adopted will relate to Naas. Therefore, any change would be considered premature pending the review of the County Plan.</p> <p><i>Recommendation 1 – Climate Action and Modal Share Targets</i><br/>Achieving a significant modal shift is dependent on a wide range of factor many of which are outside the remit of a land use plan. However, the Council have endeavoured to set ambitious targets for travel to work and school.</p> |
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|  |  | <p><i>Observation 3 – Climate Action and Data Centre Sites</i></p> <p>The request to rationalise and substantiate the spatial location of the two identified data centre sites (P1 &amp; P2) in the draft Plan is noted. Naas has been chosen as a suitable location for data centre development in recognition of its status as a Key Town. The sites identified have the ability to cater for space extensive enterprises and are contiguous to the existing urban form and proximate to necessary electricity and telecommunication infrastructure. The data centre site located at Jigginstown (P2) has the potential for waste heat to be utilised to heat a possible school campus on the adjacent Community and Education zoned lands. There is also the potential for other customers, such as the new residential development in the vicinity or any community facility/clubhouse associated with the Jigginstown linear park to connect to any future network.</p> <p>Further to the submission received from the Eastern Midlands Regional Authority (EMRA) the Council propose additional text under Section 6.4.5 on the selected sites for data centres.</p> <p>Furthermore, detailed traffic modelling has been carried out for the two proposed data centre sites (at Newhall/Jigginstown and at R409 Caragh Road) and is included in this report under Appendix 2. Traffic modelling was completed using the Naas VISUM model. In the Newhall/Jigginstown scenario two access points were modelled, one via the Devoy link road and the other via the Newhall Industrial Estate. In the R409 Caragh Road scenario two access points were modelled, one via the R409 Caragh Road and the other via the M7 Business Park. The traffic modelling outputs showed very minor impacts of the data centre, either scenario, on the road network compared to the do-minimum model in both the 2023 and 2030 models. However, from a traffic perspective the Newhall Industrial Estate access point is preferable to the Devoy Link road access point. Similarly, access from the R409 is preferable to the M7 Business Park Access. A combined scenario with a data centre in both R409 Caragh Road location and in Newhall Jigginstown location indicated that the impact of the data centers remains relatively minor in terms of increase in vehicle-kilometers and travel time.</p> <p>Heat Mapping</p> <p>Given the legislative timeframes set out under Section 20 of the P &amp; D Acts as they relate to the preparation of LAPs, it is not possible for the suggested heatmapping to be prepared to inform the</p> |
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|  |  | <p>LAP. However, consideration will be given to same for the preparation of the CDP at which level a county wide approach can be taken.</p> <p><i>Recommendation 2 – Flood Risk</i></p> <p><b>Item (a)</b></p> <p>The Justification Tests as detailed in the SFRA have been revised to satisfy all of the criteria set out in Box 4.1 Justification tests. Kildare County Council is satisfied that the sites which were subject to Development Plan Justification Tests accord with Table 4.1 of the Flood Risk Management Guidelines specifically item 1; the urban settlement has been identified for growth under the RSES item 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 (iv) Will be essential in achieving compact and sustainable urban growth and item 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.</p> <p>Furthermore, Circular PL 2/2014 is noted with particular reference to where it states that “<i>Planning authorities must strike a fair balance between avoiding flood risk and facilitating necessary development, enabling future development to avoid areas of highest risk and ensuring that appropriate measures are taken to reduce flood risk to an acceptable level for those developments that have to take place, for reasons of proper planning and sustainable development, in areas at risk of flooding</i>”.</p> <p><b>Item (b)</b></p> <p>The recommendation to amend the land use zoning map for sites Q (2), Q (3) and Q (5) is noted. In relation to Q (2) Millenium Park, RPO 4.51 of the RSES is noted, the objective for which is to strengthen the local employment base through the development of <i>inter alia</i> Millenium Park. Planning permission has been granted on these lands for development, which was the subject of a site-specific flood risk assessment and mitigation measures. Therefore, no change to the zoning of Q (2) is recommended.</p> |
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|  |  | <p>The lands at Q(3) and Q(5) are undeveloped and without the benefit of planning permission or a site specific flood risk assessment, and therefore it is agreed that lands identified as Flood Zone A and B within these sites be amended to zoning Objective 'F: Open Space'.</p> <p><b>Item (c)</b></p> <p>The recommendation to amend the land use zoning map in relation to sites H(4), C(3) and C(8) is noted. The area of land identified as Flood Zone A and Flood Zone B under the site identified as H (4) is proposed to be zoned for Open Space and Amenity. It is agreed that the part of the site C(3) that is impacted by Flood Zone A and B should be amended to zoning objective 'F: Open Space'. The zoning of site C (8) as provided for in the draft Plan reflects the extant permission on the site which was subject to a detailed Site-Specific Flood Risk Assessment. It is important to note that a number of flood risk mitigation measures have been integrated into this development and issues around displacement of residual flood risk have also been addressed during the development management process with KCC and An Bord Pleanála. In order to affect the findings of the Site-Specific Flood Risk Assessment carried out for these lands, the lands in proximity to the southern roadside was zoned open space to reflect the area that was at risk of flooding. However, as per the OPR recommendation it is considered that the zoning on site should be amended to reflect the CFRAM mapping as requested.</p> <p><b>Item (d)</b></p> <p>There is a typographical error in the Justification Test carried out for C (12) on the Tipper Road. There is no permitted residential development on these lands and as noted on Map 9.1 LUZ SFRA the subject lands are not located within a Flood Risk Assessment area. As detailed in the response to Item (a) revised Justification Tests have been undertaken to inform the proposed material alterations where necessary. In relation to the lands at Kilcullen Road with residential development nearing completion, the floodplain area is proposed to be amended to Open Space and Amenity to reflect the layout plan of the permitted residential scheme.</p> <p><b>Item (e)</b></p> <p>The recommendation to consider the potential for flood risk mitigation measures as identified in Site-Specific Flood Risk Assessment, to increase flooding to other areas, in the SFRA is noted. A review of the SSFRAs for developments currently under construction/granted planning permission (identified</p> |
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|  | <p>in the SFRA) has been undertaken for the SFRA Addendum Report that will accompany the Proposed Material Alterations to assess if there is any residual risk associated with proposed development sites which would increase flood risk to other areas.</p> <p><i>Observation 4 – Retail</i></p> <p><b>Item (a)</b><br/>The Kildare County Development Plan 2017-2023 did not identify any capacity potential for retail warehousing for Naas. The Council note the absence of Retail Warehousing from Table 11.3 Land Use Zoning Matrix. To provide for clarity it is proposed to amend this table to allow Retail Warehousing to be 'Open to Consideration' within areas zoned for Retail/Commercial. This will reflect the predominant existing land-use on site(s) and also allow for an element of Retail Warehousing at Monread, subject to compliance with the Retail Planning Guidelines. As detailed in Objective EDO 3.1 retail provision must be consistent with the County Development Plan, relevant regional policy frameworks and national planning guidelines.</p> <p><b>Item (b)</b><br/>The observation that retail floorspace restrictions as detailed in the Land Use Zoning Matrix be translated into the objectives is noted and acceptable.</p> <p><u>Observation 5 – Strategic Environment Assessment</u></p> <p><b>Item (a)</b><br/>Further information on flooding aspects will be incorporated into the final Environmental Report including strategic environmental objectives and monitoring measures.</p> <p><b>Item (b)</b><br/>It is agreed that as/when material amendments arise in respect of the Plan that the environmental reporting is iterative and transparent with the decision-making process at that stage.</p> <p><b>Item (c)</b><br/>A non-technical summary will be prepared of the final Environmental Report.</p> <p><u>Observation 6 – Land Use Zoning</u></p> |
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The observation that the K: Commercial /Residential land-use zoning is misleading is noted. It is proposed to amend the land use zoning for K (3) to T: Mixed-Use.

### Chief Executive's Recommendation

#### Proposed Material Alteration

Amend Table 3.5 - Estimated Residential Capacity of Lands Zoned New Residential as follows:

| Site Ref. No.                                              | Location                              | Site Area (Ha.)     | Estimated capacity            | Density range        |
|------------------------------------------------------------|---------------------------------------|---------------------|-------------------------------|----------------------|
| <b>Planned Local Authority Housing Schemes<sup>2</sup></b> |                                       |                     |                               |                      |
| C (1)                                                      | Old Caragh Road                       | 2.06                | 73                            | 35                   |
| C (10)                                                     | Craddockstown Road                    | 0.68                | 3                             | 4                    |
| A (4)                                                      | West of Rathasker Road <i>(CRA 4)</i> | 1.34                | 100                           | 75                   |
| <b>Private Landholdings</b>                                |                                       |                     |                               |                      |
| C (2)                                                      | Devoy Barracks                        | 4.37                | <del>152</del> 175 -218       | <del>35</del> 40-50  |
| C (16)                                                     | The Racecourse                        | 6.3 <sup>3</sup>    | 220 - <del>252</del> 315      | 35- <del>40</del> 50 |
| C (12)                                                     | Tipper Road / Blessington Road        | 2.0                 | 70- <del>80</del> 100         | 35- <del>40</del> 50 |
| C (19)                                                     | Sallins Road / Oldtown                | 2.56                | <del>89</del> 102 -128        | <del>35</del> 40-50  |
| C (15)                                                     | Craddockstown                         | 4.0                 | 140-200                       | 35-50                |
| C (3)                                                      | Finlay Park                           | <del>3.85</del> 2.8 | <del>154-231</del><br>112-168 | 40-60                |

<sup>2</sup> Reference Section 3.3.1 Social Housing Requirement

<sup>3</sup> A reduction of 10% of the overall site has been reduced for the construction of the Gallops Avenue.

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|  |  |  | C (13)                                                 | Dublin Road                     | 1.1                           | 39-55                                         | 35-50                         |
|  |  |  | <b>Town Centre Core Regeneration Areas<sup>4</sup></b> |                                 |                               |                                               |                               |
|  |  |  |                                                        | CRA 1: Main Street              | -                             | 22/2= 11                                      | -                             |
|  |  |  |                                                        | CRA 2: Castle Quarter           | -                             | 166/2 =83                                     | -                             |
|  |  |  |                                                        | CRA 3: Corban's Lane            | -                             | 12/2 =6                                       | -                             |
|  |  |  |                                                        | CRA 4: Rathasker Road           | -                             | 9/2 =5                                        | -                             |
|  |  |  |                                                        | CRA 5: Northeast Gateway        | -                             | 33/2= 17                                      | -                             |
|  |  |  |                                                        | CRA 6: Canal Quarter            | -                             | 143/2=72                                      | -                             |
|  |  |  | <b>Total</b>                                           |                                 | <b>27.16</b>                  | <del>1,001-1,285</del><br><b>1,228- 1,554</b> |                               |
|  |  |  | <b>Extant Permissions</b>                              |                                 |                               |                                               |                               |
|  |  |  | C (6) **                                               | Devoy Quarter (Devoy Link Road) | 2.24                          | 152                                           | 68                            |
|  |  |  | C (7) *                                                | Oak Park                        | 2.49                          | 71                                            | 29 <sup>5</sup>               |
|  |  |  | C (8) **                                               | Blessington Road                | <del>5.53</del> 10.8          | <del>118</del> 324                            | <del>21</del> 30 <sup>6</sup> |
|  |  |  | C (7) **<br>Infill                                     | South of Oak Park               | 1.0                           | 7                                             | 7                             |
|  |  |  | <b>Total</b>                                           |                                 | <del>10.26</del> <b>11.26</b> | <del>341</del> <b>554</b> <sup>7</sup>        |                               |

<sup>4</sup> Allocated unit capacity of Town Centre Core Regeneration Areas to be reduced by 50%.

<sup>5</sup> The stated units per hectare represent a portion of an overall residential scheme.

<sup>6</sup> The stated units per hectare reflect the existing permission. The overall units incorporate Phase 1 permitted and increase at 30uph for the New Residential lands, with are tied to the delivery of the Gallops Avenue. ~~represent a portion of an overall residential scheme.~~

<sup>7</sup> These figures differ from the extant figure under Table 3.4 as some of the extant permissions are on sites zoned B: Exiting Residential.

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|  |  | <p><b>Proposed Material Alteration</b><br/>Insert additional text under MTO 3.1 as follows:</p> <p><b>MTO 3.1</b>      <b>(a)</b> Maintain and improve, as required, the local road network to ensure a high standard of road quality and safety in accordance with the requirements of the relevant legislation.<br/> <b>(b)</b> Safeguard the development and carrying capacity of the national road infrastructure along the existing M7 <i>and associated Junctions 9, 9(a) and 10</i>, in accordance with the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012).’</p> <p><b>Proposed Material Alteration</b><br/>Insert a new sub-section, Section 5.1.1 Modal Shift Targets (including consequential table numbering) as follows:</p> <p><b><i>Section 5.1.1 Modal Shift Targets</i></b><br/> <i>Achieving significant modal shift is dependent on a wide range of factors, much of which is outside the remit of Kildare County Council such as national economic performance, Government investment in sustainable transport infrastructure, private bus service provision and willingness to embrace change. Kildare County Council have identified a number of interventions for the town of Naas which will assist in delivering this modal shift, such as the provision of new permeability links, cycling measures and public transport measures.</i></p> <p><i>Kildare County Council will endeavour to deliver a reduction in private car usage broadly in line with 2035 targets set out in the NTA’s Transport Strategy for the Greater Dublin Area. These target mode shifts have been adapted to reflect the plan period (to 2027) and are outlined in the tables below, which contain ambitious targets for travel to work and school.</i></p> |                        |              |                                                |  |



**Table 5.1A:** Modal shift targets for work trips in Naas

| Mode share for work trips | 2016 Baseline % | 2027 Target % | 2035 Target % | Overall % Change |
|---------------------------|-----------------|---------------|---------------|------------------|
| Car                       | 79.6%           | 69.8%         | 62.6%         | -17%             |
| Public Transport          | 7.9%            | 14.8%         | 19.9%         | +12%             |
| Walking                   | 9.8%            | 10.38%        | 10.8%         | +1%              |
| Cycling                   | 2.7%            | 5%            | 6.7%          | +4%              |

**Table 5.1B:** Modal shift targets for education trips in Naas

| Mode share for education trips | 2016 Baseline % | 2027 Target % | 2035 Target % | Overall % Change |
|--------------------------------|-----------------|---------------|---------------|------------------|
| Car                            | 48.6%           | 43.3%         | 39.6%         | -9%              |
| Public Transport               | 18.4%           | 21.3%         | 23.4%         | +5%              |
| Walking                        | 30.6%           | 31.7%         | 32.6%         | +2%              |
| Cycling                        | 2.4%            | 3.6%          | 4.4%          | +2%              |

**Proposed Material Alteration**

Amend sites Q (5), H (4), C (3), C (8) and 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 (see Appendix 3).

**Proposed Material Alteration**

Amend the Zoning Matrix to include for Retail Warehousing as follows:

**Table 11.3 Land Use Zoning Matrix**

| LAND USE                  | A: Town Centre | B: Existing Residential | C: New Residential | E: Community & Educational | F: Open Space & Amenity | F2: Strategic Open Space | G: Green Belt | H: Industry & Warehousing | I: Agriculture | K: Commercial/Residential | L: Leisure & Amenity | N: Neighbourhood Centre | P: Data Centre / Warehouse | Q: Enterprise & Employment | R: Retail/Commercial | U: Utilities/Services |
|---------------------------|----------------|-------------------------|--------------------|----------------------------|-------------------------|--------------------------|---------------|---------------------------|----------------|---------------------------|----------------------|-------------------------|----------------------------|----------------------------|----------------------|-----------------------|
| <i>Retail Warehousing</i> | Y              | N                       | N                  | N                          | N                       | N                        | N             | N                         | N              | N                         | N                    | N                       | N                          | N                          | O                    | N                     |

**Proposed Material Alteration**

Insert the following additional objective under Section 6.6 as follows:

- EDO 3.10** (a) Ensure no single retail convenience unit shall exceed 100sqm. of net retail space on land that is zoned B: Existing Residential and C: New Residential.  
 (b) Ensure no single unit shall exceed 200sqm of net retail space subject to a maximum number of three units on land that is zoned Neighbourhood Centre. The total net retail space shall not exceed 300sqm.  
 (c) On land zoned for T: Mixed-Use and Q: Enterprise and Employment retail development shall be in accordance with the Retail Planning: Guidelines for Planning Authorities (2012) or any subsequent guidelines, with regards the protection of the national roads / motorways and associated junctions.

|          |                                             |                                                                                                                                                     |                    |                            |                         |                          |               |                           |                |                           |                      |                       |                         |                           |                            |                      |                       |   |
|----------|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|----------------------------|-------------------------|--------------------------|---------------|---------------------------|----------------|---------------------------|----------------------|-----------------------|-------------------------|---------------------------|----------------------------|----------------------|-----------------------|---|
|          |                                             | <b>Proposed Material Alteration</b><br>Amend the zoning at Junction 9 (Maudlins) KDA to ‘T: Mixed Use’ and all associated consequential amendments. |                    |                            |                         |                          |               |                           |                |                           |                      |                       |                         |                           |                            |                      |                       |   |
| LAND USE | A: Town Centre                              | B: Existing Residential                                                                                                                             | C: New Residential | E: Community & Educational | F: Open Space & Amenity | F2: Strategic Open Space | G: Green Belt | H: Industry & Warehousing | I: Agriculture | K: Commercial/Residential | L: Leisure & Amenity | T: <i>Mixed - Use</i> | N: Neighbourhood Centre | P: Data Centre /Warehouse | Q: Enterprise & Employment | R: Retail/Commercial | U: Utilities/Services |   |
|          | Amusement Arcade                            | O                                                                                                                                                   | N                  | N                          | N                       | N                        | N             | N                         | N              | N                         | N                    | N                     | N                       | N                         | N                          | N                    | N                     |   |
|          | Agricultural Buildings                      | N                                                                                                                                                   | N                  | N                          | N                       | N                        | O             | O                         | O              | Y                         | N                    | N                     | N                       | N                         | N                          | N                    | N                     |   |
|          | Car Park (other than ancillary)             | Y                                                                                                                                                   | N                  | N                          | O                       | N                        | N             | N                         | O              | N                         | O                    | O                     | O                       | N                         | N                          | N                    | O                     | O |
|          | Betting Office                              | O                                                                                                                                                   | N                  | N                          | N                       | N                        | N             | N                         | N              | N                         | N                    | N                     | N                       | O                         | N                          | N                    | N                     | N |
|          | Cemetery                                    | N                                                                                                                                                   | N                  | N                          | Y                       | N                        | N             | N                         | N              | O                         | N                    | N                     | N                       | N                         | N                          | N                    | N                     | N |
|          | Cinema                                      | O                                                                                                                                                   | N                  | N                          | N                       | N                        | N             | N                         | N              | N                         | O                    | N                     | O                       | N                         | N                          | N                    | O                     | N |
|          | Community / Recreational / Sports buildings | Y                                                                                                                                                   | O                  | O                          | Y                       | Y                        | O             | N                         | N              | O                         | O                    | Y                     | O                       | O                         | N                          | N                    | O                     | N |
|          | Crèche/ Playschool                          | Y                                                                                                                                                   | O                  | Y                          | Y                       | N                        | N             | N                         | N              | N                         | O                    | O                     | O                       | O                         | N                          | O                    | O                     | N |

|  |  |                                     |   |   |   |                 |   |   |                 |   |                 |                 |                |                 |   |   |                 |   |
|--|--|-------------------------------------|---|---|---|-----------------|---|---|-----------------|---|-----------------|-----------------|----------------|-----------------|---|---|-----------------|---|
|  |  | Cultural Uses/Library               | Y | O | O | Y               | O | O | N               | N | N               | O               | O              | O               | N | N | N               | N |
|  |  | Dancehall/ Disco                    | O | N | N | N               | N | N | N               | N | N               | O               | N              | N               | N | N | N               |   |
|  |  | Data Centre                         | N | N | N | N               | N | N | N               | N | O               | N               | O <sup>8</sup> | N               | Y | N | N               | N |
|  |  | Dwelling                            | Y | Y | Y | O <sup>9</sup>  | N | N | O <sup>10</sup> | N | O <sup>11</sup> | O <sup>12</sup> | N              | N               | O | N | N               | N |
|  |  | Emergency Residential Accommodation | Y | O | O | Y               | N | N | N               | N | N               | O               | O              | O               | Y | N | N               | N |
|  |  | Funeral Homes                       | Y | N | N | O               | N | N | N               | N | N               | O               | N              | O               | O | N | N               | N |
|  |  | Garage/Car Repairs                  | N | N | N | N               | N | N | N               | Y | N               | N               | N              | N               | N | N | N               | O |
|  |  | Group/Special Needs Housing         | Y | Y | Y | O <sup>13</sup> | O | N | N               | N | O               | O <sup>14</sup> | N              | N               | O | N | N               | N |
|  |  | Guest House/ Hotel/Hostel           | Y | O | O | N               | N | N | N               | N | N               | O               | Y              | O               | O | N | N               | N |
|  |  | Heavy Commercial Vehicle Park       | N | N | N | N               | N | N | N               | Y | N               | O               | N              | O <sup>15</sup> | N | N | O <sup>16</sup> | N |
|  |  | Hot food take-away                  | O | N | N | N               | N | N | N               | N | N               | O               | N              | O               | O | N | N               | O |
|  |  | Industry (light)                    | O | N | N | N               | N | N | N               | Y | N               | O               | N              | O               | N | N | O               | O |

<sup>8</sup> A data centre will only be considered on the site at Maudlins Interchange towards the eastern boundary of the site.

<sup>9</sup> Ancillary to health/community use, and/or to meet group/special needs housing.

<sup>10</sup> Subject to Rural Housing Policy as outlined in the Kildare County Development Plan.

<sup>11</sup> Subject to Rural Housing Policy as outlined in the Kildare County Development Plan.

<sup>12</sup> No residential development will be permitted within the Commercial/Residential lands at the Maudlins Interchange.

<sup>13</sup> For further information on group/special needs housing refer to Section 4.4.1 of this Plan.

<sup>14</sup> No group/special needs housing will be permitted within the Commercial/Residential lands at the Maudlins Interchange.

<sup>15</sup> A heavy commercial vehicle park will only be considered on the eastern side(rear) of the site of Junction 9 (Maudlins) KDA.

<sup>16</sup> Any such development within the Northwest Quadrant will need to consider the overall development strategy of high-end office complexes and campus style developments for this area.

|  |  |                                   |   |                 |                 |   |   |   |   |   |   |                 |   |                 |                 |   |                 |   |   |
|--|--|-----------------------------------|---|-----------------|-----------------|---|---|---|---|---|---|-----------------|---|-----------------|-----------------|---|-----------------|---|---|
|  |  | Industry (general)                | N | N               | N               | N | N | N | N | Y | N | N               | N | N               | N               | N | N               | N | O |
|  |  | Medical Consultant/ Health Centre | Y | O               | O               | Y | N | N | N | N | N | O               | O | O               | Y               | N | O               | O | N |
|  |  | Motor Sales                       | O | N               | N               | N | N | N | N | Y | N | O               | N | O               | N               | N | N               | O | N |
|  |  | Nursing Home                      | Y | Y               | Y               | O | N | N | N | N | N | O               | N | O               | N               | N | N               | N | N |
|  |  | Offices                           | Y | O <sup>17</sup> | O <sup>18</sup> | N | N | N | N | O | N | O               | N | O               | O               | N | O <sup>19</sup> | O | N |
|  |  | Park /Playground                  | Y | Y               | Y               | Y | Y | Y | N | N | O | O               | Y | O               | O               | N | N               | N | N |
|  |  | Service Station                   | N | N               | O               | N | N | N | N | Y | N | O               | N | O               | O               | N | O               | O | O |
|  |  | Place of Worship                  | Y | O               | O               | Y | N | N | N | N | N | O               | O | O               | O               | N | N               | N | N |
|  |  | Playing Fields                    | O | O               | O               | Y | Y | Y | N | N | O | N               | Y | N               | N               | N | O               | N | N |
|  |  | Pub                               | Y | N               | O               | N | N | N | N | N | N | O               | O | O               | O               | N | N               | O | N |
|  |  | Restaurant                        | Y | O               | O               | N | N | N | N | O | N | O               | O | O               | O               | N | O               | O | N |
|  |  | School                            | Y | O               | O               | Y | O | N | N | N | N | O               | N | O               | N               | N | N               | N | N |
|  |  | Shop (Comparison)                 | Y | N               | N               | N | N | N | N | N | N | N               | N | N               | N               | N | N               | O | N |
|  |  | Shop (Convenience)                | Y | O <sup>20</sup> | O <sup>21</sup> | N | N | N | N | N | N | O <sup>22</sup> | N | O <sup>23</sup> | O <sup>24</sup> | N | O <sup>25</sup> | Y | N |

<sup>17</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>18</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>19</sup> Proposals of this nature shall be in excess of a gross floor area of 100sqm.

<sup>20</sup> No single unit shall exceed 100sqm. of net retail space.

<sup>21</sup> No single unit shall exceed 100sqm. of net retail space.

<sup>22</sup> Retail development shall be in accordance with the Retail Planning: Guidelines for Planning Authorities (2012) or any subsequent guidelines.

<sup>23</sup> Retail development shall be in accordance with the Retail Planning: Guidelines for Planning Authorities (2012) or any subsequent guidelines.

<sup>24</sup> No single unit shall exceed 200sqm of net retail space subject to a maximum number of three units. The total net retail space shall not exceed 300sqm.

<sup>25</sup> Retail development shall be in accordance with the Retail Planning: Guidelines for Planning Authorities (2012) or any subsequent guidelines.

|                                                                                                                                               |  |                                    |   |   |   |   |   |                 |   |   |   |   |   |   |   |   |   |   |   |
|-----------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------|---|---|---|---|---|-----------------|---|---|---|---|---|---|---|---|---|---|---|
|                                                                                                                                               |  | Stable Yard                        | N | N | N | N | O | O <sup>26</sup> | O | N | Y | N | N | N | N | N | N | N | N |
|                                                                                                                                               |  | Tourist Related Facilities         | Y | O | O | O | O | O               | N | N | O | O | O | O | O | N | O | O | N |
|                                                                                                                                               |  | Utility Structures                 | O | O | O | O | O | N               | O | O | O | O | O | O | O | O | O | O | Y |
|                                                                                                                                               |  | Warehouse (wholesale) /Store/Depot | O | N | N | N | N | N               | N | Y | N | O | N | O | N | N | N | N | N |
| <p><b>Table 11.1 Land-Use Zoning Objectives</b></p> <p><i>T: Mixed Use: To provide for general commercial/industrial/enterprise uses.</i></p> |  |                                    |   |   |   |   |   |                 |   |   |   |   |   |   |   |   |   |   |   |

<sup>26</sup> Extensions to existing facilities only.

## 3.2 Prescribed Authorities

**Table 3.1 Submissions/observations from Prescribed Bodies**

| Sub. No. | Name                                         | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.       | <b>Environmental Protection Agency (EPA)</b> | <p><i>Issues Raised</i></p> <p>The submission received from the EPA comprises of two parts. A cover letter and a copy of the 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources (2021, Version 1.12)'.</p> <p>The cover letter describes the EPA's role as an environmental authority, stating that they provide a self-service approach via the guidance document (SEA of Local Authority Land Use Plans – EPA Recommendations and Resources), which was provided with the submission. It is suggested that KCC take this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the LAP.</p> <p>Furthermore, KCC should ensure the LAP aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the NPF and the RSES.</p> <p>The letter also outlines the following:</p> <p><b>Contents of the Environmental Report</b></p> <p>SEA Regulations set out the information to be contained in and Environmental Report.</p> <p><u>Assessment of Alternatives</u></p> <ul style="list-style-type: none"> <li>• Describe the alternatives considered and how the selection and assessment of these led to selection of the preferred alternative.</li> <li>• Alternatives should be assessed against the 'Strategic Environmental Objectives' identified in the SEA ER.</li> </ul> <p><u>Assessment of Environmental Effects</u></p> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |      | <ul style="list-style-type: none"> <li>Assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.</li> </ul> <p><u>Mitigation Measures</u></p> <ul style="list-style-type: none"> <li>Where the potential for likely significant effects have been identified, provide appropriate mitigation measures to avoid or minimise these.</li> <li>Ensure the Plan includes clear commitments to implement the mitigation measures.</li> </ul> <p><u>Monitoring</u></p> <ul style="list-style-type: none"> <li>Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts.</li> <li>Consider and deal with the possibility of cumulative effects.</li> <li>Monitoring of both positive and negative effects should be considered.</li> <li>Should set out the various data sources, monitoring frequencies and responsibilities.</li> <li>If the monitoring identifies adverse impacts during the implementation of the Plan, KCC should ensure that suitable and effective remedial action is taken.</li> </ul> <p><b>EPA State of the Environment Report for 2020</b></p> <ul style="list-style-type: none"> <li>In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in the 'State of the Environment Report Ireland's Environment – An Integrated Assessment 2020' should be considered.</li> <li>This should also be considered, in preparing the Plan and SEA.</li> </ul> <p><b>Future Amendments to the Plan</b></p> <ul style="list-style-type: none"> <li>Screen any future amendments to the Plan for likely significant effects.</li> </ul> <p><b>SEA Statement – 'Information on the Decision'</b></p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> <li>How environmental considerations have been integrated.</li> <li>How the Environmental Report, submissions, observations and consultations have been taken into account.</li> </ul> |

| Sub. No. | Name                                                    | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                                                         | <ul style="list-style-type: none"> <li>Reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with.</li> <li>Measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul> <p><b>Environmental Authorities</b><br/>The letter concludes by stating the Council should consult with the other SEA Statutory Authorities, as set out in S.I. No 436 of 2004, as amended by S.I. No. 201 of 2011.</p> <p><b>Chief Executive's Opinion</b><br/>The EPA's submission has been reviewed and no changes to the Strategic Environmental Assessment are required.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p>                                                                                                                                                                                                           |
| 2.       | <b>Dept. of Environment, Climate and Communications</b> | <p><i>Issues Raised</i><br/>The submission received replies on behalf of the Waste Policy and Resources Efficiency Division. The submission requests the Council to consult directly with their Regional Waste Management Planning Office regarding the development of the final plans.</p> <p><b>Chief Executive's Opinion</b><br/>The submission from the Department of Environment, Climate and Communications is noted and aside from objectives supporting the provision of additional recycling facilities, the issue of waste management is outside the remit of the Local Area Plan. However, the Council look forward to engaging with the Eastern Midlands Waste Management Regional Office with regard to waste management policies as part of the recently commenced review (January 2021) of the Kildare County Development Plan 2017-2023.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |

| Sub. No. | Name                                          | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.       | <b>Transport Infrastructure Ireland (TII)</b> | <p><i>Issues Raised</i></p> <p>TII references that the N/M7 is part of the EU TEN-T Core Network and the strategic function of the network must be safeguarded in line with European and national policy and that national roads provide strategic transport links.</p> <p>TII notes that:</p> <ul style="list-style-type: none"> <li>Any local transport function that national roads perform must continue to be secondary.</li> <li>Local transport solutions are required for traffic/trip demand generated by local development to ensure they are complementary to and consistent with the strategic transport function of the national road network.</li> <li>Ensure that congestion and unsustainable private car dependency does not negatively impact and/or undermine the recent investment in road infrastructure.</li> <li>No further upgrades are envisaged and therefore, the junctions which adjoin the LAP need to be clearly managed.</li> </ul> <p><b>Strategic National Road Network</b></p> <ul style="list-style-type: none"> <li>TII recommend that consideration should be given to explicit policy provision to safeguard the strategic function of the national road network and associated junctions to be included as a specific objective under Policy MT03.1</li> <li>The following additional text to MTO 3.1 (b) is recommended:<br/>"Safeguard the development and carrying capacity of the national road infrastructure along the existing M7 <i>and associated junctions</i> in accordance with the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012)".</li> <li>The Authority also advises additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, however TII may not be responsible for the funding of any such schemes or improvements.</li> <li>Proposals for enhancements to existing junctions on national roads should be developed in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012).</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p><b>Urban Strategy</b></p> <p>TII notes that there is a disjointed and inconsistent approach in the drafting of policy objective in the Draft Plan. This is referenced in particular around the zoning and land use objectives for the North West Quadrant and the designated KDA's of Maudlin and Newhall.</p> <p><b>A. Northwest Quadrant</b></p> <ul style="list-style-type: none"> <li>• Welcomes the preparation of the masterplan and that it will be subject of a statutory amendment.</li> <li>• Clarification is sought on the link to the N/M7 Junction 9a, whether it will prioritise public transport or whether it is a bus-only link.</li> <li>• TII recommends that MTO 2.3 and Map 5.3 is amended to state "Bus <del>Only</del> Priority Route link to Sallins Bypass through the Northwest Quadrant" in accordance with the Naas Transport Strategy and to provide clarity.</li> <li>• Section 6.4.2 Northwest Quadrant does not refer to the need for a masterplan for the overall area which provided elsewhere in the Plan and therefore disjointed.</li> <li>• Amend Land-Use Zoning Objective Q Enterprise and Employment to acknowledge retail polices associated with proximity to national roads are recognised by footnote 77 included in Table 11.3 Land Use Zoning Matrix.</li> </ul> <p><b>B. Maudlin Interchange Key Development Area</b></p> <p>TII raises concerns that there are a number of disjointed policies and objectives regarding this KDA. Reference is made to Objective EDO 1.4 which requires the preparation of a masterplan, however the submissions suggests that no legal standing has been formulated unlike in the NWQ, and further states that Section 10.6.2 which relates to the Junction 9 KDA does not refer to a masterplan.</p> <p>Reference is also made to Objective URD 1.12 relating to carrying out a preliminary traffic modelling and to produce an Access Strategy for the lands in consultation with TII and the NTA. While Objective URD 1.13 requires any application for the development of the KDA to be accompanied by</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|          |      | <p>a shared/agreed vision for the KDA and by a comprehensive Traffic and Transport Assessment. TII advises that the approach is currently confusing.</p> <p>TII also highlights that they are a statutory consultee under planning legislation and states that they respond to planning applications Part 8's, Strategic Infrastructure Developments, Strategic Housing Developments, development plans and queries referred to it by planning authorities only. TII, only interacts, responds and meets (if necessary) with the planning authority and not directly with developers and/or future applicants. Therefore, Objective EDO 1.4 for developers to consult with TII is inappropriate.</p> <p>TII states that it is imperative that the Maudlin Masterplan lands (KDA) forms part of a "masterplan" subject to an evidence based transport analysis which includes for access framework, quantum and subsequent urban design proposed under URD 1.12 and not just through a TIA under URD 1.13.</p> <p>TII recommends that zoning Objective K is amended to highlight the need for a masterplan and that retail policies associated with proximity to national roads are recognised by footnote 77 of the Draft LAP.</p> <p>TII also recommend that the Maudlin Masterplan is included in the Plan by way of an amendment, similar to that required for the NWQ.</p> <p><b>Junction 10 (Naas South)/Newhall</b></p> <ul style="list-style-type: none"> <li>• No evidence base or traffic and transport analysis is presented to include lands in proximity to Junction 10.</li> </ul> <p><b>Retail and National Roads</b></p> <p>TII make reference that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road infrastructure.</p> |

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|          |      | <p>In this context reference is made to the Retail Planning Guidelines (2012) which states there is a presumption against large out-of-town retail centres in particular those located adjacent or close to existing, new or planned national roads/motorways. TII state that this is not referred to under Section 6.6 retail policies or footnote 77 in relation to the K zoning.</p> <p><b>4. Sustainable Travel Bridge</b><br/> TII notes that a Sustainable Travel Bridge (PT7) over the M7 linking Sallins and Naas proposes the creation of a second bridge over the M7 reserved for use by active modes and public transport. TII advises that structures crossing national roads are subject to separate approvals/agreements and TII Technical Acceptance in advance of development. All structures proposed on the national road network are required to obtain Technical Acceptance from TII in accordance with TII Publications DN-STR-03001. Consultation should be undertaken with TII Structures Section in this regard.</p> <p><b>Chief Executive's Opinion</b><br/> The recommendations by TII to strengthen the provisions of the draft Plan on the protection of the national roads network by inserting additional text under MTO 3.1 (b) to safeguard the associated junctions along the existing M7 is noted. This issue was also raised by the OPR and is addressed under the response and recommendation to Submission #009.</p> <p><i>Northwest Quadrant</i><br/> The recommendation by TII to provide clarity on the proposed link within the Northwest Quadrant to the N/M7 Junction 9a is accepted. The route proposed is a bus-only link and shall be referenced accordingly in the draft Plan.</p> <p>The recommendation to include a narrative on the requirement for a masterplan under Section 6.4.2 for the lands within the Northwest Quadrant is accepted. The Council propose to insert additional text under this section to provide for a cohesive approach to the future development of these strategic lands.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <p>The OPR in an observation relating to retail made a recommendation relating to floorspace restrictions as detailed in the Land Use Zoning Matrix and suggested that these be translated into the objectives. This relates to Footnote 77 as referred to by the TII. A new objective is proposed as a material alteration (Submission #009 refers).</p> <p><i>Maudlin Interchange Key Development Area.</i></p> <p>A masterplan is required for Junction 9 (Maudlins) Key Development Area to ensure a comprehensive and cohesive approach to the overall development of these two landholdings. This requirement reflects the shared vision for the overall site (Section 6.5.3 refers). The masterplan is to be carried out by the developers/owners of the site and shall be a requirement of any application for any development of these lands. To strengthen the provisions of the draft Plan the Council proposes to amend the narrative under Section 10.6.2 to provide for greater clarity on this issue. The concerns relating to consultation with the TII are noted and reference to same will be removed.</p> <p>As detailed in Section 10.6.2 of the draft Plan the Council will carry out preliminary traffic modelling at the Junction 9 (Maudlins) KDA (Objective URD 1.12 refers). The Council will undertake the modelling which will then be used by any developer to inform the use, quantum and intensity of development of these lands. To provide for clarity on who is responsible for the preparation of the modelling, it is proposed to insert an additional action under Section 10.8 Urban Regeneration and Urban Development. Similarly, Objective URD 1.12 will be strengthened to ensure that no development shall proceed until the Council have completed the necessary modelling on the subject lands.</p> <p>Notwithstanding the proposed modelling to be carried out by the Council, it is still considered necessary that any application for development should be accompanied by a comprehensive Traffic and Transport Impact Assessment for the overall development of the (Objective URD 1.13, refers). However, additional text is proposed to be inserted into the objective to reinforce the requirement for a masterplan on the subject lands.</p> <p>The concerns relating to the omission of the need for a masterplan for the subject lands under the Specific Objective for the site detailed under Table 11.1 Land Use Zoning Objectives is accepted. It</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p>is important to note that in the submission received from the OPR it was stated that the zoning of the subject lands as K: Commercial/Residential is misleading given that residential development is restricted and to address this issue it is proposed to amend the zoning to T: Mixed Use (Submission #009 refers).</p> <p><i>Junction 10 (Naas South)/Newhall</i><br/> Additional transport modelling has been carried out on lands in proximity to Junction 10 which did not form part of the analysis carried out for the Naas /Sallins Transport Strategy (2020). This additional study accompanies this report under Appendix 2.</p> <p>The additional traffic modelling refers to the two proposed data centre sites (at Newhall / Jigginstown and at R409 Caragh Road). Traffic modelling was completed using the Naas VISUM model. In the Newhall / Jigginstown scenario two access points were modelled, one via the Devoy link road and the other via the Newhall Industrial Estate. In the R409 Caragh Road scenario two access points were modelled, one via the R409 Caragh Road and the other via the M7 Business Park. The traffic modelling outputs showed very minor impacts of the data centre, either scenario, on the road network compared to the do-minimum model in both the 2023 and 2030 models. However, from a traffic perspective the Newhall Industrial Estate access point is preferable to the Devoy Link road access point. Similarly, access from the R409 is preferable to the M7 Business Park Access. A combined scenario with a data centre in both R409 Caragh Road location and in Newhall Jigginstown location indicated that the impact of the data centers remains relatively minor in terms of increase in vehicle-kilometers and travel time.</p> <p><i>Retail and National Roads</i><br/> The draft Plan under Objective EDO 3.1 requires that the provision of retail in Naas accords with the national planning guidelines with respect to retail development. Similarly, Objective EDO 3.2 relates to the application of the sequential approach to retail development in accordance with the Retail Planning Guidelines for Planning Authorities (2012). The presumption against large out-of-town retail centres located adjacent or close to existing, new or planned national roads/motorways is specifically stating within the Guidelines. It is considered not necessary to abstract specific measures from the</p> |



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|          |      | <p>Guidelines to be inserted into the draft Plan. The policies and objectives set out in the Draft LAP (subject to amendments set out in this report are considered to be robust and effective in terms of managing retail provision in Naas.</p> <p>Notwithstanding this, as per the submission from the OPR the footnotes contained with the Zoning Matrix Table are to be incorporated into an objective by way of a proposed material alteration (Submission #009 refers) and reference will also be made to the protection of the national roads/motorways and associated junctions in this context.</p> <p><i>Sustainable Travel Bridge</i><br/>The Council are aware of the Technical Acceptance requirements for bridge structures crossing national roads. Should the sustainable travel bridge progress to preliminary and detailed design the Council will liaise with the relevant TII departments should this objective be progressed</p> <p><b>Chief Executive's Recommendation</b><br/><i>Northwest Quadrant</i><br/><b>Proposed Material Alteration</b><br/>Amend text in Objective MTO 2.3 and Objective MTO 2.7, (along with any consequential amendments including Map 5.3).</p> <p><b>MTO 2.3</b> Support and facilitate the implementation of the following bus priority measures, subject to the availability of funding and appropriate environmental assessment and where necessary to preserve the identified routes free from development:</p> <ul style="list-style-type: none"> <li>▪ Sustainable Travel Bridge over the M7 linking Sallins and Naas.</li> <li>▪ Morell Way bus gate to facilitate a new bus-only street.</li> <li>▪ Left turn ban on to Main Street (from R445 towards Main Street).</li> <li>▪ Bus priority entrance to Piper's Hill schools.</li> <li>▪ Bus-only <del>Priority Route</del> link to Sallins Bypass through the Northwest Quadrant.</li> </ul> |

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|          |      | <p><b>MTO 2.7</b> Protect the lands zoned Q: Enterprise and Employment to the east of the Western Relief Road from haphazard development that would prejudice the future delivery of a bus-<del>only</del> <del>priority</del> route through the Northwest Quadrant. Proposals for development on lands zoned Q: Enterprise and Employment should protect the integrity of these lands and potential developers will be required to liaise with the Planning Authority and Roads and Transportation Department of Kildare County Council in advance of submitting development proposals.</p> <p><b>Proposed Material Alteration</b><br/>Insert additional text under paragraph one, Section 6.4.2 Northwest Quadrant (NWQ) as follows:</p> <p>An objective of the Regional Spatial and Economic Strategy (RSES) for Naas is to strengthen the local employment base through the development of Millennium Park in the Northwest Quadrant, where there is potential for high-quality high-density indigenous and Foreign Direct Investment. Millennium Park is currently home to Kerry Global Centre, Irish Commercials, the HSE and Horse Sport Ireland. The Park forms part of a larger significant land bank in the northwest of Naas, which represents a key area for the growth of the town over the longer-term vision to 2031. <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 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).</i></p> <p><i>Maudlin Interchange Key Development Area</i></p> <p><b>Proposed Material Alteration</b><br/>Insert text under paragraph two, Section 10.6.2 Junction 9 (Maudlins) Key Development Area, as follows:</p> <p>The biggest constraining factor to the comprehensive redevelopment of the site has been identified as the capacity of Junction 9 which has been further highlighted in the Naas/Sallins</p> |

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|          |      | <p>Transport Strategy (2020). Of critical concern, is a development type that might generate a peak traffic flow, which could result in queuing on the existing public road network, specifically south bound traffic on the M7 which may cause a traffic hazard. However, it is important to note that there is significant capacity for internal vehicular queuing (up to c. 800m) – though a new internal road network to reduce or remove any impacts on the public road network. In order to address this, there shall be a requirement that any application for development within this KDA be accompanied by a shared vision for the two sites <i>through the preparation of a masterplan</i>, with a shared ingress-egress strategy and a comprehensive Traffic and Transport Assessment for the KDA in its entirety.</p> <p><b>Proposed Material Alteration</b><br/> Amend text under paragraph four under Section 6.4.3 Junction 9 (Maudlins Interchange) and Objective EDO 1.4 as follows:</p> <p>These brownfield sites have also been designated as Regeneration Lands within the Plan (see Map 11.1). Proposals for development of these sites shall be of a high standard and quality having regard to their strategic location off the Maudlin's Interchange and as key gateway site to the town from the M7. A joint approach to the two landholdings shall be undertaken through the preparation of a comprehensive masterplan for the overall land parcel to ensure development does not take place in a piecemeal manner and integrates with existing development and infrastructure. It is imperative that development of the lands should not impact on the carrying capacity of the motorway network <del>and consultation with Transport Infrastructure Ireland (TII) is recommended in the preparation of a masterplan for the lands.</del> Further details in respect of the overall development of these lands are set out in the Development Framework detailed in Chapter 10. It should be noted that Chapter 10 also contains two specific objectives (URD 1.12 and URD 1.13) to protect the integrity of the existing road network.</p> <p><b>EDO 1.4</b> Facilitate the regeneration and redevelopment of the lands to the east of the Dublin Road roundabout, in particular the Key Development Area at Junction 9</p> |

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|          |      | <p>(Maudlins) (the former Donnelly Mirrors and Cemex Concrete sites), through a joint approach for the two landholdings through the preparation of a comprehensive masterplan comprising of an overall high quality design in recognition of its location as a key gateway site. <del>Consultation with Transport Infrastructure Ireland (TII)</del> <i>Adherence to the Design Framework set out in Chapter 10</i> is required in the preparation of any masterplan for these lands <del>and adherence to the Design Framework set out in Chapter 10.</del></p> <p><b>Proposed Material Alteration</b><br/> Insert an additional action under Section 10.8 Urban Regeneration and Urban Development, as follows:</p> <ul style="list-style-type: none"> <li><i>To carry out preliminary traffic modelling on the Junction 9 (Maudlins) lands to inform the use, quantum and intensity of development that would be appropriate for the site.</i></li> </ul> <p><b>Proposed Material Alteration</b><br/> Amend and insert additional text under Objective URD 1.12, under Section 10.8 as follows:</p> <p><b>URD 1.12</b> Carry out preliminary traffic modelling and to produce an Access Strategy for lands zoned Commercial at the Junction 9 (Maudlins) Key Development Area <del>in consultation with relevant stakeholders including Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA).</del> These will identify the <i>use</i>, quantum <i>and intensity</i> of development that can be facilitated at the location complementary to safeguarding the strategic function and safety of the national road network, in accordance with the provisions of official policy outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). The study will also identify any improvements required to the local transport network to accommodate the extent of development proposed. <i>No masterplan shall be prepared for the subject lands until such time as the Council has completed and agreed the traffic modelling.</i></p> |

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|          |                                | <p><b>Proposed Material Alteration</b><br/>Insert additional text under Objective URD 1.13, under Section 10.8 as follows:</p> <p style="padding-left: 40px;"><b>URD 1.13</b> Require that any application for development within the Junction 9 (Maudlins) Key Development Area (KDA) be accompanied by a shared/agreed vision for the KDA <i>through the preparation of a comprehensive masterplan</i> and by a comprehensive Traffic and Transport Assessment.</p> <p><b>Proposed Material Alteration</b><br/>Insert a Specific Objective for the amended zoning on the Junction 9 (Maudlins) KDA in Table 11.1 Land Use Zoning Objectives.</p> <p style="padding-left: 40px;"><u>Specific Objective</u><br/>T: Mixed -Use Junction 9 (Maudlins): <i>The owner/developer of the subject lands is required to prepare a masterplan for the overall land parcel, having regard to the traffic modelling carried out by the Council.</i></p>                                      |
| 4.       | <b>Department of Transport</b> | <p><i>Issues Raised</i><br/>The submission from the Department of Transport comprises of two letters.</p> <p>The first letter welcomes the dedicated chapter on Movement and Transport. The Department notes that there have been important policy developments since the previous plan which should be reflected in the Naas Plan.</p> <ol style="list-style-type: none"> <li>1. National Disability Inclusion Strategy 2017-2021 and the ratification of the United Nations Convention on the Rights of Persons with Disabilities. This ratification obliges the State to ensure access for persons with disabilities to the physical environment and transportation.</li> <li>2. DMURS Interim Advice Note – Covid-19 Pandemic Response which includes guidance on measures to align with the principles of universal design, Government policy on accessibility for people with disabilities and to consult people with disabilities to further appraise measures.</li> </ol> |

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|          |      | <p>3. A 'whole journey approach' constitutes a journey from starting point to destination. Local Authorities are a key stakeholder in ensuring a universal design approach to the built environment, including footpaths, roads, pedestrian crossing points, town greenways and bus stops/shelters.</p> <p>4. The mission statement of the NTA's Local Link Rural Transport Programme Strategic Plan 2018 - 2022', is "to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs." A key priority is the reduction of social exclusion and the integration of rural transport services with other public transport services. A key objective is greater interaction/co-ordination with Local Authorities regarding the assessment of strategic transport needs and in the development of proposed transport plans for local areas.</p> <p>The second letter provided contact details for the Department of Transport at Reform, Communications and Emergency Planning Divisions, Department of Transport, Lesson Lane, Dublin 2.</p> <p><b>Chief Executive's Opinion</b></p> <p>The policy documents raised in the submission by the Department of Transport are noted. To ensure the draft Plan is inclusive and provides for universal design, Policy MT1 – Walking and Cycling and MT2 – Public Transport will be strengthened.</p> <p>Furthermore, all transport measures proposed within the draft Plan will be subject to a separate statutory procedure which includes for detailed design in accordance with all relevant guidance and legalisation alongside consultation with the relevant statutory stakeholders and public consultation and necessary environmental assessments where appropriate.</p> <p><b>Chief Executive's Recommendation</b></p> <p><b>Proposed Material Alteration</b></p> <p>Insert text under Policy MT1 and MT2, as follows:</p> <p><b>Policy MT1 – Walking and Cycling</b></p> |

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|          |                                                   | <p><i>It is the policy of the Council to promote enhanced <b>universal</b> permeability for pedestrians and cyclists within Naas in order to improve access to the town centre, local schools, residential areas, recreational facilities, public transport services and other amenities.</i></p> <p><b>Policy MT 2 – Public Transport</b></p> <p><i>It is the policy of the Council to promote the sustainable development of Naas by supporting and guiding the relevant national agencies in delivering improvements to the public transport network and to public transport services <b>for all users</b>.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 5.       | <b>Eastern Midlands Regional Authority (EMRA)</b> | <p><i>Issues Raised</i></p> <p>The submission by EMRA was prepared by the Executive and approved by the members of the Regional Assembly.</p> <p>EMRA notes that that the Council are aware of the finalisation of the RSES for the Eastern and Midland Region which was made on 28th June 2019, that it is aligned with the NPF and the content framework it provides for.</p> <p>The submission noted that EMRA is not required to prepare a submission/observation, however they consider that regionally important and strategic plans, for instance those of Key Towns, should be commented upon by the Assembly.</p> <p>EMRA acknowledge the extensive work carried out to prepare the draft LAP and, in particular, that this work follows a period of considerable change, within a planning policy context, that included the publication of the NPF, the RSES and the establishment of the OPR. EMRA welcomes the overall approach and effort of the Council to coordinate and incorporate policies and objectives, consistent with the RSES and NPF. It is recognised that the draft Plan was published while the review for the CDP had commenced, which is not ideal however given the context of the previous draft plan for Naas 2019-2023 which was not made by the local authority, there is a requirement for a LAP for this Key Town, as the previous plan was 2011-2017. The submission welcomes Objective CDP 1.1 to</p> |

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|          |      | <p>align the LAP, if necessary, to the Kildare CDP 2023 – 2029, by way of a statutory amendment to the Local Area Plan.</p> <p><b>Context and Vision for the Plan</b><br/> The Vision for Naas consisting of Guiding Principles of Seven Core Themes is clear and strategic and well presented. The key priorities expressed in themes, such as Core Regeneration Areas, the Key Development Area and in the longer-term vision to the Northwest Quadrant are welcome. The submission states that the integration of the employment arc into the town centre can be achieved by the aim for the long-term delivery of the Northwest Quadrant.</p> <p>EMRA note that Environment and Climate Change is a specific theme but believes the draft plan would benefit from a demonstration of response to Climate Change and protection of Biodiversity across all seven core themes.</p> <p><b>Consistency with the RSES</b><br/> The submission notes the population and housing unit allocation contained in the Variation of the CDP and that population targets set out in the draft Plan are consistent with the CDP and the transitional population projections in the NPF Road Map. EMRA also welcome Objective CSO 1.2 to monitor constructed and permitted development to ensure compliance with the core strategy.</p> <p>EMRA states the 30% requirement and compact growth has been well addressed and the SPIA is a well-considered approach. The Assembly welcome the strategic approach to designate the land within the Northwest Quadrant as Strategic Reserve which will allow for the comprehensive and sustainable long-term approach to the realisation of these lands.</p> <p><b>Housing Approach</b><br/> The submission notes the conversion of population targets to housing units is consistent with the CDP and that units built and extant are taken into consideration in the draft Plan. EMRA also note that the approach to the social housing unmet housing need, would be considered in accordance with the S. 28 Guidelines 'Housing Supply Target Methodology for Development Planning'. However</p> |



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|          |      | <p>the submission does note that the full implications of these Guidelines have not been incorporated into Chapter 3, however as the CDP is under review and the hierarchy of plans above the draft Plan have not incorporated these Guidelines they cannot be fully incorporated in the draft Plan.</p> <p><b>Integration of Land Use and Transport</b><br/> EMRA welcomes that the draft Plan is heavily informed by the Naas/Sallins Transport Strategy, to ensure a sustainable and integrated transport system for Naas. They note that the transport interventions should be proofed against the Guiding Principles contained in Chapter 8 - Connectivity as required in RPOs 8.1 and 8.4, which require that land use plans within the GDA demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area (currently under review), and with the Guiding Principles for Integration of Land Use and Transport set out in Section 8.3 of the RSES.</p> <p><b>Enterprise and Economic Uses</b><br/> EMRA welcome the SPIA, the masterplan led approach for the KDA and the requirement for additional employment lands based on projected population, job ratio and employment growth. However the submission states that the approach should cross reference the Guiding Principles for the location of strategic employment and investment prioritisation (RSES Section 6.3) which include access to; suitable locations (depending on whether an enterprise is people or space intensive); serviced sites (energy, water, transport, communications networks); connectivity (including access to international markets via an airport/port); skilled labour force (proximity to third level and lifelong learning) and; local strengths (a diverse sectoral mix, research and technology centres, start-up incubators, emerging clusters or value chains). In particular the Guiding Principles should be considered as part of the decision on the location of additional commercial lands in peripheral locations therefore it is recommended that justification of same be stated as part of the LAP.</p> <p><b>Retail</b><br/> EMRA note that RPO 6.11 of the RSES requires that future provision of significant retail development shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012. Guiding Principles for Integration of Transport and Land use also require the location of trip intensive</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|          |      | <p>developments such as large-scale retailing in accessible locations well served by high quality public transport. EMRA welcome that EDO3.2 validates the sequential approach, and suggest that this should be further emphasised with regard to the existing out of centre retail locations to protect the viability of the retail core.</p> <p><b>Strategic Environmental Assessment (SEA) /Appropriate Assessment (AA)</b><br/> EMRA welcomes the preparation of the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). The SEA includes an assessment of the overall environmental effects from the draft Plan and the AA concluded that the Plan does not foresee to give rise to any significant effects on designated European Sites, alone or in combination with other plans or projects.</p> <p><b>Chief Executive's Opinion</b><br/> The comments and recommendations contained in the submission are noted.</p> <p>The suggestion from EMRA that the vision and strategic element of the draft plan would benefit from a demonstration of response to Climate Change and protection of Biodiversity across all seven core themes is noted. Kildare County Council recognises the issue of climate change as the most serious and threatening global environmental problem. Under the Government's Climate Action Plan (2019) all local authorities are required to achieve 50% energy efficiency and 30% greenhouse gas emissions reduction by 2030 (relative to 2009 base). In this regard, the Council is taking active and ongoing measures to reduce its overall carbon footprint. Furthermore, the first Climate Change Adaptation Strategy for the County was adopted by the Council in 2019. This provides for a series of adaptative measures to be undertaken across all areas of the Council's remit in order to reduce the potential effects of climate change within the county (i.e. increased flooding or heatwaves etc.). The climate action theme is evident throughout the Draft LAP and whilst it is accepted that it appears as an independent core theme, it underpins all other these also.</p> <p><i>Integration of Land Use and Transport</i></p> |

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|          |      | <p>The Naas/Sallins Transport Strategy (2020) was framed in the policy context of both the RSES and the NTA's Transport Strategy for the Greater Dublin Area (Section 2.1.2 of the Transport Strategy, refers), both of which require the integration sustainable land use and transport polices across the Region. The Naas/Sallins Transport Strategy, in turn has informed the draft Plan, providing for the evidence-based approach to the promotion of sustainable land use development in Naas/Sallins. The submission received from the OPR (Submission 009) states under Section 2 - Transport and Accessibility of their report, that the draft LAP has demonstrated consistency with the guiding principles expressed in the transport strategy for the RSES (RPO 8.1), and the Transport Strategy for the Greater Dublin Area 2016 – 2035.</p> <p>The integration of land use planning with transportation is fundamental to efficient and sustainable planning. The Vision for the draft Plan is to ensure that growth is planned in a sustainable and sequential manner, while prioritising a low carbon, compact, consolidated and connected pattern of development. This is achieved across the draft Plan through a combination of urban design, land use patterns and transportation systems that promote walking and cycling and measures to improve access to public transport and driving by car, which will help create active, healthier and more liveable communities.</p> <p>To achieve the integration of land use and transportation the draft Plan places strong emphasis on compact growth, evident through the attention placed on the development of infill/brownfield sites, sustainable densities and urban regeneration. The draft Plan provides for in excess of the 30% required within the defined settlement boundary for new residential and the remaining sites contiguous to the boundary, representing appropriate consolidation of the built-up area.</p> <p>Economic development is provided for within designated centres with an emphasis on connecting the Northwest Quadrant into the town centre and the regeneration of the town centre through the development of Design Frameworks contained in the Regeneration Strategy. The measures contained in the Transport Strategy will provide for sustainable mobility integrated across the land uses to create a more connected town, linking existing neighbourhoods with key destinations by</p> |

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|          |      | <p>sustainable and active modes of transport, consistent with the guiding principles for the integration of land use and transport set out in the RSES.</p> <p>The draft Plan is also consistent with the Transport Strategy for the Greater Dublin Area 2016-2035. The transportation measures which have been incorporated into the draft Plan provide interventions for cycling and pedestrian/permeability, to create an attractive alternative to the car. Congestion bottlenecks were identified and road solutions proposed to address congestion spots. Catchments for schools, bus stops, rail, sport amenities and the hospital were examined to provide a permeability strategy which will be beneficial to a broad societal group. The Strategy will ensure that the transport measures are planned and provide for future demand to drive a sustainable modal shift for the successful transition to a low carbon and climate resilient society consistent with both the GDA Transport Strategy and Guiding Principles set out in the RSES.</p> <p><i>Enterprise and Economic Uses</i></p> <p>The comments in relation to the Guiding Principles for the location of strategic employment and investment prioritisation (RSES Section 6.3) are noted. The locations for economic development within Naas have been primarily informed by Section 4.6 of the RSES, in particular RPO 4.50 which provides for the strengthening of the employment base through the development of MERITS, Millennium Park in the Northwest Quadrant and the regeneration of underutilised lands including industrial lands in the northeast of the town. The Kildare County Development Plan is currently under review and in line with RSES Section 6.3 is best placed at a county strategic level to identify strategic employment and investment prioritisation. However, in relation to the identification of data centre sites within Naas, it is considered that Section 6.4.5 should be amended to justify the proposed location.</p> <p><i>Retail</i></p> <p>EMRA's comments regarding the sequential test and existing out of centre retail locations are noted. The draft Plan under Objective EDO 3.1 and EDO 3.2 require retail development to be in accordance with the Retail Planning Guidelines for Planning Authorities (2012) which require a general presumption against large out-of-town retail centres in particular those located adjacent or close to</p> |

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|          |                                       | <p>existing, new or planned national roads/motorways. The draft Plan also states that where land use zoning for retail uses 'permits in principle' outside the Core Retail Area, these sites will be required to be assessed on their merits based on a Sequential Test and Retail Impact Assessment, where appropriate, before any site is considered positively. Having regard to the foregoing it is considered that there are sufficient measures in place to protect the viability of the retail core from out-of-centre retail developments.</p> <p><b>Chief Executive's Recommendation</b><br/> <b>Proposed Material Alteration</b><br/> Insert additional text in the third paragraph under Section 6.4.5, as follows:</p> <p style="padding-left: 40px;">This Plan promotes Naas as a sustainable international destination for ICT infrastructures such as data centres, in line with Regional Policy Objective 8.25. Two locations have been zoned for Data Centre/Warehouse locations within this Plan. Land has been designated between Junction 10 and Junction 9a, located centrally between two of the motorway junctions. The site will be served by the local road network which would disperse traffic between motorway interchanges to reduce any impacts on the motorway network. Another site has been selected to the southwest of the town. <i>Naas has been chosen as a suitable location for data centre development in recognition of its status as a Key Town. The sites identified in this LAP have the ability to cater for space extensive enterprises contiguous to the existing urban form, proximate to electricity and telecommunication infrastructure.</i> These lands are identified exclusively for Data Centres, to ensure the location of these types of proposals are controlled proximate to serviced areas of the county. The Council will not consider any alternative use on these lands, other than those associated with Data Centres (Objective EDO 1.12).</p> |
| 6.       | <b>Health Service Executive (HSE)</b> | <p>Submission by the Environmental Health Service of the Health Service Executive (HSE) states that they support and agree with the many comprehensive objectives, policies and actions in the draft Plan, which will improve the health and wellbeing of the population of Naas if the objectives are implemented in full.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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|          |      | <p>The submission is made under the remit of Healthy Ireland and relevant health supporting strategies.</p> <p><b>Climate</b></p> <p>The EHS notes measures in the draft Plan but recommends that KCC should use the draft Plan as a catalyst for climate change action to bring real change and reduce carbon emissions within the town.</p> <p>These include:</p> <ul style="list-style-type: none"> <li>○ Implementing a range of climate change mitigation measures to reduce overall carbon footprint with key aim to become carbon neutral.</li> <li>○ Setting out specific targets with regards to reducing greenhouse emissions, transport emissions and reducing energy demand including in civic buildings.</li> <li>○ Specific actions to combat reduce carbon emissions should be outlined.</li> <li>○ Key indicators for monitoring of progress on climate action.</li> <li>○ Identify infrastructure which is vulnerable to climate change and implement proactive adaptive measures to ensure resilience.</li> <li>○ An integrated approach to surface water management in the entire catchment areas around the town should be implemented.</li> <li>○ Natural flood plains and wetlands of local rivers should be protected from development.</li> <li>○ Rehabilitate riparian buffer zones with habitat restoration techniques.</li> <li>○ Restoration of freshwater ecosystems.</li> <li>○ Implement buffer zones and SUDS features as outlined in the Planning for Watercourses in the Urban Environment document.</li> <li>○ Meaningful engagement with the agricultural sector with regard to the protection of water catchment areas</li> <li>○ Promote and increase renewable energy within the town and investigate the establishment of a sustainable energy community.</li> <li>○ KCC should act in an educational capacity on climate issues for the general public in Naas and introduce various initiatives such as energy audits for local industry, educate on green</li> </ul> |

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|          |      | <p>procurement and in parting information on climate reduction to various sectors of the community including school children and young people.</p> <p><b>Sustainable Transport</b></p> <ul style="list-style-type: none"> <li>○ Notes traffic congestion is an ongoing problem, particularly around commuting times for schools and work.</li> <li>○ KCC should be commended for their initiatives, which aim to improve the mobility issues in Naas.</li> <li>○ The Naas/Sallins Strategy is noted.</li> <li>○ The submission particularly references, the local bus route strategy, mobility managements plans, the permeability/pedestrian strategy in the context of reducing walking distances from schools and the delivery timeframe KCC should be commended for same.</li> <li>○ The cycling strategy is noted and the timeframes for completion will ensure real progress is seen on the ground during the lifetime of the Plan.</li> </ul> <p>The submission requests that KCC consider the following:</p> <ul style="list-style-type: none"> <li>○ The proposed workplace mobility management plans place an emphasis on facilitating and encouraging sustainable transport options for staff.</li> <li>○ Designated or free car parking spaces are reserved for car sharing or 'go' cars.</li> <li>○ An advertising campaign should be undertaken to advertise the availability of facilities for sustainable forms of travel as they arise.</li> <li>○ KCC should invest in some small scale initiatives to improve the customer experience with regard to public transport (by reserving a portion of its budget) such as; provide quality bus corridors, structural improvements to provide shelter at all bus stops, real time travel information, integrated ticketing between modes of transport, provide bike parking at public transport nodes and provide rented bike facilities at train, bus and tourist areas.</li> <li>○ Consider areas of Naas to ban or reduce traffic flows.</li> <li>○ Specify a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance to amenities.</li> <li>○ General restriction of the future development of out-of-town retail centres except in exceptional circumstances.</li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>○ Provide facilities such as secure bike parking and changing/showering facilities at places of employment in public buildings in Naas to encourage staff to cycle.</li> <li>○ The landscaping or 'greening' of the proposed pedestrian/cycle routes.</li> <li>○ Public consultation and community engagement regarding walking/cycle routes should be carried out - listen to and address the opinions and concerns members of the public may have regarding these routes.</li> <li>○ Additional efforts may be necessary to encourage and promote the behaviour change necessary for the people Naas to abandon the convenience of their private cars and start using active travel options, initiatives recommended include; route maps highlighting all pedestrian/cycle routes, car free family fun days, restrict or close sections of the town to allow for family friendly cycles, guided walks of the Naas locality, support and promote a local park run</li> <li>○ Recommend targets for trips by bike and pedestrians are set so progress can be monitored.</li> </ul> <p><b>Green Infrastructure</b></p> <p>The submission notes the nine green infrastructure corridors earmarked for protection, but recommends KCC consider the following:</p> <ul style="list-style-type: none"> <li>○ A greening strategy should be implemented to improve Naas's appearance function and biodiversity.</li> <li>○ Consider a diverse range of green spaces such as small pocket parks, tree planting, natural playgrounds, riversides, green trails, green walls, wildlife reserves, wildflower meadows or urban gardening for the proposed Tree Planting Programme.</li> <li>○ Green spaces should be co-designed with communities and reflect local needs.</li> <li>○ Rewilding initiatives.</li> <li>○ Naas should commit to a pollinator plan.</li> <li>○ All new develop should incorporate green infrastructure and enforced at planning level.</li> <li>○ All green infrastructure should complement local environmental conditions and support local flora and fauna.</li> <li>○ Nature based solutions for flood risk management.</li> <li>○ Green infrastructure should be used to mitigate against noise and air pollution.</li> <li>○ Water usage audit of public buildings should be carried out.</li> </ul> |



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|          |      | <p><b>Town Centre Regeneration</b><br/> Consider the following:</p> <ul style="list-style-type: none"> <li>- Measures to tackle vacant units.</li> <li>- Targeted retail strategy with a town centre first approach.</li> <li>- Consider limiting expansion of shop fronts and bring housing back to the Main St</li> <li>- Improving broadband connectivity.</li> <li>- Improve marketing and placemaking for the town of Naas, promote a selling point which is unique to the town.</li> <li>- Actively engage and work with community groups/ traders' associations to implement measures which improve the public realm and appearance of the town, which should incorporate green infrastructure and planting which will improve biodiversity within the town.</li> <li>- Establish e-working hubs to provide opportunities for people to work from a location closer to home and to facilitate networking.</li> </ul> <p><b>Food</b><br/> The Council should consider providing the following:</p> <ul style="list-style-type: none"> <li>o An assessment of food outlets should be carried out to ensure there is not an over proliferation of fast-food outlets and healthy choices are available.</li> <li>o Supporting community-based initiatives that develop programmes that support a healthy lifestyle.</li> <li>o Promote through planning physical activity and non-sedentary behaviour.</li> <li>o Improve availability of healthy food.</li> <li>o Facilitate the development of community gardens/allotments.</li> <li>o Examine the feasibility of a food market.</li> <li>o Implement a strategy to combat food poverty.</li> <li>o Consider the provision of free water refill schemes.</li> </ul> <p><b>Social Inclusion</b><br/> Naas should be commended on its work to date to become an 'age friendly' town and consider implementing 'Dementia Friendly Communities' in Naas. The proposed identification of lands in the</p> |

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|          |      | <p>town centre for age friendly settlements is welcome as is the appointment of an age friendly housing specialist. Other measures that to address health inequalities are as follows:</p> <ul style="list-style-type: none"> <li>○ A diverse variety of housing to cater for a range of lifestyles, affordability and lifespan choices.</li> <li>○ Improve inclusion of people with disabilities with community-based services.</li> <li>○ Promote dialogue and discussion with disadvantaged and marginalised groups in Naas, initiatives to develop a more socially inclusive society should be implemented.</li> <li>○ Ensure there is adequate emergency accommodation.</li> <li>○ Consult with young people in the development and implementation of programmes in which they are involved, Additional facilities should be provided to cater for the needs of adolescents. e.g. playgrounds, skate parks, graffiti walls, activity centres, playing courts, community gardens, public meeting spaces etc.</li> <li>○ Identify suitable sites and provide specific funding to provide multifunctional community spaces or 'youth cafes'.</li> <li>○ All community facilities provided should have shared services making them more sustainable.</li> <li>○ Specific measures that tackle isolation and exclusion of young people from minority backgrounds in Naas should be implemented.</li> </ul> <p><b>Waste – minimising will reduce greenhouse gases</b></p> <ul style="list-style-type: none"> <li>○ Implement waste prevention measures with local business and community groups using demonstration programmes.</li> <li>○ Accessible recycling bins.</li> <li>○ Food waste reduction incentive and set targets to half food waste by 2030.</li> <li>○ Implement an education campaign to highlight sustainable food waste management options for homes and businesses.</li> </ul> <p><b>Noise</b></p> <ul style="list-style-type: none"> <li>○ A noise impact assessment is carried out for any significant developments.</li> <li>○ New development must consider the impacts from existing noise sources.</li> <li>○ Quiet areas of the town should be mapped and protected.</li> </ul> |

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|          |      | <p><b>Air Pollution</b></p> <ul style="list-style-type: none"> <li>○ Pollution hot spots should be identified and reduced through local action on these emissions.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p><i>Climate</i></p> <p>There are multiple measures across the draft Plan which have climate action and the reduction of the carbon footprint of Naas at the forefront of the decision making, including but not limited to, ensuring sustainable densities, prioritising brownfield development, increasing connectivity and prioritising sustainable movements, avoiding development in flood prone areas, creating an integrated green infrastructure network and promoting the use of biodiversity techniques.</p> <p>It is noted that the EHS recommend the setting of specific targets and actions with regards reducing greenhouse gas emissions, transport emission and reducing energy demands in civic buildings in Naas. It is also recommended that key indicators for the monitoring of progress on climate change must be outlined to ensure progress is achieved. In terms of targets reducing energy usage in civic buildings these are set out in the Public Sector Energy Efficiency Strategy (a 33% energy efficiency improvement) and are therefore outside the remit of the Naas land use plan.</p> <p>The draft Plan proposes a number of measures to reduce both greenhouse gas emissions and transport emissions, in terms of creating an environment that favours a modal shift to walking and cycling through enhancing connectivity measures and by mapping the green infrastructure to ensure its protection. In response to the submission from the Office of the Planning Regulator (OPR) it is considered appropriate to include modal shift targets for trips to work and to schools in Naas, to align with the NTA's Transport Strategy for the Greater Dublin Area (see Response to Submission 9).</p> <p><i>Sustainable Transport</i></p> <p>The measures included are at a high level suitable for a land use plan and items such as bus priority measures, bus stops, shelters, will be incorporated into the detailed design during the Part 8 process which will provide for public consultation.</p> |

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|          |      | <p>The EHS's comments in relation to workplace mobility management plans, car sharing, bicycle parking and maximum parking standards for commercial developments are noted. Mobility Management Plans are items for the County Development Plan, as the necessary development standards for the county are provided at the higher plan level. The County Development Plan sets out maximum car parking standards for those other than residential. The Council will have cognisance of the thresholds for the submission of a Workplace Plan in accordance with the Achieving Effective Workplace Travel Plans - Guidance for Local Authorities document published by the NTA which will be considered when determining planning applications.</p> <p>The Council notes the EHS's comments that out of town retail centres should be restricted. The Draft Plan and the Kildare County Development Plan are in line with the Retail Planning: Guidelines for Planning Authorities (2012) where there is a general presumption against out-of-town retail centres only in exceptional circumstances.</p> <p>Public consultation and community engagement are part of the Part 8 which the measures from the Naas/Transport Strategy shall undergo before they are implemented. Detailed design of the measures will be provided to ensure member of the public can comment fully on the proposed measures.</p> <p><i>Green Infrastructure</i></p> <p>The EHS comments in relation to Green Infrastructure are noted. Chapter 7 of the draft Plan is focused around the Green Infrastructure network in Naas. An extensive Habitat and Green Infrastructure Mapping Survey to illustrate the important areas for protection within the Plan area has been provided for in Map 7.1 and 7.2. Section 7.7 of the draft Plan details the requirements for green infrastructure and new developments, which will be informed by the green infrastructure mapping.</p> <p>The comments are noted in the relation to the proposed Tree Planting Programme. However, the details of the programme are outside the remit of a land use plan and shall be determined by the</p> |

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|          |      | <p>Kildare County Council's Parks Department. Naas has committed to a pollinator planting under Objective NE 2.1 which shall be carried out in the accordance with the recommendations of the All Ireland Pollinator Plan in order to enhance local biodiversity, visual amenity and surface water management. A water usage audit of public buildings is outside the remit of a land use plan. In terms of the comment that nature-based solutions should be used for flood risk management. The draft Plan already provides for this under Objective IO 2.3 which requires that nature-based surface water-based drainage solutions are incorporated as part of all plans and development proposals.</p> <p><i>Town Centre Regeneration</i></p> <p>The EHS's comments on Town Centre Regeneration are noted. However, the draft Plan under Chapter 10 provides for a detailed Urban Regeneration and Development Strategy, specifically addressing issues such as tackling vacant units, bringing back housing to the town centre, improving the urban realm. Furthermore, part of the overall vision for Naas underpinned by the Core Themes of Urban Regeneration, is centred around a regenerated and vibrant town centre.</p> <p>The issue of improving broadband connectivity is provided for under Objective IO 4.2 to support and facilitate the provision of telecommunications infrastructure in Naas, subject to safety and amenity requirements. Similarly, the comments to establish e-working hubs is also addressed within the draft Plan under Objective EDO 1. to encourage the provision of remote working hubs and incentivise employment creation on lands zoned 'A: Town Centre' and under Objective EDO 1.3 which relates to supporting the development of Mid-East Region Innovation Think Space (MERITS) which includes for an innovative co-working space.</p> <p><i>Food</i></p> <p>The EHS's comments in relation to food are noted. The draft Plan already discourages undesirable uses such as fast-food outlets under Objective EDO 3.6. The measures provided for in the Naas/Sallins Transport Strategy to improve cycling and pedestrian access throughout the town providing for active travel measures thereby enhancing opportunities for less sedentary behaviour. The comments to facilitate the development of community gardens/allotments are noted and accordingly, it is considered appropriate that an objective on allotments be incorporated into the</p> |

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|          |      | <p>Plan. The draft Plan already supports the development of food market in Naas under Objective EDO 2.2 and specifically for a high-quality farmer's markets under Objective EDO 3.8.</p> <p><i>Social Inclusion</i><br/> The HSE's comments on social inclusion are noted. In relation to the comments on a variety of housing being needed in Naas, Objective HCO 2.1 requires that a good mix of housing types and sizes is provided in all new residential developments, including housing designed for older people and people with disabilities. Under the Land Use Zoning Matrix Table 11.3, emergency residential accommodation is permitted in principle and open to consideration across a number of land use zoning types. Similarly, Section 4.4.1 specifically highlights that there are residents within Naas that require group/special needs housing and the land use zoning matrix provides for this type of housing across the Plan area. Similarly, the land uses objectives within the plan area can cater for a broad range of needs such as playgrounds, skate parks, youth-cafes, community spaces. The draft Plan is accompanied by a Social Infrastructure Audit where it was identified that areas for active recreation and opens spaces were below that required for the population. Table 4.3 Social Infrastructure Requirements have identified locations and zoned land accordingly to address the deficit.</p> <p><i>Waste – minimising will reduce greenhouse gases</i><br/> The Council notes the comments on implementing waste prevention measures with local business and community groups using demonstration programmes, however this is outside the remit of a land use plan. The Athy Plan does include objectives for recycling and composting facilities.</p> <p><i>Air Quality and Noise Pollution</i><br/> The HSE's air quality and noise pollution comments are noted. As detailed under Chapter 9 the EPA on their GEO Portal (<a href="http://www.epa.ie/EPAMaps">www.epa.ie/EPAMaps</a>) under the heading of Environment and Wellbeing illustrates noise mapping and air quality mapping throughout the country. Naas is stated as having '1-Good' on the air quality index. Noise resulting from roadways in Naas has also been mapped and developments, in particular residential schemes, should have regard to the mapped noise levels. Development proposals should incorporate noise mitigation measures into the overall scheme design</p> |

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|          |                                     | <p>on the advice of suitably qualified acoustic specialists (see Chapter 4, Objective HCO 2.3 and Chapter 5, MTO 3.6).</p> <p><b>Chief Executive's Recommendation</b><br/> <b>Proposed Material Alteration</b><br/> Amend Objective HCO 4.7 as follows:</p> <p><b>HCO 4.7</b>     <i>(a) Investigate the feasibility of the provision a small green waste composting site in the town for use by local community groups, as an action towards sustainable waste management.</i><br/> <i>(b) Promote community-managed gardens/allotments at appropriate locations in Naas.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 7.       | <b>Office of Public Works (OPW)</b> | <p>The OPW welcomes the commitment to manage flood risk in line with the Guidelines, to address surface water flooding issues and the need for SuDS and the guidance provided on how residual flood risk can be managed to acceptable levels through possible flood mitigation measures.</p> <p><b>Flood Zone Map</b></p> <ul style="list-style-type: none"> <li>• Flood Zones are incorrectly labelled in the legend on LUZ SFRA Data Map. The blue shade should be Flood Zone A and the purple shade should be Flood Zone B.</li> <li>• Flood extent have been omitted to the south of the map.</li> </ul> <p><b>Policy Objective IO 3.4</b></p> <ul style="list-style-type: none"> <li>• Sites that are intended to be zoned for development following the application of a Justification Test, where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning.</li> <li>• Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of, the flood plain, only water compatible development such as <i>Open Space</i> would be permitted for the lands which are identified as being at risk of flooding within that site.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <ul style="list-style-type: none"> <li>• Planning permission for these sites might then be subject to the sequential approach having been adopted and applied, following a detailed FRA.</li> <li>• This would ensure that flood risk on these sites can be managed through the sequential approach only, without the requirement for further mitigation measures.</li> </ul> <p><b>Proposed Flood Relief Scheme</b></p> <ul style="list-style-type: none"> <li>• The OPW welcomes objective IO 3.2 to deliver the Flood Relief Scheme for Naas and that the SFRA states that any FRA should be cognisant of proposed flood defences for Naas.</li> </ul> <p><b>Mitigation Measures</b></p> <p>The OPW welcomes the Potential Flood Mitigation Measures outlined in Section 4.4.6.</p> <p><b>Site Specific Flood Risk Assessments</b></p> <p>The OPW submission refers to Section 4.4 of the SFRA which relates to development proposals in flood zones. The submission notes that the SFRA refers to Stage 1 (<i>Identification of Flood Risk</i>), 2 (<i>Initial FRA</i>) and 3 (<i>Detailed FRA may be required</i>) but points out that a site-specific flood risk assessment is a Stage 3 Detailed risk assessment.</p> <p><b>Consideration of Climate Change Impacts</b></p> <ul style="list-style-type: none"> <li>• The OPW welcomes the discussion on climate change in the SFRA. The SFRA does not identify areas currently not at risk of flooding that could potentially be at risk in the future, in the context of the Mid-Range Future Scenario.</li> <li>• The OPW states that it should be noted that Naas is also at risk in the High-End Future Scenario.</li> <li>• The OPW note that the discussion on climate change is focused on incorporating climate change into development design and the SFRA has not addressed how climate change has been considered in the production of the Plan.</li> <li>• Planning authorities can consider climate change impacts in the Plan-making Stage, such as by avoiding development in areas potentially prone to flooding in the future, providing space</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <p>for future flood defences, specifying minimum floor levels and setting specific development management objectives.</p> <ul style="list-style-type: none"> <li>• Consideration to include policy objectives in relation to flood risk and climate change in the Plan.</li> <li>• The CFRAM Programme include maps for these two potential future scenarios and available to view on the OPW portal.</li> </ul> <p><b>Surface Water and SuDS</b><br/>The OPW welcomes policy objectives NE3.1, IO2.3, IO 2.1 and IO 2.2.</p> <p>The OPW state the Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions, in accordance with guidelines.</p> <p><b>Justification Tests</b><br/>Justification Tests are provided for areas on the periphery of Naas Town and should only apply to an urban centre and not the peripheral urban areas. The OPW note that some of these sites are under construction or have permission and site-specific flood risk assessments were carried out. However, there is no discussion provided that the inclusion of these measures will not cause or increase flooding to other areas or that climate change and residual risks can be managed.</p> <p><b>Enterprise and Employment Lands – Northwest Quadrant (Justification Tests 9 and 20)</b></p> <ul style="list-style-type: none"> <li>• Large area zoned for less vulnerable type zoning, which are largely greenfield and on the periphery of Naas Town.</li> <li>• Consideration should be given to avoid/substitute flood risk areas by zoning areas in Flood Zone A to a water-compatible zoning such as Open Space, ensuring the sequential approach is followed in the development management stage and not just allow development if mitigation measures are included.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <p><b><i>Blessington Road (Justification Tests 10 and 14)</i></b><br/> Planning permission has been granted for housing and a neighbourhood centre and construction has not yet commenced. Mitigation measures were proposed as part of the development. The OPW state that should the proposed development in the area not go ahead or planning lapses with no submission to renew it, KCC should consider zoning the flood risk lands as a water compatible type zoning such as Open Space.</p> <p><b>Land to east of Monread Industrial Estate</b></p> <ul style="list-style-type: none"> <li>• The Justification Test for these lands has answered no to all of Criteria 2 and it is noted that there are other lands available which are at a lower risk of flooding.</li> <li>• The OPW states that the Guidelines state that all three criteria of the Justification Test must be satisfied.</li> <li>• Mitigation measures are not in keeping with the Sequential Approach to avoid and substitute, especially when there are other lands at a lesser risk available.</li> <li>• Recommended that these lands should be rezoned as water compatible type zoning such as Open Space.</li> </ul> <p><b>Kilcullen Road</b></p> <ul style="list-style-type: none"> <li>• New residential development currently under construction.</li> <li>• Zone the floodplain/attenuation as a water-compatible type to reflect this use and prevent encroachment and/or loss of floodplain.</li> </ul> <p><b>Strategic Reserve - NWQ</b></p> <ul style="list-style-type: none"> <li>• Development in flood risk areas should be avoided, by zoning as a water-compatible type such as <i>Open Space</i> or substituted for a lesser vulnerability class.</li> </ul> <p><b>Tipper Road</b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <ul style="list-style-type: none"> <li>• The land use zoning image in the SFRA does not correspond with the land use zoning map or LUZ SFRA Data Map.</li> <li>• Planning permission has been granted for <i>New Residential</i> development on a brownfield site - an increase in the vulnerability class, which is not consistent with the Guidelines.</li> <li>• The commentary provided notes that flood risk will be mitigated by raising part of the site above the floodplain and providing compensatory storage for the 0.1% AEP event. The Justification Test notes the area <i>"has been identified as open space in the planning application to recognise this area as a designated floodplain"</i>.</li> <li>• KCC should zone the floodplain/compensatory storage as a water-compatible type to reflect this use and prevent encroachment and/or loss of floodplain.</li> </ul> <p><b>Craddockstown Community Zoning</b><br/> The OPW submission states that for sites that are intended to be zoned for development following the application of a Justification Test, where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of, the flood plain, only water compatible development such as <i>Open Space</i> would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.</p> <p><b>Finlay Park</b></p> <ul style="list-style-type: none"> <li>• All three criteria of the Justification Test must be satisfied.</li> <li>• Open Space &amp; Amenity appears to only reflect the Flood Zone A extents.</li> <li>• Kildare County Council should consider increasing the <i>"Open Space"</i> zoning to include both Flood Zone A and B.</li> </ul> <p><b>Chief Executive's Opinion</b><br/> <i>Flood Zone Map</i></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <p>The incorrect labelling in the legend on the LUZ SFRA Data Map is noted and will be amended in conjunction with the flood extents that were omitted to the south of the map. These amendments are detailed in Appendix 3 of this report.</p> <p><i>Policy Objective IO 3.4</i><br/>In respect of the OPW comments in relation to Objective 3.4 it is proposed to amend the objective.</p> <p><i>Site Specific Flood Risk Assessments</i><br/>The SFRA will be updated to note that a Stage 3 detailed risk assessment of appropriate detail is required for all planning applications. Objective IO 3.1 of the draft Plan already reflects this by requiring that all development proposals within the areas where Justification Tests have been carried out as part of the Strategic Flood Risk Assessment and where residual flood risk remains as outlined on SFRA map (Map Ref. 9.1), are the subject of site specific flood risk assessment appropriate to the nature and scale of the development being proposed.</p> <p><i>Consideration of Climate Change Impacts</i><br/>A review of the Site-Specific Flood Risk Assessments for developments currently under construction/granted planning permission (identified in the SFRA) will be undertaken and published with the AFRA Addendum Report with the Proposed Material Alterations to assess if there is any residual risk associated with to increase flooding to other areas.</p> <p>A review of the Mid-Range Future Scenario and High-End Future Scenario was undertaken to assess the future impact of increased flood risk in the draft Plan. No significant impact on the classification of zonings was identified with respect to the sequential approach. An additional paragraph will be added to the SFRA outlining this in further detail. Consideration was also given to the OPW Mid-Range Future Scenario and High-End Future Scenario climate change scenarios during the SFRA and guidelines for minimum floor levels were identified. The draft Plan and the SFRA has set out that developments must consider climate change implications in their design. It is considered appropriate to include a policy objective in the plan to ensure that developments must</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <p>assess climate change scenarios in accordance with the allowance outlined in the OPW Flood Risk Management Climate Change Sectoral Adaptation Plan 2019.</p> <p>The Proposed Material Alteration will be accompanied by a SFRA Addendum report when placed on public display and shall include the changes set out above.</p> <p><i>Surface Water and SuDS</i></p> <p>The comment in relation to the recommendation that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate. This has been considered and it is concluded that such an approach would not be practical or feasible at this time as it would be premature pending the Flood Study which includes a review of the interaction between the existing surface water systems and fluvial flood risk. However, it is considered that there is an opportunity to achieve these goals within the NWQ Masterplan Area and to include a proviso with Objective 1.1 to require a surface water management plan to be carried out for the NWQ area, to review the storm water network and identify areas for SuDS solutions in this regard.</p> <p><i>Justification Tests</i></p> <p>The OPW comments on Justification Tests not being applicable to the periphery of urban areas are noted. In response to Recommendation 2 – Flood Risk, from the OPR (Submission 009, refers) it is considered appropriate to -evaluate the findings of all the Justification Tests.</p> <p>Furthermore, Kildare County Council is satisfied that the sites which were subject to Development Plan Justification Tests accord with Table 4.1 of the Flood Risk Management Guidelines specifically item 1; the urban settlement has been identified for growth under the RSES item 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 (iv) Will be essential</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <p>in achieving compact and sustainable urban growth and item 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.</p> <p>Furthermore, Circular PL 2/2014 is noted with particular reference to where it states that <i>"Planning authorities must strike a fair balance between avoiding flood risk and facilitating necessary development, enabling future development to avoid areas of highest risk and ensuring that appropriate measures are taken to reduce flood risk to an acceptable level for those developments that have to take place, for reasons of proper planning and sustainable development, in areas at risk of flooding"</i>.</p> <p><b>Chief Executive's Recommendation</b></p> <p><b>Proposed Material Alteration</b><br/>Amend Map 9.1 LUZ SFRA Data Map (see Appendix 3) to include flood extents to the south of the map and to correct the labelling in the legend.</p> <p><b>Proposed Material Alteration</b><br/>Amend Objective IO3.1 as follows:</p> <p><b>IO 3.1</b> (a) Ensure all development proposals within the areas <i>identified as 'Flood Risk Assessment' on LUZ SFRA Map 9.1</i>, where Justification Tests have been carried out as part of the Strategic Flood Risk Assessment and where residual flood risk remains, <del>as outlined on SFRA map (Map Ref. 9.1)</del>, are the subject of a site specific flood risk assessment appropriate to the nature and scale of the development being proposed.</p> |

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|          |      | <p><i>(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.</i></p> <p>Amend Objective IO 3.4 as follows:</p> <p><b>IO 3.4</b> All development proposals should apply the use of the sequential approach in terms of the site layout and design <del>and in satisfying the Justification Test (where required), the proposal will demonstrate that appropriate mitigation and management measures are put in place. The development proposals should ensure that no encroachment onto, or loss of, the flood plain, only water compatible development such as open space would be permitted for the lands which are identified as being at risk of flooding within that site.</del> <i>If there is a proportion of the site at risk of flooding, the sequential approach must be applied to ensure that there is no encroachment onto, or loss of, the flood plain. Only water compatible development such as Open Space should be permitted for the lands which are identified as being at risk of flooding within that site. This shall ensure that flood risk on sites can be managed through the sequential approach only, without the requirement for further mitigation measures. If this cannot be achieved the applicant must clearly show that the sequential approach cannot be followed, they must satisfy all the criteria of the Justification Test and demonstrate that appropriate flood mitigation and management measures are put in place.</i></p> <p><b>Proposed Material Alteration</b></p> <p>Amend objective NWQ 1.1, as follows:</p> <p><b>NWQ 1.1</b> Require the preparation of a masterplan (to be developed in conjunction with relevant environmental/flood risk/transport assessments) for the NWQ giving full consideration to the type and intensity of development relative to future transport options and in particular public</p> |

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|          |      | <p>transport. The masterplan shall be subject to the considerations and specifications outlined in the Urban Development Strategy detailed in Chapter 10, to ensure that the future development of the Northwest Quadrant takes place in a co-ordinated and integrated manner.</p> <ul style="list-style-type: none"> <li>a) No development shall take place on the lands identified within the Northwest Quadrant (zoned Strategic Reserve or New Residential) until such time as a masterplan is prepared and integrated into the Naas Local Area Plan by way of a statutory amendment to the Local Area Plan, pursuant to Section 20 of the Planning and Development Act 2000 (as amended).</li> <li>b) No masterplan shall be completed until the OPW Flood Study has been finalised for the lands in the Northwest Quadrant.</li> <li>c) The masterplan shall include (but not be restricted to): <ul style="list-style-type: none"> <li>i. A phasing infrastructure programme including physical, social, transport and economic infrastructure.</li> <li>ii. Site-Specific Flood Risk Assessment for the masterplan lands.</li> <li>iii. Transport Impact Assessment.</li> <li>iv. Water and wastewater network requirements including assessments regarding the capacity of receiving environments.</li> <li>v. Associated Environmental Assessments and appropriate climate proofing measures</li> <li>vi. <i>A surface water management plan, to review the storm water network and identify areas for SuDS solutions</i></li> </ul> </li> <li><del>d) Individual applications for smaller sections of the Northwest Quadrant masterplan lands shall not be considered by the Planning Authority or An Bord Pleanála until the masterplan is integrated into the Local Area Plan in accordance with (a) above.</del></li> </ul> |



| Sub. No. | Name                                      | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 8.       | <b>National Transport Authority (NTA)</b> | <p><i>Issues Raised</i></p> <p>NTA welcomes the development of the Local Area Plan and the previously prepared supporting Naas Transport Strategy and objective (CSO 1.7) to create a Joint Integrated Spatial Plan for Naas and Sallins considering the interdependencies of the two settlements.</p> <p><b>Zoning and Masterplans</b></p> <p>The NTA welcome the masterplan for the NWQ as it is appropriate these lands are plan-led and suitable movement and transport objectives and infrastructure can be formulated as part of that process. The formulation of appropriate objectives relating to the proposed bus-priority route is required. The submission states that it will be appropriate at this stage to determine what design requirements would be required to service these lands in terms of providing for the various modes.</p> <p>The NTA acknowledge the Maudlins Interchange site and welcome the preparation of a masterplan for this area and state that the NTA would be happy to work with the planning authority in the preparation of these masterplans in conjunction with TII.</p> <p><u>Two Data Centre/Warehouse Sites</u></p> <ul style="list-style-type: none"> <li>• Reference is made to the two Data Centre /Warehouse sites identified however the NTA state that it is not clear how the zoning facilities 'warehouse' as this does not appear to be permitted under the zoning matrix.</li> <li>• Sites are not included in the SPIA and it is unclear if they can be serviced within the lifetime of the Plan.</li> <li>• No provision for a strategic reserve of employment lands.</li> <li>• Proposal to provide further zoning of lands to the west of the M7 appears to be contrary to the objective to consolidate and provide for a sequential development of lands at Naas.</li> </ul> <p><u>Newhall Lands</u></p> <ul style="list-style-type: none"> <li>• Unclear the requirement for additional zoning for 'industry/warehousing' at the Newhall Lands in light of the existing undeveloped zoned lands to the north of the Newhall Retail Park.</li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>The extent of the area zoned to the south of Newhall Retail Park is greater than that indicated in the SPIA.</li> </ul> <p><b>Walking, Connectivity and Cycling</b><br/>NTA welcomes the walking, connectivity and cycling movement objectives. The submission particularly notes the proposed cycle track scheme on the Main Street, which will be critical to enabling and encouraging modal shift in the town. Similarly, the east-west connections linking the northeast quadrant to the northwest quadrant will provide important connections for residential, education and business trips.</p> <p><b>Public Transport</b></p> <ul style="list-style-type: none"> <li>The NTA welcomes the public transport objectives (MTO 2.1 – 2.7) included in the Plan.</li> </ul> <p><u>Bus route proposals</u></p> <ul style="list-style-type: none"> <li>NTA is broadly in agreement, in particular the Central Spine and the Eastern Spine.</li> <li>A north-south spine route will serve specific demands in Naas including trips to the town centre, residential locations, the train station as well as providing connectivity to other local towns such as Clane. This route is already being used to a limited extent, but there is scope to better serve the demand if infrastructural improvements were implemented.</li> <li>Opportunity to reprioritise the use of the road space in the context of the opening of the Osberstown Interchange. The existing pressure on the Monread roundabout will be lessened and the importance of this link to public transport, both in terms of bus movement as well as facilitating access to the train station should be realised. Providing one strong north-south link in the town and giving appropriate bus priority should be a key objective.</li> <li>The Eastern Spine route provides linkages to the train station, the town centre and the hospital for the residential population. In the context of the Osberstown Interchange and the reprioritising of the Monread roundabout and the Sallins Road, it is not considered a requirement for the proposed additional bridge over the M7 which forms part of this route and the delivery of any such future project should not delay the prioritisation of this route in the short term.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <ul style="list-style-type: none"> <li>Western spine is a long-term future option as there is not population or road infrastructure to support this measure.</li> <li>Welcoming of the objective to upgrade the existing interchange at Market Square, bring the greatest net benefit.</li> </ul> <p><u>Bus Priority Measures</u></p> <ul style="list-style-type: none"> <li>In order to facilitate the continued sustainable growth of the town, providing an attractive public transport system with increased patronage should be a critical transport objective.</li> <li>The town has an alternative northern circulation route, a partial southern circulation route and a new alternative route to Sallins as well as the ability to bypass it.</li> <li>In this context, it is appropriate to reimagine the existing road infrastructure at certain locations and to switch the priority from the car to public transport as well as walking and cycling.</li> <li>Possible to maximise the use of existing road space, so that additional infrastructure may not be required now that the former is delivered.</li> <li>It does not appear that any bus priority measures are proposed along the Sallins Road which will form a large part of the proposed Central Spine bus route.</li> <li>In accordance with the objective to deliver both the Central and Eastern spine routes, further bus priority measures, particularly in the short term, in the absence of a bridge over the M7, will be required to enable these routes to be attractive and efficient means of movement.</li> </ul> <p><u>Connecting Ireland: Rural Mobility Plan</u></p> <ul style="list-style-type: none"> <li>The submission makes reference that the Rural Mobility Plan has been launched since the Transport Strategy was completed. The Plan aims to improve mobility in rural areas, with better connections between villages and town. Key to encouraging the use of public transport is an appropriate level of service and accessibility of stops and quality. Key infrastructure such as turning facilities and shelters with seats will increase the attractiveness of this mode.</li> </ul> <p><b>Roads</b></p> <ul style="list-style-type: none"> <li>Notes Objectives MTO 3.1-3.8.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <ul style="list-style-type: none"> <li>• Welcomes the revised design objectives for the Gallop's Avenue which will ensure that it a safer environment, more conducive to cycling and walking.</li> <li>• National road network should not be jeopardised, provision of recent upgraded infrastructure provides opportunities to reimagine the road network within the town to ensure that a balance of needs between all road users is achieved.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The comments from the NTA, specifically those relating to the masterplan for the Northwest Quadrant, are welcomed.</p> <p><i>Data Centre/Warehouse Sites</i></p> <p>The comments from the NTA in relation to the zoning of land for Data Centre/Warehouse, with warehousing not permitted are noted. Kildare County Council uses the Generalised Zoning Types (GZT) which represents a consistent scheme for categorising land use zonings across all local authorities. There is no specific category for the zoning of land for data centres. However, Warehouse (C4) is a sub-category of Commerce/Industry/Enterprise/Economic Development where the primary use would be the storage of equipment. At its core, a data centre is a centralised location that houses the computing and network equipment required to collect, store, process, and distribute large amounts of data. However, in the interest of clarity it is proposed to amend the GZT associated with the data centre sites to P: Data Centre (C7).</p> <p>The National Planning Framework sets out a two-tier approach to land zoning, however there is no specific requirement to carry out an infrastructural assessment for economic lands. However, Appendix 2 of this report has included detailed transport modelling carried out on the data centre lands, showing no anticipated traffic issues.</p> <p>There is also no requirement to identify lands in reserve for employment. The economic lands zoned in the draft Plan can accommodate a variety of floorspace scenarios, ensuring Naas has the ability to increase its employment base given its status as a 'Key Town' and County Town. The land zoned will ensure that Naas is sufficiently agile to accommodate unexpected opportunities that may arise during</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p>the plan period, while continuing to balance population and employment growth. Notwithstanding this, the lands identified as Strategic Reserve within the Northwest Quadrant will provide for a mix of uses including for residential development and economic uses.</p> <p><i>Newhall Lands</i><br/> The comments in relation to the land zoned at Newhall are noted. The lands referred to as undeveloped lands to the north of the Newhall Retail Park are well served by existing infrastructure hence their status as Tier 1 sites. However, given their proximity to the national road network they are subject to a 91-metre building line setback (Objective MTO 3.7, refers). Furthermore, the site is traversed by 220Kv lines which under the County Plan require a 30-metre clearance distance either side of the lines. Therefore, this land has impediments to development that may not suit all potential end users.</p> <p>The Council note the NTA's comments in relation to extent of the lands detailed in the Infrastructural Assessment (H7) which accompanies the draft Plan and the land zoned south of Newhall on Map 11.1. The additional lands relate to an existing use on site with a recent planning permission granted for an extension to the use. The Infrastructural Assessment examined undeveloped land and did not include those with an established use on site.</p> <p><i>Sallins Road</i><br/> The comments in relation to reimagining the road space in the context of the opening of the Osberstown Interchange, are noted. However, it must be recognised that there are significant width constraints along the Sallins Road, particularly at the bridge over the M7 which will impact significantly on the possibility of reimagining this route. Therefore, in this context there is a requirement for the proposed additional bridge over the M7.</p> <p><i>Bus Priority Measures</i><br/> The comments in relation to bus priority measures are noted. However, the transportation measures detailed in the draft Plan are of a high level and detailed proposals will be brought forward when</p> |

| Sub. No. | Name        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |             | <p>funding is secured and will provide for the full design incorporating the necessary bus priority measures.</p> <p><b>Chief Executive's Recommendation</b></p> <p><b>Proposed Material Alteration</b></p> <p>Amend the title of the P: Data Centre /Warehouse (C4) to P: Data Centre (C7) and any consequential amendments.</p> <p>Amend table 11.1 from P: Data Centre /Warehouse (C4) to P: Data Centre (C7)</p> <p>Amend Table 11.1.1 from P: Data Centre /Warehouse (C4) to P: Data Centre (C7)</p> <p><b>EDO 1.12</b> Facilitate the location of Data Centre development on land designated P: Data Centre/Warehouse at Caragh Road South and Jigginstown for the identified land use only subject to appropriate environmental and transport impact assessments.</p>                                                                                                                                               |
| 10.      | Irish Water | <p><i>Issues Raised</i></p> <p>Irish Water welcome the inclusion of our comments and assessments in both Chapter 9 (Infrastructure) and in the Sustainable Planning and Infrastructural Assessment document.</p> <p><b>Update on the National Water Resources Plan</b></p> <ul style="list-style-type: none"> <li>• Carrying out a review of all Water Resource Zones in the country, to determine projects to resolve deficits on a nationwide scale.</li> <li>• Phase 1 - highlight the vulnerability of our water supplies particularly during severe weather conditions (storms and droughts), including our largest supply, the Greater Dublin Area.</li> <li>• Phase 2 - Assessment of all potential options to resolve needs in the area, and how these have been assessed to develop a Preferred Approach, including short, medium- and long-term investment requirements and operational improvements.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <ul style="list-style-type: none"> <li>• Supply Demand Balance (SDB) in 2020, showed a deficit in supply to the GDA in the short medium and longer term.</li> <li>• Given the magnitude of the deficit a long-term solution will require a large new source to the GDA.</li> <li>• Looking to the existing asset base to develop measures required in the medium term alongside leakage measures to ensure security of supply to the existing customers and continue to allow growth.</li> </ul> <p><b>The Barrow Water Supply Scheme Area Extension Project</b></p> <ul style="list-style-type: none"> <li>• Working in partnership with KCC and DCC, the project will extend the water supply from Srowland Water Treatment Plant in County Kildare and facilitate a strategic link with Ballymore Eustace Water Treatment Plant.</li> <li>• Project will increase the security and resilience of the drinking water supply for Kildare and the wider Greater Dublin Area (GDA).</li> <li>• Project will maximise the available supply from Srowland WTP and provide up to an additional 18Mld to the wider region.</li> <li>• The project includes the construction of: <ul style="list-style-type: none"> <li>○ 3km of water main between Killashee and Naas via the Rathasker Road.</li> <li>○ Two new booster pump stations at Brannockstown and Carnalway to facilitate the transfer of water from the Old Kilcullen reservoir towards Ballymore Eustace Water Treatment Plant.</li> <li>○ Upgrade the pipework connections and controls and telemetry at Ballymore Eustace Water Treatment Plant and Old Kilcullen Reservoir.</li> </ul> </li> <li>• The benefits when complete will be to: <ul style="list-style-type: none"> <li>○ support future growth and development in Naas and the surrounding area.</li> <li>○ Decrease the dependence in Kildare on the River Liffey water supply.</li> <li>○ Increase the resilience of the drinking water supply.</li> <li>○ Increase in supply of up to 18 million litres per day (Mld) of drinking water (140,000 people).</li> </ul> </li> </ul> <p><b>Wastewater treatment and Network</b></p> |

| Sub. No. | Name                           | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|          |                                | <ul style="list-style-type: none"> <li>• Wastewater in Naas is served by Osberstown treatment plant.</li> <li>• Headroom available at the plant to cater for the projected population.</li> <li>• Plant also serves other settlements namely, Newbridge, Clane and Sallins.</li> <li>• Already been upgraded to increase capacity.</li> <li>• Working on the next stage of the scheme, upgrading the sewer network, which will ensure the network has enough capacity for future growth and will reduce the risk of overflows during storms.</li> </ul> <p><b>General Comments</b></p> <ul style="list-style-type: none"> <li>• Irish Water will have to model the required demand against latest network demands. New connections may be assigned on a first come, first served basis until the capital works are completed.</li> <li>• Two links are provided relating to connections and developer Services and details of water and wastewater plans and ongoing projects.</li> </ul> <p><b>Chief Executive's Opinion</b><br/>The information detailed in the submission from Irish Water on the draft Plan is noted.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |
| 11.      | <b>Department of Education</b> | <p><i>Issues Raised</i></p> <ul style="list-style-type: none"> <li>• The Department of Education note the designation of Naas as a Key Town and the population is to grow substantially, with 6,704 persons to 2027. The Department states that such growth could yield further potential requirements for school places at both primary and post-primary level.</li> <li>• The Department is actively seeking a site for a new primary school. The Naas Community College is well advanced and will alleviate current pressures.</li> <li>• The Department considers that it would be prudent to cater for possible future requirements to zone a suitably located site in the Naas LAP that is suitable to cater for a future post-primary school.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                         |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <ul style="list-style-type: none"> <li>• The Department notes the locations identified in the LAP but states in addition to those identified, there may be other options to explore, including State-own lands in the Canal Quarter.</li> <li>• The submission refers to two guidance documents relating site suitability for both primary and post-primary schools titled the Technical Guidance Document (TGD -025) Identification and Suitability Assessment of Sites for Primary Schools and the Technical Guidance Document (TGD -027) Identification and Suitability Assessment of Sites for Post-Primary Schools.</li> <li>• The Department welcomes the inclusions of HCO 3.1 and HCO 3.5 in the draft LAP.</li> <li>• The Department pointed out that re-naming has occurred, and it is the Department of Education and no longer the Department of Education and Skills.</li> <li>• The Department states that they welcome the continued engagement with KCC regarding the development of both new and existing schools, and emphasizes the critical importance of the ongoing work in ensuring sufficient land is zoned for schools.</li> </ul> <p><b>Chief Executive's Opinion</b><br/> The content of the submission from the Department of Education is noted. The Council will continue to work closely with the Department of Education to ensure adequate provision for schools at primary and post-primary level.</p> <p>In relation to identifying a site in the Canal Quarter for Education it is considered appropriate to zone a 2.2 hectare central site for this purpose.</p> <p>Reference to the Department of Education's title change is noted and this will be reflected throughout the draft Plan.</p> <p><b>Chief Executive's Recommendation</b><br/> The Draft Plan will reflect the name change to the Department of Education and is detailed under Section 6 on typographical errors.</p> |

| Sub. No. | Name                                                                            | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |                                                                                 | <p><b>Proposed Material Alteration</b><br/>To change Land Use Zoning Map 11.1 by changing the zoning objective of a 2.2 ha site within the NWQ from SR to E: Community &amp; Education. (See Appendix 3).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 12.      | <p><b>Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.</b></p> | <p><b>Archaeology</b><br/>Archaeological heritage is addressed quite comprehensively however, it is hoped that the following points will add more detail to the existing policies and objectives and address some issues specifically relevant to Naas.</p> <p><b>Overarching Policy for the protection of archaeological heritage</b></p> <ul style="list-style-type: none"> <li>• The submission outlines that the Council shall protect sites on the Sites and Monuments Record, Record of Monuments and Places, areas included in the Register of Historic Monuments, National monuments subject to Preservation Orders, Archaeological objects within the meaning in the Act, protected wrecks, and archaeological features as not as yet identified.</li> <li>• KCC shall take full account of, and be guided by, national policy on the protection of the archaeological heritage as set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999).</li> </ul> <p><b>Recommended policies to protect the archaeological heritage</b></p> <ul style="list-style-type: none"> <li>• Reservation in-situ of historic town defences.</li> <li>• Ensure that provision is made in the planning process ensuring the preservation in-situ of significant medieval masonry remains.</li> <li>• Secure the preservation in-situ of surviving above-ground urban medieval and early modern structures.</li> <li>• Secure the preservation in-situ of significant examples of industrial, military and nautical heritage that form part of our post-medieval archaeological heritage.</li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>• Preserve the setting and amenity of all archaeological monuments, with particular regard for upstanding monuments and the line of historic town defences.</li> <li>• Ensure a sufficient buffer area is maintained between a development and the line of historic town defences.</li> <li>• Retain the existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins.</li> <li>• Ensure that historic graveyards in the ownership or care of the local authority are managed and maintained.</li> </ul> <p><b>Architectural Heritage</b></p> <ul style="list-style-type: none"> <li>• Built heritage is considered as an integral part of the wider built environment and should be dealt with holistically throughout the Plan.</li> <li>• The Department recommends the appointment of a Conservation Officer with expert skills and practical experience.</li> <li>• Department supports the role of the Architectural Conservation Officer and their invaluable contribution to multi-disciplinary working and collaboration within the Local Authority to support the securing of larger scale urban regeneration funding and to the delivery of major infrastructural projects.</li> </ul> <p><b>Overview of policy context</b></p> <ul style="list-style-type: none"> <li>• The submission outlines that the renewal of a number of key national policy documents pertaining to archaeology and built heritage, including (Draft) Heritage Ireland 2030 and the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage, the (Draft) Built Vernacular Strategy and the National Policy on Architecture (pending), provide the context for this response. Policies and Objectives in these core documents should be inserted into plans where possible.</li> <li>• The Department recognises that this is an important time to be working collaboratively and strategically with Local Authorities particularly with regard to vulnerable built heritage sites, the safeguarding of vacant buildings and the promoting/enabling reuse and repurposing of</li> </ul> |

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|          |      | <p>existing cultural assets. In this regard the Department notes the importance of new areas of interest including built vernacular architecture and its setting both rural and urban, the focus on historic town centres and their vitality post the impact of the COVID -19 pandemic and the protection and potential of planned and designed landscapes for recreational and amenity purposes.</p> <ul style="list-style-type: none"> <li>• The submission makes reference to Goal No.11 of the UN's Sustainable Development Goals and the role culture and heritage play and how will it inform the National Policy on Architecture – Places for People, which is being prepared.</li> <li>• The submission notes that historic urban centres are a focus of government due to the negative economic impact of COVID-19 on urban centres, but there is now an opportunity for vacant town centre buildings for their re-use. The Department states it is supportive of consideration of the quality of the built environment as the setting for our lives, work and recreation and the role of cultural heritage as the capital for societal well-being, innovation and for social cohesion. The COVID-19 lockdown has demonstrated the importance of cultural and natural heritage sites and their often-shared amenity, which supported well-being in communities particularly in urban centres during the pandemic lockdown.</li> <li>• The Department states it supports the holistic integration of heritage-led strategies to deliver key infrastructural projects such as rural broadband and its sensitive installation in historic towns, the heritage-led regeneration of urban sites and the incorporation of trans-generational housing, accessible services such as health care centres adapting key town buildings and the wider consideration of cultural heritage and the opportunities it presents in relation to flood mitigation.</li> <li>• The Department states there is an opportunity for making cultural heritage more accessible and better integrated with wider tourism and recreational opportunities of the county is welcomed. This will be strategically important to enhancing as well as spreading the tourism capacity through the county's heritage sites and historic towns. The Department supports the integration and communication of multiple strands of cultural and natural heritage, particularly through the implementation of a blue and green infrastructural project that holistically deals with all aspects of archaeological, built and natural heritage.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>The Department submits that the Local Authority's leadership in the on-going support of conservation practice and the development of expertise across the heritage sector is of strategic importance in maintaining finite resources and the nurturing of specialist skills and knowledge for guiding maintenance, repair, remaking, adaptation and conservation of built heritage to best conservation practice. The submission also notes that a greater understanding of the town's surviving fabric requires research to consider effective models which address vacancy and demonstrate reuse based on an understanding of the plan, form and structure of the town's buildings. The Department also states that community engagement is necessary to a return to living in vacant buildings, to support living over the shop, and for the sensitive development to the rear of properties.</li> </ul> <p>The Department summarises that there are a number of new emerging which require greater attention and focus in future development plans and policies of Local Authorities including:</p> <ul style="list-style-type: none"> <li>National Policy on Architecture –This report is to be published in 2021.</li> <li>Heritage Ireland 2030 (Draft)</li> <li>Climate Change – heritage resilience and sustainability, consideration of appropriate measures to ensure the long-term survival of historic structures, their uses and their contribution to the sense of place.</li> <li>National Inventory of Architectural Heritage.</li> <li>Vernacular Architecture (National Strategy pending) - address the incremental damage and cultural loss of settlements and their settings due to the lack of awareness, vacancy and demolition.</li> <li>Vernacular Architecture (National Strategy pending) - address the incremental damage and cultural loss of settlements and their settings due to the lack of awareness, vacancy and demolition.</li> </ul> <p>The following areas are recommended for inclusion.</p> |

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|          |      | <p>a. Town revitalisation - Enhanced policies for heritage-led urban regeneration based on an understanding of their cultural layering/transmission of cultural significance/high quality adaptation, reuse and renewal of historic fabric and remaking of historic places.</p> <p>Specific policy around the identification of archaeological and built heritage and its role in urban regeneration may be supported by the setting up of multi-disciplinary Local Authority teams to assist the planning process.</p> <p>Key objectives for the protection of built heritage character, include high quality repair and intervention, the reuse of urban buildings and understanding of their historical context with appropriate infill to their character and scale needs to be addressed as part of the future revitalisation of urban centres.</p> <p>b. The CTHCP was piloted in Naas in 2016 and the Department welcomes the establishment of baseline data for town centres and its use to inform future heritage-led development strategies based on enabling and reuse of underutilised buildings.</p> <p>c. The Department notes the interconnection between built and natural heritage and the importance of the resource of the National Inventory of Architecture (NIAH) and the NIAH Garden Survey as the basis for assessment and interconnection of culturally significant sites as part of blue and green infrastructure projects and regional parks.</p> <p>d. Tall or large buildings in historic urban centres – mitigation of negative impact on historic character areas and urban landscape in relation to large ground scrappers as well as tall buildings through the consideration of design criteria and guidance to safeguard the historic built heritage context.</p> <p>e. Flood Relief works – attenuation, upgrading and repair of existing infrastructure, high quality design of new infrastructure and co-ordination with public realm/recreational amenity in urban centres.</p> <p>f. The Department welcomes the Local Authority initiating research, implementing policy, raising awareness and providing guidance to owners of historic buildings on such issues as thermal upgrading and building repair requires in-house expertise to provide coherent and coordinated</p> |

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|          |      | <p>advice and a key recommendation is the appointment of key resources such as Conservation Architect, Archaeologist and Heritage Officer to undertake the delivery of the Department's policies.</p> <p><b>Specific observation in respect of Chapter 10 – Urban Regeneration</b></p> <ul style="list-style-type: none"> <li>• The Plan has to deal with the legacy and outcomes of the past and create a new vision that consolidates and makes the urban centres vibrant, sustainable and attractive to its community.</li> <li>• Surveys undertaken as part of the Collaborative Town Health Check (2016) provide interesting feedback on vacancy levels, environmental issues, opportunities and deficits that needed consideration, but importantly also give a good basis for considering the future vision for a place.</li> <li>• A key finding of the CTHCP for Naas indicated that the community considered it primarily as a place to recreate, socialise and to enjoy culture.</li> <li>• In principle the Department is positively disposed to heritage-led regeneration and the harnessing of cultural assets to support the well-being and cohesion of society - an approach that supports sustainable development and climate action.</li> <li>• The Department considers that the key urban principles and the proposed mapping don't adequately reflect or integrate an adequate understanding of the urban form, the surviving integrity of the town in terms of its archaeological, built and natural heritage.</li> </ul> <p><u>CRA 1: Main Street</u></p> <ul style="list-style-type: none"> <li>• To achieve the role of CRA 1 an understanding of the building typologies and their building plots is required to ascertain how they will revert to residential use above the shop with amenity and what the potential for subdivision, extension and infill to the rear sites may be.</li> <li>• The provision of new high quality public realm will support town centre living, however, it will not address key issues of building vacancy etc. and for historic character and sense of place to survive key characteristics of the historical places and routes need to be set out as part of the plan.</li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>• The submission notes that an ACA has been established of the Main Street and audit of the surviving significance of the built fabric should be undertaken and initiatives that support the maintenance, best practice repair and reuse of the historic streetscapes appropriate to the built heritage significance of the street fronted buildings should be included in the proposed LAP.</li> <li>• The map for the Main Street should reflect the cluster or density of heritage significance, which would inform the overall public realm vision, prioritise works to core heritage buildings etc.</li> <li>• The mapping provides minimal information about the archaeological and built heritage significance, awareness of the overall grain, scale and evolution of the Main Street, the important views and vistas into and along the Main Street terraces, the key landmark buildings that enclose the public spaces and their interface with the public realm.</li> <li>• The archaeological and built heritage sites that provide the character of Naas should be clearly discernible and the relationship and connection to adjoining sites considered i.e. The Motte, the canal basin and canal, the church lands and its structures, the Mill Race and the mill complex.</li> </ul> <p><u>CRA 2: St David's</u></p> <ul style="list-style-type: none"> <li>• Having regard to the historic environment viewer the evolution and cultural layering of this site is evident and that this CRA represents the core or nucleus of the historic town.</li> <li>• The Department is supportive of residential and diverse use however the narrative in the Plan doesn't adequately emphasise the need for heritage-led approach to the site of such cultural importance to Naas and the county.</li> <li>• The proposed new buildings described have not adequately addressed the surviving heritage significance of the site nor has it made adequate provision for its long term survival based on guiding sensitive re-use and protection of medieval enclosure, routes, the historic setting of the core buildings, the graveyard and the water course feature which links to St. Corban's Mill close by.</li> </ul> |



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|          |      | <ul style="list-style-type: none"> <li>• LAP map doesn't adequately identify the heritage significance of this site with several of the key structures within as well as adjacent to the site not adequately highlighted – the line of the early enclosed wall, the medieval laneways and connections, the views of St. David's from Main Street, the enclosure of the North Main Street by the former Methodist Hall, the former school building associated with St. David's, the setting of St. David's' Church of Ireland, entrance off Main Street etc.</li> <li>• The mapping doesn't adequately identify the major drop across the site towards St. John's Lane due to the historic excavation immediate to the former school house nor reflect the impact of proposed development, access and permeability through the castle site, the church and along the surviving mill race and its mature setting.</li> <li>• Providing areas of development without sufficient survey to the cultural layering and the topography of the site provides unrealistic expectations of future development potential.</li> <li>• LAP proposes to 'allow for the sensitive and appropriate insertion of openings in the wall along Church Lane to cater for pedestrian access to new developments' – in principle interventions may be achieved however they can only be determined once the heritage assessment had been determined and the degree of alteration determined as appropriate to the integrity of the site.</li> <li>• The Department is not in support of a landmark building as denoted to St. John's Lane due to the potential impact on the historic streetscape and roofline of the Main Street, the setting of St. David's Church of Ireland and its graveyard.</li> <li>• The omission of any detailed design criteria regarding this site is of concern as the insertion of monolithic and out of scale structures within the historic streetscape are immediately apparent and detrimental to the overall architectural character of the town.</li> </ul> <p><b>Nature Conservation</b><br/> The Department states that the observations proposed are not exhaustive but are intended to assist Kildare County Council in meeting its obligations in relation to nature conservation, European sites, biodiversity and environmental protection in the process of preparing the Naas Local Area Plan 2021-2027.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <p><u>7. Natural Environment and Climate Change</u></p> <p><u>7.2. Green Infrastructure</u></p> <ul style="list-style-type: none"> <li>• The Department welcomes the Council's policy to protect, reinforce and strengthen Naas's Green Infrastructure network and to strengthen links to the wider regional network. Detailed Green Infrastructure mapping in Appendix 1 (maps 7.1 and 7.2) provides a practical framework to support the implementation of this policy and associated objectives.</li> <li>• The Department advises that a link to and a reference for habitat mapping on which the Green Infrastructure design is based should be provided to inform the general public and community groups of habitats found within the Naas area.</li> <li>• The Department notes that the Plan includes policies and objectives to increase access to and provide infrastructure within the Grand Canal for recreation, tourism and urban development.</li> <li>• The submission references that the canal is a proposed Natural Heritage Area (pNHA).</li> <li>• The Naas Corbally branch of the canal between the junctions with the Grand Canal Main Line at Railway Bridge to Corbally Harbour has been subject to ecological survey. Sections of canal around Naas Harbour were found to have a diverse water plant community. Many Charophyte species were recorded west of Naas Harbour. A fresh otter spraint was recorded in this area. The Annex I listed species, kingfisher, was recorded along the canal at Herberstown. The section of canal between Hoare's Bridge and Corbally Harbour is considered an Ecologically Sensitive Area (ESA) due to the presence of late successional stage emergent vegetation, with rare plant communities present.</li> <li>• Reference is made to Policy NH 10 of the KCDP to restrict development within a pNHA to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes.</li> <li>• An AA does not consider the effects of the Plan on a pNHA.</li> <li>• The Department considers that the sensitivities of natural heritage within pNHA must guide the Plan at a strategic level and policies and objectives which would likely have negative outcomes for biodiversity both alone and in combination with other developments within this site should be identified and suitable mitigation put in place.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <ul style="list-style-type: none"> <li>Indirect impacts, such as disturbance impacts caused by increased access to the canal, must be included in this assessment.</li> </ul> <p><b>9. Infrastructure and Environmental Services</b></p> <p><b>9.2.1. Water Supply</b></p> <ul style="list-style-type: none"> <li>The Department notes that the future water supply for Naas will be fed from a combination of the Barrow (Srowland) and the Ballymore Eustace Scheme.</li> <li>The Barrow Public Water Supply is abstracted from the River Barrow and River Nore Special Area of Conservation (SAC) (Site Code 002162) at Srowland and, therefore, the water supply to service the future development of Naas may impact on this Natura 2000 site.</li> <li>Potential impacts have not been addressed in the Appropriate Assessment (AA) screening report prepared by ARUP and dated 8th March 2021.</li> <li>The Department is aware that this project is at an advanced stage of development, with an expected completion date of Q2 2021 given by Irish Water. Nevertheless, the Department considers that the impacts of this project on the River Barrow and River Nore SAC and measures put in place to mitigate these impacts should have been included in the AA screening report.</li> <li>When assessing the impacts of water abstraction from the Barrow to supply the future development of Naas, AA screening should include the projected increased water demand due to the zoning of land in areas P1 and P2 for the provision of Data Centres, which are known to use considerable quantities of water for cooling.</li> <li>Changes in water availability due to climate change should be considered in any assessment.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The comments from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media are noted. The overarching policy and recommended policies for the protection of archaeological heritage are noted. Policy BH4 Archaeological Heritage states that the Council will safeguard the archaeological heritage in Naas and avoid negative impacts on sites, monuments, features or objects of significant historical or archaeological interest.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <p>The Council note the comments in relation to the appointment of a Conservation Officer with expert skills and practical experience. However, this is outside the remit of a land use plan although it is noted the recruitment process is underway.</p> <p><u>Chapter 10 – Urban Regeneration</u></p> <p>The Department's observations and comments regarding urban regeneration in Naas and the Collaborative Town Health Check (2016) are noted. It is agreed that the Health Check provided critical information on the town and as such it formed an important basis for the development of the Regeneration Strategy. The Department's opinion on the concept of heritage-led regeneration and the harnessing of cultural assets is also noted and accepted. With regards to the opinion about the maps contained in the Strategy, it should be noted that the maps included in the regeneration strategy are designed to be conceptual in nature in order to convey the overarching parameters and principles for the specific sites discussed. It is intended that more detailed mapping will be provided in the various masterplans undertaken during the life of the plan, and in the Public Realm Strategy.</p> <p><u>CRA 1: Main Street</u></p> <p>The Department's comments on the CRA 1: Main Street are acknowledged. The importance of the building typologies and their plots to the preservation of the character of the area are also acknowledged. As noted in the submission, Main Street forms a key component of Naas Architectural Conservation Area (ACA) and as such Chapter 8 contains a range of provisions which seek to safeguard and enhance the character of the ACA.</p> <p>The map for the Main Street CRA, is designed to be conceptual and overarching in nature. In this regard, it is considered that the Naas Town Renewal Masterplan (see Chief Executive's response to Section 10 of the Draft Plan) along with the Public Realm Strategy will provide a far greater level of</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <p>detail as to how the presentation of core heritage buildings can be enhanced within the overall public realm of the town centre.</p> <p>With regards to the heritage mapping of the Main Street CRA, it is noted that the draft Plan is accompanied by a Statement of Character for Naas ACA which provides an array of detailed mapping and an analysis of the built environment characteristics of the area including important views and vistas, along with an in-depth exploration of the area's architectural history. Similarly, this is also the case with key archaeological and built heritage within the town. The Naas Town Renewal Masterplan, Canal Quarter Masterplan and the Public Realm strategy will be required to adhere to the provisions contained within the Statement of Character for the ACA. This includes both works which affect the character of the ACA and works to the Public Realm within the ACA.</p> <p><u>CRA 2: St. David's Castle</u></p> <p>The Department's comments in relation to the proposals contained in the draft Plan for the Castle Quarter are noted. The draft Plan acknowledges the 'historic provenance' of the area. The contention that the draft Plan does not adequately emphasise the need for heritage-led is not accepted. It is noted that the plan considers that the Castle Quarter <i>'represents a major opportunity to deliver a unique amenity for Naas which can exploit the historic character of the site and create a potential major visitor 'destination' and community gathering space within the town'</i>.</p> <p>In relation to the built form proposed for the area, it is noted that this is conceptual and indicative in nature. It is further noted that the CRA is almost entirely located within the zone of archaeological potential and therefore any finalised proposals will be required to undertake the requisite archaeological surveys prior to the commencement of any development.</p> <p>It is considered that the Key Design Principles for 'CRA 2: Castle Quarter' acknowledges the undulating topography of the area and the sensitive boundary interfaces of the CRA along John's Lane and Church Lane. The Key Design Principles also provides that new built form should respect the scale, massing and fine grain of the surrounding buildings. As such any landmark building will be</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p>required to take cognisance of this sensitive receiving environment, which is located within a designated ACA. With regard to the proposed sensitive insertions, any such development proposal will be dealt with through the development management process and will require that all necessary heritage and conservation issues are taken into consideration.</p> <p><u>Chapter 7 Green Infrastructure</u><br/> The points raised in relation the impacts on the Canal NHA are noted. The final AA screening will provide an assessment of potential impacts on the Annex I listed species, kingfisher at the Grand Canal pNHA. Impacts on pNHAs are currently considered in the SEA under biodiversity.</p> <p><u>Chapter 9 Water Supply</u><br/> The LAP states that <i>'Naas is currently served by the Poulaphouca Regional Scheme which is serviced by Ballymore Eustace Water Treatment Plant to Naas via Dowdenstown Reservoir. However, the future supply will be fed from a combination of the Barrow (Srowland) and the Ballymore Eustace Scheme. Irish Water indicates that there is adequate water supply to cater for the future demands generated during the lifetime of this Plan.</i></p> <p>At this point it is unclear when the data centres might be built and what the water demand might be once constructed. It is therefore considered appropriate to include an objective for data centres to highlight the requirement for AA of any project with potential to significantly impact water supply.</p> <p><b>Chief Executive's Recommendation</b></p> <p><b>Proposed material Alteration</b></p> <p>Insert new Policy IO 1.4 as follows:</p> <p><i>Any project which has the potential to significantly increase the demands on the water supply for the town (e.g. Data Centres) will be required to carry out an Appropriate Assessment to</i></p> |

| Sub.<br>No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                 |
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|             |      | <i>ascertain whether the project has the potential to cause adverse effects on the integrity of any European/Natura 2000 site. EPA and Irish Water abstraction licensing will also require Appropriate Assessment for a project which might significantly affect a European/Natura 2000 site.</i> |





## **4.0 Summary of Submissions/Observations Themed by Section of Draft LAP and Chief Executive's Opinion and Recommendation**

### **Chapter 1: Introduction and Context**

#### **Summary of Issues Raised**

##### Achievement of Goals from Previous Plan

Submission 31 refers. The submission states that there should be a list of goals from the previous plan, detailing what has been achieved and providing reasons on goals that have been achieved.

##### Overview of Core Issues and Development Challenges

Submission 536 refers. This submission refers to text from Section 1.4 which highlights lack of social and community infrastructure delivery and poor emphasis on public transport, walking and cycling. The submission outlines its agreement with this content.

#### **Chief Executive's Opinion**

##### Achievement of Goals from Previous Plan

The submission requesting the inclusion of material detailing the achievements of goals from the previous plan, or lack thereof is acknowledged. In this regard, it should be noted that previous plan for the Naas was a Town Development Plan and not an Local Area Plan and contained provisions which could not be transferred to a Local Area Plan, and now fall under the remit of the Kildare County Development Plan (2017 – 2023). The Naas Town Development Plan (2011-2017) was also subject to differing statutory provisions which included a 2-year progress report which detailed aspects relating to the implementation of the Plan. This is available for inspection on the Council's website.

Whilst the previous Plan did not include stated goals per se, it did contain an array of policies and objectives. In preparing the draft Local Area Plan for Naas, a comprehensive review of these policies and objectives were undertaken where it was decided whether or not they would be transferred to the LAP. Specific objectives that had been achieved or were not readily transferable were omitted, whilst others which remained to be implemented or still relevant were incorporated into the draft Plan. Lastly, it is noted that many policies and objectives are continuous in nature, that is to say a policy to safeguard the natural environment of the town will be required to be implemented on an ongoing basis across successive plans.

##### Overview of Core Issues and Development Challenges

The submissions agreement with some of the content of Section 1.4 is noted.

#### **Chief Executive's Recommendation**

No change recommended.

## Chapter 2: Planning Context and Vision for Naas

### Summary of Issues Raised

#### Overall vision for Naas

Submissions 25, 138, 268, 282, 317, 396, 428, 444, 461, 502, 510, 519, 560 and 701 refer.

Several submissions received raised issues regarding the overall vision for Naas with one submission stating that Naas, the county town must develop and be re-imagined for the 21<sup>st</sup> Century and that the vision should be to make it attractive for families by making it accessible for all. This submission notes that Naas has a good reputation, it is an attractive town and that there is a need to build on its strengths. Another submission states that Naas should be positioned as a hub of social and cultural activity given the rich history of the town. A further submission hopes that the town will grow with a sense of pride, caring and peace where development is inclusive and recognises value of economic prosperity and enhanced community amenities, while preserving the past heritage in order to create an identity and vision for the future.

A number of submissions received state that the draft Plan does not offer any clear or long term vision. One submission states that the vision falls short and that it should be inspiring, and place Naas as 'best in class' for at least one of the seven core themes. Another states that the document contains a series of confusing and over-engineered objectives where the emphasis is more on infrastructure than on the day-to-day lived experience of Naas residents. Other submissions note the need for a strong vision with better long term planning and comprehensive short term planning, while one submission states that the draft Plan does not deliver on the mission and vision statement and goes on to note that there is little sense of long-term thinking. This submission further states that the draft Plan feels like more of the same, with a little more emphasis on climate and operating within national framework policy/plans.

Other submissions received however take a differing view, with some welcoming the vision or specific elements of the vision including one submission which praises planners for many achievements, despite limited budgets and resources. Another submission states that the draft Plan's vision for educational needs, cycleways and urban regeneration have merit.

Several submissions have focused on issues relating to the implementation of the draft Plan and the timeframes involved. In this regard, one submission states that timeframes in the plan are focussed on the medium term and are aspirational and strategic, rather than operational and action driven. Another submission states that the draft Plan is long on words and vague on detail and that Planning should be short and long term, beyond the life of the Plan. This submission notes that from concept to plan, to funding and execution can take twenty years or more to achieve. A further submission states that the draft Plan lacks assessment of need for longer than five years. Another submission states that the town development goals need to be SMART, i.e. Specific, Measurable, Achievable, Relevant, Time-based. This submission states that there is a need to use clear and unambiguous language and that regular check-ins should be completed to ascertain how Naas is performing against these goals and to stay on track. One submission received states that more detail about implementation should be included in the Plan. Another submission states that the Plan does not have measurable outcomes.

One submission notes the pace of growth in the town over the past number of decades and suggests that the pace of change already experienced will see Naas grow to a town of 40,000. Another submission received states that in seeking to meet the housing, social, transport and environmental needs of a growing population, reference should be taken from UK based industrial towns along canals which have been transformed into great areas to live and work and this could Make Naas a more liveable town.

A submission by the Kildare County Chamber notes that the future for Naas as envisioned by the National Planning Framework (NPF) and supported by the Regional, Spatial and Economy Strategy (RSES) is key to the ambitions of the county as a whole. In this regard, the submission states that provision of adequate fully serviced development land capacity within Naas environs is critical. The submission encourages dialogue between the County Kildare Chamber Policy Advisory Council and regarding the Naas Local Area Plan (LAP) and the County Development Plan process. Another submission notes it is expected that there would be a high level of synergy between the Naas LAP and the County Development Plan which is currently under review.

A number of submissions refer to the COVID-19 pandemic and note that it represents an opportunity to reimagine and reshape the vision of the town. One submission notes that the council should utilise government policy to facilitate working from home and active mobility. Another submission states that we need to learn from the pandemic in order to improve aspects of the transport, amenity, retail and overall communities' strategy. Another submission states that we need to capitalise on what we have learned as a result of the pandemic and the work/life balance has shifted.

One submission states that making the Irish language more accessible to the community should be central to the proposed vision, including more Irish language opportunities and ensuring that Irish is visible through public signage and given prominent status. The submission goes on to note that Plans are being negotiated for a Co. Kildare cultural centre in Sallins which will encourage tourism to the area. Accordingly, the submission contends that Naas is well positioned to benefit from visitors in terms of business, particularly if the Irish language is viewed as an integral part of the town. The submission requests that planning should begin now to ensure opportunities that exist are optimised.

#### Core Theme of Town Centre Regeneration

Submission 282, 502 and 536 refer.

One submission refers to the Regional Policy Objectives outlined in Section 2.1 and suggests RPO 4.5 (regeneration of historic core) and RPO 4.51 (regeneration of under-utilised industrial lands) and states that these should be addressed in short-term.

Another submission states that successful towns like Kilkenny, Westport and Clonakilty have strong town planning. It further states that it appears little or no attention is given to creating retail clusters and that this allows the proliferation of 'dead shops' on Main Street. The submission notes that dead shops are defined as those without interesting shop fronts or businesses attracting significant footfall, where no life is brought to the street. The submission states that without specifying what can and cannot operate on a high street, and incentivising the right retail clusters, planning by stealth creates dead town centres and dead shops. In relation to the issue of tackling vacancy within the town centre, one submission calls for a tax or levy on empty properties to incentivise owners to develop property.

With regard to the rejuvenation of the retail offer within the town centre, one submission states that there is a need to build on past successes/clusters and encourage their growth and for example, develop a cluster of high-end fashion, but notes that this requires active engagement and incentives. The submission further states that dead shops on Main Street should give way to active retail, even via pop-up shops.

One submission received is supportive of plans finishing the Town Centre complex and development of St. David's Castle. Another submission notes that the town has a growing reputation as a "food hub" with businesses ranging from coffee shop food trucks all the way to some of the finest restaurants in the county. This submission states that this should be further developed and provide the facilities, the support services, to promote Naas as a "foodie destination".

### Core Theme of Economic Development

Submission 282 refers.

In relation to the theme of economic development one submission received states that Naas is a commuter community and in a post-Covid environment there is capacity to change and build and deliver 'local', in terms of county and global company's supply chain. This submission states that Naas should be a wi-fi town with excellent telecommunications services and notes that there is a need for local services, offices and hot-desks for commuters. The submission also notes that the trend of click-and-collect/internet shopping means opportunities for warehousing and distribution hubs, for large organisations and also the clusters of retailers and service industries. The submission further notes that there is a need to create incentives and infrastructure for innovative green industries.

With regards to innovative manufacturing one submission received states that there are many opportunities for a town/county that recognises the 'green theme' and establishes incentives and infrastructure and that there are also opportunities for creative and innovative industries. The submission notes that Naas has a cluster industry, the manufacturing of trailers and commercial vehicles, and that once this is recognised it can grow and expand.

### Core Theme of Urban Design

Submission 282 refers.

One submission notes that Urban design cannot work on six-year cycle and the Plan must address the "beyond".

### Core Theme of Sustainable Movement

Submission 25, 282 526 refer.

One submission states that on the issue of walking in Naas, it is concluded that the draft Plan has not taken adequate account of the Canal Greenways (including the Corbally Line) and the de Burgh Estate / Oldtown Water Gardens. Another submission welcomes the provisions for the greenways along the Canal including the link to Corbally Harbour.

Another submission states that a 'hierarchy of rights' for road users should be the key approach to providing policy and infrastructure. This is where the pedestrian is prioritised first, then cyclists, public transport, electric vehicles and lastly other road uses. This submission welcomes plans for increased pedestrianisation, but states that it needs to be more radical. Submission suggests that Naas Harbour to Leinster Mills should be pedestrianised, with resident access only and also St. Johns Lane. The submission further notes that pedestrian crossings should be better managed with more zebra crossings installed. The submission acknowledges successful planning of roads with traffic separation for pedestrians/cyclists in South/South-West side of Naas. The submission goes on to outline concerns relating to poor or missing pedestrian infrastructure in the town and states that this applies also to cycling infrastructure.

In regard to sustainable mobility, one submission received states that it should be possible to walk or cycle to all the schools in the plan area from any household and that a national approach is required for the provision of public transport. However this submission notes that the provision of relevant facilities is important. With regards to private cars, the submission notes that electric vehicles require 'fast' charging points across Naas, as visitors would be happy to travel to Naas if there is fast-charge availability. This submission outlines a range of suggestions in relation to the improvement of the movement and transport network within Naas.

Another submission notes that there is no reference to the Design Manual of Urban Roads and Streets (DMURS) as being a guiding document in the formation and preparation of the Plan. The submission notes that DMURS Chapter 3 (Street Networks) and Chapter 4 (Street Design) set out the approaches to design and movement within street networks with the aim of creating better connected places. The submissions goes on to state that recently built housing and school developments in Naas are still following the dendritic design principles of which DMURS is critical and there does not appear to be any consideration in the Plan that the DMURS design principles will be used in future development.

#### Core Theme of Homes and Communities

Submission 282 refers.

With regard to the core theme of homes and communities one submission received states that there is a need to encourage mixed housing and have no socio-economic segregation. This submission further states the need to encourage greater diversity once green construction standards met.

In relation to the provision of amenity lands, one submission received welcomes the intentions of the draft Plan regarding the Oldtown Estate and other open space plans for the town.

#### Core Theme of Heritage and Culture

Submission 282 and 396 refer.

One submission states the Canal, which has benefitted from the Council's improvements and those of Waterways Ireland, should form a centrepiece of planning and regeneration in Naas. This submission goes on to state that monuments and heritage sites such as St David's Church, de Burgh Estate and others should have appropriate access, illumination, preservation and celebration of our history should be promoted alongside the other needs such as housing, retail services, employment and social infrastructure.

One submission states that the Plan should seek to exploit the rich history of Naas. This view is supported by another submission which states that in terms of historic attractions within and proximate to the Town. A further submission received states that Naas is spoiled for choice in the 'Ancient East' and notes various historic features. The submission states that it is important the Plan does not take aforementioned elements for granted and outlines a level of pessimism given the slow development of Jigginstown Castle and purchase of St. David's Castle.

In terms of culture, one submission received outlines the unique features of the county. It notes that both Naas and Punchestown racecourses could both provide opportunities for the town and that there needs to be collaboration. The submission suggests development of Punchestown as a home for equestrian sport and events, particularly with development of world-standard cross-country course. This submission goes on to state that there is a gap when it comes to activities/facilities for those trapped in low-income families. More resources and financial help are required, particularly around youth activities / services. The submission notes that in other jurisdictions school/college facilities, idle in evenings, are licensed to resident associations/community groups for activities.

### Environment and Climate Change

Submission 282 refers.

One submission received also suggests increased planting in the town to aid biodiversity and carbon footprint.

With regard to the issue of dog-fouling the submission states that there should be fines. In this regard. In relation to littering the submission requests increased litter surveillance, including CCTV. The submission notes that reuse, repurpose, recycle policies are impacting how the Silliot Hill Recycling Centre and Civic Amenity works and charges.

On the issue of climate change it is suggested that the council should set the pace by switching to EV/Hydro vehicles, having carbon neutral offices, installing modern LED street lighting and more lighting along pedestrian ways.

## **Chief Executive's Opinion**

### Overall vision for Naas

The nature and variety of submissions regarding the overall vision for Naas is noted and acknowledged. In this regard, it is considered that the draft Plan is underpinned by a robust and comprehensive strategic vision which is intended to guide the future growth of the town in a sustainable manner, in a way that reflects the inherent character of Naas and identifies the potential of utilising its existing assets as the basis for improving the quality of life, wellbeing and resilience of all its residents.

The seven core themes are intended to be cross-cutting in nature and are designed to act as guiding principles and helping to provide a level of focus and direction to the policies, objectives and actions contained in the draft Plan. The core themes were developed on the basis of the many strengths of Naas and seek to overcome the various developmental challenges identified in order to secure the town's long term sustainability as a Key Town with the Eastern and Midland Region.



It should be noted that the objectives contained in the draft Plan have a statutory basis and play a key role not only in defining and guiding the spatial development of the town over the life of the LAP (through the development management process) but are also used in a range of other areas such as supporting applications for funding for critical regeneration and development projects within the town. It is further considered that the delivery of servicing and social infrastructure, a central element of the draft Plan, is instrumental in improving the day-to-day lived experience of Naas residents.

Regarding the various submissions relating to time frames, it is acknowledged that the time scale of many of the key aspirations of the draft Plan, such as the regeneration of the town centre and the development of the Northwest Quadrant, will extend beyond the life of the Plan. It is for this reason that the vision outlined for Naas extends to '*2031 and Beyond*'. On the issue of implementation, Section 11.2 outlines an infrastructure delivery schedule for infrastructural delivery on all new residential zoned lands, town centre core regeneration areas and for strategic infrastructure within the Plan area. Furthermore, details regarding the envisaged delivery of various transportation improvement measures proposed for the town are outlined in Chapter 5 Movement and Transport.

The draft Plan is considered to adhere to the National Planning Framework and is considered to actively implement the Naas-specific Regional Planning Objectives contained in the Regional Spatial and Economic Strategy. In relation to the expectation of a high level of synergy between the Naas LAP and the Kildare County Development Plan 2023-2029 (CDP), it should be noted that both are being progressed under the updated national and regional planning policy framework (i.e. NPF/RSES). Should the provisions of the Naas Local Area Plan differ from those contained in the adopted Kildare CDP 2023-2029, the CDP will take precedence. However objective CDP 1.1 provides for the Local Area Plan to be amended, if necessary, to incorporate any updated contents of the next CDP, as they relate to Naas.

The challenges and opportunities arising from the COVID-19 pandemic are acknowledged. Indeed, it is considered that the provisions of the draft Plan in relation to the development of public open space within the Plan area (i.e. Sallins- Naas Greenway, access to Oldtown Demesne and Kerdiffstown Park) dovetail with the public's growing appreciation and patronage of outdoor spaces since the start of the pandemic. Furthermore, the draft Plan acknowledges the potential for changing work environments in the post-pandemic economy and consequently has incorporated an objective EDO 1.8 which encourage the provision of remote working hubs and incentivise employment generation on lands zoned A: Town Centre. Lastly, objective EDO 1.10 seeks to facilitate home-working and other innovative forms of working which reduce the need to travel but are subordinate to the main residential use of the dwelling.

The request that making the Irish language accessibility central to the vision for Naas is noted. While Kildare County Council is committed to supporting the development of the Irish language, it should be noted that a Local Area Plan is a statutory land use planning document and the specific protection or promotion of languages does not fall within its remit. In relation to the issue of signage, as per the Official Languages Act, the Council has a statutory duty to ensure that the Irish language is used in its signage.

#### Core Theme of Town Centre Regeneration

It is considered the provisions of the draft Plan as outlined in the comprehensive Urban Regeneration and Development Strategy represents a first but necessary step in actively complying with RPO 4.5 (regeneration of historic core) and RPO 4.51 (regeneration of

under-utilised industrial lands). It is further noted that Kildare County Council has continued in its efforts to secure the regeneration of the town. In this regard, the Council was recently awarded €3.5 million under the Government's Urban and Regeneration Fund to progress aspects of the Regeneration Strategy relating to Naas Town Centre.

In relation to the specification of uses within in the town centre and in particular on Main Street, it should be noted the comprehensive land use zoning matrix outlined in Table 11.3 of the draft Plan provides for a range of uses to be either 'permitted in principle', 'open for consideration' or 'not permitted' on lands zoned A: Town Centre. However, it is not within the remit of the Plan to force existing uses to either close or move from their established premises. Furthermore, in relation to the taxing or levying of empty properties, the Vacant Site Levy applies to sites in excess of 0.05 hectares, which is not a person's home. In this regard, given that the lands zoned A: Town Centre have been designated as regeneration lands, a levy can be applied to all vacant sites within the town, subject to the provisions of the Act. The suggestion of giving incentives for certain shops to promote the clustering of activities is noted but is considered to be an issue for corporate management and is consequently outside the remit of this LAP.

The draft Plan contains a number of objectives supporting the completion of Corban's Lane Shopping Centre and the appropriate development of St. David's Castle.

The submission related to developing the town as a food hub is noted. It is considered that an increased presence of restaurants and other food related businesses in the town would act to attract visitors to the area, thereby fulfilling a key aim of the Regeneration Strategy.

#### Core Theme of Economic Development

In relation to the theme of economic development the draft Plan acknowledges that Naas is a commuter town but also notes that it has an impressive employment base with a jobs ratio of 1.01, with an net inflow of 2,762 workers daily (Census 2016). The Economic Development Strategy of the draft Plan seeks to maintain this ratio over the period to 2027. Whilst all employment generating activities will be encouraged, the draft Plan specifically supports the development of high tech sectors in areas such as manufacturing and research.

As noted above, the draft Plan has incorporated an objective to support the development of remote working hubs within the town centre. It is further noted that Objective IO 4.2 supports and facilitates the provision of telecommunications infrastructure in Naas, subject to safety and amenity considerations. The suggestion of making Naas a wi-fi town is considered to be a corporate management issue and is consequently not within the remit of the LAP. Additionally, creation of incentives for green industries falls outside the remit of this land use Plan.

It is considered that the LAP has zoned an appropriate quantum of lands zoned for industrial and warehousing uses to ensure a sufficient supply to meet the town's needs over the period to 2027.

#### Core Theme of Urban Design

The submission noting that Urban design cannot work on six-year cycle is acknowledged and accepted. The Council is aware that the various provisions of the Urban Regeneration and Development Strategy including the transformation of the public realm can only be



implemented over the longer term across multiple plans. Accordingly, a key output of the Strategy is the production of a Public Realm Strategy for the town. This document will be of critical importance in shaping and developing the public space of the town over the longer term. It is intended that the public realm plan will be a dynamic and evolving document and will not have a defined lifespan but will be updated on a continuous basis.

### Core Theme of Sustainable Movement

The contention that the draft Plan has not taken adequate account of the Canal Greenways (including the Corbally Line) and the de Burgh Estate/Oldtown Water Gardens is not accepted. It is considered that both the completion of the Sallins-Naas Greenway and the provision of public access to the Oldtown Demesne are key priorities of the Plan. In this regard, it is anticipated that the greenway scheme will be progressed through the Part 8 process for obtaining planning permission later this year with a view to going to construction in 2022, if the Part 8 is successful. In relation to access to the Oldtown Demesne, Table 11.4 Implementation and Delivery Schedule provides for this to be delivered over the short term (1-2 years).

The submission relating to the 'hierarchy of rights' for transport modes is acknowledged. In this regard, it is noted that the draft Plan takes cognisance of such a principle in Figure 5.1 Existing and Desired Movement Hierarchies and contains an array of measures which seek to achieve a meaningful shift towards sustainable movement patterns within town over the life of the Plan and beyond.

With regards to specific issues of pedestrianisation, such proposals are intended to be the subject of more detailed consideration as part of the preparation of plans including the Public Realm Strategy and the Canal Quarter Masterplan.

As noted above, the Plan seeks to develop a high-quality pedestrian and cycling network within the town. The measures outlined range from upgrading existing infrastructure to the building of new infrastructure along with the provision of other supporting measures, such as for example, enhanced pedestrian and cyclist priority at traffic junctions. The collective aim of such measures is to create a more integrated and age friendly settlement and provide for a realistic, safe and convenient alternative to the car, especially for short trips within the town, including journeys to and from school. With regard to the request to provide more electric charging facilities including fast charge facilities, objective IO 5.4 provides support for the rolling out of electric vehicle charging infrastructure across the town. Furthermore, it is a provision of the parking strategy (Section 5.5) to provide for the installation of additional electric vehicle charging points within public car parks in the town centre.

The Council acknowledges the mandatory requirements outlined in the Design Manual of Urban Roads and Streets (DMURS) (updated 2019). It should be noted that the implementation of development standards relating to road and street design falls under the provisions of the Kildare County Development Plan 2017 – 2023 (CDP). In this regard, attention is drawn to objective WC 6 of the CDP which requires that all roads in existing and new developments are designed in accordance with the principles, approaches and standards contained in DMURS, the NTA National Cycle Manual and other appropriate standards.

### Core Theme of Homes and Communities

The submissions in relation to the core theme of homes and communities are noted. The draft Plan contains several objectives (HCO 1.2, HCO 2.1, HCO 2.2, HCO 2.4 and HCO 2.6) which seek to ensure that all new development provides for a sustainable, mix of housing types, sizes and tenures.

The submissions welcoming the provisions of the draft Plan in relation to open space and amenity lands are noted.

### Core Theme of Heritage and Culture

Submissions relating to the core theme of heritage and culture are noted. The plan acknowledges the importance of protecting and supporting its natural and built heritage assets in order to develop Naas as a vibrant and culturally rich town. Accordingly, in seeking to achieve a sustainable model of development for Naas, the focus will be centred on heritage-led regeneration to enhance the town as a visitor destination and create new local employment opportunities. Central to this vision is the development of key assets such as the Canal Greenway, St. David's Castle and Jigginstown Castle and the draft Plan contains a number of supporting objectives in this regard. It should be noted however, that most of the historic/cultural properties in the town are not currently under the ownership of the Council and consequently, this places certain limitations on the actions of the Council in terms of regeneration efforts.

The submission regarding the development opportunities at both Naas and Punchestown Racecourses are noted. In this regard, the Draft Plan acknowledges the importance of both venues to the development of the equine and tourism industries (Section 6.5 Tourism). Furthermore, policies ECD 24 and ECD 25 of the Kildare County Development Plan (2017 - 2023) provides for the active promotion of the equine industry as an economic driver for Kildare and also provides support for the redevelopment and upgrading of facilities of Punchestown and Naas Racecourses.

The submission relating to the access of cultural activities by all members of society is noted, however such an issue is considered to be outside the remit of a Local Area Plan.

### Environment and Climate Change

The draft Plan contains an array of provisions which seek to maintain, protect and enhance the existing green infrastructure and biodiversity of Naas (see Chapter 7 Natural Heritage and Climate Change).

The issues raised relating to dog fouling and littering are considered to be day-to-day management issues and consequently not within the remit of the Plan.

Objectives IO 5.1 and 5.5 of the draft Plan support the development of recycling and composting facilities in the Town.

Kildare County Council recognises the issue of climate change as the most serious and threatening global environmental problem. Under the Government's *Climate Action Plan (2019)* all local authorities are required to achieve 50% energy efficiency and 30% greenhouse gas emissions reduction by 2030 (relative to 2009 base). In this regard, the Council is taking active and ongoing measures to reduce its overall carbon footprint. Furthermore, the first Climate Change Adaptation Strategy for the County was adopted by the Council in 2019. This provides for a series of adaptative measures to be undertaken

across all areas of the Council's remit in order to reduce the potential effects of climate change within the county (i.e. increased flooding or heatwaves etc.).

### **Chief Executive's Recommendation**

No change recommended.

## **Chapter 3: Compliance with the Core Strategy**

### **Summary of Main Issues Raised**

#### General Compliance with the Core Strategy Issues

Submissions 282, 317, 385, 359, 457, 488, 636, and 648 refer.

One submission states that the proposed Local Area Plan is contrary to national, regional and local planning policy or government circulars, orders or statutory instruments. This submission outlines concerns regarding outside influence in rezoning decisions.

A number of submissions received outline the serious issues facing Naas with regard to the acute shortage of housing, which has been further exacerbated by construction delays arising from Covid-19 restrictions. A range of submissions refer to the planned increase in homes in Naas over the life of the Local Area Plan and state that this is considered to be insufficient to cater for overall housing demand within the town. These submissions ascertain that the draft Plan needs to be more ambitious for Naas given its status as a Key Town, a major centre of employment and the location of major recent investment in terms of utilities and roads. One submission argues that the constraints of national policy (NPF and RSES) have been interpreted too narrowly and in a manner which will militate against consolidating Naas as the County Town. In this regard, submission recommends that policy objective be included to facilitate development of Naas as a Key Town to grow commensurate with the economic, social, cultural, and physical capacities within the overall constraints of the county's population and housing allocation.

One submission received refers to the contents of the Ministerial letter to local authorities accompanying the Housing Guidelines (published December 2020) and states that this represents an important and welcome evolution from the NPF projections for annual new homes in the 2018 - 2040 period and should be fully reflected in the Plan.

A further submission requests that urgent dialogue is required by Kildare County Council with the Department of Housing to ensure that the Plan can be revised in order to increase to number of homes allowed for development. Such requests for an increased zoning allocation for residential development is reiterated in other submissions where the substantial growth in the population since 2016 is noted. Accordingly, one submission states that the projected population in the draft Plan of 28,000 persons by 2027 could be reached years ahead of time. This submission states that given the number of cases on the housing list there will be little available for first time buyers and that consequently house numbers need to increase. Similarly, another submission conveys disappointment that some residential lands have been 'de-zoned' when there are 8,000 on the housing list in Co. Kildare.

One submission received agrees with the consolidation of sites within the CSO boundary, but notes that the LAP stays silent on healing the rift between the CSO footprint and the extensive perimeter of development which was established legitimately under the former Urban District Council. The submission states that acknowledging and analysing fully an existing context should be a starting point for a LAP.

### Approach to New Residential Zoning (and delivery of supporting infrastructure)

Submissions 488 and 701, 457 refer.

Regarding the overall location of new residential development within the town, one submission states that it appears that most of the houses either recently developed or due to be built are located in the southern half of the town, with lands in the northern half, and closer to Sallins rail station and the M7 and its junctions, being designated as Strategic Reserve for possible development in the future. This submission states that this is having direct and indirect effects on the residents in the area with regards to the pressure it places on existing social and roads infrastructure. The submission goes on to state that the area lacks appropriately scaled parks and playing pitches etc. The submission requests that the Council re-balances its development strategy for Naas to ensure that all areas of the town are developed in a more balanced and sustainable manner.

A number of submissions received express concerns about the delivery of critical social infrastructure alongside the development of new housing in the town. One submission notes that the draft Plan is explicit that social infrastructure have not kept pace with new housing development in the town and that is the case before the other major new residential developments have been commenced/completed and prior to further development being granted planning permission. In this regard, one submission requests that Councillors and officials engage proactively with government and public and private sector bodies to ensure that the components of community infrastructure are funded and developed in a timely manner. This submission states that it is essential that firm commitments are obtained from the Department of Education about meeting the high demand for school places in Naas and its catchment area

With regard to the overall quantum of residential development being proposed one submission states the role of An Bord Pleanála in relation to SHDs and planning appeals means that there is a high degree of uncertainty about densities and heights, which may mean a larger population than projected in the draft Plan. Another submission recommends that zoned residential lands especially within the 2016 CSO boundary should be reviewed to ensure appropriate densities can be developed to secure the development of more affordable housing units.

A further submission states that despite of the urgent need for housing, policy support for the growth of Naas and infrastructure being in place the Draft LAP seeks to reduce significantly 'C: New Residential' zoned lands and notes that much these lands are "Phase 2" where it is unclear when the development of these lands may be permitted.

One submission received notes that Monread was developed out to the limit of the old circular boundary of Naas Town Council. In this regard, the submission suggests that approaching the Northwest Quadrant (NWQ) in a similar manner, would connect the northern arc into the town proper and also present the opportunity to zone more land for residential development.

### Future Development Priorities

Submissions 452, and 528 refer.

One submission notes that the draft Plan provides for the urban form of the town to be consolidated and strengthened with new development in the longer-term vision being

directed to the Northwest Quadrant (NWQ). In this regard, the submission asserts that it is not clear how this aim can be reconciled with the development of the NWQ. Furthermore, the submission states that little detail is available within the draft Plan on the development of the NWQ and outlines concerns that the plan amounts to an incoherent sprawl of retail, residential, community and commercial development which will seriously impact on the compact growth required to build a strong and resilient town centre. The submission notes that NPF is explicit in stating that *'where lands cannot be serviced during the lifetime of the Plan, they should not be zone for development'*. Similarly, another submission outlines concerns regarding zoning 500 acres of the NWQ without a coherent plan.

With regards to the intention of the draft Plan to seek the incorporation of Sallins into a future Local Area Plan for Naas, one submission states that doing so just because of shared rail links is not sufficient and the LAP must address Sallins inclusion as a whole, as well as Johnstown and Kill, especially if addressing 'beyond' 2027. This submission states that their inclusion/exclusion has implications for six of the seven Core Themes.

## **Chief Executive's Opinion**

### General Compliance with the Core Strategy Issues

The contention that the draft Plan is contrary to national, regional or local planning policy is not accepted. It should be noted that in its submission to the draft Plan, the Office of the Planning Regulator (OPR) *'commends what is considered to be a well thought out and robust plan'*. The OPR further acknowledges in its submission that the draft Plan is consistent with the Regional Policy Objectives of the Regional Spatial and Economic Strategy, and the Core Strategy of the Kildare County Development Plan 2017 – 2023 (as varied).

It should be noted the proposed land use zoning objectives for all lands within the Plan area have been made on the basis of a robust evidence-led decision making process which was informed by a range of supporting documents including the Naas/Sallins Transport Strategy, a Social Infrastructure Audit and the Strategic Planning and Infrastructural Assessment. The preparation of these documents has been acknowledged and welcomed by the Office of the Planning Regulator and they are available for inspection on the Council's public consultation portal (<https://consult.kildarecoco.ie>).

In relation to the quantum of land proposed to be zoned for new residential development, it is noted that the Draft Naas Local Area Plan 2021-2027 has been prepared in the context of the National Planning Framework (2018), the Regional Spatial and Economic Strategy (2019-2031) and a recently varied County Development Plan (June 2020). The draft Plan is required to comply within a hierarchy of plans within the parameters for new housing set out by the Core Strategy, which in turn is required to comply with the NPF and RSES. The publication of 'Guidelines for Housing Supply Target Methodology for Development Planning' (December 2020) pursuant to Section 28 of the Planning and Development Act, 2000 (as amended) are noted. While these guidelines provide further clarification around the NPF Implementation Roadmap population projections, they do not supersede the NPF and RSES, they simply apply these figures to housing delivery targets to provide a uniform methodology to core strategy formulation across all plan making functions.

It is acknowledged that the housing allocation for Naas may be altered under a revised Core Strategy contained in the next County Development Plan. This may require that the Naas Local Area Plan be amended to align with the Core Strategy of the Kildare County



Development Plan 2023-2029 and to incorporate other material changes relevant to Naas, once the new County Development Plan is adopted. The draft Plan provides for this scenario in objective CDP 1.1.

The request that a policy objective is included to facilitate development of Naas as a Key Town to grow commensurate with the economic, social, cultural, and physical capacities within the overall constraints of the county's population and housing allocation is noted. However, it is considered that the draft Plan already incorporates all the relevant provisions of the RSES as they apply to Naas and therefore such a suggestion is deemed to be unnecessary.

With regards to the differences between the CSO defined boundary and that of the former Naas Town Council, it is considered that the draft Plan has fully acknowledged the situation on the ground when setting the boundary of the draft LAP. For example, the draft Plan has incorporated the substantial 'Naas Environs' lands which lie immediately outside of the Naas Town Council boundary but became 'un-zoned' following the adoption of the Kildare County Development Plan in 2017.

#### Approach to New Residential Zoning (and delivery of supporting infrastructure)

It is acknowledged that the southern half of the town has witnessed substantial residential development over recent years. A key element behind this is the availability of servicing infrastructure (water, wastewater and roads) within this part of Naas. However, a key priority for the draft Plan is to enable development of the Northwest Quadrant (NWQ) over the longer term. Such a possibility is not feasible in the short term due to the major infrastructural constraints present within the NWQ lands. In this regard, it is noted that under the provisions of the National Planning Framework, the Council cannot zone land for development which is not serviceable within the life of the Plan. However, the draft Plan sees the NWQ lands as representing a unique opportunity for the strategic expansion of the Naas in the post-2027 period.

The submissions received which express concerns about the delivery of social infrastructure in tandem with new residential development are noted. The draft Plan acknowledges this as a critical issue and has as part of its development prepared a comprehensive Social Infrastructure Audit (SIA) which identified the key social infrastructure needs of the town over the life of the LAP, taking into consideration the population targets of the LAP. The outputs of the SIA have assisted in the development of key supporting objectives of the Plan and the zoning of an appropriate quantum land for community, educational and recreational uses etc. It should also be noted that a Local Area Plan is a land use planning document and consequently there are limitations on its remit. Whilst a LAP may support the siting of a particular amenity at a specific location, it cannot ensure its development, which often times falls to the responsibility of other service providers. To this end, Kildare County Council undertakes to actively engage with all key public and private organisations, including the Department of Education, on an ongoing basis to ensure the delivery of critical social infrastructure in Naas.

The concerns outlined that there is a high degree of uncertainty as to overall densities on foot of SHD applications and planning appeals is noted. In this regard, objective CSO 1.2 of the draft Plan provides that the Council monitor the scale, type, tenure and location of constructed and permitted developments during the lifetime of the Plan and apply appropriate development management standards to ensure compliance with the allocation outlined within Core Strategy.

On the issue of establishing appropriate densities within the town, please refer to Submission 009, where it is the recommendation of the Chief Executive that Table 3.5 of the draft Plan be amended to comply with the Section 28 Ministerial Guidelines on Sustainable Residential Development in Urban Areas (DoEHLG, 2009).

Regarding the New Residential lands zoned 'Phase 2', Section 3.4.1 of the draft Plan is clear that while the Strategic Planning and Infrastructural Assessment (SPIA) has identified them as suitable for residential development, they represent an excess of the housing requirement needed over the plan period to 2027.

In relation to the suggestion that the Northwest Quadrant (NWQ) be developed out to the limit of the circular boundary of Naas Town Council, it is considered that while the lands of the NWQ represent a strategic opportunity for the town, zoning further land for residential development in this area is premature given that there is already a sufficient quantum of more sequentially appropriate lands proposed to be zoned, in accordance with requirements of the County Kildare Core Strategy.

#### Future Development Priorities

With regards to the concerns outlined about the scale of the development planned for the Northwest Quadrant (NWQ), it should be noted such development is considered to be a long term strategic aim, envisaged to take place across a number of local area plans. It is further noted that the majority of the lands within the NWQ are zoned 'SR: Strategic Reserve' where objective CSO 1.9 provides safeguards against their haphazard development over the life of the plan. In conjunction with this, the draft Plan contains objective (NWQ 1.1) which requires the preparation of a comprehensive masterplan for the NWQ which will ensure that all future development will take place in a coordinated and integrated manner. This objective provides for the masterplan to be integrated into the Naas Local Area Plan by way of a statutory amendment.

The submission relating to settlements of Sallins, Johnstown and Kill and their potential incorporation into the Local Area Plan are noted. Objective CSO 1.7 provides for a transition over the life of the Plan towards the preparation of a Joint Integrated Spatial Plan incorporating both Naas and Sallins. In relation to the settlements of Kill and Johnstown, it is noted that their spatial plans are currently provided for in the Kildare County Development Plan 2017 – 2023, where Kill is defined as a small town and Johnstown as a village. It is considered that their inclusion within an overarching LAP for Naas could potentially result in such a future Plan becoming unwieldy and lacking in focus.

#### **Chief Executive's Recommendation**

No change recommended.



## **Chapter 4 Homes and Communities**

### **Summary of Issues Raised**

#### Residential Density, Mix and Design

Submissions 363, 373, 389, 390, 429, 452, 502, 511, 583, 597 refer

Many submissions express concern about high density developments in Naas. Concern has been raised in some submissions about the south west quarter of Naas and the excessive number of houses planned there. Almost 1,000 houses have been planned/built around the Devoy link Road, which are high density developments with a low amount of green space. It is argued that 3 to 5 storey buildings are not suitable here and the Plan should consider the impacts of high-density developments. Another submission outlines concerns about high density housing developments being built in the John Devoy area and the lack of services to ensure sustainable communities. Additional creches and recreational amenities, like sports pitches, are required for community benefit.

Another submission suggests that higher density developments should be encouraged in the form of terraced or duplex housing and not apartments.

A submission refers to the proposed densities for Site C(3) Finlay Park and suggest that the proposed density of 40-60 per hectare is excessive, is at odds with previous plans and to the established character of the area. It is requested that this be amended as no justification has been given for the dramatic increase in proposed density on the site.

A submission suggests that housing targets should be increased as the LAP only targets 1,000 new homes and there is already 750 people on the housing list.

A submission suggests encouraging the 'cluster approach' which is being piloted in Tipperary, where land is developed on the periphery of towns and villages and allows homeowners the flexibility of living on their own plot.

#### Housing Mix

Submissions 383, 457, 501 and 511 refer.

Several submissions refer to housing mix throughout the town and within individual developments.

One submission suggests that mixed use housing options should be encouraged to include single living starter homes, family units of different sizes, (including extended family options for older relatives or people with disabilities) and dwellings for older people to ensure people can remain within their community. Another submission refers to apartment buildings and housing mix, indicating that many apartment buildings in Naas have become homes for families and the Plan should ensure that these buildings and surrounding spaces facilitate family living. The multi-age nature of apartment buildings helps communities work together. The submission also urges a mix of 2, 4 and 6- bedroom houses and housing types to encourage multiple ages and stages of life in the one development. Some submissions suggest that the plan needs to ensure all new residential developments are located in sustainable locations; have an appropriate mix of housing type, tenure, density and size including the provision of appropriate supported housing and longer-term residential care solutions designed for older people and or people with disabilities.

Another submission suggests that a greater selection of houses should be made available to a wider demographic. It is also suggested that a housing model should be pursued which provides quality living conditions for the residents through the incorporation of sufficient communal well-planned and safe garden spaces for children to play and for people to sit outside in fresh air and build community.

#### Taller Buildings

Submissions 185, 390 and 452 refer.

One submission indicates that while the plan stated increased building height will be actively pursued for redevelopment and regeneration, there are no height limitations placed.

Another submission indicates that the LAP should identify specific sites for landmark buildings where up to six stories may be permitted. Apart from the landmark buildings, nothing higher than four stories should be allowed.

Another submission argues that the LAP should identify what the term “taller buildings” means, in the context of Naas town (rather than, for example in the context of the major cities). Five or six stories may be suitable in regeneration sites but would not be acceptable outside such an area, such as the Northwest Quadrant, because of its impact on the established residential areas (which are predominantly two storey). Anything higher would be unacceptable and it is important that the LAP makes this clear, and specifically states that heights in excess of this would constitute a material contravention of the LAP.

#### Strategic Housing Developments

Submission 359 and 597 refer

These submissions raise concern in relation to the SHD process, in particular heights and densities being substantially in excess of what is permitted under the terms of the LAP. While this SHD process is due to end in 2021 it is not clear if the assessment process will return of the full remit to Local Authorities.

#### Living over the shop

Submissions 268, 452, 502, 511 and 583 refer

All submissions received in this regard encourage living over the shop.

#### Working from Home

One submission indicates that with more people working from home, policies and actions should encourage family friendly communities through, for example, quality supply of broadband, home offices in gardens and reflecting what is emerging as a societal preference.

#### Low Energy Buildings

Submissions 452 and 583 refers.

It is suggested in one submission that this requires more attention, particularly for existing housing stock. Another submission suggests that the Plan should pursue a housing model

(either directly or through private development) which is self-containing in terms of energy requirements and seeks to reduce the overall carbon/environmental footprint such as:

- (a) Incorporation of passive solar heating, solar panels and other renewable forms of energy in all new housing developments;
- (b) Rainwater harvesting and grey water reuse in all new housing developments;
- (c) Incorporation of sufficient communal, well-planned, suitably screened spaces in all new apartment complexes.

Furthermore, it is argued that there should be strict requirements for efficient use of resources; BER to be achieved, development is to be self-sufficient for energy (through solar on roofs, heat pumps, etc.); self-sufficient for grey water (rainwater harvesting, and grey water re-usage); flood management using best practice building, for example, permeable paths, swales etc.

### Age Friendly Housing

Submissions 138, 268, 432, 444, 452, 457, 502, 528, 530, 559, 596 refer.

Several submissions indicate it is encouraging to see the focus on age-friendly accommodation in the plan. Some of the issues raised on this topic include:

- The housing need of older people should be given a higher priority, as downsizing within the local area is proving problematic.
- There's a need for step-down housing, like two-bedroom apartments for older people in the town.
- KCC's minimum target of 12% of new builds being suitable for persons with a disability should be significantly increased to cater for an ageing population.
- Suggests a block of two-bedroom apartments at the start of each new housing estate, specially designed for older people. New estates should have a small number of special needs housing which would allow disabled and older people to mix inclusively.
- Housing for older people should facilitate the keeping of pets, should have access to growing areas for food / flowers both individually and co-operatively, should move away from the privatised / commercialised care model with international funds operating for profit; should facilitate older people to remain in their homes, and in the community for as long as possible. More one-bed properties with adequate storage and space for a visiting family member to cater for single people and those with changing circumstances.

### Location of Age Friendly Housing

Submission 653, 432, 453, 444, 457, 511, 559, 583 refer.

Several submissions refer to the location of housing for older people and indicate that it must not be located on the edge of the town and must be located close to amenities.

Some submissions refer to St. David's Castle as a suitable location for age friendly housing given its central location and walking distance to amenities. It is suggested this should be developed by the Council and managed by a trust. Other suggested locations include close to the Harbour in the North West Quadrant. MacAuley Place is reference as an international best standard which we should learn from.

Some submissions suggest that the site on the Old Caragh Road C(1) is an ideal location for a housing project like McCauley Place with a public amenity, gardens, a walk and cycle way, a dog park, a men's shed project, open amphitheatre, exercise equipment and seating etc. to accentuate and make the most of the canal at this point. It would also be attractive for those who may want to downsize as they grow older.

Another submission suggests that sites should be identified for nursing homes and retirement living through zoning and/or clear policy statements. It also suggests that young families want to be close to their parents for support and parents in turn need the support of their children as they get older. Grandparents looking after grandchildren and siblings looking out for their parents are critical to development of healthy communities.

Another submission suggests that as 55% of the population in Naas are in 25-64 age cohort the plan will need to find the appropriate housing mix for the over 65's in the coming years.

One submission suggests Kildare County Council should examine the potential of new housing models such as the proposed multi-generational integrated community development. It is argued that the plan should also include associated care and support models, which fall between home care and full-time nursing home care. This should become a Policy Statement and Objective within the Plan. Kildare County Council should identify appropriate urban and rural sites with the capacity to satisfy and sustain the need for such well proven community integration and enhancement schemes.

One submission suggests that schemes should include transport links to ensure our elderly population have safe, easy access to essential services.

#### Social Infrastructure

Submissions 286, 383, 429, 457, 559, 596, 583, 597 refer

Several submissions indicate that it is essential that services and facilities are provided in advance of, or in parallel with, new residential developments. The provision of community infrastructure and services is central to fostering sustainable communities and delivering successful places to live and have a sense of belonging. Furthermore, it is argued that population growth will place increasing demands on existing social infrastructure, schools and creches which are already operating at capacity, while creche places are non-existent.

One submission suggests that the plan should focus on promoting liveable communities, i.e. one that is safe and secure, has affordable and appropriate housing and transportation options, and offers supportive community features and services. Furthermore, it is suggested that the Plan should undertake a feasibility study to examine the health and environmental benefits of adopting the LIFE RADIUS approach undertaken with Trinity College Dublin & Green Project Management.

Some submissions refer to the 15-minute City concept and suggest that this should be adopted for our towns with services available within a 5-minute catchment.

#### Education

Submissions 383, 457, 517, 701 459, 559 refer.

One submission notes that Naas has a wider catchment for school places due to lack of secondary schools in Sallins, Kill and Johnstown, which have also seen sustained population

growth. Another submission refers to the lack of school places causing unrest for parents in the Naas area. Provision of special education is very concerning with many parents having to become professional campaigners to assert their children's constitutional right to an education. A move towards a rights-based system must be facilitated by local and national government.

One submission suggests that educational zones must be adequate to incorporate primary, secondary, and childcare as an option with amenity facilities, and to plan for 50 years ahead.

Two submissions indicated that the plan should include a requirement to provide additional education campuses within the town's environs to encourage students to walk or cycle to school.

One submission indicates that it is disappointing to see that no lands are zoned for Education on the north-east side of the town. A campus near the Donnelly Mirrors site would be ideal to serve the surrounding residential areas.

One submission states that the Community College on the Craddockstown Road is putting up more prefabs at the expense of playing fields. Written provision could be made in the plan to ensure that development will not occur unless the necessary educational and healthy lifestyle promoting assets/infrastructure is in place.

### Childcare

Submissions 20, 31, 268, 359, 423, 444, 452, 457, 461, 511, 530, 551, 597, 653

Several submissions refer to the significant lack, and under-provision, of childcare facilities in Naas. The issues highlighted in these submissions include:

- It must be a condition of planning permission that creches be provided in the first phase of development.
- The standard of 1 creche per 75 dwellings must be enforced.
- At present there are 5 outstanding creches to be built.
- Specific sites need to be identified in the Plan for childcare services.
- Change of use applications for creches must be resisted.
- There cannot be a future situation where there are jobs, housing, good roads but no places for minding children.
- This wait is too long for creches required under planning permissions to be completed.

The Plan should include an additional levy option to support childcare provision as an alternative to requiring a unit for every 70 housing dwellings.

### Health Facilities

Submissions 444, 452, 551 and 559 refer

Two submissions indicate that there is an under provision of GPs in Naas. One submission suggests that the appropriate benchmark for GPs to patients is the ratio used in Scotland of 0.76/10000. Another submission indicates that there are no national standards for primary care centres or the number of doctors for an area. The US benchmark used is meaningless and hides the fact there is a shortfall of GP services in the town. Consultation with GP practices have confirmed this. There are no measures in the plan outlining how KCC intends dealing with this shortfall and clarification would be welcome.

Another submission indicates that the current and future supply and demand regarding GP service is inconclusive. Using the American ratio has the potential to be inaccurate as their healthcare system is very different to Ireland. More sophisticated modelling will yield better predictions.

Another submission refers to the need for adequate psychological / mental health services at primary care level. The community services while excellent are not sufficient. It is suggested Naas leads on prioritising mental health services as it develops in the coming years. A commitment to mental health in the plan can get the necessary results.

### Parks/Open Space

Submissions 11, 30, 46, 50, 60, 228, 359, 373, 383, 390, 423, 428, 444, 449, 502, 511, 544, 583 and 599 refer.

Several submissions are seeking additional parks and playgrounds to be provided throughout the town, to be located near schools and to support surrounding residential estates. One submission suggests that spatial justice should be a core consideration for developments in Naas as everyone should have access to green spaces. Another submission indicates that the provision of a range of open spaces and recreational areas and buildings is becoming more critical for a healthy and balanced community.

Two submissions call for improved linkages and an accessible network between parks and open spaces, for example from the Lakes, through the Fairgreen, K Leisure to the Harbour, Monread Park, DeBurgh Lands and onto Kerdiffstown Park.

Some submissions note that the Plan should actively seek to create more parklands in the Harbour (for example near the canal stores) and within the north-west quadrant between the Naas and Corbally branches of the canal. The Plan should use the canals and rivers as natural open spaces and harness their potential for cycle connectivity links to Sallins and Millenium Park for example. Quiet, low noise spaces are a declining asset in our town. Open spaces have become more important as housing densities increase and apartment living becomes more normal.

One submission suggests that Zoning Map 11.1 showing open space should be reviewed to clarify and differentiate between private and public open spaces as well as existing and possible future open spaces and further states that the pattern currently of open spaces being a function of each individual housing estate needs to be supplemented to deliver a network of open spaces ranging from local pocket parks to larger well-planned and managed public parks serving Naas.

One submission calls for more community gardens in Naas, while another submission suggests that lands south of Mill Lane nursing home should be designated for allotments and a community garden.

One submission draws reference to Amsterdam where many urban corners have small playgrounds for children.

### Naas West/ Caragh Court/Community Park Proposal

Submissions 17, 31, 49, 50, 74, 76, 78, 106, 110, 156, 157, 200, 212, 228, 283, 286, 373, 390, 424, 429, 453, 652, 553, 599 and 652 refer.

Several submissions call for the area beside Caragh Court/Old Caragh Road 9, Site C(1), to be converted to a public park or Community Park for existing residents of the area. It is



argued that this would be an ideal location for a community park in the Naas West area for the following reasons:

- It would support many activities to sustain the health, wellbeing and social development of residents of the area.
- A community park would rejuvenate the area that has been neglected.
- Space is needed to accommodate outdoor recreation and leisure.
- It would be walking distance for so many residents in the vicinity.
- Activities that could take place here include: Bike track, Dog park, Chess Boards, Men's Shed, biodiversity park, Scouts Den, playgrounds, small cycle track, 'Green Prescriptions', etc.
- An amphitheatre could be accommodated, as a special place to visit to enjoy various culture events that can be held there. The site might be able to incorporate a natural amphitheatre for small outdoor events during the summer months.
- Additional housing here would increase traffic congestion.
- Naas West needs a Community Park. There is a lack of amenities in the area.
- The area has canal frontage with pedestrian access via Ploopluck Bridge, which could form part of interconnected network of social infrastructure that benefits the entire population of Naas and contribute to Greenway and Blueway projects. This would be the perfect location to facilitate kayaking, boarding etc.
- It would help protect biodiversity and contribute towards climate action.
- A Park at this location would comply with many County Development Plan policies and objectives in relation to protecting landscape, building integrated communities, balancing built and natural environment, social inclusion and community facilities etc.
- examples of other locations, including: Weaver Park, Dublin; Templeville Road, Dublin; and Castlebar, Mayo.

Several submissions have been received specifically objecting to the 'New Residential' zoning objective on these lands C(1). The submissions argue that more housing at this location is not a good idea for the following reasons:

- One type of housing (e.g. supported housing/social housing) in one area is counterproductive. More social housing in this area will take value away from the area.
- This proposal will repeat bad planning of the past.
- The area needs more open green spaces, not houses.
- The area needs uplift and we should build responsibly for future generations.
- The canal offers a palette to build around in a thoughtful way and the zoning should be reversed or number of houses reduced.
- It is a better solution to pepper-pot social housing for better inclusion and integration.
- All developments should be 10% not 100% social housing.
- A mix of social, affordable and older person housing with open space amenities would work well here, given how close it is to walk to the town centre.
- It's a missed opportunity to deliver a park.
- There are already plans to expand Finlay Park by 900 houses, so 73 additional units will add more social housing which does not help with social integration.

#### Finlay Park and North West Quadrant

Several submissions refer to the provision of open space in Finlay Park (site C3) and state that once this open space is zoned 'Open Space and Amenity' it should be developed as usable space for sports and recreation immediately, irrespective of any future plans for the

estate. The plan should include an objective to require the developer to make this space usable open space, to be completed and usable within 2 years. This would be an ideal location for a playground, and it is suggested that it should be provided by the developer as a condition of permission.

Some submissions refer to the fact that Finlay Park housing development is built on wetlands beside the Corbally Branch of the Grand Canal.

One submission suggests that the provision of open space zoning can only be fully assessed in the context of the ultimate zoning for the North West Quadrant when a final masterplan is agreed. Another submission highlights that a strategic reservation of land is required for a Town Park for West Naas, to facilitate a diverse array of recreation activities and social infrastructure. The Strategic Reserve Lands in the NWQ would be ideal and the zoning objective should be changed from SR to 'F: Open Space'.

Another submission suggests that these lands at NWQ should be zoned for amenity purposes, to provide for a major park in medium/long term. No other location could provide such a necessary provision close to housing and the town centre, both banks of the canal should be restored to allow for cycling and walking and connect with greenway and blueway projects.

#### Jigginstown Park

Submission 20, 15, 29, 87 refer.

Several submissions have been received in support for proposals for Jigginstown Linear Park and encourage the prioritization of this project in the short to medium term. Three submissions also call for direct accessibility to the park for residents of Primrose Gardens/Castlefarm, enabling people to avoid the bypass and R445.

#### De Burgh Lands/Oldtown Demesne

Submissions 233, 225, 491, 215, 536 refer

One submission calls for the public park at the De Burgh lands to be delivered as this is a vital green lung needed for the people of the Sallins Road. Another submission calls for the Millbank Lodge section to be opened to the public in the short term. Other submissions suggest public access should be fast tracked, whilst maintaining biodiversity and heritage value. Another submission requests that the part of the site located within the walls of Oldtown Demesne should be made accessible for the community to enjoy and tourism value.

Several submissions object to the rezoning of part of the DeBurgh estate for residential purposes, C(19). The reasons include:

- Resulting excessive traffic congestion and pollution on the Sallins Road, especially in conjunction with existing schools, GAA Clubs
- Pedestrian safety on the Sallins Road;
- Visual impact of apartments on the public wooded area and amenity vista.
- Impact on the character of the road, especially is development is high rise.
- Impact on air quality



### Parks and Dog Park

Submissions 488, 479, 359, 452, 528, 597, 599 refer.

Several submissions call for an objective to explore the provision of a dog park in Naas.

In relation to the operation of parks in general, the following issues were raised:

- There needs to be greater use of CCTV to discourage anti-social behaviour especially in public spaces where people are encouraged to linger.
- It is suggested that parks should be designed to suit all ages with the necessary facilities (benches, bins, exercise machines etc.)

### Sports Facilities

Submissions 46, 50, 206, 281, 359, 418, 429, 457, 485, 501, 559, 565, 573, 597, 599, 613, 652 and 653 refer.

Many submissions acknowledge the planned population increase for Naas and express concern regarding the commensurate provision of sports facilities, such as playing pitches and formal facilities. The submissions highlight that the Draft Plan must ensure adequate lands are zoned for sporting facilities for existing and future residents. The need for additional space and facilities for established clubs is also mentioned in many submissions.

Submissions received from organized sporting organisations include:

- Naas Sports Group Management representing Naas Athletic Club, Naas AFC and Naas Hockey
- Naas GAA
- Naas Rugby Football Club

Submissions in support of these reinforce the need for additional playing pitches and running tracks. The clubs have waiting lists for membership and additional land is essential. One submission indicates that a site should be identified for Municipal Pitches as soon as possible.

A submission from a Sports Group in the town requests that the LAP should identify areas under the control of the Council to facilitate the immediate demands for sport in the community as well as future proofing against population growth. An expansion of facilities is urgently required in Naas. Submissions have been made in support of an Athletic Club also, and their plans to develop an 8-lane track and upgrade of existing facilities at Naas Sports Centre on the Caragh Road.

Another submission from a GAA club also indicates that KCC must ensure additional open space and amenity land is reserved for the benefit of sports clubs. Existing facilities at Naas GAA club are insufficient to meet members needs or cater for growth. KCC should identify and reserve land for open space and amenity for use by sporting organisations to meet growing population.

The submission from a local Rugby Football Club welcomes policy HC4 and also indicates that land availability for the development of sports facilities is becoming problematic for all sports clubs. It is requested that KCC identify, procure and develop communal lands for additional playing facilities within the lifetime of the plan.

Another submission calls for GAA pitches to be used by schools and this should be 131edestriani in the LAP. One submission indicates that at present one school in the town are forced to travel for activities incurring significant time and cost to do so. Playing fields adjacent that are easily accessed is important for sport, fitness, and personal development in Schools. Provision should be made in the plan for schools such as Naas CBS to have access to playing fields nearby. Several submissions refer to the lack of playing facilities at Pipers Hill School and the Gaelscoil.

Another suggests that much greater investment is needed in the provision of amenity, sport, and recreation facilities for all ages which merits a review of the priorities set out in the Development Contributions Scheme.

#### Arts/Culture/Library

Submissions 286, 423, 444, 502, 511 refer.

Two submission indicate that the Potato Market should be developed as an outdoor space for cultural and arts events. Two submissions suggest that the Old Post Office building on Abbey Street should be acquired and converted into an Arts Centre. Another submission suggests that this would facilitate 131edestrianization and outdoor dining. Two submissions refer to the old library in the harbour and suggest it should be used as an art gallery and artist workshop space. A submission suggests the Canal Basin should be developed as a cultural area. The building is currently occupied by a youth organisation and could be transformed into an Irish culture centre. The Fleadh was held in Naas recently and it would be great to hear music across the canal.

#### Cremation / Faith

Submissions 134, 511, 502 refer.

Two submission indicate that the plan should identify another graveyard area, even though there is current capacity at St. Corbans. Bodenstown, which is the closest to Sallins, is close to capacity.

One submission refers to cremation/interment facilities and suggests alternative methods of interment, such as the Urn Tower, should be provided for.

#### Irish Language

Submission 296, 443, 411, 416, 296, 510, 568 refer.

Some submissions indicate it is a pity that Irish is not mentioned in the draft plan, particularly given that 800 children attend the Irish schools in Naas.

- Irish should be more visible on signage and in public places in Naas.
- Incentivise shops who promote the Irish language
- All new developments should have an Irish language name,
- New estate should have Irish names to celebrate our heritage.
- Consideration should be given to a small Gaeltacht style development.
- There are many opportunities to promote Irish such as naming business parks, street names, etc.

## Chief Executive's Opinion

### Residential Density, Mix and Design (including Taller Buildings)

The submissions received in relation to residential density, housing mix and design are noted. The future housing targets for Naas for the plan period have been established having regard to the National Planning Framework, the Implementation Roadmap and Variation No. 1 to the Kildare County Development Plan 2017-2023. It is not within the remit of the Plan to increase these targets, as the LAP must align with the County, Regional and National policy framework.

The allocated growth for Naas has been distributed having regard to the principles of compact growth, to consolidate the urban footprint of Naas and to prevent suburban sprawl. Government policy, as outlined in the Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities (DEHLG, 2009), sets out a range of appropriate densities for different site locations. In relation to specific areas of the town mentioned in the submissions, such as adjacent to Finlay Park and the south west quadrant of the town near Devoy Park, the proposed density ranges are considered appropriate having regard to these Guidelines. Furthermore, these areas are located within reasonable walking distance of the town centre and amenities where higher medium to higher densities are considered appropriate and which align with National and Regional planning policy, as well as Section 28 guidelines. This is supported by the OPR in their submission to the Draft Plan (Submission 9).

In accordance with the Urban Development and Buildings Heights: Guidelines for Planning Authorities (2018), local authorities are required to explicitly identify areas where increased heights will be actively pursued for redevelopment, regeneration and infill development. The Guidelines also require that such plans should not provide for blanket numerical limitations on building heights. It is considered that the Draft Plan complies with these Guidelines and no further change is recommended.

The submission suggesting that a 'cluster' approach should be considered on the periphery of the town is noted, however this policy approach is appropriate for small towns and villages, and not for a Key Town. Notwithstanding this, planning applications for low-density schemes may come forward through the normal planning application process on lands zoned 'Existing Residential' in the environs of the town and these would be considered on a case by case basis.

In terms of housing mix, the submissions received are noted, in particular the calls for schemes to include a variety of home types, including starter homes, homes for the elderly and family units. In this regard, policy HCO2.1 of the Draft Plan states it is an objective of the Council to require that a good mix of housing types and sizes is provided in all new residential areas and in appropriate brownfield/infill areas, to meet the needs of the population of Naas, including the provision of appropriate supported housing and longer term residential care solutions designed for older people and/or people with disabilities.

A submission has been received in relation to the Strategic Housing Developments process. The SHD process is outside of the Local Area Plan process and governed by the Planning and Development (Housing) and Residential Tenancies Act 2016. The Local Area Plan is just one document within a hierarchy of plans and guidelines that An Bord Pleanála must consider when assessing a SHD.

The submissions received encouraging living over the shop are noted and this is acknowledged in the Draft Plan. Furthermore, the submission highlighting the current situation regarding working from home is also acknowledged. Section 6.4.6 of the Draft Plan refers to working from home. Objective EDO1.10 is to facilitate home-working and other innovative forms of working which reduce the need to travel but are subordinate to the main residential use of the dwelling and do not result in a disamenity in an area.

#### Low Energy Buildings

Section 4.4.2 of the Draft Plan refers to Low Energy Buildings and acknowledges the significant role that design, construction and operation of new buildings play in reducing energy demand and increasing energy efficiency into the future. In response to the submission that calls for the plan to pursue a housing model that is self-containing in terms of energy requirements to reduce the overall carbon and environmental footprint, Policy HCO2.5 of the Draft Plan seeks to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings. All new buildings will be required to achieve the Nearly Zero Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD). Furthermore, development standards for new developments are governed by the County Development Plan which are currently being reviewed as part of the preparation of the County Development Plan 2023-2029 in the context of *inter alia* Climate Action.

#### Age Friendly Housing

Many submissions refer to this topic and they welcome the inclusion of policies in the Draft Plan regarding Housing for Older People and Naas Becoming and Age Friendly Town. Objective HCO2.1 of the Draft Plan refers. Having regard to the issues raised in the submission, it is considered appropriate to strengthen this objective by including a proviso requiring all planning applications for on lands zoned New Residential to be accompanied by a Housing Mix Statement to indicate compliance with Objective HCO2.1.

Several submissions suggest locations for age friendly housing, such as at St. David's Castle, near the Harbour in the North West Quadrant and on the KCC site on the Old Caragh Road C(1). The Draft Plan acknowledges McAuley Place as a national exemplar model of housing for older people. It also acknowledges that there will be further opportunities for Naas to expand this supported housing market. The zoning objectives for the three areas referred to above would all facilitate age friendly housing should such a proposal come forward. Achieving a housing mix where large and small families can co-habit side by side is envisaged in objective HCO2.1.

In response to the submission that suggests sites should be identified for nursing homes and retirement living, Table 11.3 of the Draft Plan indicates that nursing homes are permitted in principle in areas zoned Town Centre, Existing Residential and New Residential and are open for consideration on lands zoned Community & Education and Commercial/Residential. This also allows the co-location of nursing homes with retirement living options. In response to the submission seeking a policy statement for a multi-generational integrated community development, it is considered that this is actively supported by HCO2.1 of the Draft Plan.

#### Social Infrastructure

The submissions received that highlight the importance of delivering social infrastructure in tandem with new homes are noted. This requirement is fully acknowledged and it is for this reason that the Draft Plan is informed by a Social Infrastructure Audit which examined the

availability and capacity of facilities in Naas. This evidence base was essential in determining future requirements and to make recommendations based on existing and anticipated settlement growth. Table 4.3 of the Draft Plan sets out the Social Infrastructure Requirements for the plan period, and it indicates the required schools, childcare, sports and recreation facilities and open space to be delivered to cater for the existing and planned population increase and the mechanism for that delivery. This is supported by a suite of policies and objectives in Sections 4.6 and 4.7 of the Draft Plan accordingly.

The submissions that refer to the 15 Minute City concept and the 'Life Radius/ Blue Zone' approach are noted. Both of these concepts refer to *inter alia* achieving an environment where people's need to travel for work, education, shopping, play etc. is reduced to improve the built environment and quality of life. With respect to these approaches, the Draft Plan is underpinned by the fundamental guiding principles of town centre regeneration, sustainable movement and environment & climate change which are cross-cutting themes that all seek to achieve compact growth and improve quality of life for residents of Naas.

### Education

The submissions referring to school capacity and the provision of special education in Naas are noted. Section 4.5.1 of the Draft Plan refers to baseline information regarding the current situation for primary and secondary schools and it is acknowledged that Naas schools are currently operating above capacity. To address this, Section 4.5.2 of the Draft Plan includes a Future Demand Analysis which concludes that additional sites will be required for schools during the lifetime of the Plan. Lands are therefore zoned for new schools at three locations (Caragh Road, Kilcullen Road/South Distributor Road and Jigginstown) and this is also included in Table 4.3 of the Draft Plan 'Social Infrastructure Requirements'.

In response to the submission that notes there is no school zoned on the north-east side of the town, a site is zoned for Community & Education purposes on Fishery Lane.

Furthermore, and in response to the submission from the Department of Education, another site (2.2 hectares) is proposed to be zoned for a school within the NWQ area. While the Local Area Plan can make provision for school sites within a plan area, the Department of Education is the responsible agency for the delivery of school facilities (including special education).

### Childcare

The submissions referring to the lack of childcare spaces is noted. The significant under-provision of full-time care and care for the younger age profile in Naas is acknowledged in Section 4.5.1 of the Draft Plan. The obligation on developers to provide a childcare facility for 20 children for every 75 houses is provided for in the Childcare Facilities Guidelines for Planning Authorities (2001), which is reinforced in Section 17.5 of the Kildare County Development Plan. This is also included in objective HCO3.2 of the Draft plan.

Notwithstanding this, and in acknowledgement of the current childcare situation, it is considered appropriate to include a new Action in Section 4.6 of the Plan to Investigate the feasibility of the provision of a childcare facility on KCC owned lands during the lifetime of the Plan.

The submission referring to a levy option as an alternative to provide childcare is noted, however this is a matter for the Development Contribution Scheme and not a Local Area Plan.

### Health Facilities

A Social Infrastructure Audit (SIA) was prepared as a supporting document to the draft Plan. As stated in the audit there are no national standards for health provision in Ireland relating to the provision of primary care centres or the number of doctors in an area. In the absence of any standards the Graduate Medical Education National Advisory Committee (GMENAC) standards were referred to. The comments in relation to the Scottish standards are noted, however, the SIA was very clear on stating that even though Naas was above the recommended American standards, the reality in Naas is quite different. Through consultation with GP practices they all confirmed they were full, and they believed that a significant demand for new doctors in the area existed. It was also highlighted in the Audit that doctors retired from within the study area in recent years and were not replaced, which has caused a strain on existing resources and has been exacerbated by the increasing population in Naas and the surrounding catchment. Therefore, it is considered that the SIA has fully acknowledged the reality of the under provision of GP practices. Section 4.5.1 and 4.5.2 also recognise that general practices are experiencing significant pressure in the provision of healthcare in Naas.

The Naas Local Area Plan is a land use plan. The Land Use Zoning Matrix as detailed in Table 11.3, 'Permits in Principle' a Medical Consultant/ Health Centre, across Town Centre, Community and Education, and Neighbourhood Centre, land use zonings. Medical Consultant/ Health Centre is also 'Open to Consideration' in areas zoned as Existing Residential, New Residential, Commercial/Residential, Leisure and Amenity, Enterprise and Employment and Retail/commercial. Furthermore, Objective HCO 3.1 encourages development of new facilities and improvements to the expansion of existing facilities for healthcare facilities.

The issue of mental health services is noted however the provision of general practices and public health services is outside the remit of a land use plan. The draft Plan has provided sufficient zoned land and objectives to support for such facilities.

### Parks and Open Spaces

The numerous submissions that refer to the importance of open space and parks are acknowledged. The Draft Plan is informed by the Social Infrastructure Audit which examined the availability and capacity of facilities, including open space, in Naas. This evidence base was required to determine future requirements and to make recommendations based on existing and anticipated settlement growth. Table 4.3 of the Draft Plan sets out the Social Infrastructure Requirements for the plan period, and it includes a number of parks and open spaces that are planned for Naas, including Jigginstown (21 hectares), Oldtown Demesne (6 ha) and Kerdiffstown (31.25ha). This is in addition to open space provided as part of new residential developments. Chapter 5 of the Draft Plan also includes walking and cycle links to improve accessibility between residential and amenity areas and promote active travel. The amenity value of the Canal is also acknowledged, and this is considered in more detail in response to the issues raised under Section 10 of the Draft Plan.

The submission that refers to the differentiation between public and privately owned open land is noted. However, land ownership is not considered an appropriate consideration component to a zoning map.

The submissions calling for more Community Gardens and urban playgrounds in Naas is noted. Policy HCO4.1 of the Draft Plan is to support and facilitate the provision of



appropriately located multi-functional community facilities to meet the needs of the growing population in Naas. Policy HCO4.6 also supports a network of playgrounds and amenity spaces throughout the town and the environs. It is considered appropriate to include reference to community gardens and allotments in HCO4.6.

#### Naas West/Caragh Court/Community Proposal

The submissions received calling for a Community Park proposal to be brought forward on the land zoned 'New Residential' C(1) are noted. The zoning of this land for New Residential purposes is considered appropriate for a low-medium density development, having regard to its location within reasonable walking distance of amenities and to the established pattern of development in the area. Furthermore, the subject site was categorised as Tier 1 lands within the Sustainable Planning and Infrastructural Assessment and the site is located within the defined settlement boundary of Naas and at such represents compact growth. The development of this site for residential purposes contributes to the compact growth of the town.

The zoning of C(1) is discussed in further detail under issues raised in response to Chapter 11.

#### Finlay Park and NWQ

The submissions received in relation to the delivery of open space in Finlay Park are noted. The enforcement of planning conditions is dealt with through a separate process to this Local Area Plan.

The submissions that refer to the importance of the NWQ to the overall provision of open space for the town are noted. Section 10.7.5 of the Draft Plan refers specifically to the masterplan for the NWQ and it is stated that the masterplan will comprehensively address planning and design considerations to include *inter alia* open space hierarchy, landscaping, boundary treatment, entrance and public art installations.

#### Jigginstown Park

The submission received supporting the proposals for Jigginstown Linear Park are noted and acknowledged. Direct access to Jigginstown Park from Primrose Gardens/Castlefarm would require access across third party lands which would be considered as part of the detailed design of the park project.

#### De Burgh/Oldtown Demesne

The submissions that call for the public park to be opened at the DeBurgh lands are noted. Table 4.3 of the Draft Plan includes the delivery of a park within Oldtown Demesne to be delivered by KCC during the lifetime of the Plan.

The submissions that object to the zoning of land within the DeBurgh Estate for residential purposes C(19) are noted and acknowledged. These lands are in the ownership of Kildare County Council. Given the location of C(19) within reasonable walking distance of the town centre and social infrastructure, it is considered that a residential scheme at this location would contribute towards the compact growth of the town in a sequentially positive manner. Any residential project at this location would be subject to a planning application or Part 8 process, would be subject to detailed design scrutiny and subject to its own public consultation process. The zoning of C(19) is also discussed further under issues raised in response to Chapter 11.

### Parks in general/ Dog Park

The submissions received referring to standards for new parks are noted. The detailed design of any new park will be subject to a separate design and public consultation process.

It is an objective of the Plan to investigate the feasibility of providing a dog park within lands designated for Open Space and Amenity in conjunction with the Council's Park's Department (HCO4.8).

### Sports Facilities

The many submissions received in relation to the current provision of formalized sporting facilities is noted. As with schools and childcare, the Social Infrastructure Audit carried out to inform this Draft Plan included an audit of sports and recreation facilities. This highlighted there are 21 locations in Naas with sports facilities of different descriptions with clusters located at Naas Sports Centre, Naas GAA, Monread Park and Monread Community Centre. The future demand analysis indicated that an additional 6.8 hectares of land is required to comply with the benchmark guidance outlined in Fields in Trust. Table 4.3 of the Draft Plan sets out the sports and recreation facilities to be delivered during the lifetime of the Plan, including Kerdiffstown Park, Jigginstown Park and within the centre of Naas Racecourse. It is also an objective of the Draft plan, as expressed in HCO4.5 to facilitate sports and community groups in the acquisition and/or use of lands for sports and recreation purposes.

The submission that refers to identifying a site for Municipal Pitches is noted. There will be opportunity to address this with the roll out of parks at Jigginstown and Oldtown Demesne parks. It is considered appropriate to expand the Action in Section 4.7 of the Draft Plan to include reference to Municipal pitches.

The submission that refers to the Development Contribution Scheme is noted; however, this is not a matter for a Local Area Plan.

### Arts/Culture/Library

The submissions received in relation to the Potato market are noted. It is noted that the site is in private ownership, however the Council has secured this as a location for the Farmers Market.

The submissions referring to the Old post office building on Abbey Street, the old library in the harbour and the Canal basin are all noted. The use of these buildings for cultural purposes would accord with the zoning objectives pertaining to the area and the regeneration issues are addressed in more detail in response to issues raised on Chapter 10 of the Draft Plan.

### Cremation/Faith

It is not considered necessary to consider additional internment space during the lifetime of this Plan. The inclusion of a cremation/internment facility at Saint Corbans would be considered on its own merits and subject to the normal planning application process.

### Irish Language



The submissions received in relation to the use of the Irish language are noted. Kildare County Council is committed to supporting the growth of the Irish Language, as per the Kildare County Language Plan. The Kildare County Development Plan 2017-2023 (CDP) which the LAP must adhere to encourages the use of the Irish Language in our county's shop fronts similarly it requires that names of residential and other developments shall include the use of the Irish Language. As per the Official Languages Act the Council has a duty to ensure that the Irish language is used in signage.

## **Chief Executive's Recommendation**

### **Proposed Material Alteration**

Amend HCO2.1 as follows:

Require that a good mix of housing types and sizes is provide in all new residential areas and in appropriate brownfield/infill areas, to meet the needs of the population of Naas, including the provision of appropriate supported housing and longer term residential care solutions designed for older people and/or people with disabilities. *All planning applications on lands zoned C: New Residential or C: New Residential Phase 2 shall be accompanied by a Housing Mix Statement illustrating compliance with this objective.*

### **Proposed Material Alteration**

Include a new Action under Section 4.6 Education, Childcare and Health Facilities as follows:

*To investigate the feasibility of the provision of a childcare facility on Kildare County Council lands during the lifetime of the Plan.*

### **Proposed Material Alteration**

Amend HCO4.6 as follows:

Facilitate and promote the development of a network of playgrounds, amenity spaces *(to include community gardens and allotments)* and recreational areas for children of all ages which are universally designed throughout the town and its environs.

### **Proposed Material Alteration**

Amend Actions listed under Section 4.7 Other Community, Sports and Recreational Facilities as follows:

Address the deficiencies in the provision of sport and recreation facilities *and investigate the feasibility of Municipal Pitches* in Naas through active engagement with the relevant clubs and The Sports Partnership.

## Chapter 5: Movement and Transport

### General Matters

This Section of the report deals with various issues that arose from Chapter 5 Movement and Transport. Individual specific measures that relate to Maps 5.1 to Map 5.4 are addressed in the following section of the report.

Submissions 011, 015, 018, 020, 021, 022, 023, 024, 027, 031, 136, 137, 141, 142, 145, 200, 204, 250, 259, 261, 262, 268, 293, 296, 302, 306, 317, 333, 346, 359, 383, 385, 389, 402, 415, 423, 428, 430, 433, 443, 444, 452, 453, 457, 461, 466, 473, 482, 488, 492, 502, 501, 510, 511, 523, 530, 536, 538, 551, 559, 560, 565, 577, 582, 583, 589, 591, 597, 602, 777-795, refer.

### Issues Raised

#### *Walking and Cycling*

There is support across several submissions from the permeability/pedestrian strategy and cycleways proposed. One submission state that more incentives and infrastructure to walk and cycle are required. Two submissions suggest that new developments should contain links but not imposing retrofitted permeability into an established estate/development is not acceptable. It has been stated that permeability can create issues, such as anti-social behaviour. Future consultation with the residents is required regarding the measures proposed in the draft Plan. One submission state that the proposed pedestrian measures in Map 5.1 in the Appendix maps are wholly inadequate and do not reflect the ambition outlined in Chapter 5.

It has been suggested that cycling infrastructure in Naas town is subpar and offers no protection for cyclists, and often lure cyclists into uneven road surfaces where debris tends to collect. What is needed is effective and well-designed cycling infrastructure. One submission state that cycling lanes should be segregated where possible or clearly identified shared space with a 30km/hr speed limit and should be prioritised over car access. Another submission state that shared bicycle and pedestrian pathways are not recommended in section 1.9.3 of the National Cycle Manual.

A number of submission question when particular cycle schemes which have received Part 8 approval Dublin Road Cycle Scheme, proposals for the Kilcullen Road to improve the walking and cycling environment will be implemented and that is should be as soon as possible. Other submissions state the proposed cycling infrastructure omits sections of R445, Jigginstown Green/Park, with no cycle lanes approaching Gael Choláiste Chill Dara on the R445, breaking safe cycle routes for school access from Jigginstown side of R445.

#### *Public Transport*

Barriers to using public transport are seen as fares/fare complexity, inability to make connections across different buses, no consistent service, fragmented service, lack of routes, high cost acts as a disincentive. It has been suggested that a move to free public transport is required, especially for those under 18 years of age.

#### *Train*

Many submissions refer to the need for Sallins Train Station to be included in the Dart+ expansion programme. It has also been suggested that a branch of the DART should link into the Harbour area. Another submission suggests that this should be done along the route identified for a bus street. It has also been suggested that the derelict site opposite the Big

Ball would be a suitable location for a Dart Station. It has also been stated that another station is required west of Sallins on the Naas Ring Road.

Other issues that relate to the Sallins Train Station that have been referred to include the needs for bike storage, lack of parking, the station needs renovation, the service is not adequate, an app is required to helping with planning journeys.

#### *Bus*

Many submissions suggest the need for more local bus routes connecting the immediate area such as to Clane, Kill, Rathcoole, Tallaght, Blessington, Kilcock, Celbridge, Maynooth and its University and state that this has not been addressed in the draft Plan or the Transport Strategy. Another suggestion was that Naas needs a Bus Connects system. One submission state that the shuttle bus service from Naas to Sallins is adhoc and another submission states that a high frequency local bus services to and from the Sallins Train Station is required. It has also been suggested that there are no bus priority measures in the area and bus lanes are needed.

One submission suggests that a terminal on Millennium Road near Kerry Foods which could be a pick-up point for all buses through town would be welcome. It has also been suggested that accessible, electric buses could loop around the town and Sallins picking up passengers every 10 minutes, similar to Dublin Bus Connects service.

One submission suggests that MTO 1.11 should be amended to provide for bus stops on both sides of the road, as currently there is a stop on one side only. It has also been suggested that collect and let down areas for buses are required across the Plan area. One specific submission refers to the New Caragh Road where the school bus blocks traffic on pick-up. Also, a suggestion for a bus stop at Oak Park to facilitate commuting to and from Dublin City Centre, as town centre is 25 minutes' walk has been requested. Other submissions refers to the need for all bus stops should have shelters.

#### *Naas/Sallins Transport Strategy*

One submission requests that the Transport Strategy measures needs to be clearly mapped out and linked to the Plan for Naas. Other submissions state that there are not enough projects given a 'short' timeframe especially cycling infrastructure and not enough projects are graded with high importance. One submission further notes that the results from the NTA's multimodal Eastern Regional Model have not been taken into account in the preparation of the transport (traffic) model developed for Naas/Sallins and therefore, the impact of the improved transport networks across the Greater Dublin Region have not been reflected in this exercise. Another submission refers to the modelling contained in the Transport Strategy and states that it does not have the functionality to assess changes in mode choice as a result of planning or policy proposals.

#### *HGV's*

Numerous submissions raise the issue of a ban on HGV from the town centre; to reclaim streets and squares. It has been suggested that if access is required it should be arranged by permit, and be local access only. It has been requested in another submission that the measure should be prioritised and implemented as soon as possible as it has been mooted for decades and still not happened. Concern is expressed in another submission that while they welcome the reduction in HGV from the town centre, it expresses concerns regarding proposals to direct these from the Newbridge Road to turn right onto the ring road by Chadwicks. It highlights that this junction is extremely busy and HGV traffic along this route will increase the overall traffic.

### *Motorway Set-Back*

One submission received states that there is considerable existing development within the 91-metre setback from the motorway and therefore queries the usefulness of the 91-metre setback as required under Objective MTO 3.7 and considered 182m (91 x 2) is extreme to protect the future of the road network. The concerns in relation to noise are noted in the submission. The submission concludes by recommending an amendment to Objective MTO 3.7 to require a 40-metre building line setback and that ancillary development will be considered in the setback zone.

### *Outer Orbital Route*

Many submissions refer to the need for an outer orbital road in Naas to meet the goals of traffic removal from the town centre and also to open up more lands for development.

### *Modal Split*

One submission suggests that the draft Plan should have greater ambition in tackling modal split in Naas, by creating the conditions to attract more citizens to cycle and walk on a habitual basis.

### *30km/hr Speed Limit*

It has been suggested that a 30km/hr speed limit should be implemented into the town centre and along the ring roads. Another submission suggest that a 30km/hr speed limit should be applied to all areas within the exception of the ring road and the M7.

### *Suggested Movement and Transport Infrastructure*

Several of the submissions received outline specific individual measures that they would like to see implemented across the Plan area, as follows:

Pedestrian/zebra crossings are suggested to link

- the Castle Farm/Primrose developments and the Elsmore development,
- adjacent to CBS (secondary) Corbans Lane,
- Friary Road to Poplar Square,
- Dublin Road, Wolfe Tone Street,
- at Oak Park entrance, schools
- near the Ballymore Roundabout.

Other infrastructure measures suggested are proposals to:

- Widen all paths near amenity areas to 4metres.
- Insert raised table crossings at all entrances and estates.
- Roof/canopy over the Murtagh's Corner - New Row - Main St. R445 - Corban's lane - R448 junction and the south-west vacant site.
- Dipping of footpaths for cyclists.
- Transport rental, hubs, or car sharing.
- Filter lights at Craddockstown Crossroads
- Speed bumps on the Blessington Road are required.
- Implement improvements to pedestrian traffic lights to prioritise pedestrians as provided for.
- Consideration on what priority traffic gets at new junction at Main Street and Newbridge Road.

### *Suggested Movement/Connectivity Measures*

Several submissions made various suggested links/connectivity measures across the Plan area, as follows:

- Cycle and walking infrastructure along Sallins Road.
- Improving Sallins Road-Monread junction to accommodate right turn into Monread when leaving Naas.
- Reconfiguration of the junction of Sallins Road and Monread.
- Link from Oldtown Walk to Millennium Park.
- Connect site C (19) with an internal greenway from Naas GAA to Mill Lane.
- Off-road cycle lane be constructed from Craddockstown Golf Club to the junction of Friary Road.
- Extend the walking trail connecting Sundays Well, through to the Lakes, enabling connection with the proposed canal route (K Leisure to Corbally Harbour).
- Connect the canal to the surrounding estates of Primrose Gardens, Castlefarm, and Wentworth Place.
- Construct new pedestrian/cycle bridges at Landen Park, Oldtown Demense, Soldiers Island, Naas Harbour and Locks at rear of Naas GAA.
- Improve walking and cycling facilities at Corbans lane.
- Make Lough Bui a cul-de-sac for school safety.
- Connect the ring road to Caragh village by a single side shared space cycle / walking track.
- Friary Road to the CBS must have a segregated cycle lane.
- A cycle lane should be provided on the Newbridge Road R445 from Jigginstown Green to the Old Caragh Road.
- A cycle lane should be provided on the R409 from R445 junction.
- Construct footpaths on both sides of Town Hall.
- Cycle scheme for Naas to Newbridge.
- Abbey street be closed off to traffic and a pedestrian square be constructed.
- Cycle track from Naas to Newbridge along R445.
- Cycle lane from Pipers Hill through the land zones F2 strategic open space from rear of Bellingsfield to Ballymore road.
- C8 is permeable by through road, reducing need for inner relief road.
- Naas Neighbourhood Greenways network to connect the town and provide strong links to the hinterland.

#### *Parking Strategy /Pedestrianisation*

There is support for the pedestrianisation of the Main Street and even the surrounding areas. With one submission stating that only disabled, local and bus access provided for. Car-free Sundays in the town centre should be trialled. One submission suggested that from Poplar Square to Murtagh's Corner should be pedestrianised with local and bus access only, and specific arrangements could be made for Dunnes Stores.

Submissions refer to the need to designate "Go Car" type rentals to help reduce the need for car ownership. One submission request drop-off point be located on the Kilcullen Road for secondary school children to prevent congestion and bottlenecks in the Pipers Hill area. It has also been suggested that parking outside schools should be eliminated, to create drop and safe parking zones close to but away from schools. Another submission suggests car free zones outside schools 30/40 minutes prior to schools starting and ending and suggest that this would facilitate easier and safer walking/cycling for drop off/pick up.

One submission suggests that more EV charging points are required. Also, that the Plan should incorporate for the use of electric scooters.

Many submissions propose LED parking signs on each of the access routes into Naas are imperative to advise of parking capacity/availability and suggest that the signs could also provide seasonal messages, advertising and HGV ban times.

Many submissions suggest that parking on the Main Street should be removed to enable a pedestrian friendly environment along with cycling lanes. Another submission asks for parking to be reduced and replaced with tree planting.

It has also been suggested that a park and ride station could be provided in Millennium Park and keep the town centre as a parking free station. Another submission states that the construction of a park and ride in the Sallins/Naas area should be prioritised.

### Chief Executives' Opinion

#### *Walking and Cycling*

To bring about change in society in terms of moving towards active travel improving permeability across all areas in the town is required. Providing improved permeability can be seen as an opportunity for established estates. Many estates have limited levels of connectivity restricting convenient access to bus stop, travel to school or nearby services. Improving connectivity will provide choice, it is imperative that active modes of transport become a more attractive viable and convenient alternative than the car.

With high quality design and appropriate lighting such measures will not have the negative anti-social impacts feared. Should any of the connectivity routes proposed in the Draft Plan be progressed in the future each would be subject to a separate statutory procedure which includes for detailed design and public consultation.

It is considered that where possible, cycle facilities should be segregated when there are significant traffic volumes. Where this is possible, the detailed design relating to the cycling measures will endeavour to do so. However, this is not always possible and shared street options are a solution so that cyclists are not precluded, and active modes of transport become viable. The Naas/Sallins Greenway will be developed as a segregated route. Along other routes the delivery of high-quality segregated infrastructure will be pursued.

The comments regarding the delivery Dublin Road Corridor Scheme and the Kilcullen Road Scheme are noted. The programme for the delivery of roads projects (including cycle schemes) where Part 8 approval has been given will be subject to funding and resources, as such is outside of the remit of a Local Area Plan.

The comment on the omissions on Newbridge Road are noted. However, Kildare County Council have recently developed the Naas/Sallins Transport Strategy which informed this LAP. The Strategy outlines a plan for the delivery of sustainable transport structure over the coming years. The strategy is an evolving document and any identified gaps in the cycling network will be examined and considered for inclusion in future iterations of the Strategy.

The measures contained in the current Cycling Strategy are considered the best measures to create a network of safe, comfortable, coherent and convenient cycling routes throughout the study area for as many local trips as possible, including journeys to work and school and journeys made for other purposes such as shopping, visiting friends and family and attending leisure activities.

#### *Public Transport*

The barriers to public transport are noted. It is a policy (Policy MT2) of the draft Plan to promote the sustainable development of Naas by supporting and guiding the relevant national agencies in delivering improvements to the public transport network and to public transport services. The measures contained in the draft Plan presents potential solutions to improve conditions for public transport, thereby ensuring a sustainable modal shift for the successful transition to a low carbon and climate resilient society.



It should be noted however that bus fare pricing and fare structure is a matter for service providers. The Transport Strategy contains an objective to lobby for integrated ticketing, improved services to town, increased bus capacity and frequency. However, this is outside the remit of a land use plan.

#### *Train*

Objective MTO 2.5 of the Draft Plan supports the upgrade and expanded Park & Ride facility at the Sallins Railway Station and the electrification of the rail line to Sallins with DART Services thus providing a 10-minute peak commuter rail frequency. As part of the Rail Transport Options put forward in the Naas/Sallins Transport Strategy Rail Option 1 comprises to lobby for the relocation of Sallins Train Station to the West. The analysis found that the option was major or highly negative. Relocating the station to the west would remove most of the residential areas of Sallins from the 1km walking catchment and would have a detrimental impact on accessibility/social inclusion, integration of land-use-transport policy and the environment as car use would rise.

The loss of greenfield habitat to build the station and the park and ride facility would be a further negative environmental impact. This option would incur significant investment costs, which would be compounded by reduced fare revenue as patronage falls. The station would be outside the walking distance of many Sallins residents and this would reduce physical activity.

#### *Bus*

It is an objective of the Draft Plan to engage and co-operate with the Department of Transport, National Transport Authority (NTA), Transport Infrastructure Ireland, Irish Rail, Local Link and other stakeholders to improve the provision of public transport in Naas. These provisions include the delivery of a sustainable bus-only link between Naas and Sallins Railway Station, a local bus route, additional bus stops and the provision of bus priority measures to ensure the improved movement of bus services through the town centre and local neighbourhoods (MTO 2.4, refers).

The Draft Plan proposes three local bus routes to improve services across the Plan area in the short and medium terms. The Plan also provides for a number of bus priority measures to support the operation of the proposed local bus routes and the proposed Bus Interchanges. While the matter of the development of additional bus stops are more appropriately addressed by the National Transport Authority (NTA), the Naas/Sallins Transport Strategy contains an objective to upgrade bus shelters.

#### *Naas/Sallins Transport Strategy*

The transportation measures contained in Map 5.1 to 5.4 are indicative only. Should the measures be progressed in the future they would be subject to a separate statutory procedure which includes for detailed design and appraisal, consultation with the relevant statutory stakeholders and public consultation. The delivery of the measures have been categorised according to their estimated delivery timescale. The timescale category is not a reflection of the importance attached to each measure, but rather reflects the challenge involved for implementation and the expected duration of the planning/construction process.

The use of the NTA's Eastern Regional Model for the Naas/Sallins Transport Strategy was not considered appropriate as the zone structure and level of detail within the ERM is not significantly refined in the Naas/Sallins area to reflect the intricacies of traffic movements or local public transport improvements. Additionally, as there are no planned/committed schemes within the NTA's GDA Strategy that have a direct impact on transport demand within Naas and Sallins the use of the NTA's ERM was not considered essential for the Naas/Sallins Strategy. More appropriate analysis tools such as catchment/permeability analysis in GIS were utilised extensively as part of the Naas/Sallins Transport Strategy to

assess and inform the walking, cycling and permeability elements of strategy and also to assess and inform local bus service improvements.

It should be noted however that the NTA's ERM, particularly its multimodal functionality, was utilised at a strategic level to assess the potential benefits of a future bus service improvement to link Naas to the train station in Sallins. As the Sallins line connects to the larger national rail network linking to Dublin's City Centre, this was considered the best approach for assessing this particular measure.

#### *HGV's*

The Draft Plan proposes a restriction on HGVs through the town to improve the overall circulation (Objective MTO 3.2, refers). It is envisaged that as part of this proposal, access for HGVs with deliveries in the town centre would be via a permit and would be partially maintained through the use of restrictions at specific times of the day. HGV restrictions in the town centre would provide numerous benefits in terms of safety, accessibility and social inclusion and physical activity. HGVs would be required to re-route around the Naas Southern Ring Road and Millennium Park Road, which it is accepted, may result in an increase in traffic elsewhere but such impacts would be significantly outweighed by the benefits for the town centre.

#### *Motorway Set-Back*

The comments are noted on the 91-metre set back and in particular that development has occurred within the 91-metre setback previously. During the preparation of the draft Plan this issue was discussed at length with Transport Infrastructure Ireland (TII) who are responsible for the protection and maintenance of the motorways. It is considered that the setback of 91-metres was adequate to protect the national road network and associated junctions. The 91 metres on either side of the motorway is considered appropriate and will provide for greater options in the future. While no further upgrades are envisaged at this time, it is the role of the Council to protect national investment in infrastructure beyond the lifetime of many land use plans. Each planning application will be assessed on a case-by-case basis and therefore it is reasonable to retain the wording that, in certain circumstances development may be considered in the setback zone in recognition of local conditions and the nature of the proposed activity.

#### *Outer Orbital Route*

National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that '*Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens*'.

Naas has a legacy of residential development located outwards in a somewhat dispersed pattern of development removed from the established town centre. The Vision for Naas 2031 and beyond is to ensure growth is planned to create a compact, consolidated and connected urban form, rather than opening up more lands for development.

The analysis undertaken as part of the Naas/Sallins Transport Strategy which has informed the Draft Plan, found that the Outer Orbital Road, is not an optimal solution as it would have limited positive impact on the town centre. Outer Relief Roads are used by designers to direct longer distance traffic, and in particular Heavy Goods Vehicles (HGVs), away from cities, towns and villages provided they are clearly separated from the urban area (DMURS,



pg 58). Therefore, a bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas.

#### *Modal Split*

One of the Key Themes that guide the overall Vision for the draft Plan is Sustainable Movement. The Draft Plan seeks to develop and encourage more sustainable travel modes including walking, cycling and public transport and to reduce the existing over-reliance on the private car across the plan area, particularly within the town centre. The Draft Plan will address the modal shift in transportation through implementation of the permeability, cycling, public transport and road transport measures detailed in Chapter 5 and illustrated on Map 5.1 to Map 5.4. The draft Plan provides for 49 specific pedestrian measures and 40 cycle infrastructure measures to improve connectivity for both pedestrians and cyclists throughout the town. It is considered that the implementation of these measures will see a huge improvement in Naas over the lifetime of the Plan and will provide significant progress in achieving a modal shift.

#### *30km/hr Speed Limit*

This is outside the remit of the Naas Local Area Plan. However, this will be considered as part of the speed limit review being undertaken by Kildare County Council.

#### *Suggested Movement and Transport Infrastructure*

The suggestion in relation the additional pedestrian/zebra crossing, filter lights and speed bumps are noted. However, this is outside the remit of a land use plan and is a matter for the Naas Area Office which co-ordinates the delivery of specific services in the Naas area. As the transportation measures/projects provided for in the plan are progressed, the detailed design will provide for appropriate crossing facilities where necessary.

The development of Murtagh's Corner is a key objective within the Draft Plan. Issues raised such as outing a canopy/roof and decisions on the prioritisation of traffic, will form part of the detailed design of the project and are outside the remit of a land use plan.

#### *Suggested Movement/Connectivity Measures*

The draft Plan makes provision for a large range of measures across the Draft Plan area which when developed will provide an improved and permeable sustainable network of cycling and pedestrian routes, improving the permeability of the town centre, providing for an improved public transport network and alleviating traffic congestion in the town centre. It is acknowledged that there are many other potential measures however those presented in the Plan will facilitate the urban regeneration of Naas Town Centre which is a key overarching theme across the Plan.

The comments made in relation to the Sallins Road are noted. It must be recognised that there are significant width constraints along the Sallins Road which will impact on the possibility of the reimagining of this route. These constraints form a significant barrier to the delivery of high-quality cycle/walking infrastructure along this route. However, the delivery of the Naas-Sallins Greenway (Objective MTO 1.3, refers) which runs parallel to the Sallins Road will provide the opportunity to link into residential estates, schools, local GAA complex and the Grand Canal harbour in the centre of Naas. Thereby providing a better alternative to the Sallins Road.

The comments in relation to a greenway associated with site C19 are noted. However, the connections to the surrounding area will be considered as part of any planning application for all new residential land including the C 19 on Sallins Road. Any planning application will be assessed in accordance with the standards pertaining to the Design Manual for Urban

Roads and Streets (DMURS), the Sustainable Residential Development in Urban Areas and the associated Urban Design Manual.

The suggestion in relation to providing for an active travel connection between Naas and Caragh is noted. It should be noted that Objective MTO 1.12 of the draft Plan proposes to investigate the feasibility of a greenway/cycleway link between the town of Naas and the village of Caragh.

*Parking Strategy /Pedestrianisation*

Public realm improvements such as pedestrianisation and tree planting within the town centre will form part of the proposed Public Realm Strategy (Section 10.5, refers). Particular attention will be focused on public spaces within the town centre and approaches to the town.

The draft Plan has indicated the bus terminus/mobility hub in the Northwest Quadrant/Canal Bank area as a potential location which could facilitate alternative modes of transport including e-car rental/car sharing hub, bike/e-bike and e-scooter rentals, in addition a direct pedestrian access to the Main Street Interchange.

Complimentary parking measures such as signage are outside the remit of a land use plan. However, it is important to note that the Naas/Sallins Transport Strategy proposes Variable Message Signs (VMS) displayed at strategic locations.

Parking was a key aspect of this transport strategy which aims to improve the efficient use of existing car parks in the town centre. The Plan will support a balanced approach to effectively manage parking to support the local economy and encourage sustainable travel modes in order to reduce reliance on the private car. The additional measures in relation to walking and cycling are considered important for a modal shift in particularly in relation to active travel modes to school rather than through the provision of school drop off locations.

The Parking Strategy Measure PK 7 provides for the additional electric vehicle charging points. Objective MTO 4.3 ensures that all new proposed developments make provision for the use of electric vehicles through a significant increase in the provision of clearly and exclusively designated electric car charging points on public and private land in partnership with ESB and other relevant stakeholders and landowners.

The comments in relation to the Park and Ride facilities are noted. The Draft Plan contains an objective to investigate the merits of a second station with a Park & Ride to the west of Sallins to serve the population of Naas and the wider region (Objective MTO 2.6, refers). It should be noted however, that Millennium Park has not been identified through the Transport Strategy as an appropriate location for Park and Ride. The location chosen in the Naas/Sallins transport strategy provides the best location for commuters accessing the train station and will not have a negative impact on the capacity of the national road network

**Chief Executive's Recommendation**

No change recommended.

## Pedestrian, Cycle, Public Transport and Road Measures

This sub-section of the report on Movement and Transport relates to submissions/observations received across the various pedestrian, cycle, public transport and road measures as detailed on Map 5.1 to Map 5.4. Road measure RD 1 – The Gallops Avenue will be dealt with separately under the following section.

### Walking measures (Map 5.1)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                |
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| <b>Pedestrian Measure No. 21</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Pedestrian/Cyclist footbridge over Canal and associated path to link to housing estate (Landen Park)</b>                    |
| Submission 261, 432, 452, 528, 546 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Positioning and design need to be complementary to the canal vista.</li> <li>Structures should not provide shelter for anti-social activity.</li> <li>Disproportionate permeability rate through Landen Park.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                |
| <b>Pedestrian Measure No. 22</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Pedestrian link between Naas Branch Greenway - Oldtown Demesne housing estate - Millennium Business Park - Sallins Road</b> |
| Submission 396, 398, 432, 452, 546, 600 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Do not support further breaks in the famine wall - impact the safety, security and amenity.</li> <li>Diminishes amenity.</li> <li>Proposed breaks open into car parks - safety concerns.</li> <li>Proposes a bridge onto the canal from the De Burgh estate at the GAA Club.</li> <li>Connect old mill through into Millennium Park.</li> <li>Anti-social behaviour.</li> <li>Private estate and part of a management company responsible for maintaining and services areas.</li> <li>Increase traffic into a residential estate with drop offs to the GAA pitch in Millennium Park.</li> <li>Oldtown Demesne requires safety audit for access to main road and traffic calming measures.</li> </ul> |                                                                                                                                |
| <b>Pedestrian Measure No. 27</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Pedestrian link between Morell Lawns - Sallins Road</b>                                                                     |
| Submission 452 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Morrell Lawns requires safety audit for access to main road &amp; traffic calming measures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                |
| <b>Pedestrian Measure No. 28</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Pedestrian link between Oldtown Walk - Sallins Road</b>                                                                     |
| Submission 452 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Oldtown Walk requires safety audit for access to main road &amp; traffic calming measures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                |

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|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>Map 5.1 does not reflect existing circumstances as it fails to show recent housing development.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                    |
| <b>Pedestrian Measure No. 29</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Pedestrian link between Alder Grove - Sallins Road</b>                                          |
| Submission 452 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                    |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Alder Grove requires safety audit for access to main road and traffic calming measures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                    |
| <b>Pedestrian Measure No. 36</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Pedestrian link between housing estates; Rathasker Heights - Rathasker Road - Devoy Quarter</b> |
| Submission 057, 065, 067, 079, 093, 094, 169, 180, 203, 208, 483, 546, 571, 590, 693, 312 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                    |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Dissect green area where children play.</li> <li>Safe environment will be destroyed by the proposed link.</li> <li>Other access points along Rathasker Road exist, in St Michaels Terrace and a path linking Rathasker Road to Fair Green Street.</li> <li>No need for the measure is questioned.</li> <li>No improvement to journeys to the Craddockstown Road destinations and marginal if any improvement to journeys to the Garda Station.</li> <li>Vandalism.</li> <li>Dangerous.</li> <li>Anti-social behaviour.</li> <li>Security risk.</li> <li>Increased through traffic.</li> <li>Previous pedestrian path from Rathasker Road to St Conleths Place had to be closed due to anti-social behaviour.</li> <li>Protect the town's green areas.</li> <li>Value of house will go down.</li> <li>Lack of prior consultation and engagement with stakeholders contrary to NTA's Best Practice Guide (2015) on permeability.</li> <li>Proposal goes against NTA Guidelines for 'Scheme Design' as it has a steep incline.</li> <li>Necessitate steep access, itself a danger to pedestrians and cyclists.</li> <li>Rathasker Heights front gardens are open and unwallled – detrimental impact on residents and properties.</li> <li>impact privacy and enjoyment of private space.</li> <li>People have a right to feel safe in their neighbourhoods.</li> <li>Difficult to drive in and out of estate whilst also being aware of walkers and cyclists.</li> <li>Contrary to protecting and creating parks and amenities.</li> </ul> |                                                                                                    |
| <b>Pedestrian Measure No. 37</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Pedestrian link between housing estate Carraig Oscair – Rathasker Road</b>                      |
| Submission 067, 079, 180, 208, 253, 279, 312, 375, 385, 406, 417, 493, 546, 571, 590, 635, 693 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                    |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Safety concerns.</li> <li>Increase in footfall result in anti-social behaviour.</li> <li>Previous antisocial behaviour occurred on the green and residents took measures to protect the community.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                    |

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| <ul style="list-style-type: none"> <li>• Previous pedestrian path from Rathasker Road to St Conleths Place had to be closed due to anti-social behaviour.</li> <li>• Other access points along Rathasker Road exist, in St Michaels Terrace and a path linking Rathasker Road to Fair Green St. Therefore, no need for another path cutting through and disrupting a residential area.</li> <li>• Impact on security and environment.</li> <li>• Lacking information on planned location.</li> <li>• Removal of existing hedgerow will be required.</li> <li>• Existing pedestrian access point 50m north of the proposed location.</li> <li>• Difficult to drive in and out of estate whilst also being aware of walkers and cyclists.</li> <li>• Split the green area.</li> <li>• Concern over new position of No. 37.<sup>27</sup></li> <li>• Calming measures on the road required and where link 37 meets the road</li> <li>• Require significant engineering works as the Rathasker Road is circa 1.5m lower than the main green area.</li> <li>• Farm-gate was closed as result of antisocial behaviour.</li> <li>• The gate / opening is in a superior position to the proposed new link and the new link would cost significantly more than reopening the existing gate and result in loss of mature and historic hedgerow.</li> <li>• Superior access point would be via gate at northern corner of green area, opposite former Men's Shed building.</li> <li>• Re-open the pedestrian gate opposite the former Naas Men's Shed (old farmhouse).</li> <li>• Contrary to policy NH 13, objective NHO4 and objective MTO 1.10.</li> <li>• Junction is part of the driving instruction/test route resulting in a very busy junction.</li> </ul> |                                                                                                |
| <b>Pedestrian Measure No. 38</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Footbridges and associated connecting paths to link the Canal Bank area from Sarto Road</b> |
| Submission 261, 452 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Positioning and design need to be complementary to the canal vista.</li> <li>• Structures should not provide shelter for anti-social activity.</li> <li>• Should be short term instead of long term.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                |
| <b>Pedestrian Measure No. 39</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Pedestrian link between housing estate Ashfield Park - South Ring Road</b>                  |
| Submission 111, 316, 452, 529, 563, 592, 674, 702 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Unnecessary as existing South Ring Road caters for pedestrian traffic.</li> <li>• Another access through the estate is overkill.</li> <li>• Diminishes the safety and security of the estate.</li> <li>• Wait until proposals to develop adjoining lands have planning approval.</li> <li>• Agreement needs to be reached following negotiation with residents.</li> <li>• Safety.</li> <li>• Pedestrian crossing should be added to allow safe access across the Kilcullen Road as children in these estates cannot walk or cycle to the schools on Kilcullen Road.</li> <li>• Security.</li> <li>• Privacy.</li> <li>• Anti-social activity.</li> <li>• Environmental damage.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                |

<sup>27</sup> No. 37 was relocated as a result of submission received on the Naas/Sallins Transport Strategy.

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| <ul style="list-style-type: none"> <li>Ashfield requires safety audit for access to main road and traffic calming measures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                           |
| <b>Pedestrian Measure No. 45</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Pedestrian link to hospital from Craddockstown Park housing estate</b> |
| Submission 091, 597, 097, 150, 159, 172, 181, 184, 248, 278, 359, 365, 369, 370, 376, 387, 393, 397, 407, 445, 450, 468, 469, 477, 480, 698 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                           |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Danger to children in the area with access to open water.</li> <li>Link from railway walk through famine graveyard will provide more access to hospital.</li> <li>Sufficient exits allowing access from Craddockstown Park to the hospital already exist.</li> <li>Access through the green area was reviewed previously and discounted on safety grounds.</li> <li>Green space is a safe place to play.</li> <li>Security concerns.</li> <li>Keep estate closed – not wanted.</li> <li>No advantage as estate is a couple of hundred metres from hospital so no advantage.</li> <li>Waste of taxpayers' money.</li> <li>No consultation with the residents.</li> <li>In 2010 Naas Town Council, after consultation, removed a proposal to install a pathway between Craddockstown Park and The Lakes.</li> <li>Steep incline from the fence which is stated to be 16 feet.</li> </ul>                                                                                                                                                                                                                                                                                              |                                                                           |
| <b>Pedestrian Measure No. 46</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Create pedestrian link between; Thornbrook - R410</b>                  |
| Submission 175, 280, 301, 319, 340, 452, 465, 690, 691, 687, 688, 689 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                           |
| <ul style="list-style-type: none"> <li>Issues Raised</li> <li>Antisocial behaviour.</li> <li>Disrupt livelihood and sense of security.</li> <li>Bring huge change in footfall.</li> <li>Loitering and littering.</li> <li>Safety concerns.</li> <li>Crime.</li> <li>Volume of pedestrian traffic.</li> <li>Antisocial behaviour.</li> <li>Parking in estate to walk to Tesco/Born/Pharmacy.</li> <li>Car parking during the race meetings at the racecourse.</li> <li>Noise pollution from weekend footfall.</li> <li>Residents pay for green to be maintained.</li> <li>detrimental impact on the amenities.</li> <li>Disruption to quality of life.</li> <li>Already causing considerable anxiety and worry.</li> <li>Thornbrook will become a shortcut for people travelling to the town centre and people will congregate in the green area causing nuisance.</li> <li>Destroy grass growth.</li> <li>Risk will not be assessed or managed unless CCTV cameras are installed by the Council.</li> <li>If a person suffers a physical or emotional interference as a result of creating this walkway, recompense could be sought.</li> <li>Thornbrook requires safety audit for access to main road and traffic calming measures.</li> </ul> |                                                                           |



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| <b>Pedestrian Measure No. 48</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Pedestrian routes along The Gallops Avenue</b>                      |
| Submission 198 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                        |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Invite anti-social behaviour into the Racecourse</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                        |
| <b>Pedestrian Measure No. 51</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Create path between Broadfield View - R448</b>                      |
| Submission 297, 401, 403, 440, 452 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                        |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Existing main entrance to the estate can be used for all ingress and egress.</li> <li>• Unnecessary.</li> <li>• Traffic would come back into the estate to access the new pedestrian route, causing congestion, pollution and hazard to residents, cyclists and pedestrians.</li> <li>• Security risks.</li> <li>• Removal of feature walls.</li> <li>• Create a rat run.</li> <li>• Height differential, which will result in the link being expensive to implement.</li> <li>• No consultation was undertaken with the residents.</li> <li>• Broadfield requires safety audit for access to main road and traffic calming measures.</li> </ul>                                                                                                                |                                                                        |
| <b>Pedestrian Measure No. 52</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Create path between Esmondale housing estate and R448</b>           |
| Submission 452 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                        |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Esmondale requires safety audit for access to main road and traffic calming measures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                        |
| <b>Pedestrian Measure No. 58</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                        |
| Submission 452 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                        |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Cluain Aoibhinn / Craddockstown Crescent requires safety audit for access to main road and traffic calming measures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                        |
| <b>Pedestrian Measure No. 63</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Pedestrian link between housing estate Jigginstown Green - R445</b> |
| Submission 012, 013, 014, 017, 021, 022, 023, 024, 032, 033, 034, 035, 036, 041, 047, 049, 051, 052, 078, 124, 194, 204, 277, 285, 323, 332, 333, 334, 359, 392, 399, 404, 452, 514, 551, 595 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                        |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Already an existing established opening/walkway from the R445.</li> <li>• Proposed pathway is 50 metres/ 100 yards/100 metres from the existing one.</li> <li>• Create 3 entrances within 200-300 yds of one another.</li> <li>• Dissipation of public funds.</li> <li>• Taxpayers money could be used to incorporate a pathway somewhere else.</li> <li>• Impact safety.</li> <li>• Burglaries.</li> <li>• Anti-social behaviour.</li> <li>• Gangs of youths already congregate by the opening to the canal and sports centre and under the Caragh Road bridge.</li> <li>• Child safety with new access to busy road, especially with the restrictions of HGVs through the town centre resulting in more on the R445.</li> <li>• Impact on privacy.</li> </ul> |                                                                        |

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| <ul style="list-style-type: none"> <li>• Negative impact on security.</li> <li>• Jigginstown Green requires safety audit for access to main road and traffic calming measures.</li> <li>• Noise and light pollution with the removal of the existing hedgerow.</li> <li>• Hedgerow removal contrary to policies on biodiversity.</li> <li>• The estate would become an overflow carpark for the new medical centre.</li> <li>• Littering.</li> <li>• Increase footfall – crime and vandalism.</li> <li>• Cyclists on a quiet walkway a danger to people.</li> <li>• Street lighting will be required which will impact on the residents.</li> <li>• The attenuation pond would require altering, creating an issue with flooding.</li> <li>• Upgrade the existing pathway and entrance from the Newbridge Road.</li> </ul>                                                                                                                                                                                                                                                                                 |                                                                              |
| <b>Pedestrian Measure No. 64</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Create link from R409 - Grand Canal Greenway Naas Branch</b>              |
| Submission 012, 017, 021, 022, 032, 033, 034, 035, 036, 041, 047, 049, 051, 052, 071, 078, 124, 194, 204, 277, 285, 323, 359, 392, 410, 514, 595, 597 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                              |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Canal access already exists on both sides of the bridge.</li> <li>• Anti-social behaviour - drinking, lighting fires, partying.</li> <li>• Safety concerns for children and families.</li> <li>• Security breaches will occur.</li> <li>• Proposals would impact on attenuation pond, increasing flood risk.</li> <li>• The green area on the left side of the bridge (Jigginstown Green) has acted as a community garden.</li> <li>• Drainage of the green in Jigginstown estate is required.</li> <li>• Removal of protective fencing would create safety concerns.</li> <li>• Require the removal of a substantial amount of the communal garden and trees.</li> <li>• Will increase further casual throughways and/or congregation within Jigginstown Green estate.</li> <li>• Desist children from playing on the green areas.</li> <li>• Creating easier access is not good planning.</li> <li>• Increase footfall – crime, vandalism.</li> <li>• Involve removal of trees and hedgerow between Jigginstown Green and R409.</li> </ul> |                                                                              |
| <b>Pedestrian Measure No. 66</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Pedestrian link between housing estates Kingsfurze Avenue - Woodlands</b> |
| Submission 141, 142, 158, 265, 300, 631, 830-883 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                              |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Path on green space.</li> <li>• Already exists a walkway between Kingfurze Avenue and Woodlands.</li> <li>• Not needed.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                              |
| <b>Pedestrian Measure No. 68</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Pedestrian link between Devoy Barracks Site and Newbridge Road</b>        |
| Submission 304, 361 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                              |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Goes through Military Park, which is a busy industrial area with heavy machinery movements during the day.</li> <li>• Busy access road for retailers and customers and will result in serious injury or harm.</li> <li>• Section of route been used as a car park.</li> <li>• Impact on established uses.</li> <li>• Safety risk.</li> <li>• Width of road not available to serve the proposal.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                              |



- steep gradient from St. Patrick's Terrace onto the Naas-Newbridge road, which poses a high risk of serious injury to cyclists.
- 45% of workplace organisations believed that pedestrians were not aware of the risks associated with workplace transport (HSA).
- Ireland has recorded the highest increase in the EU over the last 10 years in cyclist fatality rates.
- The increase in cyclist deaths in Ireland compares to a 5% annual decrease in the deaths of motor vehicle drivers and passengers on Irish roads over the same period.

## Chief Executive's Opinion

### *Overarching Advisory on all Movement and Transport Measures*

Developing an improved and permeable sustainable network of cycling and pedestrian routes to encourage alternatives options, improving the permeability of the town centre, providing for an improved public transport network and alleviating traffic congestion in the town centre are priorities of the Plan. In Naas, there is a well-documented reliance on the private car across the plan area, particularly within the town centre. One of the most critical elements in addressing climate change is to reduce the level of carbon pollution from transportation and the need to bring about a modal shift. Therefore, the draft Plan seeks to develop and encourage more sustainable travel modes including walking, cycling and public transport and to reduce the existing over-reliance on the private car.

As part of the preparation of the Draft Naas Local Area Plan 2021-2027, the Naas/Sallins Transport Strategy was undertaken. This supporting document has assisted in placing sustainable transport considerations to the forefront of land use planning considerations in the formulation of the Draft Naas Local Area Plan. The Transport Strategy presents a comprehensive analysis of the current transport situation in Naas/Sallins, outlines the impact of future proposed land development on transportation and presents potential solutions to improve conditions for active modes, public transport and private vehicles. The focus is on revitalising the town centre, improving the transport functionality by facilitating a significant modal shift from vehicular traffic to public transport, in addition to increasing walking and cycling, thereby making Naas a more attractive place to live, work, visit and do business.

The assessment provides an insight into the existing transport patterns and constraints in Naas and also identifies the interventions that are required to effectively accommodate the anticipated increase in demand due to planned population growth, ensure the optimal transportation interventions can be planned, and drive a shift towards sustainable movement. One of the key outputs of the Transport Strategy is a series of proposed measures to improve the active modes of transport (walking and cycling) in the town and have informed the contents and policy objectives of this Chapter.

It is important to note that the measures contained in the draft Naas Plan do not proposit to be a definitive analysis of all the options for the possible measures, but rather a broad reckoning which indicates they are suitable for inclusion as potential transport objectives for inclusion in the draft Plan. They will then form the basis for individual projects which will then be examined on their own merits (through a Part 8 process, in accordance with the Planning and Development Acts 2000 (as amended)), detailed design will be configured and each project will be subjected to rigorous analysis, to ensure that they are the most suitable option at the particular location.

### *Pedestrian Measures*

The public consultation survey carried out as part of the Naas /Sallins Transport Strategy found that 62% of respondents which have children attending primary and secondary school in Naas believe safety due to traffic as being one of the main barriers to active travel to school. While the biggest barrier at 66% was the lack of quality/existing cycle facilities. The pedestrian measures across the draft Plan are crucial to the delivery of a safe, convenient, pedestrian/cycle measures to the school(s).

#### *Pedestrian Measure No. 21 and No. 22*

These links are a key requirement to reduce the number of vehicular journeys as they will improve access to Naas Town and schools. The measure will provide for pedestrian/cyclist access to the Naas Community School at Millennium which is currently under construction and will have capacity for 1,000 pupils.

In relation to the boundary wall, any such features will be subject to detailed assessment and minimal disruption and Kildare County Council will engage the services of necessary appropriate specialists in this regard.

#### *Pedestrian Measure No. 27*

The draft Plan contains an indicative pedestrian measure only. Should the measure be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal.

#### *Pedestrian Measure No. 28*

The maps contained in the draft Plan do not show all recent developments as these maps are based on most current available from the Ordnance Survey. The draft Plan contains indicative pedestrian measures only. Should the measure be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for site survey, detailed design and careful appraisal.

#### *Pedestrian Measure No. 29*

The draft Plan contains an indicative pedestrian measure only. Should the measure be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal. The delivery of the measures has been categorised according to their estimated delivery timescale. The timescale category is not a reflection of the importance attached to each measure, but rather reflects the challenge involved for implementation and the expected duration of the planning/construction process.

#### *Pedestrian Measure No. 36*

The measure is considered critical in the provision of connectivity between Rathasker Road and the residents of Rathasker Heights. The route will provide for more convenient access to Gael Cholaiste Chill Dara, the Osprey Hotel and Áras Chill Dara.

#### *Pedestrian Measure No. 37*

It is important to note that after the submissions received during the public consultation of the Naas/Sallins Transport Strategy, measure No. 37 was relocated. A submission from the Rathasker Heights Residents Association states that no information has been provided regarding the new location for PL37 and therefore a view cannot be given about its suitability.

as a replacement for the original location. The indicative location is illustrated under Map 5.1 as part of the draft Plan that went on public display on the 9<sup>th</sup> March 2021.

The measure will formalise an existing informal arrangement. It is considered critical in the provision of connectivity between Rathasker Road and the residents of Rathasker Heights and Carraig Oskair, providing for greater connectivity for the surrounding area.

*Pedestrian Measure No. 38*

The Canal Quarter is perhaps the most strategically important Core Regeneration Area in Naas in terms of its location, for it has the potential to act as a key link and starting point of a series of sustainable movement corridors. Of critical importance to the regeneration of the area, will be the provision of the new pedestrian and cycle bridge over the canal to link the area to Basin Street and the Main Street/town centre. The provision of the bridge, a key piece of infrastructure to achieve the overall vision for the area, will be respectable of its setting and of high-quality.

*Pedestrian Measure No. 39*

The provision of this route will provide for enhanced connectivity to the Kilcullen Road and Rathasker Road. The measure will enable residents in the area to link quicker with the proposed Cycle Measures (No 11) for a cycle track/lane from Kilcullen Road to the town centre and also to the existing infrastructure provided on the Kilcullen Road. There are three schools located along this roadway and the Transport Strategy has provided measures that make active modes of travel the most convenient option. Security and environmental impacts will be important aspects when developing the overall design for the project.

*Pedestrian Measure No. 45*

Through the rigorous analysis required to advance the project to the next stage, the issue of whether the measure will represent a significant danger will be assessed. Alternatives in the area as suggested will be examined in greater detail through the detailed assessment of the measure. As with all projects and as detailed in Section 5.2.1 of the draft Plan the various measures proposed will be subject to public consultation as part of the overall consent procedure.

*Pedestrian Measure No. 46*

It is considered that this link would benefit residents and those of the wider community. It will provide for a more convenient access to schools. It is necessary that appropriate crossing facilities should be included as part of the detailed design which was acknowledged in the Naas/Sallins Transport Strategy Submission Report.

*Pedestrian Measure No. 48*

With high quality design and appropriate lighting, the measures will not have the negative anti-social impacts feared.

*Pedestrian Measure No. 51*

The purpose of this link is to provide better access to schools for children.

*Pedestrian Measure No. 52*

The draft Plan contains an indicative pedestrian measure only. Should the measure be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal.

*Pedestrian Measure No. 58*

The draft Plan contains an indicative pedestrian measure only. Should the measure be progressed at any stage in the future it would be subject to rigorous comprehensive assessment which will include for detailed design and careful appraisal.

*Pedestrian Measure No. 63*

This route will provide for a convenient access to the bus stop adjacent to the Jigginstown Green on the Newbridge Road.

*Pedestrian Measure No. 64*

This measure will provide for a more convenient access to the proposed high-quality greenway and issues of anti-social behaviour will be mitigated through appropriate design and public lights.

*Pedestrian Measure No. 66*

It is considered that this link will provide a hard surface for an existing informal route.

*Pedestrian Measure No. 68*

The overall design concept for the Devoy Barracks Key Development Area (KDA) is that the area should be permeable and integrate seamlessly with adjacent lands. Connections within the KDA should prioritise sustainable movement and the integration of existing links between the area and Newbridge Road including the provision of pedestrian/cyclist only routes such as provided for under Measure 68 are crucial to achieve this vision.

**Chief Executive's Recommendation**

No change recommended.

**Cycle Measures Map 5.2**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| <b>Cycle Measure No. 16</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Northwest Quadrant Link Road</b>                                  |
| Submission 044, 367 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                      |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Clarification required on how the measure connect from Finlay Park to Abbey Bridge, as it is not clear on the map.</li> <li>Priority bus route proposed through Finlay Park is unsuitable as it would be passing through a residential area.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                      |
| <b>Cycle Measure No. 25</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Woodlands to Kingsfurze Avenue proposed link – minor greenway</b> |
| Submission 141, 142, 158, 265, 300, 442, 452, 631, 830-883 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                      |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Safety risk to pedestrians with the cyclists using the same route.</li> <li>Link already exists to the Dublin Road between houses no. 49 and 50.</li> <li>Greenway pedestrian cycling link should allow separate paths for cyclists and pedestrians.</li> <li>Design must also ensure the safety of less mobile pedestrians particularly where cyclists cross the pedestrian path.</li> <li>Duplicates the existing connection lower down the Woodlands Hill that is already in place, recommend that the existing route be upgraded and signed appropriately.</li> </ul>                                                                                                                                  |                                                                      |
| <b>Cycling Measure No. 28</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Sallins Road to Millennium Park and canal greenway</b>            |
| Submission 432 refer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                      |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Disproportionate permeability rate through Landen Park.</li> <li>Permissive access would be required from LPOMC to facilitate the introduction of a proposed greenway.</li> <li>Public liability insurance issues.</li> <li>Maintenance issues relating to surfaces and street lighting.</li> <li>Consider extending the cycleway through Landen park along our lands and border to a bridge crossing just below the (third) lock from the De Burgh estate.</li> <li>Pedestrian and cycling path leading to a second bridge through Millennium Park is suggested - provide access to and from the new Community College on Millennium Road and provide access via the cycleway to Oldtown Walk.</li> </ul> |                                                                      |

**Chief Executive's Opinion**

Please refer to the Overarching Advisory on all Movement and Transport Measures.

*Cycle Measure No. 16*

The development of the Northwest Quadrant lands will be contingent upon the preparation of a masterplan for the area and provision of facilitating infrastructure including the proposed bus-only link. The measures as illustrated on Map 5.2 are indicative only and derived from the high-level analysis undertaken as part of the Naas/Sallins Transport Strategy. The cycle lanes associated with the bus-only route will be a crucial part of the masterplan for the Northwest Quadrant and will involve rigorous detailed design which provide for a clearer picture on how the route will interact with Finlay Park. The Masterplan will be integrated into the Plan by way of a Statutory Amendment under Section 20 of the Planning and

Development Act, 2000 (as amended) which will be subject to a separate public consultation.

*Cycling Measure No. 28*

These links are a key requirement to reduce the number of vehicular journeys as they will improve access to Naas Town and schools. The measure will provide for pedestrian/cyclist access to the Naas Community School at Millennium which is currently under construction and will have capacity for 1,000 pupils.

In relation to the boundary wall, any such features will be subject to detailed assessment and minimal disruption. Kildare County Council will engage the services of necessary appropriate specialists.

*Cycle Measure No. 25*

It is considered that this link will provide a hard surface for an existing informal route. This active mode measure is not a precedent to a vehicular route and there is no intention to make this a vehicular route in the future.

**Chief Executive's Opinion**

No change recommended.

### Public Transport Measures Map 5.3

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| <b>Public Transport Measure No. 1 (PT1)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Upgraded bus interchange for Market Square/South Main Street</b> |
| Submission 268, 530                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                     |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Alternative location – heart of the town.</li> <li>• Not suitable location.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                     |
| <b>Public Transport Measure No. 2 (PT2)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Bus terminus /mobility hub at Naas Harbour</b>                   |
| Submission 261, 268, 390, 488, 530, 719 - 776 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                     |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Positioning and design need to be complementary to the canal vista.</li> <li>• Structures should not provide shelter for anti-social activity.</li> <li>• Are is central to development the town not a bus hub.</li> <li>• Hub should not be located here but in Millennium Park.</li> <li>• Not suitable for a bus terminal.</li> <li>• Traffic intensive.</li> <li>• Not environmentally friendly.</li> </ul>                                                                                                                                                                                                                                                                                                     |                                                                     |
| <b>Public Transport Measure No. 7 (PT7)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Sustainable Travel Bridge</b>                                    |
| Submission 490 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                     |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• New objective to support the Dedicated Bus and Active Modes Transport Link connecting Naas Town Centre to Sallins Naas railway station will provide for pedestrian and cycle access from the lands it bisects north of the proposed M7 Sustainable Travel Bridge and south of Sallins Naas train station.</li> <li>• New objective for vehicular permeability through the Dedicated Bus and Active Modes Transport Link will allow for continuing access from the landholdings located immediately to the west and east of that part of the Dedicated Bus and Active Modes Transport Link located north of the proposed M7 Sustainable Travel Bridge and south of Sallins Naas train station.</li> <li>•</li> </ul> |                                                                     |
| <b>Public Transport Measure No. 11 (PT11)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Bus Priority Route to Sallins Bypass</b>                         |
| Submission 136, 200, 390, 719-776 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                     |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>• Priority bus route through Finlay Park is unsuitable for residential area.</li> <li>• Finlay Park must remain cul-de-sac.</li> <li>• Privacy issues.</li> <li>• Bus route through estate is unacceptable due to air and noise pollution, and privacy issues.</li> <li>• Outer ring road should suffice as bus route.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                     |                                                                     |

### Chief Executive's Opinion

Please refer to the Overarching Advisory on all Movement and Transport Measures.

#### *Public Transport Measure No. 2 (PT2)*

The exact location of the bus interchange within the town centre is not proposed, but rather an indicative location at Market Square/South Main Street. To progress the project further, a complete project appraisal which includes a Multi-Criteria Analysis (MCA) and environmental



analysis is required. The town centre location is seen as a medium-term solution. As the town develops, a dedicated area for a bus hub will be needed and is proposed within the Northwest Quadrant in proximity to the Harbour. The importance of the Market Square as a public space is accepted.

*Public Transport Measure No. 2 (PT2)*

The Canal Bank is a very sensitive area, with some environmental constraints (flood risk and ecological sensitivities). Its future development including the necessary transport infrastructure will be carefully managed as part of the Northwest Quadrant masterplan. The general location near the Canal Bank will provide for easy access to the town centre, link into the bus-only route through the Northwest Quadrant and provide for convenient access to the road network including the M7. The hub would connect the town bus services with the Dublin commuter bus routes.

*Public Transport Measure No. 7 (PT7)*

The lands associated with the Sustainable Travel Bridge are predominately located outside the development boundary for Naas. Therefore, it is inappropriate to include specific objectives in the Naas Plan for land outside the plan area. The proposed route to Sallins is indicative only and any future proposal will be analysed in significant detail at design stage and all available options will be considered as part of this process.

It is important to note that there is a mapping error on both Map 5.1 (Measure 18) and Map 5.2 (Measure 19) as they relate to Public Transport Measure No. 7 and should match accordingly. Therefore, in the interests of clarity the maps are proposed to be amended to correctly illustrate these Public Transport Measures.

*Public Transport Measure No. 11 (PT11)*

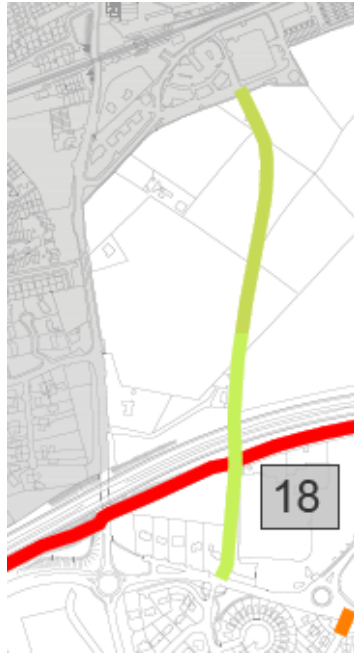
The development of the Northwest Quadrant lands will be contingent upon the preparation of a masterplan for the area and provision of facilitating infrastructure including the proposed bus-only link. The measures as illustrated on Map 5.3 are indicative only and derived from the high-level analysis undertaken as part of the Naas/Sallins Transport Strategy. The bus-only route will be a crucial part of the masterplan for the Northwest Quadrant and will involve rigorous detailed design which provide for a clearer picture on how the route will interact with Finlay Park. The Masterplan will be integrated into the Plan by way of a Statutory Amendment under Section 20 of the Planning and Development Act, 2000 (as amended).

The comments in relation to an outer relief road are noted however, the Naas/Sallins Transport Strategy which informed the plan found that this roadway was not the optimal solution as it would have limited impact on the town centre. Outer Relief Roads are used by designers to direct longer distance traffic, and in particular Heavy Goods Vehicles (HGVs), away from cities, towns and villages provided they are clearly separated from the urban (DMURS, pg 58). Therefore, a bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas.

## **Chief Executive's Recommendation**

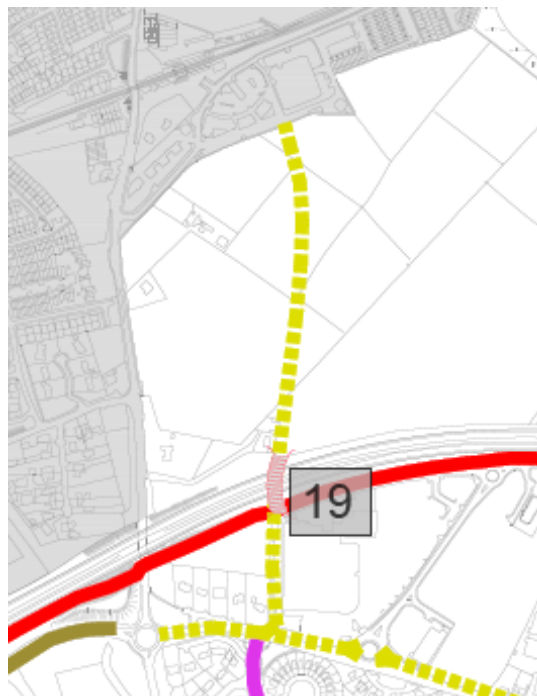
### **Proposed Material Alteration**

Amend Measure 18 on Map 5.1 to correspond correctly with PT 7 as shown on Map 5.3.



### Proposed Material Alteration

Amend Measure 19 on Map 5.2 to correspond correctly with PT 7 as shown on Map 5.3.



**Road Measures Map 5.4**

| Road Measure RD2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Upgrade of Murtagh's Corner Junction and link road to Corban's Lane |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Submission 452 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                     |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>No left turn to main street from R445 should come into force after other car parks have been built.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                     |
| Road Measure RD3/RD3A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Millbridge Street                                                   |
| Submission 019, 038, 077, 081, 086, 089, 098, 100, 103, 104, 105, 107, 108, 112, 113, 114, 121, 126, 129, 130, 132, 133, 135, 136, 137, 139, 140, 143, 144, 147, 148, 149, 153, 154, 155, 161, 162, 170, 173, 176, 177, 179, 183, 192, 193, 195, 196, 197, 199, 202, 206, 209, 217, 218, 200, 222, 223, 224, 229, 231, 225, 227, 228, 230, 233, 242, 246, 255, 256, 257, 261, 269, 284, 293, 307, 318, 324, 328, 330, 331, 337, 347, 351, 353, 356, 359, 367, 368, 371, 372, 373, 374, 378, 380, 390, 391, 408, 412, 414, 421, 422, 423, 429, 434, 436, 438, 441, 444, 454, 455, 464, 471, 472, 474, 475, 476, 478, 484, 487, 491, 495, 499, 500, 509, 513, 527, 531, 533, 541, 546, 549, 555, 559, 562, 572, 581, 585, 593, 597, 602, 610, 622, 631, 634, 636, 637, 640, 648, 653, 654, 660, 661, 699, 719-776 refers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                     |
| <b>Issues Raised</b> <ul style="list-style-type: none"> <li>Routing traffic over the canal through a residential area.</li> <li>Objections to the 'canal flyover'.</li> <li>Destroying natural environment.</li> <li>Noise.</li> <li>Pollution – CO2s and NOX.</li> <li>Visual impact.</li> <li>Unnecessary short cut.</li> <li>Destroy Wildlife Sanctuary on both sides of the canal.</li> <li>Overloading of traffic issues on Sallins Road.</li> <li>Tailbacks at Monread Avenue Junction.</li> <li>Negative impact at the junction of Finlay Park/Caragh Road.</li> <li>Proposal passes seven junctions within 100 metres of each other.</li> <li>Design ill-conceived.</li> <li>It will just move congestion.</li> <li>Only develop as an active travel route.</li> <li>Local schools have classes walking the canal daily.</li> <li>Damage the potential for water-based activities on the canal.</li> <li>Junction of the new road and Sallins Road unsuitable for large volumes of traffic.</li> <li>Already a relief road close to it.</li> <li>Contrary to government policy on reducing climate change and encouraging active travel.</li> <li>Conflicts with plans for the greenway and DeBurgh lands.</li> <li>Potential of the area should be protected.</li> <li>Risk to the safety of children, residents and nursing home residents.</li> <li>Intersection of the proposed new road and the old Mill Lane would be hazardous.</li> <li>HGV's through a residential area.</li> <li>A sop to developers.</li> <li>EU directive on Environment and Health recommends directing traffic away from residential areas not through them.</li> <li>The new road proposed to the Sallins by-pass a better alternative.</li> <li>Branded as a street with no street features, but rather a relief road.</li> </ul> |                                                                     |

- No consideration of the impact on 'Oldtown Water Gardens' or St. Patricks Well, which provide cultural, heritage and environmental value.
- Conflicts with four of the Core Themes of the Plan namely, Homes and Communities, Heritage and Culture, Environment and Climate Change and, Urban Design.
- Built through Strategic Open Space and proposed greenway.
- Contrary to the objective in the draft Plan "to preserve, provide for and improve recreational amenity, open space and green infrastructure networks."
- Grand Canal is a proposed Natural Heritage Area (pNHA).
- Careful develop the canal don't put a road across it.
- Air and noise pollution.
- Existing footpath width very poor.
- Any crossing should be by 'subway'.
- LAP describes the canal as 'jewel in the crown' and 'hidden gem'.
- Access should be local pedestrian, cycle and for disabled parking.
- Require a new bridge carrying large traffic volumes which would spoil an amenity area.
- Naas Sallins Transport Strategy traffic modelling is problematic and has not adequately considered M7 Junction 9a, the new Sallins by-pass and potential traffic changes due to pandemic.
- New 9a bypass will decrease traffic in the town centre.
- There are also two existing bridges for cyclists close to the proposed site of the new bridge.
- Finlay Park should be a cul-de-sac.
- Road would be better routed from Millbridge Lane to the Applegreen Roundabout.
- Bridge would create anti-social behaviour, drinking and graffiti.
- Already an outer ring road at Millennium Park.
- Negatively impact the Canal Quarter regeneration area.
- Millennium Ring Road a better access route for Finlay Park.
- The draft Plan states that 10,000 people use canal on Car Free Sunday and the road would destroy this amenity.
- Move congestion for one place to another.
- RD3 will go over PERM 16 Greenway Scheme.
- More concentration should be placed on completing the ring road through Naas Racecourse, as this has been planned and was on part of the raison d'etre by which Naas racecourse got planning permission for extensive house development on their lands i.e The Gallops.
- Proposed bridge would be detrimental to 'important views' GC30 and GC31.
- Proposal was removed from previous draft plans several times following resistance from local councillors and residents.
- 2023 AM Peak in Figure 9.9 of NSTS, show traffic reduction along Millennium Park Road, R407, Sallins Road and Main Street. Illustration shows but does not mention increase in traffic from the Mill Lane Sallins Road Junction towards Sallins.
- NSTS MCA analysis (Table 9.2) states road will promote cycling and walking, residential areas already have direct access to the canal, so the analysis is redundant.
- Unexamined assumptions evident in NSTS Submissions Report Section 6.0.
- Based on selective traffic modelling without consideration for people or the environment.

- Disagrees with the NSTS Report's inference the proposal will solve congestion on Newbridge Road and Main Street, allowing traffic to reach an equilibrium with no negative consequences.

## Chief Executive's Opinion

Please also refer to the Overarching Advisory on all Movement and Transport Measures.

### *Road Measure RD2*

The restriction of traffic to one direction on the Main Street would require an alternative route be available in the first instance. The development of Corban's Lane and the restriction of parking on that street would allow this, then a proposal to limit traffic to one direction could be considered. Therefore, the left turn ban will only be introduced after the Corbans Lane improvement is complete. The left turn ban relates to east bound traffic alone.

### *Road Measure RD3/RD3A*

As part of the Naas/Sallins Transport Strategy, a number of road transport interventions were examined. The purpose of these roads interventions is to improve traffic conditions on the overall Naas/Sallins road network. This will ultimately support the implementation of public transport, walking and cycling proposals. One of the proposals examined was Millbridge Street. This proposed option connects the Old Caragh Road to Millbridge Way. This option would provide greater access between the R409 Caragh Road and the R407 Sallins Road and would require a crossing of the canal. This option was chosen to support east-west movement of vehicles from future developments in and around the Naas Harbour area. This will support a reduction of traffic on the Newbridge Road and Naas Main Street which will allow for improvements in cycle infrastructure and public realm upgrades in the town centre.

In order to assess the potential benefits of Millbridge Street, a state-of-the-art local area model (LAM) was developed in the software VISUM version 18.02-13. VISUM is a comprehensive strategic traffic and transport planning package used around the world to assess new infrastructure, traffic management changes, local plan forecasting, economic analysis etc. The results predicted that the Millbridge Street offered significant congestion relief to Newbridge Road and Naas Main Street, also facilitating east-west permeability. This would not only benefit drivers but would be used as a pedestrian and cyclist route also. There are significant positive impacts of this roads proposal which are evident from the analysis. In particular, this road would ensure efficient east-west movement of traffic for new developments in the Harbour Area. It will also reduce traffic along main arteries into Naas Town. This would facilitate the implementation of active mode and public realm objectives.

Two indicative alignment routes are proposed in the draft Plan for the Millbridge Street. It is important to note that the road measure as illustrated in the draft Naas Plan is not a definitive analysis of the road measure, but rather a broad reckoning which indicates that it is suitable for inclusion as potential transport objectives in the draft Plan. Similarly, the route as indicated is also subject to change as part of the overall masterplan for the Northwest Quadrant. This will provide for a comprehensive analysis of the overall landbank including for the provision of infrastructure links. Should this route be progressed at any stage in the future it would be subject to a separate statutory procedure which includes for detailed design, rigorous environmental assessment, consultation with the relevant statutory stakeholders and public consultation. The environmental assessment will examine several of

the issues raised across the submissions. Furthermore, as stated in the Submission Report on the Naas/Sallins Transport Strategy at a minimum this route should be preserved to provide access for public transport, walking and cycling. This will be further examined at the project appraisal stage.

### **Chief Executive's Recommendation**

No change recommended.

## **The Gallops Avenue**

The predominant issues raised across the Movement and Transport Chapter concerned a number of measures derived from the Naas/Sallins Transport Strategy and which Map 5.1 to Map 5.4 refers.

### Gallops Avenue

Approximately 403 submission made comments relating to the Gallops Avenue and the Naas Inner Relief Road. Many of these submissions were in support of the road measure however, the majority were opposed to the inclusion of RD 1 as detailed on Map 5.4. There were a number of recurrent themes in the submissions received in relation to the proposed road measure.

#### *Concerns with the Road Measure*

- Air pollution.
- Noise pollution from construction/operation of the road.
- Dirt.
- Vibration.
- Safety concerns for families and children, and those walking to school.
- Will not solve current traffic problems, unwanted.
- Negative impact on quality of life.
- Stress and anxiety due to the road.
- Loss of amenity space and will destroy trees.
- Internal and external wall cracks in houses due to the heavy vibrations of trucks passing.
- Result in antisocial behaviour and rubbish dumping.
- Racecourse great amenity, a green lung and should be reserved for recreational purposes.
- No protective barriers.
- Devaluation of property.
- Reduction in car parking at the Racecourse.
- Restricted access for walkers to the Racecourse.
- It has been suggested that if the road proceeds to the Council should extend the safety and noise screen barrier at the rear of sites in Woodlands.
- Create challenges to exit estates.
- Thousands of vehicles and HGVs being put through residential areas.
- Affect the flow of traffic on the N7.
- 300-400 HGVs per day, into a residential area.
- Waste of public money determined by budgets.
- Short term not a long-term solution.
- Shift congestion to Blessington Road, Tipper Road, Dublin Road, Sundays Wells, The Gallops.
- Need to promote greener, healthier and safer transport environment.
- Locking people behind 12ft walls.
- Tipper Road is not fit for purpose as a road that would cross the Gallops Avenue and has no proper footpaths or cycle lanes.
- Hedgerows do not act as a sound barrier to continuous traffic.
- Divides the town.



- Damage to the boundary wall at Tipper Lodge.
- Environmental impact.
- Capacity of the surrounding road network to cater for the additional traffic.
- Impact the road will have on the KARE Service Centre, which is located close to the road's junction with Blessington Road. How can project be squeezed into limited space between AIB, KARE, DEM Machines and Elmwood.
- Kildare County Council lied to residents when announcing funding for proposed road was only available to 2020.
- Open space in the Racecourse Gate residential estate would be reduced to less than the minimum requirements of 15%.
- No Environmental Impact Assessment (EIA) carried out.
- Barrier to wildlife.
- Zoning of New Residential is fully dependent on delivery of this road. This proposal is at odds with sustainable transport as vehicles drawn through residential areas.
- The road measure contradicts measures contained in the draft Plan

#### *Outdated*

Many submissions refer to the length of time the road measure has been proposed at this location. It has been stated that it is a 30-year/40-year proposal and out of date. Some submissions received state they are surprised that Kildare County Council continue to receive consultant reports recommending this route.

#### *Rebranding*

Many submissions believe the Gallops Avenue is just a new name for the Naas Inner Relief Road, it has been suggested that the measure is identical, a copy, same route, , renamed road. The description of Gallops Avenue as boulevard/avenue when it is only slightly narrower than the Inner Relief Road is insulting. Renaming route does not change the negative impact on community.

#### *Naas/Sallins Transport Strategy*

Various submission raised the fact that the Naas/Sallins Transport Strategy has no legal standing and is a non-statutory document. It has been suggested that Naas needs a Transport and Traffic Management Strategy. One submission requests statistics showing reduction of traffic on Main Street as a result of proposal, including air pollution, noise pollution and safety, are useful as it shows what is expected to be dragged through homes, back gardens and green areas.

Many submissions believe the multi-criteria analysis used in the Naas /Sallins Transport Strategy to look at alternatives was flawed. An example is the placing of the amount of by-passing traffic, increased speed of traffic and journey times on the same footing as environmental impacts of traffic noise and air quality on residents.

It has been stated the Transport Strategy lacks balance, effectively placing the convenience of traffic ahead of human health, safety and amenity. It has also been stated that the choice of Gallops Avenue is not properly justified, that it was taken as a given. A route linking the Blessington and Dublin Roads, to the east of the racecourse where there are no housing estates, was excluded inappropriately on

traffic grounds. The Strategy should be updated following the M7 upgrade and opening of Junction 9a will have a significant impact on the traffic flows around Naas.

Under Fig 12.6 Road Strategy Measure 5 there seems to be a convenient omission of using the Gallops Avenue as an alternative route for HGVs through the town. It is stated that the Council's traffic figures failed to demonstrate that this route would ease congestion in 2004. Reference is made to the practice of massaging traffic figures to make them fit the preferred outcome during the Part 8 stage in 2019.

#### *Democratically Defeated*

It has been stated across many of the submission received that the Naas Inner Relief Road was comprehensively democratically defeated through the Part 8 process in 2019 by those democratically elected to Naas Municipal District Council. Submission received express anger, outrage and insult that the road measure is included in the draft Plan.

#### *Crossing of Municipal District Boundary*

Several of the submissions received state that the Naas Local Area Plan must only include Naas and not overlap into other areas. It has been stated that the Naas Plan should not go to full council but rather should only be voted on by local Naas councillors.

#### *Alternative Road Routes*

Many submissions state that an outer orbital route is required. A relief road taking traffic away from town centre and out and around residential areas, would minimise bottlenecks and improve traffic flow. The outer route would bring HGV's away from the town centre and away from residential areas. It has been suggested across many submissions that Route 6 is the solution. A route starting at the Naas Ball and going close to Forenaughts, away from all the estates is suggested and a route to the eastern northern side of Naas. It is also suggested that the route should link the Big Ball roundabout to Blessington Rd, routed between the Cemex site and Donnelly Mirrors site around the rear of Naas Industrial Estate and then around the back of Naas Racecourse to join with the Blessington Road.

There have been a number of objectives suggested to replace the Gallops Avenue as follows:

*"To provide an outer ring road for the eastern/north-eastern side of Naas, to cater for by-passing traffic, linking the Blessington Road with the Dublin road close to the junction of the latter with the N7. This outer ring road will be so routed, so as not to traverse or cut through existing residential areas and will provide a long-term development boundary to the east/north-east of the town of Naas".*

It has been suggested that the routing of the proposed new ring road to the east and south of Naas from the roundabout at Maudlins along Fishery Lane and around the outside of Naas Racecourse towards Tipper Road, rather than bringing it along the west side of the racecourse and dividing the town.

A greenway along the route of the Gallops Avenue is suggested instead of a road.

### *Support for the Gallops Avenue*

The Gallops Avenue is supported by the National Transport Authority as a positive contribution to the Naas transport network (Submission No. 8 refers). Another submission welcomes proposal to extend Gallops Road with pedestrian/cycling route linking racecourse to Tipper Road and considers that it will contribute to better traffic distribution and new cycling routes. One submission state that it is a vital piece of infrastructure and is an essential element to navigate around the town. Pedestrianisation and making the Main Street more people friendly cannot succeed if alternatives, long since planned, are abandoned. It is also stated that not to allow this road to be completed will limit the supply of new homes and increase prices.

Another submission states that the road measure is welcomed and that it has been an objective of the Planning Authority for decades and predates the development of any housing west of the racecourse, including The Gallops and Kings Court. These two schemes were predicated on them delivering a portion of the distributor road. This road is part of a larger, town-wide integrated transportation strategy designed to promote sustainable transport, reduce traffic congestion in the town centre and create space for pedestrian/cycle facilities and bus service.

One submission suggests that greater education of the benefits among the wider community is required to garner support for the road measure. Another submission states that the majority of the town want this road measure, that only a small number of houses back/face onto it compared to how many people in Naas will benefit from it. The reduction in width and other changes made to the road are welcome and the road will be a safe place for people to walk and cycle, with reduced speed traffic.

### **Chief Executive's Opinion**

The issues raised in all the submissions pertaining to the Gallops Avenue are noted. Naas suffers from congestion and it is undisputed in many of the submissions received that new road infrastructure is required to assist in the sustainable, economic and social development of Naas. The crux of the issue is the location of the infrastructure. The Council is cognisant that the previous Naas Inner Relief Road was turned down by democratic vote at the Naas Municipal District meeting in June 2019. Furthermore, it was the project that was rejected and not the removal of the objective from the County Development Plan or Naas Town Development Plan. The objective provides only the spatial context for a piece of infrastructure, the project (either through a Part 8 or application to An Bord Pleanála) addresses the detailed design.

Several of the submissions received refer to the proposed Inner Relief Road as being a 30/40-year-old scheme which is out of date. It is accepted that the concept of the Naas Inner Relief Road has been around for a number of years, given that the issue of traffic congestion on the Dublin Road has been an ongoing concern requiring a solution for quite some time. Objectives for the connectivity measures have been detailed across several successive planning documents. However, the issue of the selected route being out-of-date is disputed as repeated analysis by varying independent consultants have proven that a roadway at this location is the most viable and appropriate solution.

Across the National Planning Framework (Project Ireland 2040) there is a requirement for a more evidence-based approach to planning, ensuring the best available data, information and knowledge are used to underpin statutory plans. The most recent assessment carried out, was under the non-statutory Naas/Sallins Transport Strategy (2020) which examined possible options and includes a Multi Criteria Analysis (MCA) which teases out options at a very high level. This Strategy was undertaken to provide up-to-date analysis in 2020 to optimise decisions taken during the land use planning process.

Taking an evidence-based and plan-led approach ensures routes are maintained free from development and funding can be secured during the lifetime of the Plan. It is important to note in the context of the route RD1 identified in the draft Plan that, whilst the identification of a route does not presume a route will be progressed, it retains the alignment as a protected corridor for future examination. Should the route be progressed at any stage in the future, it would be subject to a separate statutory procedure which includes for detailed design, rigorous environmental assessment, consultation with the relevant statutory stakeholders and public consultation. The environmental assessment will examine a number of the issues raised across the submissions.

Submissions recommend the Council look at putting the connectivity measure to the east of the Racecourse. The Transport Strategy put forward the option of the Gallops Avenue (Alternative Route), located on a corridor to the east of Naas Racecourse. The analysis undertaken shows that this route will provide some benefits, but not to the same extent as the Gallops Avenue. Its impact in relieving congestion on the Dublin Road (R445) corridor is only half that of Option 1 (Gallops Avenue), as in the year period 2023 AM peak scenario the reduction in traffic on the Dublin Road is 14.9% in Option 1 compared to 5.0% in Option (Alt), while in the year 2023 PM the reduction is 28.1% compared to 19.3%.

The study found that the Outer Orbital Road, which is a measure suggested in submissions, is not an optimal solution as it would have limited impact on the town centre. Outer Relief Roads are used by designers to direct longer distance traffic, and in particular Heavy Goods Vehicles (HGVs), away from cities, towns and villages provided they are clearly separated from the urban (DMURS, pg 58). Therefore, a bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas.

While the alternative routes made in the submissions are noted. The selection and inclusion of roads projects need to be based on the evidence available during the plan preparation process. The Council cannot put forward schemes when evidence supports alternatives. However, as stated previously the identified road projects will undergo a further detailed, standalone statutory process. Furthermore, Kildare County Council have an onus to ensure the spending of public money is in the best interests of the county. The promotion and progression of an alternative, inferior option cannot be stipulated in a land use plan when the evidence base is not there to support it.

Several submissions highlighted that the Naas Inner Relief Road has now been rebranded, the Gallops Avenue. The route was given a revised name as it has been

reimagined and redesigned. Conscious of the need to minimise adverse impacts, real and perceived, on people and the natural environment in the area, the new proposal the Gallops Avenue, will become an eastern street connection which facilities increased permeability for pedestrians and cyclists as well as drivers. Any street connection at this location will need to be integrated within the urban fabric so that a sense of place is maintained and prevents severance between adjoining areas.

The primary function of the Gallops Avenue is to be an active travel route connecting the Blessington Road to the Dublin Road. The focus will be on green initiatives such as expanded footpaths and cycle ways, providing a safe route for pedestrians and cyclists. The form of the new street will prioritise these active forms of travel and result in a low speed environment for vehicles. This will be achieved by reducing the width of the vehicular lanes and increasing space for pedestrians and cyclists. This will be done in accordance with the DMURS standard for street design. It is envisioned that this new "Avenue" would create a green, tree-lined streetscape, with mature planting and a focus on providing a boulevard that would be enjoyed by residents rather than a car dominated environment.

There are many examples in Ireland of streets that carry significant volumes of through-traffic at moderate speeds and retain a high place value/levels of connectivity. Successful solutions tend to be designed as boulevards with well planted medians and verges that provide a buffer between the trafficked carriageway and the surrounding pedestrian environment. It is this design concept that the Gallops Avenue will follow.

Many submissions received referred to the potential of air and noise pollution. The main factors which determine the level of road noise and air pollution are traffic volume, speed, levels of congestion and the proportion of HGVs. The creation of a permeable street network at this location and the wider Naas, which promotes walking, cycling and public transport will lead to reductions in vehicular traffic. Less concentrations of traffic will consequently lead to reductions in noise and air pollution. The redesigned street /boulevard connection with well planted medians and verges will also reduce both noise and air pollutions, while providing a buffer between the carriageway and the surrounding pedestrian environment.

The criticism of the Naas/Sallins Transport Strategy in terms of an inadequate study of the national road network upgrade and the opening of Junction 9a, is noted and incorrect. A detailed traffic modelling exercise including analysis on the M7 and its interchanges was undertaken as part of the strategy contained in the Naas/Sallins Transport Strategy Future Year Traffic Modelling Report. The Naas/Sallins Transport Strategy was developed to outline a policy-led overall strategy for future integrated land use and transport development in the Naas / Sallins Area, to develop an over-arching strategy that promotes modal shift to active travel and public transport modes and reduces reliance on private vehicular travel. A state-of-the-art macro simulation model in the software VISUM was developed to assess the impact of future land use proposals in the Naas/Sallins Transport Strategy.

Section 5.4 of the draft Plan commits to a review of the design of what was previously referred to as the Naas Inner Relief Road and which is now being referred



to as the Gallop's Avenue is required including the re-examination of elements that may have caused particular concern. In recognition of the issues raised across the submissions received, it is proposed to include a detailed objective in the Plan for the extensive redesign of the route which will address a number of the concerns raised in the submissions relating to the Gallops Avenue. Furthermore, this should be carried out with consultation with residents and stakeholders.

The many comments in relation to the Draft Naas Plan 2021-2027 crossing two Municipal District boundaries and the Plan going to full council are noted. As per the County of Kildare Local Electoral Areas and Municipal Districts Order 2018 the Newbridge/Kildare Municipal District boundary adjoins the Naas Municipal District boundary at the Bundle-of-Sticks Roundabout. It is not considered appropriate to exclude a significant quantum of established commercial areas (such as Naas Nissan, Finlay Motors, Naas Paving /Patio Centre and the M7 Business Park) from the land use plan for Naas. As a result, the draft Plan boundary crosses into the Newbridge Kildare MD boundary and in accordance with the Local Government (Performance of Reserved Functions in respect of Municipal District Members) Regulations 2014 the local area plan is required to go to full council.

### **Chief Executive's Recommendation**

It is recommended that the objective to deliver the Gallops Avenue be maintained in the Naas Local Area Plan. Whilst this does not presume which route will be progressed, it retains the alignment as a protected corridor for future examination. The Gallops Avenue route is seen as an integral part of the transport solution for Naas into the future and as such its retention in the Draft LAP is fundamental.

Therefore, it is considered in respect of the submissions received, necessary to insert an additional objective in the Plan to require a redesign of the route and to carry out public consultation with residents and stakeholders.

### **Proposed Material Alteration**

Insert additional objective as Objective MTO 3.3 and renumber subsequent objectives accordingly.

**MTO 3.3** *To comprehensively re-examine the design of the Gallops Avenue (R410 to R445 - Blessington Road to Dublin Road). The focus of the redesign 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 be designed to have the appearance of a street, avenue or boulevard which would provide a generous tree lined verge, including segregated cycle lanes and pedestrian paths in accordance with the Principles of Sustainable Safety to offer a safe environment for all road users including cyclists.*

*The redesign shall be carried out after consultation with local residents, stakeholders and other interested parties. The redesign will take account of best practice design guidance for sustainable infrastructure,*

*such as the Design Manual for Urban Roads and Streets (DMURS) and the NTAs National Cycle Manual. The redesign shall include, but not be limited to, examination of the following;*

- *Delivery of protected junctions with consideration for raised tables where appropriate.*
- *Delivery island bus Stops in line with guidance provided in the NTAs National Cycle Manual (or any successor to same in terms of best practice).*



## Chapter 6: Economic Development, Retail and Tourism

### Summary of main Issues Raised

#### Economic Profile

Two submission recommends including the Irish language as a heading in table 6.1: Economic Assets to Drive Employment Growth. These submissions further recommend adding the following bullet points under 6.3.1 Jobs Growth and Economic Development, paragraph 'The Economic Development Strategy for Naas will be achieved by:':

- Providing grants to businesses that wish to erect permanent Irish language or bilingual signage on their premises.
- Allocating funding to leisure/recreation/environmental/heritage projects only if Irish language or bilingual signage is erected for those projects.
- Encouraging the use of the Irish language at all levels of business by funding an award scheme for businesses that use Irish. This could be done in conjunction with Cill Dara le Gaeilge.

#### Naas Economic Development Strategy

Several submissions urge KCC to develop a metric to determine how much land is required to accommodate the additional 3,329 jobs over the course of the term. One of these submissions adds that the commercial and industrial floor space in the plan is unknown.

Another submission proposes the development of an innovation hub where new or upcoming businesses can share experiences i.e., legal, accountancy, admin, etc, and other non-core issues. The submission adds that KCC through the local enterprise office could periodically sponsor somebody (accountants, solicitors, etc) to provide those skills/talks for SMEs.

One submission stated that there's a fragmented provision of post-secondary education which is a driver of economic growth and suggested that some courses from NUIM be run from a Naas campus. The submission further suggests developing quality public transport links, integrated into the Greater Dublin Area plan as an essential component of economic development.

One submission proposes that strong collaborations be fostered with educational institutions to create innovation and start-up hubs to create solutions and new ideas to address the climate and biodiversity crises. The submission also made the following recommendations in relation to economic development:

- Support structures such as the Local Enterprise Office, should have a core focus on climate and biodiversity issues.
- Engage with experts frequently on emerging green economy thinking including technology, new regulations, and new innovations.
- Innovation Hubs should be supported, with supports weighted towards those with a sustainability focus.
- Add cycling infrastructure as cyclists will lead to increased footfall and additional spend in local areas.
- Provide safe, accessible areas where customers can rest, enjoy some food, meet others. Our current levels of car dependency impose congestion, health, and environmental costs on our trading sectors.
- Increase sustainable mobility and connectiveness to our retailers.

- Create places that encourage workers to exercise, eat lunch, host meetings in our town centres.
- Ensure broadband keeps up with developing needs.
- Create a transport link needed between Maynooth and Naas.

The submission further propose that the LAP harness the following Economic opportunities associated with climate change mitigation:

- No, or low, commercial rates on businesses that are set up for sustainability, for example, zero waste stores.
- Protection of on-street shopping.
- Introduce rules to make it easier for sustainable businesses to set up, and harder for non-sustainable ones.
- Support MERITS in hosting sustainability pre accelerator programme (start-ups).
- Local Enterprise Office to increase focus on sustainable enterprises and sustainability related courses.
- More outdoor dining facilities.
- Meet local needs as far as possible. Change bye-laws to ensure that farmer's markets and other local initiatives/markets are not hindered by prohibitive legislation.

Several submissions expressed their concern that Naas could lose job opportunities due to a shortage of industrial zoned land, particularly for higher-value technology driven production. One of these submissions expressed a need for co-op units for start-ups as well.

#### Locations for Economic Development

To reverse the commuting trend associated with working in Dublin, one of the submissions proposes the identification and servicing of strategic industrial and commercial planned sites. Several submissions stated that there's a demand for working hubs, close to homes or within walking, cycling or short driving distances and with access to family and childcare support. Buildings similar to the MERITS was suggested.

Another submission requests that the industries and businesses encouraged to locate in Naas are transparent in their treatment of workers and suppliers and can provide proof of their positive climate and biodiversity impact. The submission further requests that the right environment be created which will attract progressive, climate positive industries to locate in Naas.

Another submission proposes identifying and supporting areas along tourist and walking trails for appropriate development as anchor points with appropriate facilities and localised business opportunities. Tunnels under the town was also mentioned and it was proposed that the use of such assets be investigated.

Two submission requests that large service stations and retail parks not be permitted outside the town.

#### Town Centre and Core Retail Area

One of the submissions requested that brownfield land be identified within the boundaries of the Town Centre Area for potential regeneration and provided the lands between South Main Street in Naas and the Canal Harbour as an example.

A number of submission requests that the town centre be designated as a development zone with incentives for "Living over the Shop".

Another submission propose local markets to be situated in the town centre.

The importance of enhancing the town centre was emphasized by one submission and it was suggested that it should be a mission for those responsible to deliver each goal relating to the Town Centre.

Concerns were raised in some submissions regarding removing on-street car parking and the negative impact on the retail and nightlife of Naas and that it's contrary to achieving a Purple Flag status for the town.

Another submission states that the MERITS will be an important location for High Potential Start Ups (HPSU's) and therefore needs to be linked with Sallins Train Station.

#### Northwest Quadrant (NWQ)

One of the submissions requested that the motorway building line constraints be reduced in the plan (S.17.7.2) on land zoned and serviced for employment/commercial uses to ensure a compact and sustainable urban footprint.

One submission acknowledges the success of Naas in attracting manufacturing FDI and suggest a strategic review of how the LAP support the future growth of land banks to focus on growing sectors of business such as life sciences, ICT and food technology.

Two other submissions request considering a mixed-use zoning for Millennium Park in order to integrate housing and reduce car dependency.

One submission questions what ancillary services and housing support are required if enterprise & employment is the primary focus for the Northwest Quadrant. The submission further questions whether it will result in a masterplan akin to that developed in 2008 for the Northwest Quadrant.

#### Junction 9 (Maudlins Interchange)

One of the submissions requests that the former Donnelly Mirrors and Cemex Concrete sites be developed as a matter of urgency.

#### Junction 9a (Naas South) / Newhall Caragh Road South and Jigginstown

Various submissions raised their concerns with regards to the identified sites for data centres. The concerns raised includes:

- Data centres provides very limited employment opportunities and their location in town is inappropriate.
- The Jigginstown site would render land close to the town centre useless for future development and public amenities.
- The benefit of data centres to Naas is questionable as they guzzle electricity and deplete grid infrastructure. Electricity supply continuity will need to be ensured and the costs of repairing the electricity grid should not fall on the taxpayer or bill payer.

Two submissions support the provision of a data centre at Caragh Road and another supports the zoning of land for data centre usage in general.

One of the submissions proposed more suitable locations for data centres at the link road between Naas and Newbridge or Newhall.

## Tourism

One submission proposes that council take a more active and strategic role in the development and renewal of key sites around Naas, like the strategy pursued by Limerick Local Authorities in recent years.

The re-purposing of the Eir building as part of the regeneration of Abbey Street is encouraged in one submission.

Several submissions propose the development of a long-term coherent plan for the reintroduction of the De Burgh estate and to assess its impact on social infrastructure, active travel, health, and recreation.

Two further submission are encouraged by the Jigginstown Castle proposals; however they suggest that the plan include the area immediately surrounding the castle.

One of the submissions proposes the Green and Silver circular route (e.g Royal Canal, the mid Shannon, Grand Canal, Dublin) to be elevated to a national planning status level and for the route to be developed as a tourist route.

Its stated in one submission that the Caragh Road section of the canal (from Ploopluck Bridge to Jigginstown Castle) is not being made the most of as an asset and requests that the entire branch of the canal in Naas be included in objective EDO 2.1.

Several submissions are encouraged to see the proposals to extend the greenway/blueway to Corbally Harbour and elaborates on the potential for tourism development through boating, kayaking and a walking and cycling route. Two of these submissions raised concerns regarding navigation on this section of the canal. The concerns raised included that the bridges must be of adequate dimensions (i.e. 3.5m high x 5m wide) to pass the largest boats; that quay walls should not be obstructed, thus preventing mooring; that the turning circle at the "junction" in the Harbour should not be compromised; and that the former canal bridge at Corbally Harbour would have to be reconstructed to make the section fully navigable.

Several submissions propose the removal of the culvert at Newbridge Road and the replacement with a bridge suitable for boats to reopen the Corbally Line to Corbally Harbour and boost tourism.

One submission refers to Corbally Harbour as a neglected heritage site and proposes a restoration programme for the site and future uses such as a water activity centre, a canoe club base, restaurants, a Kildare Canal Heritage Museum, and a coffee shop. The submission further identifies the opportunity to offer commercial return barge trips between Naas town and Corbally Harbour.

Another submission states that the Naas Annual Canal Festival highlights Naas and its canal and suggests that over time with adequate funding and planning touring boats could make the trip to Corbally Harbour.

One submission mentioned that vibrant canals are a catalyst for business opportunities and suggested that with renovations and marketing it will result in many benefits for County Kildare.

Another submission suggests that an inland marina development on flooded bogs connected to the canal could be a wonderful opportunity to stimulate tourism and recreational activity.

Several submissions support the concept of barges, houseboats and recreational boating on the Naas canal and believes it will deter anti-social behaviour. These submissions also raised the need for the following facilities for boats:

- Adequate water supply for boaters.
- Pump out facilities for waste.
- Rubbish disposal facilities.
- Mooring facilities.

One submission request that residential boats not be introduced on the canal unless a system of licensing, and all services including water and wastewater, refuse etc. are in place.

Other submissions emphasise the development potential of the Grand Canal Harbour and propose the following:

- Restaurants in the evening and a marketplace during the day.
- Change the use of the Old Canal Warehouse to a Restaurant/Bar/Bistro to facilitate outside dining.
- Use the existing Library Building for an Irish Cultural Centre.

The development of Naas as a “foodie hub” is proposed by one submission.

Another submission proposes that the lakes, famine graveyard and the Fairgreen area be rejuvenated and developed into an amenity and tourist attraction.

### Retail

Submissions with respect to retail generally, agree that retail changed and to rather focus on the street scape as there's no requirement for additional small shops off the Main Street. These submissions stated the need to contextualize retail in business/busy quarters and referred to recent ambitions to develop the castle quarter, the Cultural or Canal/Harbour quarters as examples of how to approach this issue but emphasised that all these plans need to be commercially viable.

One submission suggests encouraging retail growth and maintenance and to investigate how rates can support traders within Naas.

### The Retail Offer

Two submissions questions what the councils retail strategy will be after the development of the 'key sites'. These submissions then propose that the council work with local stakeholders in bringing an appropriate and desirable mix of retail into the Core Retail Area of Naas.

### Locations for Retail Developments

One submission requests flexibility with regard to zoning policies to facilitate scale-appropriate retail floor space at appropriate locations in order to serve new residential growth areas. The submission further request that Monread Centre be supported in policy and objectives, as well as recognising its strategic role with respect to its current and future uses.

The continued growth of local convenience retailing with supportive policies, objectives, and flexible zoning was requested in one submission and that no policies be introduced that could lead to any restrictions on deliveries. The submission further requests Local Authority engagement with retail operators as part of any future public realm or transportation

strategies. The delivery requirements of convenience food store operators should be acknowledged and policies providing for deliveries, including early morning deliveries, should be encouraged.

Another submission detailed that modern larger retail convenience layouts require unobstructed and level floor plates and requested that alternative lands that are sequentially appropriate be identified for retail convenience uses and flexible land use zonings. The submission emphasises that town centre locations may not always be viable in terms of space for customer car parking provision, access for large goods vehicles and an efficient back of house area.

One submission requested that the LAP policies recognise that the design of modern retail formats is dictated by retailers' requirements, current Building Regulations, Fire Safety and Disability Access requirements and suggests that the LAP reference these requirements.

A number of submissions reference the acceleration in online shopping in recent months, along with 'Click and Collect' and home deliveries, and support for these should be included in the Plan.

Three of these submissions makes reference to Monread shopping centre and request that no sites be zoned as district centres as the definition is too loose

#### Retail/Commercial Land Use Zoning

One submission referred to the objectives under ED 3 – Retail for Corban's Lane Shopping Centre to become a circular retail centre. The submission notes that there are lots of excellent examples of circular economy centres in Europe and states that there is a need to take inspiration from them and the submission also outlines the role of such centres.

Several submission requests that KCC engage with stakeholders, both public and private entities to ensure that a quality Farmers Market return to Naas at the earliest opportunity. These submissions elaborated on the requirements for quality farmers markets.

One submission is encouraged to see the requirement of a sequential test for out-of-centre retail development in order to restore the Core Retail Area.

Several submissions requests that the LAP include a specific policy that all comparison retailing, and all but local convenience retailing (i.e. up to no more than 1,000 sq. metres gross floorspace) not be permitted outside the town centre.

### **Chief Executive's Opinion**

#### Economic Profile

With respect to comments and suggestions in submissions regarding the metric used to determine how much economic/enterprise/employment zoned land is required over the lifetime of the plan, Section 6.3.1 of the Draft LAP provides the basis for estimated job growth and its correlation with economic development. Naas as a Key Town in the Core Region is a large economically active service centre that provides employment for a large catchment, with high-quality transport links and the capacity to act as a growth driver in one of the fastest growing urban areas on the periphery of Dublin. Naas has a jobs ratio which significantly exceeds the 0.70 target set out in the County Development Plan. The Draft LAP makes provision for maintaining a job ratio of 1.01 with a net inflow of 2,762 commuters to work daily.



In relation to the suggestion for the development of an innovation hub, it should be noted that Kildare County Council are currently engaged in the process to deliver the MERITS facility which will accommodate a new, purpose built, 'co-working' incubation and accelerator space, for technology entrepreneurs and technology businesses, specifically those involved in the digital economy, internationally traded services, and high-tech manufacturing. It will work closely with Maynooth Works (Maynooth University's business incubator unit) to extend and enhance the technology environment in the region. With respect to the Local Enterprise Office (LEO) providing training and mentoring in relation to upskilling, this is a core function of the LEO and forms part of its annual work programme.

The contention that the provision of second level education is fragmented in the town with a knock-on effect on economic development is noted. Whilst the SIA which accompanies the Draft LAP identifies additional school places and the policies and objectives of the Draft Plan identifies new school sites and facilitate where possible expansion areas on existing school sites, the delivery of these facilities is a matter for the Department of Education.

Regarding suggestions relating to the functions of the Local Enterprise Office, while such positive suggestions are welcome, their delivery is outside of the remit of a land use plan.

With respect to the proposals relating to the LAP harnessing economic opportunities associated with climate change and mitigation, it is considered that this concept is woven throughout the plan from the core themes underpinning the plan vision to the various active travel interventions for recreation and general movement improvements.

While the suggestions relating to a number of other 'soft' areas in placemaking such as amendments to bye-laws and regulations around outdoor dining are noted, such issues are not within the remit of a land use plan.

#### Naas Economic Development Strategy

Regarding suggestions that insufficient lands are zoned in the town for development of an industrial nature, Section 6.3 of the Draft LAP details the number of jobs required to accommodate the growing population of the town of Naas. The economic lands zoned under the Draft Plan can accommodate a variety of floorspace scenarios, ensuring Naas has the ability to increase its employment base given its status as a 'Key Town' and County Town. The land zoned within the plan area will ensure that Naas is sufficiently agile to accommodate unexpected opportunities that may arise during the plan period, while continuing to balance population and employment growth in a sustainable pattern.

The issues around commuter trends highlighted in the submissions are acknowledged, and in this regard it should be noted that though the net inflow of commuters is positive for Naas, the economic impacts of the commuting population will only be fully harnessed by ensuring that people who work in Naas also use local businesses and amenities. Increasing the attractiveness of the town centre environment to ensure these workers have reasons to use its services and facilities is a key objective of this Plan. Similarly, in order to make the town more self-sufficient and to address the economic and social impact of commuting, it is critical that the number of jobs is increased. Having regard to the foregoing it is considered that the Draft LAP provides sufficient objectives, zoned lands and regeneration provisions to support and enhance the sustainable economic growth of Naas, consistent with its role as a Key Town and County Town in Kildare.



### Locations for Economic Development

The submissions suggesting locations for economic development in Naas are noted. Furthermore, the suggestion that green route access to these is also acknowledged. In this regard the zoning of lands for economic development has been informed by a Sustainable Planning and Infrastructural Assessment (SPIA) which was published alongside the Draft Plan. A variety of employment uses are generally 'permitted in principle' or 'open for consideration' across a range of land use zonings. In addition, the Draft Plan seeks to guide enterprise and employment development to appropriate locations by identifying specific economic clusters, which takes cognisance of the requirements of the different enterprises. These areas have been carefully selected to ensure the land use objectives are compatible with the wider area and that adequate land has been zoned for enterprise to grow and develop. To this end, policy ED1 and the associated objectives support the development of Naas as the enterprise and employment hub for County Kildare and the region, increase employment located in the town, reduce commuting and ensure new development contributes towards reducing the overall carbon output.

With respect to the submissions requesting that large service stations and retail parks not be permitted outside of the town, the Draft Plan is underpinned by the principle of compact growth and as such, development of this nature would be subject to the sequential approach as set out in the Retail Planning Guidelines issued pursuant to Section 28 of the Planning and Development Act 2000 as amended.

The submissions suggesting that there's a demand for working hubs, close to homes or within walking, cycling or short driving distances and with access to family and childcare support are noted and acknowledged. In this regard EDO 1.9 of the Draft Plan supports and encourages the provision of ground floor live-work units and/or co-working spaces as part of mixed-use and residential developments in appropriate locations, as a means of enlivening streets and to provide flexible accommodation for small businesses and remote working opportunities. In this regard, it is proposed to broaden this objective to include "in appropriate locations with access to high quality public transport and/or active travel routes".

### Town Centre and Core Retail Area

The issues raised regarding the regeneration and 'town centre first' approach are noted. In this regard, Chapter 10 of the Draft Plan sets out an Urban Regeneration and Development Strategy for Naas which underpins the overall development strategy and has been developed to address the challenges affecting the future development of Naas. The Urban Regeneration Strategy address specific areas for development which seeks to direct and shape the future growth of the town through a series of principles.

- A continued focus on the consolidation of the urban form through infill development within the defined built-up area of the town and building at sustainable densities
- Emphasis on plan-led development with a particular focus on town centre regeneration and a sustainable urban expansion within the Northwest Quadrant (NWQ).
- Recognition of the town centre as being the primary area of retail activity in Naas.
- Identifying the key areas for economic development as being centred along the 'employment arc' to the north and west, in addition to the town centre (where further economic potential exists).
- An understanding of the need to deliver new and improved connections through the provision of a high-quality public realm along with a focus on sustainable movement. These connections will help link the town centre with surrounding residential areas, the periphery, and the wider hinterland of the town.

- The identification and utilisation of historic and natural assets to provide for new and enhanced tourism and recreational activities.

Specific objectives relating to the town centre, core retail and regeneration areas are addressed in more details in Chapter 10 of this report.

#### Northwest Quadrant (NWQ) (See also Chapter 10)

With respect to the submission which raises issues relating to the 91 metre set back from the motorway and the subsequent impact on the developability of the zoned lands, the comments are noted. During the preparation of the draft Plan this issue was discussed at length with Transport Infrastructure Ireland (TII) who are responsible for the protection and maintenance of the motorways. It was considered that the setback of 91-metres was adequate to protect the national road network and associated junctions. While no further upgrades are envisaged in the near future, it is the role of the Council to protect national investment in infrastructure beyond the lifetime of many land use plans. As noted under Objective MTO 3.7 the setback relates to building line only and under certain circumstances ancillary development may be considered within the setback zone in recognition of local conditions and the nature of the proposed activity.

The comments regarding Naas' success in attracting FDI are noted and acknowledged.

The submission requesting clarity around the masterplan for the NWQ in the context of the 2008 masterplan are noted. In this regard, the planning and policy context within which the masterplan was prepared in 2008 has changed considerably. The vision for the NWQ is to provide a sustainable low carbon urban district which is underpinned by a series of public transport and active travel initiatives to address climate action and decarbonizing obligations.

With respect to the query around the nature of ancillary services and housing supports required for the NWQ, it is considered that such detail will be addressed through the masterplan preparation process.

#### Junction 9 (Maudlins Interchange) (See also Chapter 10)

The submission requesting that the Maudlins KDA be developed as a matter of urgency is noted. The Draft Plan explicitly acknowledges the importance of these lands on the primary approach to Kildare's County town and the design concept provided in the plan also addresses the primacy of the site. However, it should be noted that these are in private ownership and the development of same is somewhat outside of the control of the Planning Authority. Notwithstanding this, the lands are identified as regeneration lands and will therefore will be subject to appropriate active land management measures as set out in the Urban Regeneration and Housing Act 2015.

#### Caragh Road South and Jigginstown

The submissions raising concerns and equally those supporting data centres are noted. Data Centres by their nature, are trending towards hyper scaled units and are land extensive and energy hungry developments and can have differing locational requirements depending on the type of data accessibility speeds they cater for. All Data Centres have common infrastructure requirements such as access to high voltage electricity lines, high powered fibre optic cables, water supply, good site security and accessibility. While the Draft Plan promotes Naas as a sustainable international destination for ICT infrastructures such as data centres, in line with Regional Policy Objective 8.25, it equally requires a series of protection measures with respect to this type of development including the consideration of district

heating etc. The locations identified have access to high quality energy and other necessary infrastructure without impacting on the integrity of these services in terms of their provision for Naas.

### Tourism

The nature and variety of submissions regarding the extent and range of tourism potential for Naas is noted. In this regard, it is considered that the draft Plan widely acknowledges this potential. The town has a number of attractive physical, heritage and cultural amenities, which should be protected, preserved and promoted through the many mechanisms of a land use plan. Furthermore, the Council will continue to work with Fáilte Ireland, Into Kildare and other tourism bodies to promote and realise the objectives of the Into Kildare Strategy '2020 Vision for Kildare Tourism' and align with the objectives of Ireland's Ancient East brand.

The contents of the submission suggesting that the council take a more active and strategic role in the development and renewal of key sites around Naas, like the strategy pursued by Limerick Local Authorities is noted. In recent years, Kildare County Council have established a hugely successful Strategic Projects and Public Realm Team who pursue national funding for and deliver strategic projects including URDF projects such as that recently approved for Naas Town Centre.

The submission encouraging the re-purposing of the Eir building as part of the regeneration of Abbey Street is noted and in this regard it should be noted that EDO 2.7 of the Draft Plan makes provision to investigate the re-use of the Eir building on Abbey Street for a mix of cultural, community, leisure and/or tourism uses.

The submissions proposing the development of a long-term coherent plan for the reintroduction of the De Burgh estate are noted. Section 11.2 of the Draft LAP identifies an Infrastructure Delivery Schedule for Strategic Infrastructure for the town of Naas, of which access to the Oldtown Demense is identified for delivery in the short term.

The submissions encouraged by the Jigginstown Castle proposals are noted and it should be noted that the lands surrounding the castle are considered to form part of the overall amenity of the area and will be sensitively considered in the context of any proposal for a tourist amenity at this location.

The submissions supporting the inclusion of policies and objectives to deliver the greenway/blueway to Corbally Harbour and on the potential for tourism development through boating, kayaking and a walking and cycling route on the canals are noted and acknowledged. In this regard, it is an objective of the Plan to develop the entire length of the Grand Canal as a greenway corridor connecting the town to Sallins and to Corbally Harbour. Furthermore, while there are existing roads and/or footpaths along the Naas to Osberstown Road section, and from the Harbour to Jigginstown, current walkers rely on the grassy towpath for other sections (and particularly from Jigginstown to Corbally). The greenway from the Harbour to Sallins is at design stage, which needs to be seen in its wider context, specifically, the current development of the greenway from Hazelhatch (Celbridge) to Sallins; and funding has been received to develop designs for the section from Sallins to Clonkeen on the Offlay border. The greenway is extremely important for the people of Naas; however, it also has a broader strategic importance and significant tourism potential for Naas and the region.

With respect to the submission which states that the Naas Annual Canal Festival highlights Naas and its canal it should be noted that CQ 1.9 of the Draft LAP makes provision to

continue to support and encourage local festivals, events and markets (seasonal/farmers) in the vicinity of the Harbour Area.

The submissions supporting the concept of barges, houseboats and recreational boating on the Naas canal and believes it will deter anti-social behaviour are noted. In this regard, the submission requesting that residential boats not be introduced on the canal unless a system of licensing, and all services including water and wastewater, refuse etc. are in place is also noted.

The submission emphasizing the importance of the development potential of the Grand Canal Harbour is noted. The Canal Harbour is a Core Regeneration Area (CRA6) in the Draft LAP which includes Abbey Street, the Harbour and Canal Bank. Furthermore, an Urban Design Concept Framework For the area is included in the Draft Plan to achieve its full potential in a four-step approach to the overall urban design concept framework which promotes high quality urban design and animates the streetscape at ground floor level with active uses along key connections and civic spaces.

The proposal to develop Naas as a “foodie hub” is noted. It is considered reasonable to expand Objective EDO2.2 to include reference to promoting Naas as a Foodie Hub.

The submission proposing that the lakes, famine graveyard and the Fairgreen area be rejuvenated and developed into an amenity and tourist attraction is noted. The Fairgreen Lakes consist of three small linked artificial lakes, with the northernmost of the lakes boasting the best developed marginal vegetation with large beds of reed sweet grass. The lakes are also home to a population of mute swans, mallard, little grebe and moorhen. The lakes are hydrologically fed by the Naas Hospital Stream which is a separate green infrastructure corridor. This corridor also incorporates sections of semi-natural grassland surrounding the lakes and parkland to the east. While these habitats are heavily modified and artificial in origin, they do represent some of the most important green areas within the urban fabric of Naas. The lakes are an important habitat for waterbirds and invertebrates, and it is considered that its amenity is in its simplicity and interference of this unique amenity as a tourist attraction is unnecessary and unwarranted.

### Retail

The content of the submissions with respect to retail generally are noted and the overall change in retail provision is agreed to some extent. The town centre first approach underpins the Draft LAP with a series of objectives to reinvigorate the main street and supporting streets in order to support the viability and vitality of the town centre overall.

### Locations for Retail Developments

The submissions requesting flexibility with regard to zoning policies to facilitate scale-appropriate retail floor space at appropriate locations in order to serve new residential growth areas are noted, however this must be balanced with the town centre first and sequential approach to new retail development which is threaded through the Draft LAP. It is considered that the Draft Plan makes adequate provision to support the local retail needs of new residential areas, nevertheless it is critical that there should be no provisions contained in the Plan that would act to undermine the primacy and function of the town centre.

With regards to submissions requesting that any policies and objectives which may restrict deliveries be removed from the plan, it should be noted that there are no such provisions in the Draft Plan.

The submission requesting that the Local Authority engage with retail operators as part of any future public realm or transportation strategies is noted. In this regard it should be noted that the Naas/Sallins Transport Strategy was subject to an independent public consultation process in 2020. Furthermore, consultation forms an integral part of all public realm projects in Kildare.

The submissions requesting that modern larger retail convenience layouts require unobstructed and level floor plates and that the LAP policies recognise that the design of modern retail formats is dictated by retailers' requirements, current Building Regulations, Fire Safety and Disability Access requirements and suggests that the LAP reference these requirements are noted. The Draft Plan is explicit in terms of promoting the regeneration of the town centre as a high intensity mixed use area, however, it also acknowledges that there may be issues around site amalgamation, access and building standards in terms of providing any substantial residential uses within these areas. Although residential uses will be encouraged, the urban regeneration strategy for the town centre focuses on rekindling the economic, civic and amenity function of these areas. Furthermore, sufficient provision is made at appropriate locations within the plan area for mixed uses with easy access for modern retail formats.

The submissions referencing the acceleration in online shopping and 'Click and Collect' and home deliveries and requesting support for these are noted, however, such provisions are outside of the remit of a land use plan.

#### Retail/Commercial Land Use Zoning

The submission referring to the objectives under ED 3 – Retail for Corban's Lane Shopping Centre to become a circular retail centre are noted. In this regard it is considered that the EDO 3.5 of the Draft Plan to facilitate and encourage the appropriate redevelopment or re-use of the Corban's Lane Shopping Centre site for a mix of town centre uses in accordance with Chapter 10, Urban Development and Regeneration Strategy is sufficiently robust to address the spatial elements of the completion of the Corban's Lane Shopping Centre.

The content of the submissions relating to the Farmers Market are noted. In this regard, the Draft Plan under EDO 3.8 support the continued development of a high quality 'Farmers Market' within the town.

The submission which welcomes and supports the requirement for the sequential test for out-of-centre retail development is acknowledged.

### **Chief Executive's Recommendation**

#### **Proposed Material Alteration**

Amend EDO 1.9 of the Draft Plan as follows;

To support and encourage the provision of ground floor live-work units and/or co-working spaces as part of mixed-use and residential developments in appropriate locations *with access to high quality public transport and/or active travel routes*, as a means of enlivening streets and to provide flexible accommodation for small businesses and remote working opportunities.

### **Proposed Material Alteration**

Amend EDO 2.2 of the Draft Plan as follows;

EDO2.2 Encourage the development of tourism activities such as water-based activities, cultural and agri-tourism, equine tourism and food markets in Naas, *including the promotion of Naas as a 'Foodie Hub'*.



## Chapter 7: Natural Environment and Climate Change

### Main Issues Raised

#### Biodiversity Plan/Climate Change Targets

Submissions 352, 415, 428, 433, 448, 457, 551, 560 and 583 refer.

There are several submissions which emphasise the importance of the natural environment, particularly the importance of a 'healthy environment' and suggest this principle should underpin everything in the Naas LAP. One submission suggests the LAP change the wording throughout from "Climate Change" to "Climate Breakdown" or "Climate Emergency" to accurately reflect the situation as acknowledged by scientists.

One submission believes the LAP should give biodiversity and climate change equal weight as they are both inextricably linked. In a similar respect, another submission suggests the LAP take a 'Climate and Biodiversity First' approach, as opposed to these themes being secondary to other development/economic objectives. There should be clear and measurable objectives and accountable reporting. Another suggestion calls for the LAP to tie climate targets back to commitments made in other plans and that KCC ensure sustainability is a major factor for all funding applications.

Multiple submissions state a biodiversity plan for Naas is required and that the LAP should support the development of such a plan. Similarly, another submission suggests the development of a landscape plan that links greenway and blueway projects should be included.

#### 7.2 Green Infrastructure

Submissions 262, 292, 423, 428, 431, 433, 444, 448, 452, 459, 565, 517, 528, 536, 551 refer.

While complimenting the inclusion of Chapter 7 and section 7.3.1.1, submission no.262 suggests the chapter fails to address the urgent need to reduce the dominance of cars and calls for specific measures in relation to this are included.

Several submissions suggest attempts are made to link the identified Green Infrastructure Corridors and other biodiverse areas. This would benefit wildlife and create a biodiversity trail which could contain information boards to inform users of the range of biodiversity and plant species. Similarly, other submissions suggest greenways/biodiversity trails linking Lakelands, the Canal and De Burgh estate, or that incorporate the old Sallins to Tullow Railway from Naas Town Centre to Pipers Hill at Naas.

**Some submissions welcome the greenway developments and believe it will enhance cycling, walking and running, particularly if it enables increased linkages with parks, such as Kerdiffstown Park.**

Another submission suggests a development-free setback zone of 90m from the canal to preserve it for future generations.

#### 7.3 GI – Habitat Survey and Mapping

Submissions 385, 383, 452, 453, 496, 553 and 635 refer.



One submission notes that Monread Park is not identified as one of the Green Infrastructure Corridors and raises concerns that the park is so devoid of wildlife and planting.

Two submissions note the Caragh Road section of the canal is included in Map 7.2 but not in Map 7.1, particularly surprised by the omission of the hedgerows. Both submissions also call for the inclusion of Caragh Road and Jigginstown Castle areas in section 7.3.1 Green Infrastructure Corridors.

Some submissions suggest updating Map 7.1 to reflect trees/hedgerows on the western side of Rathasker Lane as no longer existing.

A submission requests more detail on plans for the Craddockstown and Castlsize Stream.

A submission suggests the objectives of Policy NE1 should include Ploopluck bridge and Jigginstown Castle.

A submission is concerned with the absence of comment in the LAP on bats and the legal protection applied to their roosting and breeding sites. Notes the importance of continuous green corridors for bats and highlights the need to protect these corridors.

A submission highlights the Ennis Community Biodiversity Toolkit and suggests Naas develops one.

#### 7.4 GI – Trees, Hedgerows and Woodlands

Submissions 383, 415, 457, 502, 511, 428, 452, 551, 583 refers.

Two submission suggest the prioritisation of Objective NE2.1 and extra funding for estates with green spaces to undertake planting.

Several submissions believe the LAP should be clear and unambiguous in relation to trees and hedgerows and that Naas must participate in the conservation of important habitats. It is suggested all trees and hedgerows are protected as planting new trees does not compensate for cutting down mature trees. Suggests signage in parks to educate people on tree species and their value. Calls for investment in pocket parks and tree planting for flood mitigation.

One submission believes that existing hedgerows require sensitive management that is in keeping with the Wildlife Act. Other submissions suggest the planting of more diverse and native trees, and planting occurs for biodiversity and not aesthetic reasons.

One submission states that many developers remove trees or hedgerows on their sites and states that planning permission should encourage the protection and maintenance of existing trees and hedgerows. Naas still has many green corridors and there should be a focus on protecting these. Suggests KCC actively and aggressively pursue those who fell trees and hedgerows without appropriate permits.

A submission states the LAP can impact emissions by ensuring carbon remains locked up in wetlands, hedgerows and trees.

#### 7.5 GI – Surface Water Management

Submissions 352 and 415 refer.

One submission notes the importance of water environments and access to these environments for certain species of birds. It calls for the management of riparian zones as a

means of protecting and enhancing bird life in Naas and highlights areas where planting of shrub species, such as Dogwood, are blocking waterway access for birds. Furthermore, it is suggested that more perching opportunities and nest boxes are provided, along with the 'freeing up' of waterways, to assist birds. The submission offers suggestions for improving the aquatic environment of waterways, helping birds and other species.

Another submissions suggests the creation of wildlife ponds which can function as water storage areas and improve biodiversity and mental health, as does submission no.457 which also calls for policies that manage growth while encouraging respect for the landscape and biodiversity. It is also stated that the town's flood mapping needs revision based on developments that have occurred in recent years.

#### 7.6 GI – Open Spaces and Recreation Areas

Submissions 382,383,395, 415, 448, 423, 444, 428, 453, 496, 551, 395, 559, 595,

One submission understands KCC are taking ownership of parklands at Oak Park and requests the Council respects the existing approach that promotes biodiversity. It is also requested that bins are provided. In a similar respect, submission no.315 calls on KCC to help establish community gardens in all residential estates and that all parks include shelters and toilets.

Many submissions welcome the support for the All Ireland Pollinator Plan and tree planting proposals and note it is important existing parks are enhanced for biodiversity in-line with the Pollinator Plan. They propose a ban on pesticides and weedkillers and suggest all public spaces contain pollinator friendly plants. They also suggest road verges and green areas are left uncut to support growth and pollination.

Several submissions call for an assessment of open spaces to enable areas to be used for biodiversity, arguing that many residential estates could include more biodiverse green areas, community gardens and allotments. Similarly, one submission suggests local residents are supported with Objective NE1.6 and many estate green areas could be utilised. Believes better community engagement required for buy-in and collaboration on biodiversity measures.

A submission believes the canal is an underexploited asset and should be developed to provide more cycling and walking routes.

Another submission suggests the community garden, hedgerow and trees around Jigginstown Green are noted in the LAP.

It is suggested in a submission that there is a need for an active strategy to combat invasive plants, such as Japanese Knotweed. Suggests staff and those contracted for work by KCC are made aware of invasive species. It is also requested that KCC preserve the area between Kingsfurze estate and Naas racecourse, a hotspot for biodiversity.

#### 7.7 GI New Developments

Submissions 428, 452, 551, 457, 583, 559 and 461 refers.

Two Submissions suggest that green roofs and/or solar panels should be required for all new developments and that pesticide-free native trees, hedges and gardens are planted in all new estates. Fencing and walls should be designed to enable wildlife pass freely.

Another submission suggests planning permissions include climate friendly/renewable energy conditions. Similarly, tree planting, or contributions in lieu should form a condition of approval.

A submission states many new developments in Naas are not suitably climate-proofed, engage in the removal of trees and hedgerows and have no natural flood management systems. Furthermore, the submission proposes a housing model that is self-sustaining in terms of energy, incorporates renewables and conserves water as one that should be pursued.

A submission states that weather proofing of new and existing housing stock is facilitated to enable residents make these necessary changes.

It is suggested in another submission that the Plan should encourage use of pollinators and suggests public buildings utilise sustainable energy technologies.

#### 7.8 Heat Waste Utilisation

Submissions 16, 534, 262, 452, 457 refers.

One submission calls for a policy to be included within the LAP that prevents planning approval for any 'high energy consumption' development until an assessment of its impacts on climate targets, resources and the source of energy is carried out. The assessment should clarify the sustainability of such developments. In particular, the submission is referring to the impacts of data centres.

Another submission does not feel it is appropriate to include data centres in this section and suggests gas turbine generators are an attempt at greenwashing. Suggests data centres are located near renewable energy sites and that if a deep drill geothermal/hydrothermal power station is required, this should be mentioned in the LAP.

Two submissions suggest that the reference to retrofitting houses in 7.5.2.3 is meaningless. The dependence on the private sector, individual homeowners and the role of Sustainable Energy Communities should be highlighted, and measures identified to accelerate uptake.

It is suggested in another submission that communities should be encouraged to develop their own energy sustainment plans.

### **Chief Executive's Opinion**

#### Biodiversity Plan/Climate Change Targets

The suggestion to change the wording from Climate Change to Climate Breakdown/Emergency is acknowledged.

With regard to the submissions that suggest climate and biodiversity are given equal weight and form a more integral and central element of the entire LAP, these concerns are noted. The integral nature of climate change and biodiversity is evident in the Core Themes that provide a frame for the entire LAP. Environment and Climate Change is one of the seven Core Themes, which ensures that throughout the Plan a series of measures are integrated to reduce the effects of climate change through focusing on; compact growth, town centre regeneration, sustainable mobility, energy waste, green infrastructure protection and enhancement, that will aid in the delivery of a sustainable low carbon and climate resilient future for Naas. The importance of climate change and biodiversity considerations underpin the range of policies and objectives that are key to the LAP.

The suggestions for clear and measurable objectives and accountable reporting, with respect to climate change, are noted. As previously stated, the LAP contains a series of integrated measures to reduce the effects of climate change. Furthermore, it is a policy

within the LAP to implement the Climate Resilient Kildare: Climate Change Adaptation Strategy 2019 -2024, ensuring that climate action considerations are integrated into land use planning, aiding the transition to a climate resilient low carbon society, while also promoting and maximising the most efficient and sustainable use of land.

The submissions suggesting that KCC develop a Biodiversity Plan, and those suggesting the development of a Landscape Plan that links areas have been noted. With regard to the latter, there are several policy objectives contained within the LAP that seek to increase, enhance and protect linkages between open space areas and other important 'green' spaces. See Objectives NE 1.1, NE 4.1, NE 4.2, NE 4.3 and NE 4.4. The Heritage Office of KCC is currently engaged in the preparation of a series of Local Biodiversity Action plans, under which Naas could be considered.

The suggestion that KCC ensure sustainability is a major factor for all funding applications has been noted.

#### Green Infrastructure

The Council acknowledges the need to reduce the dominance of private cars in terms of transport modal split. Indeed, one of the Seven Core Themes that guide the LAP is 'Sustainable Movement'. Which seeks to develop the appropriate infrastructure and networks that facilitate uptake in active travel and encourage greater use of public transport. It is a stated ambition of the LAP that it seeks to reduce the existing over-reliance on the private car across the plan area, particularly within the town centre. There are numerous policies, objectives and projects contained throughout the LAP that are attempts to reduce the over reliance on the private car and encourage more sustainable transport and movement.

Those submissions suggesting greater linkages between 'green' and biodiverse areas, via 'biodiversity trails', have been noted, with the potential benefits for well-being, tourism and biodiversity acknowledged. It is the intention of the Council to improve and enhance the range of green spaces and natural amenities in Naas, with several proposals to sensitively develop amenity areas, such as the canal. Indeed, there are several policy objectives contained within the LAP that seek to increase, enhance and protect linkages between open space areas and other important 'green' spaces. See Objectives NE 1.1, NE 4.1, NE 4.2, NE 4.3 and NE 4.4.

The suggestion of a development-free setback zone of 90m from the canal is noted. Objective NE 1.4 calls for the maintenance of such a buffer zone, stating that the extent and composition of the buffer zone (up to 30 metres) shall be determined in consultation with a qualified ecologist and will be informed by Planning for Watercourses in the Urban Environment (IFI, 2020).

#### GI – Habitat Survey and Mapping

It is noted that Monread Park is not identified as one of the Green Infrastructure Corridors. Similarly, the Council notes the submissions calling for the inclusion of Caragh Road and Jigginstown Castle areas as Green Infrastructure Corridors. As outlined in section 7.3 of the LAP, the nine Green Infrastructure Corridors have been identified in the Habitat Survey and subsequent mapping of Naas. In most cases these green infrastructure routes connect to each other and the wider landscape outside of the Naas local area plan boundary. With regard to the suggestion that Monread Park is devoid of wildlife and planting, as stated previously, there are several objectives within the LAP that seek to enhance and protect local biodiversity and KCC will seek to collaborate with local stakeholders to deliver on this.

The Council acknowledges those submissions that note the Caragh Road section of the canal is included in Map 7.2 but not in Map 7.1, including the unintended omission of the hedgerows.

The Council also acknowledges those submissions that suggest updating Map 7.1 to reflect the existing situation of trees/hedgerows on the western side of Rathasker Lane. It is considered reasonable to amend these maps accordingly.

The request for more detail on plans for the Craddockstown and Castlsize Stream is noted.

The suggestion to include Ploopluck bridge and Jigginstown Castle in Policy NE1 is also noted.

The selection of the Green Infrastructure Corridors included the consideration of the value that these areas have in terms of providing habitats for species, such as bats. The purpose behind the identification of Green Infrastructure Corridors is to highlight the need for developers to be aware of the sensitivity of the particular areas and to consider the retention of natural features and their linkages to the wider area in any development proposal. Many of the corridors contain treelines and hedgerows which can act as ecological corridors linking habitats to each other and the wider landscape allowing for movement of species. Indeed, section 7.3.1.9 notes that the Killashee corridor has been identified as a potential location used by bat species.

The suggestion to develop a toolkit based on the Ennis Community Biodiversity Toolkit is noted and it is agreed to include an objective in this regard.

#### GI – Trees, Hedgerows and Woodlands

The Council acknowledge the suggestions to prioritise Objective NE2.1. With regard to suggestions to support local communities to improve the biodiversity of green areas, Objective NE 1.6 seeks to protect and enhance local sites in collaboration with stakeholders.

The importance of mature trees and hedgerows, and the need to conserve important habitats is acknowledged. The LAP contains several policies and objectives that seek to protect and enhance existing biodiverse areas. As previously stated, the identification of Green Infrastructure Corridors is an attempt to highlight areas of particular importance for biodiversity and species' habitats. Objective NE 2.2 calls for the protection of trees and woodlands, while Objectives NE 5.1 and NE 5.2 seeks to ensure new developments take sensitive approaches to surrounding green infrastructure. Objective NE 2.1 is an acknowledgement of the role trees and hedgerows can play in surface water management, as well as biodiversity and amenity uses.

The suggestion that many developers remove trees or hedgerows on their sites is noted, as is the suggestion that planning permission should encourage the protection and maintenance of existing trees and hedgerows. As has previously been stated, one purpose of identifying Green Infrastructure Corridors is to highlight the need for developers to be aware of the sensitivity of the particular areas and to consider the retention of natural features and their linkages to the wider area in any development proposal. Where possible, existing trees and hedgerows should be maintained, or managed in a sensitive manner.

The Council acknowledge the carbon sequestration potential of existing wetlands, hedgerows and trees.

### GI – Surface Water Management

The importance of water environments and access to these environments for certain species of birds is noted. The LAP includes a range of policies and objectives that will attempt to protect and enhance the natural environment and the habitats that are essential for all species of animals, including birds. Several of the Green Infrastructure Corridors have been identified as offering important habitats for water bird species. The various objectives for maintaining and improving biodiversity and planting already discussed will also improve conditions for bird species. With regard to specific protections for waterways, Objective NE 1.4 should be noted as it seeks to maintain a buffer zone along the canal, while Objectives IO 2.4 and IO 2.6 offer similar aims.

Sections 9.3 and 9.4 of the LAP offer details on how surface water and ground water systems can be managed sensitively to mitigate against flooding and to offer added benefits for biodiversity and amenity use. Section 7.5 provides further information on this, referencing Sustainable Urban Drainage Systems (SUDS) which can offer solutions that can function as water storage areas and improve biodiversity and mental health. With regards to flood mapping, details on proposals for future flood mapping and mitigation can be found in Chapter 9 of the LAP.

### GI – Open Spaces and Recreation Areas

The requests to respect the existing approach to biodiversity in Oak Park and to provide bins are noted. The suggestion that all parks contain shelters and toilets is also noted. With regard to supporting the development of community gardens, as outlined previously, KCC will endeavour to collaborate with, and support, stakeholders in the enhancement of existing green/open spaces.

The Council acknowledge the suggestions that existing parks are enhanced for biodiversity in-line with the All-Ireland Pollinator Plan, and those submissions suggesting verges and green areas are left uncut to support growth and pollination. There are several objectives within the LAP that seek to enhance and protect local biodiversity.

The suggestion that local residents are supported with Objective NE 1.6 to utilise green areas for biodiversity is noted. The Council also acknowledges the need for suitable consultation and community engagement as a means of delivering upon the biodiversity goals. As is identified in Objective NE 1.6, cooperation with a range of stakeholders is a priority for KCC.

With regard to the suggestion that the canal area is an underexploited amenity asset, it should be noted that there are numerous aims and objectives in the LAP that seek to sensitively enhance the canal area to enable greater usage of this amenity and to promote biodiversity. Indeed, the canal is identified as a Green Infrastructure Corridor, while Objective NE 1.3 is a direct call to enhance the built, natural and recreational potential of the Grand Canal Corridor within Naas and to encourage and promote sustainable access to and enjoyment of the Grand Canal

The request for the LAP to note the community garden, hedgerow and trees around Jigginstown Green is acknowledged.

The importance of identifying and actively managing invasive species is acknowledged. Council staff can play a key role in tackling invasive species and ensuring they do not prove detrimental to the native species of Kildare. The request to preserve the area between Kingsfurze estate and Naas racecourse for biodiversity is also noted.



### GI New Developments

The suggestions that green roofs and solar panels are included in new developments, and that native planting occurs are acknowledged. The LAP contains a section (7.7) dedicated to green infrastructure and new developments, with Objectives NE 5.2, NE 5.3 and NE 5.4 all supportive of environmentally sensitive new developments. Similarly, Objective IO 4.5 encourages the use of renewable energy technologies, such as solar panels, in new developments. The suggestion to integrate wildlife passes in walls and fences is noted.

The suggestion that tree planting, or contributions in lieu should form a condition of planning approval have been noted.

With regard to future housing models, Chapter 4 of the LAP provides extensive details on proposals for residential developments in Naas. Under Policy HC1 and Policy HC2 there are several objectives that seek to encourage infill developments, diversity in house types, diversity in housing tenures, the regeneration of vacant sites and properties, and promote high levels of energy conservation and efficiency. Section 4.4.2 outlines the Council's aims to see the delivery of low energy buildings that can help play a role in reducing energy demand.

Similarly, and in response to the request to weatherproof the housing stock, it is an aim of the Council to encourage the retrofitting and refurbishment of the housing stock, as stated in section 4.4.2.

The suggestion that public buildings utilise sustainable energy technologies has been noted.

### Heat Waste Utilisation

The suggestion for a policy to be included within the LAP that prevents planning approval for any 'high energy consumption' developments until an assessment on climate target impacts and energy sources is carried out is noted. This submission specifically mentions data centres as a high energy development. The LAP notes just this, with section 6.4.5 offering detail in this respect. As part of the planning process, developments are required to undertake detailed assessments on potential impacts, including impacts on the environment. This is particularly the case with large-scale developments. Therefore, any planning application for such a development will undergo a series of assessments that will, in effect, seek to establish the sustainability of the development and the extent to which it may impact the surrounding environment.

The submission opposing the inclusion of data centres in section 7.8 and the suggestion that gas turbine generators are an attempt at greenwashing is noted. With regard to the potential location of data centres, the lands zoned for data centres have been selected to ensure the location of these types of proposals are controlled proximate to serviced areas of the county. Furthermore, Objective WH1.2 seeks to ensure development proposals on data centre zoned sites explore the potential for the development of low carbon district heating networks.

The submissions highlighting the potential role of Sustainable Energy Communities are noted. It is considered appropriate to include an objective to support community energy generation.

## **Chief Executive's Recommendation**

### **Proposed Material Alteration**

Insert a new objective NE 2.3

**NE 2.3: To support the preparation of a Biodiversity Action Plan for Naas including the development of a Community Biodiversity Toolkit.**



### Proposed Material Alteration

Insert a new objective NE 4.5

NE 4.5: Promote the use of pesticide-free and pollinator friendly fertilizers and other treatments used in gardens and public open spaces. Progress the reduction, and ultimate cessation, of use of such pesticides and treatments by Council staff on public lands.

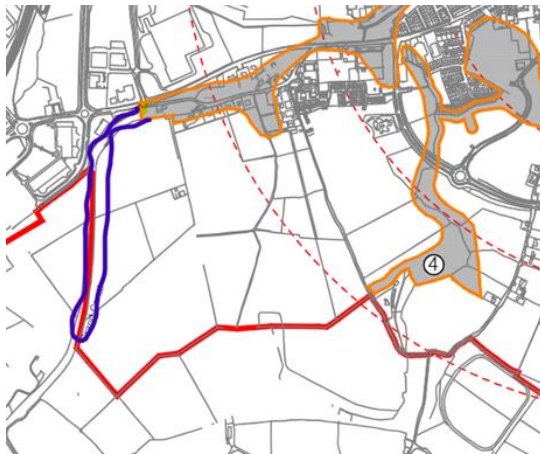
### Proposed Material Alteration

Insert a new objective NE 2.4

NE 2.4: Seek to develop an Invasive Species Action Plan for Naas, in collaboration with key stakeholders and community organizations.

### Proposed Material Alteration

Amend Map 7.2 to extend the 'Green Infrastructure Corridor' for GI1 Grand Canal to include the area outlined in blue below (and any consequential amendments):



### Proposed Material Alteration

Amend Map 7.1 to change the reference from 'tree line' to 'hedgerow' for the section highlighted in the image below (and any consequential changes):



### Proposed Material Alteration

Amend Map 7.1 to remove the 'hedgerow' line along the western section of the Rathasker Lane Road.



## Chapter 8: Built Heritage

### Main Issues Raised

Submission 18, 31, 296, 317, 443, 457, 502, 511, 523, 560, 582 refer.

#### Record of Protected Structures

Several submissions are concerned about the current condition of many of Naas' historical buildings and sites, including Jigginstown Castle and several of the bridges crossing the canal. The submissions consider such sites as an important part of the history and built heritage of Naas and should be protected. A call is made for the repair, restoration and renovation of these sites.

One submission suggests a process is established for listing and de-listing protected structures, with a nominated officer to oversee it. It is suggested that structures must be commercially viable to renovate, otherwise it will not happen.

One submission suggests KCC acquire, for the purposes of restoration and/or redevelopment, sites including: Cemex site; Donnelly's site; Jigginstown Castle; Market House; Potato Market; and, Rag Castle.

Some submission recommend the following alteration to Objective BH1.3: Raise awareness of the unique built heritage of Naas by facilitating conservation interpretation and management projects, such as 'Open House Tours' *to include the text 'Every effort would be made to provide these tours in Irish, as well as English.'*

#### Architectural Conservation Area

One submissions calls for the preservation of the historic core of Naas, and its use as a public space for the community to enjoy.

Two submission suggest the following is included to Objective BH2.2: *'The inclusion of Irish will be encouraged through the awarding of grants for same.'*

It is also suggested the following objectives are added to BH2:

*'To establish a 'Is le gach duine an Ghaeilge' initiative to encourage everyone to use whatever Irish they have and to promote businesses and organisations that provide services through Irish.*

*To liaise with Cill Dara le Gaeilge regarding future proposals for the best way to optimise the opportunities that the status of Iónra Gaeilge for Naas/Sallins and the nearby cultúrlann in Sallins will bring.'*

Submission no.579, in reference to Objective BH2.5, suggests the objective highlights the importance of preserving minor street furniture as a public realm asset.

#### Archaeological Heritage

Several submissions highlight the richness of history that sites, such as Jigginstown Castle and Moat Hill, represent and suggest they could contribute towards tourism and a sense of culture if sensitively restored and renovated.

One submission is supportive of objectives to renovate, preserve and/or protect the historical sites and buildings of Naas, but it is requested that these objectives are 'followed through'. Similarly, one submission suggests a masterplan for the town needs to encompass a vision and plan to improve landmarks and preserve the historic core.

Many submissions do not feel the town is fully capitalising on its history and heritage. Jigginstown Castle is cited as an example of how sites of historical importance have been left to deteriorate for years and have no explanatory plaques or signage to highlight its history. Suggestions to remedy this include a Town Signage Strategy that relates to the town's history and identifies a heritage trail.

## **Chief Executive's Opinion**

### Record of Protected Structures

The submissions made in relation to protected structures are noted.

Regarding the existing condition and restoration of various buildings and structures important to Naas' heritage, it is a stated aim of the LAP to '*enhance, protect and conserve the unique built heritage of Naas, while recognising the town's assets as a valuable resource and instrument for the creation of a sense of place*'. Furthermore, Map 8.1 and 8.1a identify the locations of protected structures. These structures merit protection and enhancement, many of which have been identified by the National Inventory of Architectural Heritage (NIAH). However, it should be noted that this list is not exhaustive and the process of adding structures to the list occurs through the County Development Plan process.

The procedure to add (or delete as the case may be) a building or structure to the record of protected structures can only occur through the process of making of the county development plan or under the provisions of Section 55 of the Planning and Development Act 2000 (as amended) and therefore such a proposal cannot be considered during the LAP process.

Regarding the acquisition of certain sites deemed important for their heritage value it is an objective of the LAP to encourage and facilitate cooperation between the various building owners, landowners and other stakeholders within the town to ensure the best possible outcomes in the developing proposals for regeneration and development. The Planning Authority may, if deemed appropriate, consider the use of its compulsory purchase powers and along with other powers to facilitate development and secure the strategic objectives of the Plan.

The suggestion to alter the objectives of Policy BH1 in relation to the use of the Irish language for any heritage projects and/or tours is noted and it is considered that the Draft Plan provides sufficient support for the Irish language within the context of a land-use plan.

Submissions relating to the historic core of Naas are noted. An area in the town centre of Naas along Main Street and extending towards the Harbour has been designated as an Architectural Conservation Area (ACA) in the Kildare County Development Plan 2017-2023 (as varied). The ACA designation aims to protect this area within the town, that has special significance. There are a range of policies and objectives in the LAP that aim to support and protect the ACA and the historic core of Naas, ensuring it can be sensitively enhanced for the benefit of current and future generations.

### Architectural Conservation Area

The submissions made in relation to architectural conservation and the historic core of Naas are noted. An area in the town centre of Naas along Main Street and extending towards the Harbour has been designated as an Architectural Conservation Area (ACA) in the Kildare County Development Plan 2017-2023 (as varied). The ACA designation aims to protect this area within the town, that has special significance. There are a range of policies and objectives in the LAP that aim to support and protect the ACA and the historic core of Naas, ensuring it can be sensitively enhanced for the benefit of current and future generations.

The suggestions to alter the objectives of Policy BH2 are noted and the objective will be amended to include reference to the Irish language.

### Archaeological Heritage

The submissions made in relation to archaeological heritage are noted.

The submissions which stress the need for Naas to capitalise on the richness of its history and heritage by restoring structures and enhancing the tourism offering are noted. The issues raised by these submissions are addressed by the various policies and objectives identified throughout Chapter 8 as well as being specifically referred to in section 6.5.

## **Chief Executive's Recommendation**

### **Proposed Material Alteration**

Amend the objectives of Policy BH2 to include the following:

Objective BH2.2: Have regard to the Naas ACA Statement of Character and Kildare Shopfront Guidelines (2013) in the consideration of any shopfront or commercial proposals within the ACA. All proposals (contemporary or traditional,) must be of a high quality of design and finish, contributing positively to the established pattern, scale, materials and proportions of buildings *and should consider the use of the Irish language.*

No further changes recommended.

## **Chapter 9: Infrastructure and Environmental Services**

### **Main Issues Raised**

#### 9.2 Water and Wastewater

Several submissions (No.262, no.452, no.551) request further information on the future change in water supply, suggesting these changes have not been explained sufficiently.

Submission no.457 points to the increased capacity of the Osberstown WWTP as an opportunity to capitalise on years of investment. It is suggested strategic infrastructure planning is coupled with a programme of capital investment and community support. Strategic planning should build long-term capacity and not require regular upgrading.

Submission no.206 point to the majority of future development occurring in the west and south-west of Naas and is disappointed that the LAP fails to reference the requirement for appropriate infrastructure to service these developments.

#### 9.3 Surface Water and Ground Water

One submission (no.31) believes the Local Authority has not adequately maintained culverts, storm drains and water channels, which can lead to localised flooding. Additionally, it suggests KCC have failed to properly take in charge certain estates, such as Caragh Green/Meadows/Court, with green areas lacking adequate drainage and becoming swamps as a result. Requests greater efforts are made to maintain drainage systems.

#### 9.4 Flood Risk Management

Submission no.206 is concerned about the predicted future increase in rainfall events, highlighting the impact on surface water runoff. It is suggested that flood risk assessments account for the increasing extreme events, particularly given the prevalence of development areas with prior flooding experience. Similarly, submission no.138 requests information on the proposed measures to mitigate against flooding in respect of new road and residential developments.

#### 9.6 Pollution and Environmental Services

Submission no. 138 requests further information on the locations of noise monitoring stations and the extent of air quality monitoring, specifically in relation to proposed road developments. Submissions no.551 and no.583 suggest that air quality monitors are installed at schools, playgrounds and other locations throughout Naas.

Several submissions (No.262, no.452, no.551) ask whether consideration is being given of a return to municipal waste collection. Suggests provision is made for the collection of waste, such as electrical items, by the Council to avoid illegal dumping.

One submission (no.528) suggests commercial rate payers are provided with a breakdown of what their rates pay for. It is suggested that commercial rates pay for waste collection, among other services, and the Council must deliver on these services, particularly as litter is an issue.

A number of submissions (no.428, no.452) suggest water dispensers are installed throughout Naas to reduce plastic bottle waste and schemes targeting waste reduction and recycling are encouraged and supported.



## Chief Executive's Opinion

Irish Water assumed responsibility for public water and wastewater services from 1<sup>st</sup> January 2014 and is now the responsible body for the operation of public water and wastewater services. Kildare County Council works closely with Irish Water in ensuring the satisfactory delivery of Irish Water's Water Service Programme as it relates to Kildare (including Naas). It is considered that the policies and objectives set out in Chapter 9 the Draft LAP provides a satisfactory outline of the role Kildare County Council plays in the provision of water services in the county in conjunction with Irish Water under the current legislative provisions for public water service provision in Ireland.

With respect to the submissions suggesting integrated strategic and infrastructure planning, and those citing a need for the adequate provision of infrastructure to service future development sites, the Draft LAP is conscious of these issues. Chapter 1 of the Draft LAP outlines the range of assessments, guidelines and strategies that exist, or have been developed, to inform the preparation of the LAP. These assessments include a Strategic Environmental Assessment (SEA), an Appropriate Assessment (AA), a Strategic Flood Risk Assessment (SFRA), a Sustainable Planning and Infrastructure Assessment (SPIA), a Social Infrastructure Assessment (SIA) and a Transport Strategy. In particular, the Sustainable Planning and Infrastructure Assessment (SPIA) comprises both quantitative and qualitative research analysis of existing and proposed infrastructure, offering an assessment of the suitability of lands throughout Naas to accommodate future development.

It is noted that adequately maintained culverts, storm drains and water channels are required to prevent localised flooding. Policy I2 of the Draft LAP states the Council's intention to *"maintain and enhance the existing surface water drainage systems in Naas and to protect surface and ground water quality in accordance with the Water Framework Directive"*. Furthermore, it is an objective of the Council to *"carry out an audit of an existing surface water infrastructure to identify improvement works as required"*, with a stated action of carrying out a survey of existing culverts to develop a programme of improvements.

Concerns of the potential for increased future flood events are noted, as are concerns relating to the impact of future developments on flood risk. As outlined in section 9.4, there is high uncertainty regarding the flood risk in Naas due to the lack of model calibration events and possible interconnection between fluvial and surface water drainage and canal systems. With this in mind, KCC have commissioned a Flood Relief Scheme for Naas, in conjunction with the OPW. Additionally, a Strategic Flood Risk Assessment (SFRA) was carried out for the local area plan. The LAP avoids development in areas considered at risk of flooding, while the SFRA has identified areas where developments will be required to undertake a Site-Specific Flood Risk Assessment. It is an objective of the LAP that such assessments are carried out for development proposals in areas identified by the SFRA and shown on Map Ref 9.1.

The request to provide air quality monitoring stations near schools and playgrounds is noted. In terms of air quality and noise monitoring with respect to development, the LAP states that development proposals should incorporate noise mitigation measures into the overall scheme design on the advice of suitably qualified acoustic specialists, as noted in objectives HCO 2.3 and MTO 3.6. Similarly, development proposals must indicate mitigation measures to be utilised in order to minimise negative impacts on air quality. The Council wishes to note that it does not maintain or operate air or noise monitoring stations. The EPA undertake such exercises, with the locations of their stations found on their GEO Portal ([www.epa.ie/EPAMaps](http://www.epa.ie/EPAMaps)).



In terms of the query as to whether the Council is considering a return to municipal waste collection, there are currently no such plans. As stated in the LAP, refuse collection in Naas is currently carried out by several private contractors and Kildare County Council operate recycling facilities for glass and cans at several locations throughout the town. The Council wishes to note that Waste Management policies and objectives in Kildare are reflective of the overarching EU, National and Regional policy and legislation. The Eastern-Midlands Region Waste Management Plan 2015-2021 provides the framework for waste management in the region and sets out a range of policies and actions to meet specified mandatory and performance-based targets. The current County Development Plan includes a number of specific policies to support the implementation of Eastern Midlands Region Waste Management Plan 2015-2021.

The request to provide a breakdown of how the Council utilises commercial rates is noted. Details on commercial rates, budgeting and expenditure can be found on the Council's website (<https://kildare.ie/countycouncil/YourCouncil/Publications/Finance/>). However,, this is not a matter for a land use plan.

The suggestion to provide water dispensers throughout Naas as a means of reducing plastic bottle waste is noted. With regard to the suggestions for support schemes targeting waste reduction, it is noted that the LAP contains a specific objective (IO 5.3) that supports education and awareness programmes and offers grant aid for such programmes.

### **Chief Executive's Recommendation**

No changes recommended.

## Chapter 10: Urban Regeneration and Development Strategy

Submissions 11, 18, 25, 31, 42, 165, 258, 261, 262, 268, 292, 293, 296, 308, 309, 320, 341, 346, 347, 351, 359, 390, 396, 408, 415, 418, 428, 429, 430, 433, 443, 452, 453, 456, 457, 459, 474, 488, 496, 317, 502, 504, 511, 519, 530, 531, 533, 536, 541, 546, 551, 552, 555, 556, 557, 560, 566, 570, 577, 579, 582, 584, 586, 587, 589, 597, 602, 648 and 719 – 776 refer.

### Main Issues Raised

#### Overarching Urban Regeneration and Development Strategy Issues

A large number of submissions were received in relation to the Urban Regeneration and Development Strategy of the draft LAP with many noting that the rejuvenation of the town must be a critical focus for the Council over the life of the Plan.

As regards the overall development strategy of the town, one submission noted that it was important to develop a design-led strategy; to maximise strengths of the town; to promote sustainable movement; to integrate old with new in a contemporary manner; to create a sustainable town; to apply urban design principles for all new development. One submission stated that town centre revitalisation should not hinder development in the suburbs, with areas such as Monread over-capacity and playing catch-up for services. Another submission noted that much of the LAP is predicated on the use of Sallins Train Station and consequently the LAP must be synchronised with Irish Rail's future plans.

Submissions also noted that Naas is a heritage town and suggests more focus needs to be made the promotion of its status in this regard. One submission states that there is no mention of the overall aesthetics of Naas and suggests a 'theme' for street art/furniture/monuments/roundabouts etc. which would help make town cohesive and encourages visitors/tourists.

One submission received commented on that much of the built heritage material in the urban regeneration strategy is poorly presented citing the poor quality of photographs used. This submission further noted that the lack of map data is disturbing.

Many submissions noted the prevalence of vacant and derelict sites within the town centre, particularly along Main Street. A number of submissions noted the appearance of many shop fronts as poor while others provided examples of properties that are either vacant or derelict. Several submissions stated the need to do more to tackle the issue and noted that there was a legislative basis for the Council to act in this regard. One submission noted that Vacant Sites Register contents are poor with only one site in Naas on the list. This submission states the that many underutilised/vacant sites and properties could have a residential function and suggests that a list of properties with unknown ownership be published. It also suggests a range of actions to identify and quantify vacant properties.

Numerous submissions received relate to living over the shop initiatives. Several stated that steps must be taken to make it attractive and viable. One submission suggests that the requirement for parking and greenspace for over-shop living is dispensed with as it hinders residential use.

### Naas Town Centre and Core Regeneration Areas

Issues surrounding the development of the town centre were the subject of a significant number of submissions. Many submissions outlined concerns about the town centre, the poor quality of the open space and the poor maintenance of some shopfronts. One submission stated that there appeared to be no clear design vision for the town centre whilst another stated that the town centre area should be considered as a key amenity should be centred around the idea of community, where people can gather to meet without the intrusion of traffic and also stated that the attractions of the town centre for the resident and visitor must be a good selection of food and beverage outlets complimented with an interesting selection of retail shops. Other submissions requested the need for investment in the appearance of the town centre to make it look cohesive and more appealing.

A number of submissions welcomes the multi-faceted focus of the LAP on addressing the challenges faced by Naas Town Centre. The concept of the six core regeneration areas (CRAs) has also been welcomed by some submissions. One submission suggests the need for a theme to link all CRAs and states that this should be focused on creativity and unique streetscapes. Another submission states that there is a need for the pro-active management of the sites, where each site is project managed, but sits within an overall integrated framework of implementation. This submission also states that the successful regeneration of Naas will require an integrated approach and pro-active leadership from all departments of the Council, while working closely with multiple external stakeholders. The recent awarding of a €3.5 million under the Urban Regeneration and Development Fund to support the preparation and implementation of a Naas Town Renewal Masterplan for the historic core of Naas was also noted as a positive development.

#### CRA 1: Main Street

The Main Street CRA attracted a number of submissions on a variety of issues, the most significant of which related to traffic. In this regard many submissions referred to the dominance of traffic, in particular the prevalence of HGVs within the town centre. A number of submissions called for an immediate ban of HGVs from the Main Street and town centre. Submissions also requested the need to make Naas a people-friendly town and that a critical focus should be directed towards the needs of cyclists and pedestrians along Main Street in order to improve infrastructure to making it more welcoming for public transport active travel, inexperienced cyclists, and families. In this regard, a number of specific measures were proposed including the creation of a one-way looped traffic system within the town, segregated cycle lands, the banning of traffic along certain sections of the Main Street during periods of the weekend, and the expansion of the Poplar Square scheme to link it with the Sallins Road.

A number of requests and suggestions were also submitted with regard to the improvements of the Main Street. These ranged from the upgrading and widening of footpaths to provide universal design with more zebra crossings, to the provision of bins, and free Wi-Fi. Some submissions suggested providing a rain cover over certain portions of Main Street to enhance trade/tourism. A number of submissions also referred to the effects of the Covid-19 pandemic and stated that it highlighted that Naas unfit for outdoor living and more outdoor seating and recreational amenities were required.

A number of submissions referred to the improvements proposed within the CRA including public realm interventions on Poplar Square, Market Square and in front of the Court House and others requested that Market Square be reinstated for festivals and markets and that it

be the location of farmers' market on Sundays. Another submission stated that the removal of the taxi rank from the square should be considered. Furthermore, submissions expressed opposition to any proposal to locate a bus interchange at Market Square.

A number of submissions emphasised the links between the Main Street and the Fairgreen and requested that such links should be enhanced with the landscaping of the Fairgreen being upgraded. It was also suggested that the area could include a multifunctional bandstand or stage.

One submission cited the opportunity arising from a future relocation of Naas Courthouse which it states creates the potential for the old Courthouse to be turned into a museum or tourist information/attraction.

Another submission refers to page 125 of the draft Plan and asks what is in mind for the "high-quality piece of architecture" which is proposed for the site at the proposed new junction between Corban's Lane and Main Street South.

## CRA 2: Castle Quarter

The provisions of the draft Plan in relation to CRA 2: Castle Quarter received a significant number of submissions. Many noted the potential of the area, emphasising the cultural and heritage significance of this most historic part of Naas. Several submissions noted the potential of the Castle and its attendant grounds for varied uses including an amenity space/park, a cultural/tourist/educational destination and the location of a farmers' market. One submission requested that the Council should enter into pro-active collaboration with the owner of St. David's Castle to ensure meaningful public access and the optimisation of the cultural and economic potential of site. Other submissions noted the general neglect of both the Castle and the surrounding area and stated the need for investment in both restoration and regeneration.

Whilst several submissions welcomed the provisions in the plan for St. David's Castle that it could potentially be the site of an interpretive centre and a community gathering space, others cited concerns about proposals for residential development within the grounds of the Castle. These submissions noted the sensitive and historic nature of the site, highlighted that there was plenty of other brownfield sites available for residential development within the town centre and requested that the lands surrounding the Castle, which are rich in biodiversity be retained or zoned for amenity use. In this regard, submissions noted that it was the last opportunity to create a park in the town centre and highlighted the role that such an amenity would play in the town not only for community well-being however also its location in proximity to schools and town centre uses such as coffee shops.

Other submissions were however in favour of an element residential development being located within the grounds of the Castle, noting the the potential for high-quality residential development to the south of the castle but also and stating that optimism that on-site parking, combined with the sensitive and appropriate insertion of openings in the wall along Church Lane will encourage the use of pedestrian and cycle routes. Another submission states that the St. David's Castle site should have significant public realm and age-friendly housing and that there was an opportunity to create a McCauley Place type of project within the heart of town.

Requests were also made that this ideal location, at the heart of the town, should be maintained and opened for the people of the town to enjoy and to improve the attractiveness of the town in terms of its tourism offer of Naas. In relation to the interpretive centre

proposal, an number of submissions were made which requested that this should a 'bilingual' attraction and requested that Section 10.4.4 of the draft Plan be amended in this regard.

With regard to the rest of the lands within CRA 2, one submission stated that it envisages a mix of residential and commercial uses and regards the lands to the north and east of the Castle as having development potential, enhancing the character of the Castle Quarter by utilizing framed views.

On the issue of transportation and connectivity within the Castle Quarter, one submission stated that the Castle and its environs should form part of the pedestrianisation of the town centre from the Presbyterian Church to Poplar Square and that this route could tell the 'Story of Naas' and become the starting point of a cultural and historic trail as provided for in the Plan.

Several submissions welcome the provisions in the Plan to develop pedestrian and cycling routes within the Castle Quarter. A number of submissions state that the lands within east of the CRA are an ideal location for footpath/cycleway through park to serve the east of the town.

A number of submissions request that more access be provided to St. David's Church. However one submission objects to what it states is a proposed cycle lane through the grounds of St. David's Church for a number of reasons including the fact that the church grounds (and Right of Way) are private and are vested in the Representative Church body, the potato market has no access to the church grounds, the church gates are locked and security issues. It further notes that car parking spaces are rented out to aid the maintenance of the church and cycle lane alongside the present entrance, footpath and housing would be unsafe. It also outlines times when access would not be possible due the holding of funerals, Sunday Services, Baptisms etc.

A number of submissions stated that a farmers' market could be facilitated on the site of the former potato market leading from Church Lane with one submission stating that the Council acquire the Potato Market, which is an ideal place for public seating.

### CRA 3: Corban's Lane

One submission in relation to the Corban's Lane CRA raises concerns about proposals within the draft Plan to create strong urban edges with active frontages along the southern periphery of the Naas Shopping Centre on Corban's Lane and for the sensitive and appropriate insertion of new active frontages along Church Lane. It also raises misgivings about the sensitive retro-fitting of a pedestrian link through the centre to a location proximate to the entrance of St. David's Castle. This submission also requests that such provisions be omitted from the draft Plan stating that while the retro-fitting of new active frontages along Corban's Lane and Church Lane is not feasible, there may be the possibility of delivering some enhanced window frontage at the upper levels depending on future tenants. Another submission notes that the completion of Corban's Lane Shopping Centre is of critical importance. A further submission refers to the need for a one-way traffic system to be developed along Corban's Lane, to coincide with the development of the shopping centre. One submission made on behalf of a landowner in the CRA requests that lands fronting on to the southside of Corban's Lane, opposite the Corban's Lane shopping centre site should be considered for the provision of car parking. The submission suggests this would be more acceptable and make better economic use of the Town Centre Regeneration site.

#### CRA 4: Rathasker Road

One submission refers to section 10.4.6 of the draft Plan which provides for a footpath/cycleway along Rathasker Stream. The submission states that the ambition for this route is expressed too passively in the plan as there is a need to provide such infrastructural connections for the large future population in Devoy Quarter area within the life of the Plan.

#### CRA 5: Northeast Gateway

The proposals in the plan regarding the Northeast Gateway CRA were the subject of several submissions received. One submission noted that this location is fitting for a terminus for active travel initiatives proposed for the Dublin Road. However another submission considered that the proposal for a landmark building at the corner of the junction of the Dublin Road and Blessington Road will impact on views to and from Naas. Another submissions states that the Northeast Gateway location is fitting for a terminus for active travel initiatives proposed for the Dublin Road.

Another submission recognises the development potential of this site and supports town centre revitalisation and proposed pedestrian/cyclist links. However, this submission goes on to outline a number of concerns in relation to the Key Design Principles outlined for CRA5. It states that the principles are based on the assumption that the entire site is capable of being redeveloped as a single entity and doesn't have regard to the requirements to maintain a viable convenience store on the site. The submissions states that there must be balance between meeting objectives and delivering development in a viable manner where uses are already established. It notes that the success of a convenience supermarket is inextricably linked to the provision of adequate car park facilities preferably located at grade. This submission suggests that the following objective /principle should be incorporated into Section 10.4.7 of the Plan:

*'The Council recognises that there are established business interests on these lands and the requirements of these operators in terms of maintaining a viable floor plan layout, adequate parking provision, appropriate access and servicing requirements must be considered in a pragmatic manner to ensure the ongoing viability of these businesses. Redevelopment proposals for the site would be subject to the preparation of a Masterplan by the developers, which would address the pivotal location of the site at the entrance to the town, whilst simultaneously recognising and incorporating the fundamental operational requirements of the convenience store.'*

#### CRA 6: Canal Quarter

The provisions contained in the draft Plan in relation the Canal Quarter received a significant number of submissions, several of which welcomed the overarching concepts and principles regarding the regeneration of the Canal Quarter. Many submissions noted the undeveloped potential of the area as a recreation and tourism hub. Several submissions expressed concerns over the level of vacant and undeveloped sites within the CRA and stated the need to utilise the provisions of the vacant sites levy to encourage development of properties in the area. Others welcomed the focus on mixed use development and noted that the sites identified for development will bring much needed focus and investment to this area, and by extension aiding the overall rejuvenation of the town centre. One submission stated that the area is ripe for regeneration centred around water-based activities. Another submission stated that in order to maximise the potential of the regeneration of the harbour area and ensure the delivery of a consistently high quality in urban design, architecture, and public



realm, the Council will need to adopt a pro-active leadership role and draw up a brief to guide the overall development. The submission states that this brief will seek to exploit the relationship to water, provide for generous public realm, and incorporate a mix of destination uses across the commercial, hospitality and cultural spectrum.

Conversely, some submissions outlined concerns over aspects of the regeneration framework including the level of residential development proposed and the prospect of other uses such as a hotel being developed. One submission stated that there was ample room for residential and commercial development in other parts of the town, whilst another noted the large scale development would be a huge disruption to the community living there and to wildlife.

A number of submissions received emphasised the importance of the Canal along with the Harbour with regards to its biodiversity and amenity value. One submission stated that the area had been utilised by thousands during the pandemic and the harbour is a jewel in the crown of Naas and should be protected from development. Another submission outlined concerns relating to the proposed park opposite the Canal Harbour and stated that the area acts as a wildlife refuge in an urban centre and that its value is that it isn't readily accessible to the public. However, another submission commends the provision of a public park at this location. A further submission states that the while draft Plan speaks about the heritage and natural value of the canal harbour why then is the Plan proposing to urbanise this green lung and introduce more carbon dioxide emissions and noise etc. This submission further states that umbrella terms, such as 'Recreation and Amenity' and 'Tourism' can mislead as such activities do not automatically exist harmoniously. A number of submissions request that no development takes place alongside the canal. One submission argued no further zoning for development should be permitted adjoining the canal, particularly within the area of open land left Naas branch of the canal and the former Corbally branch. Other submission states that the area should be zoned for amenity and related uses only.

As regarding activities on the Canal itself, a number of submissions noted the potential for the waterfront to be animated by the mooring of barges and the holding of other water-based activities. Furthermore, other submissions received outlined the unique opportunity to develop both the Canal and Greenway as a destination for people to visit and enjoy with one submission noting the potential for the harbour to become a mirror destination to Sallins at the other end of the Greenway. A number of submissions received stated that residential moorings along the canal should be promoted. However, other submissions outlined concerns relating to the provision and management of the servicing infrastructure for houseboats. One submission suggested that it may be preferable to develop a secure and serviced marina to accommodate houseboats etc rather than have a small number of craft moored along a linear pontoon. This submission also states that consideration should be given to developing a marina as a commercial proposition between the Council and a developer. Another submission states that the location of such a marina should be along the Corbally branch of the canal.

A number of submissions stated that the development of bridge and infrastructure must not interfere with the navigation of the waterway by watercraft and must conform to bridge heights on the canal network. One submission noted that vibrant and successful canal quarter requires the firm foundation of a canal system fit for purpose and that the harbour is generally empty of boats for several reasons including the fact that Naas line is short and requires passage through five locks, there is a lack of servicing infrastructure and the back of the harbour is heavily silted and requires dredging.



The issue of the Grand Canal Greenway received a number of submissions. The fact that the Greenway was under construction was noted however, questions were raised as to its completion. One submission welcomes the bridge at Landen Park to be constructed as part of the Naas to Sallins Greenway scheme. Other submissions referred to the need for the Greenway to be extended further along the Corbally Branch of the line and not just terminate at the Canal Harbour. In this regard, a number of submissions noted that need for provision to be made to replace the culvert blocking navigation at Jigginstown with a bridge to facilitate the passing of canal vessels. One submission stated that the reinstatement of a canal bridge on the R445 would allow this line to be reopened to boats and barges and would be a much-needed incentive to attract boats up the Naas branch from the main line of the canal. As regards the water supply to the canal, one submission welcomes the recommendation in the plan that the water supply issue be re-examined as in the absence of a dependable supply. This submission states that the water supply issue needs to be addressed as an urgent priority for the waterway to fulfil its potential as a base for water-based activities.

With regard to specific uses and activities within the Canal Quarter, a number of submissions received outline a range of potential activities included the development of the area as a cultural or food quarter where cultural venues or restaurants could replace/occupy vacant buildings. Submissions also suggest the setting up of temporary facilities would help such as food markets and the licensing of cafés, restaurant barge(s) on the water itself. One submission stated that people want focal points to visit. In this regard, a number of submissions noted that the currently Library building would soon become vacant and a number of alternative uses including developing an Irish Culture Centre, its use as a base for youth organisations or a cycle café. Others suggested the need to regenerate specific sites including the post office yard, the old warehouse building and the Market House. One submission however stated the no taxpayers' money should go towards the restoration of the Market house building. Whilst one submission stated that the Eir building on Abbey Street should be demolished and replaced with an attractive development if there was no longer any use for it, other submissions requested that the Council explore acquiring the building and transforming it as an arts and culture hub for the town

With regards to the issues of accessibility and the public realm, a number of submissions request the restriction of vehicular traffic within the Canal Quarter and alongside the Canal. These vary with some proposing a complete ban on vehicles within the area whilst one submission states that restricting access could be seen as creating gated communities. One submission states that roads can be shared safely whilst other submissions note that the LAP provides for a people centred space but states that it doesn't go far enough. It is also stated that the extent of pedestrianisation planned for the area is not made clear in the draft Plan.

A number of submissions received strongly advocated the need for an enhanced public realm in the area particularly alongside the Canal and Canal Harbour. Suggested interventions included a plaza at the Canal Harbour as well as enhanced spaces for public seating along the canal and other streets in the area such as Abbey Street. One submission states that the pandemic has shown that an enhanced public realm with a focus on outdoor seating and dining should be a priority for the area. In this regard, a number of submissions requested that specific interventions within the Canal Quarter be considered to improve both accessibility within the area and the overall built environment. Such interventions include the construction of footpaths on both sides of the Town Hall (Library) and the closing of the junction at Abbey Street to traffic for the purposes of developing a pedestrian square.

The issue of transportation and connectivity attracted a number of submissions. Many of these focused on proposals to connect the Canal Quarter with the lands of the North West Quadrant (NWQ). In this regard, concerns were outlined regarding the proposed bridges and their effect on adjacent areas. One submission states that proposals in respect of the harbour area poses conflicts between the transport proposals and pedestrian safety and residential amenity, including through the Sarto estate. Whilst some submissions support the principle of a pedestrian/cyclist bridge, others do not. A number of submissions state that a bridge would be visually obtrusive, disrupting views from the harbour across the canal. Several submissions outline objections to both the proposal for a bus only bridge across the canal and the location of a bus interchange on the Canal Bank. One submission states that the plans included in the LAP are deceptive and do not should the impact of such bridge constructions. Another submission states that while they have with a link to the NWQ, it should not cross over the canal. Other submissions state that the bus interchange must be located away from such a visually and environmentally sensitive area. Further submissions note the provision of car parking beside the proposed bus interchange at Abbey Bridge. In this regard, one submission outlined concerns about its scale, and suggests that a much smaller car park, with increased parking on Abbey Street would be better. This submission notes the amount of green open space that the car park is proposing to cover would undermine the existing green infrastructure of the area.

Several submissions outlined concerns about the design and massing of new built form in the area. One submission stated that such developments would be most likely developed in the modern brutalism style with no sense of place. It was also felt that the development of around the Harbour and Abbey Bridge areas would consist of apartment blocks which would not be in keeping style or context of the surrounding low rise development and would block views across the Canal. Another submission suggested that the Council demolish the existing housing on Basin Street for the purposes of constructing more appropriately scaled infill development.

A number of submissions were received in relation to specific elements of the regeneration proposals for the Canal Quarter. Several submissions stated that the playground constructions watch tower type erection appeared to be inappropriate and obstructive, blocking views across the Canal. Another submission stated that '*Harbour of Lights*' initiative and all the public amenity improvements proposed had great potential.

### Public Realm Strategy

Many submissions welcomed the emphasis in the draft Plan places on the public realm within the town. One submission stated that the streetscape and appearance of the town is of immense importance to the regeneration of Naas and that good design improves the quality of the town experience, improves community spirit, increases civic pride, promotes social inclusion, and adds to the quality of life for residents and visitors. Several submissions urge the upgrade and reimagining of the public realm be a key area of focus over the life of the Plan and that the Public Realm Strategy when produced should be incorporated in or linked to the LAP in some way. Numerous submissions cite various examples of poor quality public realm within the town centre. These include narrow and uneven footpaths, along with the varying quality and consistency in design and distribution of street furniture. Several submissions referred to the tactical urbanism project developed by the Council for Poplar Square and stated that it should be used as a template for the rest of the town centre and that such a move would have a transformational effect on the town.

With regards to public realm and transport a number of submissions noted that the dominance of motorised traffic in Naas is having consequential negative effects in terms of the overall quality and people's experience of the public realm within the town. Several submissions stated that having recognised this problem in the draft Plan, there was now an opportunity to rebalance the modal split in favour of active travel thereby enabling the overall enhancement of the public realm, making it a safer and more attractive for walkers and cyclists. It was further suggested that a better designed public realm with enhanced facilities would make it easier for children to walk/cycle to school thereby reducing congestion during the peak travel periods. A key theme that was also raised in this regard was the need to first remove HGVs from the town centre.

A significant number of submissions received included an array of suggestions and requests relating to specific public realm interventions that could be made. Several related to the need to develop a standard design template for bollards, bins, public signage (universally accessible agus ag úsáid Gaeilge ar gach comhartha) and seating consistent with Naas's heritage town status. A number of submissions noted the poor and neglected state of many shopfronts within the town centre and stated that there needed to be a coordinated approach on the part of the Council to tackle the issue. One stated that the town would benefit from a colour-scheme initiative (e.g. Clonakilty) and shop fronts schemes (e.g. Malahide) and that a shop fronts award initiative could be rolled out. This submission also stated that there could be different colour schemes for different areas of the town, seasonal planting; appropriate lighting etc.

Other suggested public realm interventions to improve the quality of built environment and provide an enhanced sense of place includes the following:

- Need to deal with graffiti and litter issues, including the number and appearance of bins.
- Increased tree planting / soft landscaping along streets and in areas such as the Fairgreen.
- Improvements of the laneways linking the Main Street with Corban's Lane and the Canal Quarter.
- Tackling visual pollution of signage and excess street furniture / providing more signage.
- Improved and bespoke lighting scheme.
- Plaques for historic buildings.
- The promotion of street art, statues and urban art installations (including gable end murals).
- Replacing car parking with footpaths.
- Clear goal of undergrounding all overhead wiring.
- Creating opportunities for on-street dining.
- The development of public plazas at Market Square, Fairgreen and the Canal Harbour.
- The closing of the town centre to through traffic on certain hours during the weekend.
- A range of movement and accessibility interventions including the provision of pedestrian crossings, increased car parking provision, improvement of junctions, the provision of access points, and development of a one-way system for traffic within the town centre.
- Improve aesthetics of the approach roads / more biodiversity projects on approach roads.
- Provision of public water fountains.
- More electric car charging points on Main street.
- Fairgreen recycling centre to be screened off in short-term.

### Devoy Barracks Key Development Area (KDA)

One submission was made in relation to the Devoy Barracks Key Development Area. One stated that the proposed density of the site is excessive, given the significant residential development that has occurred on surrounding lands within recent years. This submission also considered the area too small for medium/high residential development and that 15% open space provision was too small given the envisaged population. The submission further stated that there was no provision for a local shop to serve the area.

### Junction 9 (Maudlins) Key Development Area (KDA)

Several submissions were received on the proposals in the draft Plan for the Junction 9 (Maudlins) KDA which comprises of the former Cemex/Donnelly Mirrors site. One submission stated that the area is not an appropriate location for high rise focal buildings. However, a number of other submissions welcomed the proposal both from an economic regeneration and development point of view but also from an aesthetic perspective. In this regard the current derelict condition of the site was referred to as an 'eyesore' which reflects poorly on Naas on what is the main entrance to the town from Dublin.

One submission relating to the KDA referred to potential issues with traffic congestion arising out of the development of the site and particularly the potential for it to negatively affect the traffic capacity of Junction 9 along with active travel infrastructure. This submission stated that the junction design should allow traffic flow into the industrial area to avoid tailbacks with sufficient capacity for traffic so it doesn't conflict with routes such as Naas to Kill greenway. One submission stated that the site would be the perfect location to incorporate an outer ring road which would feed out onto the N7/Junction 9.

One submission requested that the Junction 9 (Maudlins) KDA should be retained in the final Naas LAP and that the Council to use its powers to secure the regeneration of the Maudlins KDA and to seek national urban regeneration funds to assist in this process as appropriate.

### Northwest Quadrant

The proposals of the draft Plan regarding the Northwest Quadrant (NWQ) attracted a number of submissions relating to several different aspects, including the overall concept, the proposed Masterplan as well as issues relating to flooding and transportation. Several submissions welcomed the provisions in the plan relating to the NWQ lands, noting its importance to the future development of Naas over the medium term. A number of submissions welcomes the rationale behind the 'SR: Strategy Reserve' zoning designation on lands within the NWQ and expresses hopes that they are not changed in the final Plan. One submission welcomes the designation of the NWQ as a strategic development zone.

A number of submissions refer to the provisions of the draft Plan to carry out a masterplan for the NWQ. However, one submission takes issue with Objective (NWQ 1.1) which prohibits the consideration of applications for smaller areas of the NWQ until the completion of a masterplan. In this regard, the submission states that the implementation of such an embargo on the development does not accord with good planning, natural justice or sustainable development. The submission goes on to question the legality of the provision stating that there does not appear to be any provision in the Planning and Development Acts or Regulations to allow a planning authority arbitrarily refuse to consider a planning application. It notes that according to Section 34(1) of the Planning and Development Act,

where an application is made to the Council, the planning authority “may decide to grant the permission subject to or without conditions, or refuse it”. It further states that provision to refuse to consider an application is not referenced and questions on what basis may a Local Area Plan debar An Bord Pleanála from considering a planning application. This submission therefore requests that that objective NWQ 1.1(d) be omitted from the Plan.

The issue of flood risk within the Northwest Quadrant was raised in a number of submissions. Concerns included the long-term intentions of directing the growth of the town towards the NWQ given that issues relating to flooding remain unresolved, with the area being identified by as potentially at risk from flooding under the National CFRAM Programme. In this regard, several submissions were received from residents living adjacent to the NWQ outlining concerns including the regular/historic occurrence of flooding within parts of the NWQ, issues relating to poor drainage, and the need for further assessment and analysis. While one submission stated that the area around The Knocks was well-drained and not subject to flooding others noted that areas of land around the old wastewater treatment plant and The Knocks remain in a flooded state for most of the year. Submissions outlined concerns that development within specific parts of the NWQ would result in flooding being displaced to surrounding residential properties which are already surrounded by waterbodies.

Several submissions received however, noted the provisions of the plan to first prepare a OPW Flood Study/Flood Relief Plan to inform the development of the masterplan. In this regard, submissions received from both residents and landowners requested that they be consulted as part of this flood assessment process and also as part of the preparation of the NWQ masterplan.

A series of submissions outlined concerns about the potential for development within the NWQ and how it might affect the existing green infrastructure of the area. In this regard, several submissions requested integrity of the green infrastructure network (hedgerows, trees etc.) be safeguarded and maintained. Other submissions noted the importance of the Grand Canal greenway both as an amenity area and an ecological corridor and expressed hopes that the masterplan will not undermine this role and that large scale housing development will be kept away from this area.

On the issue of transportation, one submission received noted objective MTO 2.3 in relation to a proposed bus priority route between Naas Town Centre, the NWQ and Sallins-Naas Train Station and notes the provisions of the LAP in this regard, including objective MTO2.3. Also noted was that an indicative route for the Northwest Quadrant Link is shown in the draft Plan. However, it notes *that* the new route does not link with the town centre but the draft LAP states that the route could in the future be extended to link into the Town Centre via a bus-only bridge (with 'bus gate') over the canal. In this regard, a submission recommends that in order to ensure an appropriate level of connectivity between the Sallins-Naas Train Station, the NWQ and the town centre, a direct indicative pedestrian, cyclist and public transport route connecting the Naas-Sallins Train Station through the NWQ to the town centre should be included as an objective of the Plan as a short-term measure.

One submission relating to potential transportation links states that any connection from NWQ to the town centre should be for pedestrians or cyclists only to force a modal shift, whilst others oppose any link between the NWQ and Naas Town Centre.

With regard to transportation within the NWQ lands a number of submissions state that the area should have an integrated grid style cycle and walking network. Others however outline



concerns about the nature of the proposed bus priority link and request that it should be re-routed away from the Finlay Park residential estate which must remain a cul-de-sac.

## **Chief Executive's Opinion**

### Overarching Urban Regeneration and Development Strategy Issues

The submissions received regarding the overall contents and proposals set out in the Urban Regeneration and Development Strategy are noted. In relation to the concerns about more peripheral areas of the town being neglected at the expense of the town centre, it is considered that the contents of the draft Plan along with the Urban Regeneration and Development Strategy incorporates provisions for the delivery of key pieces of community and social infrastructure across all parts of Naas. For example in the Monread area, the plan proposes the development of a bus priority measures, dedicated pedestrian and cycling infrastructure and improved access to the future Public Park at Kerdiffstown. The draft Plan highlights the importance of retaining the town centre as the established commercial core of Naas. It is therefore considered that prioritising its regeneration is crucial to the overall civic, economic, social and cultural well-being of Naas, its residents and businesses. With regards to the opinion that the Plan places great emphasis on the use of Sallins Train Station, it is considered that in keeping with national policy as outlined in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) priority must be placed on promoting the use of all types of public transport modes including rail-based transit. It should be noted that the Planning Authority conducts ongoing engagement with key public transport stakeholders including Irish Rail and the National Transport Authority.

It is considered that the plan places particular emphasis on Naas's status as a heritage town. Indeed the Regeneration Strategy predicated on the concept of heritage-led regeneration which seeks to build on the strengths of the town, including its architectural, archaeological and natural heritage.

In relation to the overall aesthetics of the town it is noted that the Section 10.5 of the draft Plan provides for the development of a Public Realm Strategy. This Strategy will seek to deliver an actions-based programme for the effective presentation, management and development of the town's public realm where particular attention will be focused on *'the town centre, approaches to the town, designated neighbourhood centres and the public space network within the town'*.

With regards to the comment in one submission which outlined concerns regarding the poor presentation and quality of the imagery and mapping, it should be noted that the maps included in the strategy are designed to be conceptual in nature in order to convey the overarching parameters and principles for the specific sites discussed. It is intended that more detailed mapping will be provided in the various masterplans undertaken during the life of the plan, and in the Public Realm Strategy.

Kildare County Council acknowledges that vacancy and dereliction within the town centre are problems that can only be addressed by sustained efforts over the longer term. Indeed, the prevalence of such issues underpins the reasons why it was considered necessary to prepare a comprehensive Urban Regeneration and Development Strategy for Naas. It is noted that the entire town centre has been designated as 'regeneration lands' for the purpose of applying the vacant site levy (see objective HCO 1.5). It is also an action of the draft Plan to use the Council's statutory powers to stimulate the development and appropriate re-use of vacant and derelict sites in Naas.

The Council acknowledges that development management standards can in some circumstances act as a barrier to over-shop living. However, such standards are not within the remit of this Local Area Plan as they come under the purview of the Kildare County Development Plan, which is currently being reviewed.

The Council endeavours to continue to support 'living over the shop' initiatives within the town centre. In this regard, it is proposed to amend objective EDO 1.9 to include a provision to support and encourage 'living over the shop' initiatives.

#### Naas Town Centre and Core Regeneration Areas Response

The submissions in relation to the appearance and presentation of the town centre are noted. The draft Plan acknowledges that such issues represent an ongoing challenge affecting the developmental potential of the commercial and historic core. In this regard, specific provisions of the LAP including objective URD 1.6 commit the Council to actively engaging with the community, landowners, developers and other agencies to secure resources for the enhancement, renewal and regeneration of Naas Town Centre.

In relation to the overall appearance of shopfronts, it is noted that Kildare County Council has for the last number of years developed a successful Shop Front Improvement and Accessibility Grant scheme. It is an action of the draft Plan to continue to promote the uptake of this scheme within the town.

The submissions received in relation to the concept of the six Core Regeneration Areas and the requirement for proactive management of the sites is acknowledged. In this regard, it should be noted that Council have a dedicated Strategic Projects and Public Realm Unit in place, to manage and lead regeneration projects across the county, including towns such as Naas. This unit has recently secured €3.5 million in fund for the development and implementation of a Town Renewal Masterplan Plan for Naas (as was noted by one submission). It is noted that the awarding of this key tranche of funding was announced by the Government subsequent to the publication of the draft Plan. Accordingly it is considered appropriate to amend the Urban and Regeneration Strategy to provide support for the Naas Town Renewal Masterplan.

#### CRA 1: Main Street

The submissions received in relation to Main Street are noted. The dominance of vehicular traffic within the town centre and especially along Main Street is acknowledged in the draft Plan. It is further acknowledged that this has had negative consequential effects on other users of the space including, pedestrians and cyclists and people using public transport. As a response to this, the draft Plan contains a series of provisions aimed at tackling the problem in order to re-balance the public realm within the commercial core away from private vehicular use. With regard to the banning of HGVs, it is noted that the objective MT 3.2 provides for restrictions to be placed on HGV movements through the town centre. Table 5.3 states that this will be implemented within the short term, subject to the availability of funding.

The requests and suggestions relating to the improvement of the physical environment along Main Street are noted. While the design framework for the Main Street CRA outlines concepts and principles for improved pedestrian facilities and an enhanced public realm, such proposals are intended to be further explored and refined in the proposed Public Realm Strategy for the town, which is provided under objective URD 1.11. It is further intended that



the Public Realm Strategy will also include a bespoke materials template for the town centre including for pavement, signage and street furniture such as bins. The Public Realm Strategy will also look at the issue of seating and its distribution within the town centre. Suggest design interventions such as the provision of a rain cover will also come within the remit of the Public Realm Strategy. With regard to the request for free Wi-Fi to be provided for Main Street, it is considered that such an issue is matter for corporate management and consequently does not come within the remit of this land use plan.

Suggested improvements to particular spaces such as Poplar Square, Market Square and the area in front of the Court House are noted. It is noted that the design framework for CRA 1: Main Street includes provision for design interventions within these important spaces. The success of the temporary tactical urbanism project at Poplar Square is also noted and it is envisaged that the Public Realm Strategy will provide for a more permanent design solution for the space. It is further envisaged that Public Realm will also provide proposals for the design and use of Market Square and also provide for improving the quality of connections between Main Street and the Fairgreen, along with the upgrading of the Fairgreen itself, and the provision of facilities such as bandstands. With regard to the concerns about the location of a bus interchange at Market Square, it should be noted that objective MTO 2.2 of the draft Plan provides a level of flexibility as to its precise location where it states it is an objective of the Council *'to secure the implementation of a bus interchange at Market Square/South Main Street'*.

With regard to the future use of the Courthouse, section 10.4.8 of the Plan notes its potential relocation and outlines the desirability of a new courts complex being potentially located on a site within the Canal Quarter. Whilst the Council would welcome a continued public use for the existing Courthouse building, such a decision would ultimately be a matter for the Court's Service/Office of Public Works.

In relation to the query regarding what the Council has in mind with respect to the "high-quality piece of architecture" which is proposed for the site at the proposed new junction between Corban's Lane and Main Street South. In response to this it should be noted that the provision merely seeks to set out a principle to ensure that any built form on this prominent site within the town centre should be of very high architectural quality the final design will be formulated through the development management process.

#### CRA 2: Castle Quarter

The significant number of submissions in relation to the Castle Quarter are noted. With regard to St. David's Castle and its attendant grounds, further noted that the site is in private ownership and accordingly, the role of the Local Authority to effect change is limited in this regard. However, the draft Plan does acknowledge the potential of the site to deliver an amenity destination which could be a key tourism and recreational attraction in the town. To this end, Objective 1.8 of the draft Plan provides for the Council to actively seek the regeneration of St. David's Castle as a key visitor destination within Naas Town Centre. Furthermore, in recognition of its private ownership status, it is an action of the LAP to *'work with the owners of the St. David's Castle with a view to providing public access to this historic site as a tourist and heritage destination'*. The requests to create a bilingual interpretive centre on the St. David Castle site are acknowledged. It should be noted that Kildare County Council is committed to supporting the growth of the Irish Language, however the fact that the property is not in public ownership places substantial limitations on the Council to effectively implement such a suggestion in this regard.

In relation to potential uses within the St. David's Castle site, it is considered that there is scope for the development of an element of high-quality residential development on the lands, subject to appropriate planning and environmental considerations. It is further considered that such a use would not only contribute to the revitalisation of the town centre as a whole but also support key policy objectives of the Plan in relation to compact growth and infill development.

The draft Plan acknowledges the presence of significant green infrastructure on the site and has incorporated a range of provisions and detailed objectives to safeguard and protect such features.

In relation to accessibility and permeability, the concerns outlined in relation to proposed pedestrian/cycling routes through the grounds of St. David's Church (as outlined in Figure 10.9) are acknowledged. It should be noted however, that such routes are very much conceptual in nature and merely indicate the potential for permeability links at a local level. These routes do not form part of the proposed pedestrian and cycling measures for Naas, as outlined in Table 5.1 and Table 5.2 of the draft Plan.

In relation to potential future uses of the Potato Market, it is noted that the site is in private ownership. However, the Council has secured this as a location for the Farmers Market.

#### CRA 3: Corban's Lane

In relation to the concerns raised about the requirement for active frontages and pedestrian links within the Corban's Lane Shopping Centre Site it should be noted that the design framework is intended to be very much conceptual in nature, reflecting the principles of best practice in urban design. In this regard, reference is made to Figure 10.10 where the diagram key refers to 'potential active frontage insertions' and 'envisaged/potential links'.

In relation to the request for the consideration of car parking a site to the south of the CRA opposite the Corban's Lane Shopping Centre site. It is noted that under the Table 11.3 Land Use Zoning Matrix such a use would be '*permitted in principle*' and the site has also been identified as (PK 2), a relocation space for parking within the town centre. However, any application for planning permission for such a use shall be considered on its own merits, subject to design and planning considerations, as part of the development management process.

#### CRA 4: Rathasker Road

The submission relating to the pedestrian/cycle link along Rathasker Stream is noted. However, as with all the design frameworks for the Core Regeneration Areas they are formulated to be indicative and conceptual in nature, reflecting best practice in urban design. Whilst this proposed route is not included as one of the proposed pedestrian and cycling measures for Naas, as outlined in Table 5.1 and Table 5.2, its presence on the in Figure 10.4.6 provides for this connection to be progressed if applications for re-development of the sites along the route are received within the life of the Plan.

#### CRA 5: Northeast Gateway

In response to the issues raised regarding the proposed development of a landmark building at the junction of the Dublin and Blessington Roads, it should be noted that this does not mean that such a building will be a high rise development. As provided for under the Section

28 Ministerial Guidelines on Buildings and Heights (2018) any proposes for such a building be required to 'successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views'. In this regard, cognisance will also be to the sites prominent location proximate to the boundary of the Naas Architectural Conservation Area.

In relation to the concerns with respect to the Key Design Principles outlined for CRA5 and the consideration of it being redeveloped as a single entity, it should be noted that as outlined in Section 10.4.2 *'the CRAs are designed to act as catalysts for change within the town centre with each area being the subject of a **flexible and responsive** urban design framework to **guide** stakeholders, developers and the Planning Authority.'* Accordingly, it can be seen that the purpose of the CRAs is conceptual in nature with their role being one of guidance in terms of promoting best practice urban design principles should these sites be brought forward for redevelopment within the life of the Plan. The Planning Authority is fully aware of the range of different landowners within each CRA and a degree of flexibility will be applied should a site within the CRA be the subject of a planning application. In this regard, any individual proposal will be considered on its own merits, subject to design and planning considerations, as part of the overall development management process.

#### CRA 6: Canal Quarter

The significant number of submissions received regarding the development proposals for the Canal Quarter is acknowledged. The range and varied nature of often conflicting submissions is further acknowledged. This is considered to demonstrate a high level of interest amongst the public on the future of this critical space within the town of Naas. Whilst it is noted that some submissions do not appear to want any significant redevelopment of the Canal Quarter, the Planning Authority considers that this area represents a critical built and natural heritage asset, which if sustainably and appropriately harnessed can play a crucial role in achieving the sustainable regeneration of the town centre. In this regard, the Planning Authority agrees which submissions which note the potential for the Quarter become a key destination within the town, centred on water-based activities. With regard to provisions of the vacant site levy, the Canal Quarter (apart from the Canal Bank) is located within a designated regeneration lands and will therefore subject to the application of the Vacant Site Levy as provided by objective HCO 1.5 of the draft Plan.

Concerns relating to the overall potential for regeneration within the area to negatively affect the existing green infrastructure and wildlife of the Canal Quarter area noted. However, it is considered that the draft Plan contains a range of objectives aimed at protecting and enhancing the green infrastructure in Naas. Specifically, Objective CQ 1.6 seeks to retain the riparian corridors within the Canal Bank Area, including the Rathasker stream corridor. It should be noted that while the final plans for the Canal Bank itself will detailed by the masterplan for the Northwest Quadrant (to be incorporated into the LAP), the majority of the area will be retained as a public park.

With regard to the development of mooring sites, a marina, a slip-way and other servicing infrastructure, it should be noted that the daft Plan includes provisions to support the development of such water-based activities, subject to planning and environmental considerations. It is further noted that the Canal itself, including the Canal Harbour is under the ownership of Waterways Ireland, who is responsible for its overall maintenance including dredging etc. The draft Plan contains provisions that support cooperation with Waterways Ireland in improving the navigation of the Canal (objective CQ 1.10). Furthermore, it is an action of the LAP for Kildare County Council to liaise with Waterways Ireland regarding

future development proposals for the canal branches and the Canal Harbour. Such consultation would also be undertaken with regard to proposals for the development of new bridge structures across the Canal, the design of which will take in to full consideration issues relating to the present and future navigation of the canal by boat craft.

The Plan considers the potential for houseboats and barges to be moored within the Canal Quarter as not feasible at the moment but that further appraisals should be undertaken to investigate such a possibility over the longer term. Accordingly, issues raised in relation to the permitting and licensing of house boats along with associated servicing infrastructure are considered to be premature.

Submissions relating to the development of the Sallins-Naas Greenway alongside the Canal are noted. The Council widely acknowledges the Greenway as a critical piece of infrastructure for the town in terms of developing active travel patterns and enhancing the role of the canal as a public amenity and tourist attraction. To this end, it is anticipated that the greenway scheme will be progressed through the Part 8 consent process later this year with a view to going to construction in 2022, if the Part 8 is successful.

The draft Plan also acknowledges the future potential of the reopening the Corbally branch of the Canal for navigation of canal vessels (alongside the extension of the Canal Greenway) and contains a number of provisions to support and facilitate its development. It is noted that the culvert on the R445 may need to be replaced with a bridge to allow this to happen. The draft Plan provides support for this through objective MTO 3.8.

The various submissions regarding the proposed future of uses and activities within the Canal Quarter are also acknowledged. It should be noted that this CRA has historically been zoned as Town Centre and therefore the uses being proposed (a mix of Residential and Commercial) would have historically been permitted in principle in the area. As regards requests for specific uses for particular buildings within the Canal Quarter the following is noted:

- Objective EDO 2.7 seeks to investigate the re-use of the Eir Building on Abbey Street for a mix of cultural, community and leisure and our tourist uses.
- Objective URD 1.9 seeks to promote and facilitate the re-use of the existing Naas Library building with an active community use which will complement the vision for the Canal Harbour.

With regards to the specific request to develop an Irish Cultural Centre in the vacant Library Building whilst the exact future use of the building is outside of the remit of this Plan, such would be 'permitted in principle' under the town centre zoning designation of the site. It is further noted that it is the policy of the Plan as detailed in Policy HC4 to facilitate and support a broad range of community, cultural and recreational facilities to serve the needs of the residents of the Plan area and its wider catchment.

In relation to the development of a proposed food or/and cultural within the Canal Quarter, it is considered that such activities would be in keeping with its town centre zoning designation and would also act to attract visitors to the area, a key aim of the Regeneration Strategy.

Regarding the use of other noted buildings such as Market House and the former Canal Warehouse objective URD 1.3 encourages the full utilisation all buildings and sites with due cognisance to quality of urban design, integration and linkages. Uses such a cycling cafes

and bike rental shops within the area would also be encouraged as they assist greatly in the patronage of the Canal Greenway.

The submissions relating to the issue of accessibility and the public realm are noted. Whilst the Draft Plan aims to create a pedestrian friendly environment with the Canal Quarter, it does not seek to completely close-off the area from traffic nor does it seek to create a 'gated community'. Various provisions within the draft Plan place particular emphasis on the idea of creating a high-quality pedestrian environment and public realm with objectives supporting the concepts of share space and an animated waterfront at the Canal Harbour featuring a public plaza. However, it is important to note that the design framework of the CRA is intended to be conceptual in nature, setting out broad principles and design parameters. It is therefore envisaged that specific issues concerning the design of the public realm including options for access, shared space and pedestrianisation will be dealt with as part of the masterplan for the Canal Quarter, as provided for by objective URD 1.10.

On the issue of transportation and connectivity it should be noted that a key provision of the Plan is to secure a high level of integration between the town centre and the Northwest Quadrant (NWQ). Whilst connectivity and links between the Canal Quarter, the NWQ and existing residential areas such as Sarto Park and Abbey Bridge are provided for in the Plan, it is noted that they are very much strategic in nature. It is anticipated that the location, nature and design of such links will be refined in the proposed masterplan for the NWQ which will be incorporated into the LAP by way of a statutory amendment. Similarly, the masterplan will also refine and finalise the nature and layout of the bus priority route and the bus interchange/car park facility on the Canal Bank, along with any potential connection across the Canal. As a statutory amendment to the LAP the masterplan will be subject to the relevant environmental assessments and considerations.

Regarding the issue of the design and massing of new development in the area, the draft Plan seeks to promote the development of high-quality architecture in new build developments, whilst also seeking to protect and enhance the existing built heritage of the area. However, it should be noted that any individual proposal will be considered on its own merits, subject to design and planning considerations, as part of the overall development management process. Issues such as the scale and nature of the surrounding built form will also be taken into consideration.

Specific proposals such as the watch tower on the Canal Bank and the 'Harbour of Lights' initiative are designed to be concepts to animate the area, to encourage activities and to create an attractive designation. Such concepts will be further developed and refined in both the masterplan for the Canal Quarter and the North West Quadrant masterplan.

### Public Realm Strategy

The submissions received in relation to the overall quality and presentation of the public realm within Naas and particularly within the town centre are noted. The draft Plan acknowledges that in many instances the public realm is poor and that this hinders the overall experience and enjoyment of the town by both residents and visitors alike. It is considered that a high quality public realm allows a visitor (tourist, resident shopper, business investor etc.) to have a positive and memorable experience of the town, increasing their potential to linger, spending more time and contributing to the local economy. Therefore, it is considered crucial to the regeneration of the town centre that the public realm needs to become an attractor and a destination in its own right, adding vibrancy and creating



a more active town centre. To this end, objective URD 1.11 of the Draft Plan provides for the preparation of a Public Realm Strategy. Such a strategy will provide for a coordinated programme of investment is required for the town's public realm, which includes its public spaces, parks and streets and recreational infrastructure. It is considered that the tactical urbanism project at Poplar Square provides an example, albeit in a temporary manner, of how an urban design intervention can have a transformation effect on the public realm.

On the issue of transportation and the public realm, it is accepted that the poor quality and layout of the public realm in the town plays a role in reducing the attractiveness for active modes of travel such as walking and cycling. However, it is considered the preparation of a Public Realm Strategy (objective URD 1.11) in combination with the outputs of the Naas/Sallins Transport Strategy (as incorporated into Chapter 5 of the draft Plan) will, when implemented, provide for a general revisioning of the public realm to enable walking and cycling to become a realistic, attractive, safe and convenient alternative to the private car for all short journeys within the town.

The array of suggested interventions in the public realm are noted and acknowledged. It is intended that the Public Realm Strategy will seek to address most if not all of the issues raised, including many of the specific spatial interventions suggested. With regard to the request for standard design template for street furniture, it is envisaged that the Public Realm Strategy will include a bespoke materials palette for the town, including for pavement, signage and street furniture which will complement and enhance the natural and built environment of the town. In relation to the issue of signage, all signs will be visually accessible and as per the Official Languages Act, the Council has a statutory duty to ensure that the Irish language is used in signage.

In relation to the issue overhead wiring, objective IO 4.3 seeks the undergrounding of all electric and telecommunications cabling within the town. Specific measures relating to the closing or restricting of parts of the town centre to through vehicular traffic at particular times is considered to be a traffic management issue and therefore does not come within the remit of the Plan. Similarly the issues of bin servicing and tackling graffiti within the town are considered to be part of day-to-day management issues for the Local Authority and not issues to be addressed through a land-use plan. Regarding the request to provide more electric charging vehicles on Main Street, objective IO 5.4 of the draft Plan provides support for the rolling out of electric vehicle charging infrastructure across the town. Furthermore, it is a provision of the parking strategy (Section 5.5) provides for the installation of additional electric vehicle charging points within public car parks in the town centre.

#### Devoy Barracks Key Development Area (KDA)

The submissions made with regard to the Devoy Barracks KDA are noted. It should be noted that the residential density levels are determined by Section 28 Ministerial Guidelines on Sustainable Residential Development in Urban Areas (DoEHLG, 2009). In this regard, the guidelines provide for the site to be developed at an increased level of density given its central location, proximate to the town centre along with the presence of public transport options within its vicinity.

Development management standards including those relation to open space is not within the remit of the Local Area Plan. The provision for a 15% open space requirement on new residential zoned lands such as the Devoy Barracks KDA is set out in Chapter 17 Development Management Standards of the Kildare County Development Plan 2017-2023.

### Junction 9 (Maudlins) Key Development Area (KDA)

The submissions regarding the provisions within the Plan for this KDA are noted. It should be noted that the design brief for the KDA does not contain the any provisions which support 'high rise' development on the site. It does however seek to regenerate this strategic site to create a high-quality mixed-use (commercial) development that will act as a gateway to the town. In this regard, the overall design of the built form will be of critical importance and it is considered that a best practice urban design response would envisage the creation a high-quality built environment with a strong building edge which would 'announce the town'.

With regard to the potential for traffic congestion being generated the redevelopment of the site, it is considered that the Plan has sufficient safeguards in place as outlined in Section 10.6.2 and objective URD 1.12 which provides for the undertaking of traffic modelling and an access strategy for the site to identify the quantum of development which could be safely facilitated without undermining the capacity and safe functioning of the national roads network, including Junction 9.

In relation to the suggestion about the KDA being an appropriate location for the route of an outer ring road, it is noted that the Plan does not contain any provision for such a proposal as it is considered that the need for such a route does not arise within the six-year timeframe of the Plan.

### Northwest Quadrant

The submissions received in relation to the North West Quadrant (NWQ) are noted. The concerns outlined about the potential ramifications of implementing objective NWQ 1.1(d) which provides that certain planning applications for smaller sections of the NWQ lands would be refused to be considered by the Planning Authority until a masterplan is integrated into the LAP is noted. The intention of NWQ 1.1(d) was to protect strategic development potential of the NWQ from haphazard development over the short term. However, it is further noted that such a safeguarding mechanism is appropriately provided for by NWQ 1.1(a). Accordingly, the request to delete objective NWQ 1.1(d) is accepted.

There appears to be a level of confusion in a number of submissions regarding flood risk within the NWQ and the provisions of the LAP to appropriately deal with the issue. Section 10.7.4 of the draft Plan notes that there is a level of uncertainty relating to flooding within the NWQ and that a more detailed appraisal of flood risk within the area is currently being undertaken by the OPW in conjunction with KCC. This is expected to be completed by the end of 2021. Furthermore, Objective NWQ 1.1 (b) notes that the masterplan cannot be completed until such at time as the OPW Flood Study has been finalised. It is therefore the intention of the Plan the findings of the Flood Study will play a crucial role in determining the nature, location and layout of future development within the NWQ, as detailed by the NWQ masterplan. Regarding the request for public and stake consultation, it should be noted that the OPW Flood Study is a technical analysis which is aimed at providing clearer and more accurate data about the level of flood risk within the area. On the other hand, the draft Plan requires that the masterplan for the NWQ be integrated in to the LAP and this will necessitate an amendment to the plan which includes provision statutory public consultation.

On the issue of safeguarding the existing green infrastructure of the NWQ, including along the Grand Canal Greenway, it should be noted that the draft Plan has been informed by a Green Infrastructure Habitat Survey and Mapping exercise. This in turn informed the development of a range of objectives (Chapter 7 Natural Environment and Climate Change) aimed at protecting and enhance the green infrastructure in Naas. Furthermore the NSQ



lands either fully or partly contain three major green infrastructure corridors (see Map 7.2 Green Infrastructure Corridor Map). It should be noted that the objectives of the draft Plan will require these green infrastructure features to be incorporated into the design and layout of the NWQ masterplan.

In relation to the submissions concerning transportation and connectivity proposals within the NWQ it should be noted that while the overarching principles of promoting sustainable movement within the lands through the provision of high-quality pedestrian and cycling links, the development of a bus priority route and 'park and ride' facilities will remain key to the overall development of the NWQ. Proposals regarding their exact nature, extent and location are still very much conceptual. In this regard it is envisaged the masterplan will play a crucial role in providing greater detail and clarity on such movement proposals and connectivity links.

## Chief Executive's Recommendation

### Proposed Material Alteration

Amend objective EDO 1.9 as follows:

Support and encourage *'living over the shop' initiatives, and* the provision of ground floor live-work units and/or co-working spaces as part of mixed-use and residential developments in appropriate locations, as a means of enlivening streets and to provide flexible accommodation for small businesses and remote working opportunities.

### Proposed Material Alteration

Amend the Urban and Regeneration Strategy to provide support for the Naas Town Renewal Masterplan, as follows:

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.*

*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.*

Amend the heading of existing section 10.5 Public Realm Strategy, as follows:

#### *10.5.1 Public Realm Strategy*

Insert the following new objective after objective URD 1.10 and renumber all subsequent objectives accordingly:

**URD 1.11** *To prepare a Town Renewal Plan to guide the long term regeneration of Naas. This plan will incorporate a Health Check and detailed Urban Design Analysis and implement its recommendations on a phased basis over the lifetime of the Plan and beyond.*

Amend the Objective URD 1.11 as follows:

**URD 1.11** Prepare a Public Realm Strategy ~~for Naas~~, *either as part of, or an action of the Town Renewal Plan for Naas.* ~~s~~Such a strategy shall focus on the identified Core Regeneration Areas and seek to implement its provisions on a phased basis over the life of the Plan and beyond.

Insert the following action into the list of actions outlined in Section 10.8 Urban Regeneration and Urban Development:

- *To work with relevant agencies and stakeholders to prepare a Town Renewal Plan to include a retail health check survey in the town centre and identify actions to support town centre regeneration.*

This proposed material alteration may result in consequential alterations in other sections of the draft Plan.

### Proposed Material Alteration

Amend objective NWQ 1.1, as follows:

**NWQ 1.1** Require the preparation of a masterplan (to be developed in conjunction with relevant environmental/flood risk/transport assessments) for the NWQ giving full consideration to the type and intensity of development relative to future transport options and in particular public transport. The masterplan shall be subject to the considerations and specifications outlined in the Urban Development Strategy detailed in Chapter 10, to ensure that the future development of the Northwest Quadrant takes place in a co-ordinated and integrated manner.

- e) No development shall take place on the lands identified within the Northwest Quadrant (zoned Strategic Reserve ~~or New Residential~~, *New Residential (inc. Phase 2) and Commercial/Residential*) until such time as a masterplan is prepared and integrated into the Naas Local Area Plan by way of a statutory amendment to the Local Area Plan, pursuant to Section 20 of the Planning and Development Act 2000 (as amended).
- f) No masterplan shall be completed until the OPW Flood Study has been finalised for the lands in the Northwest Quadrant.
- g) The masterplan shall include (but not be restricted to):
  - i. A phasing infrastructure programme including physical, social, transport and economic infrastructure.
  - ii. Site-Specific Flood Risk Assessment for the masterplan lands.

- iii. Transport Impact Assessment.
  - iv. Water and wastewater network requirements including assessments regarding the capacity of receiving environments.
  - v. Associated Environmental Assessments and appropriate climate proofing measures
- ~~h) Individual applications for smaller sections of the Northwest Quadrant masterplan lands shall not be considered by the Planning Authority or An Bord Pleanála until the masterplan is integrated into the Local Area Plan in accordance with (a) above.~~

## Chapter 11: Land Use Zoning Objectives and Implementation

### Main Issues Raised

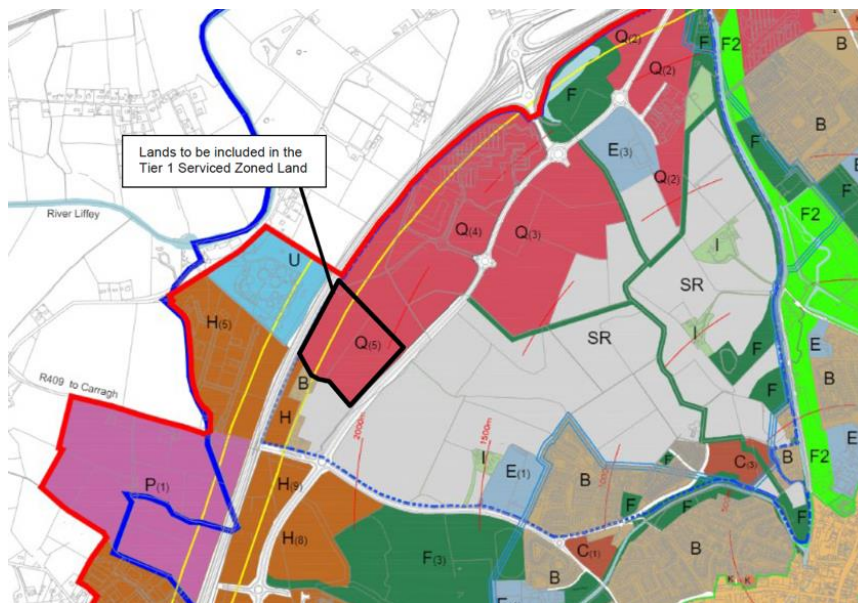
Submission 15, 44, 346, 481, 554, 633, 655 refer.

#### Zoning Requests

One submission considers the freight transport / logistics sector as having the potential to deliver employment growth, however this growth is potentially restricted by proposed land use zoning objectives. The submission notes that 'Heavy Commercial Vehicle Park' is deemed 'open for consideration' under the Q zoning, but contains a note (69) which states *"Any such development within the Northwest Quadrant will need to consider the overall development strategy of high-end office complexes and campus style developments for this area"*. It is also stated that 'Warehouse (wholesale)/Store/Depot' is not permitted in Q zoned lands.

It is stated that if this zoning is to be adopted it would render impossible the development of logistics services and employment within Q - Enterprise & Employment zoned lands and would hinder the growth of DSV in Naas. The submission considers this restrictive land use as contrary to the previous LAP and to the established strategic rationale for the motorway network, as reiterated in TII's submission on the Issues Paper for the Pre-Draft Stage of Kildare County Development Plan 2023 –29. The submission recommends that within 'Q: Enterprise & Employment' zoned lands the land use 'Warehouse (wholesale) /Store/Depot' should continue to be 'open for consideration'.

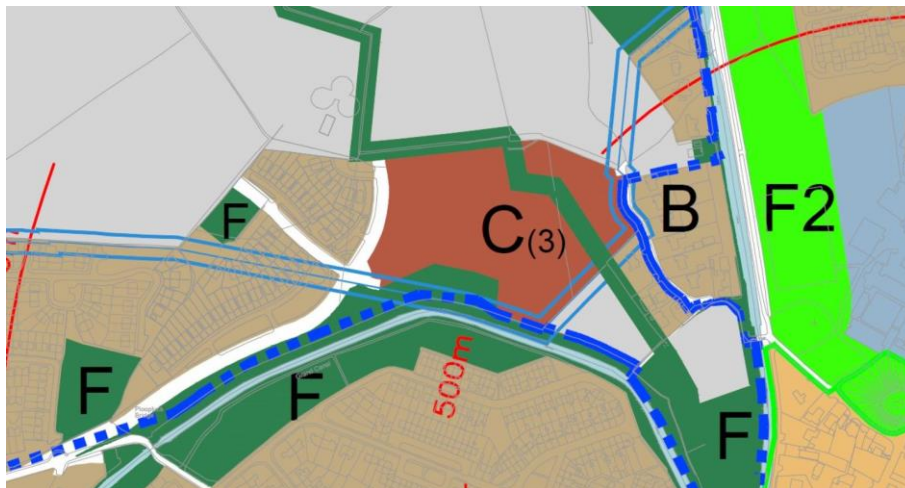
One submission refers to the SPIA and the designation of significant areas of the Q zoned lands within the NWQ as Tier 2. It disagrees with this designation and suggests that Q(5) zoned land should be included in the designated Tier 1 Serviced Zoned Lands. The image below highlights the lands.



One submission refers to lands at Jigginstown which the Draft LAP proposes zoning for a mix of uses including 'P: Data Centre/Warehouse' and 'F: Amenity and Open Space'. The

submission outlines concerns relating to the very restrictive range of uses 'permitted in principle' under the proposed zonings. There are concerns that only data centres are permitted in principle with 'utilities' the only other use 'open for consideration' and that all other uses listed in the matrix now proposed as 'not permitted'. The submission requests that the range of uses currently allowed under the 'I: Agriculture' zoning, be carried over to the 'P: Data Centre/Warehouse' zoning so that if a data centre is not developed, the lands can continue to be used and developed as an agricultural holding in full conformity with planning policy. Further requests that the range of uses 'open for consideration' in the proposed 'P: Data Centre/Warehouse' zoning should be further expanded to allow for similar compatible uses.

One submission requests clarification on a particular aspect of the Land Use Zoning Map. Referring to the image below, the submission notes that the line marked on the left of area zoned B is on a private road and the line above area zoned B is between two private gardens where there is no undeveloped space.



#### Other

One submission refers to section 6.4.5 and states that the Jigginstown location is inappropriate for a data centre, arguing such centres provide little direct employment while occupying large areas of real estate.

Two submission support the provision of a data centre at Caragh Road, considering the site ideal for several reasons that include its proximity to: the existing Millenium Park, Osberstown Business Park and the M7 Business Park; enhanced fibre connectivity in this region; the Osberstown WWTP; and, a range of businesses that may possibly avail of a district heating system.

One submission is concerned about the zoning of lands opposite Caragh Court as New Residential and suggests a local park offers a better use of these lands. It is stated that rezoning of this land contradicts Part V of the Urban Regeneration and Housing Act.

#### New Residential Zoning – C(1) – Caragh Road

There are a significant number of submissions that oppose the zoning of lands opposite Caragh Court as zoning objective C(1) – New Residential (No.174, no.254, no.267, no.285, no.294, no.342, no.400, no.418, no.429, no.449, no.544, no.565, no.566, no.597, no.601, no.606, no.609, no.613 and no.623).



Concerns are raised about further residential development in this area, particularly as the site is in such close proximity to the canal amenity area. Furthermore, there is a perception that the area already has significant residential development and more housing will add to local issues such as traffic and congestion. Several of the submissions suggest such development is not in-line with National policy. It is also suggested there are other, more appropriate uses for this land, such as a public park, given that the area is in need of recreational space and this site could provide such uses. A range of potential amenity uses and community infrastructure that could be catered for on this site are described in several submissions. Reference is made to the CDP, and in particular the provision of community infrastructure, which is considered central to fostering sustainable communities.

This issue was also raised under Chapter 4 'Homes and Communities'.

#### New Residential Zoning – C(19) – Sallins Road

Numerous submissions were received objecting to the zoning of lands at the former DeBurgh estate/demesne as C(19) – New Residential (No.271, no.311, no.359, no.374, no.414, no.426, no.437, no.460, no.464, no.539, no.597, no.640, no.648, and no.700).

Concerns are raised about the potential consequences of this zoning due to the negative impact on already existing traffic issues (particularly on Sallins Road), its associated negative environmental impacts and the perceived concentration of social housing in this area of Naas. Several submissions state that these lands form part of the Green Belt and are, therefore, protected. The area cannot sustain further residential development and any such development would impact on the heritage and amenity value of the surrounding area. It is also suggested that development at this location would be contrary to climate action measures, which are fundamental to the overarching objectives and principles of the LAP. A number of the submissions request that new residential developments are focused on brownfield sites. Several further suggestions are made for these lands, including that these lands are instead zoned F: Strategic Open Space, that the green belt zoning is reinstated, and that if residential development is to occur, it should be low-density and age-friendly.

#### F2: Strategic Open Space

Submission no.327 and no.494 request the lands zoned as SR - Strategic Reserve, between the canal and Finlay Park/Caragh Court, are instead zoned F: Open Space and Amenity with a special objective included that the lands be reserved for a future town park. It is stated that there is an urgent need to provide spaces for outdoor recreation and leisure, particularly in the aftermath of the pandemic where the importance of such outdoor recreational spaces was emphasised. These lands offer an ideal location for a park that services the community.

#### New Residential Zoning – C(16) - Kingsfurze

Submission no.206 and no.383 oppose the zoning of lands adjacent to Naas Racecourse as C(16) – New Residential as it breaks the links between existing green areas which form a wildlife corridor into the town. It is suggested the current use as an open green space is retained.

#### Data Centre/Warehouse – P(2)

Submission no.116 objects to P(2) – Data Centre/Warehouse zoning objective for lands at Caragh Road South. Concerned that such a zoning is not compatible with the residential use of properties that adjoin these lands. Notes these lands were not previously subject to industrial zonings. Suggests areas of land around Junction 10 as more suitable for data centre development, given the energy and infrastructural requirements. It does not appear that the SEA has adequately assessed the environmental implications of the proposed new 'P' – Data Centre zoning. Requests the removal of this zoning objective for these lands.

Lands zoned F(2) south of Kilcullen and Ballymore roundabouts

Submission no.589 acknowledges the progressive stance in planning for green spaces and amenities, specifically in relation to the area zoned F(2). The submission considers the Open Space and Amenity zoning for these lands are the most suitable as there are many challenges other zonings would face, such as topography, existing floodplains, the biodiversity of the land and unsuitable surrounding transport infrastructure. The submission suggests lands to the east of F(2) has potential to become another lake, improving wellbeing, wildlife, plant life and a reservoir taking advantage of a floodplain. Also recommends developing walkways that could enhance the area's amenity value.

Office, Enterprise and Employment Zoning – Q(6)

Submission no.597 suggests Old GAA land on Dublin Road is more suited to residential.

Lands south of Mill Lane Nursing Home

Submission no.597 suggests land south of Mill Lane nursing home should be designated as amenity and green space for allotments.

Request for lands northeast of Newhall to be considered for Commercial use

Submission no.350 requests that approximately 10-15 acres of land northeast of the proposed roundabout at Newhall be considered for commercial zoning to facilitate 100+ jobs moving from Dublin to Kildare. The lands in question are not specified in the submission.

## **Chief Executive's Opinion**

The request in relation to the 'Q' land use zoning objectives is noted, as is the potential employment generating capacity of the logistics industry. The objective of lands zoned Q: Enterprise and Employment is to provide for and facilitate the provision of high job-generating uses. The mix of uses 'permissible in principle' and 'open for consideration' under this zoning objective is considered appropriate for this objective in terms of compatibility of uses with industry. The proposed modifications to the zoning matrix would closer align the Q: Enterprise and Employment zoning with the H: Industry and Warehousing zoning. It is considered appropriate to retain different land use objectives through the zoning matrix, particularly in this instance to protect the functions of lands zoned Q for higher order uses, and to ensure lands are available for different development uses.

The Council notes the request that Q(5) zoned land should be included in the designated Tier 1 Serviced Zoned Lands. As is noted within the LAP, the zoning of lands for economic development has been informed by the SPIA which accompanies the LAP. A range of employment uses are generally 'permitted in principle' or 'open for consideration' across a range of land use zonings. This Plan seeks to guide enterprise and employment development to appropriate locations by identifying specific economic clusters, which takes cognisance of the requirements of the different enterprises. The areas have been carefully selected to ensure the land use objectives are compatible with the wider area and that adequate land has been zoned for enterprise to grow and develop.

Regarding the submission that relates to lands zoned P: Data Centre/Warehouse, Kildare County Council uses the Generalised Zoning Types (GZT) which represents a consistent scheme for categorising land use zonings across all local authorities. There is no specific category for the zoning of land for data centres. However, Warehouse (C4) is a sub-category of Commerce/Industry/Enterprise/Economic Development where the primary use would be the storage of equipment. At its core, a data centre is a centralised location that houses the computing and network equipment required to collect, store, process, and distribute large



amounts of data. This zoning objective is to facilitate data centres only and warehouses are not permitted, as stipulated in the Zoning Matrix. In the interest of clarity, and as recommended in response to the submission from the NTA, it is proposed to amend the GZT associated with the data centre sites to 'P: Data Centre' (C7).

The submission that suggests the Jigginstown location is inappropriate for data centre zoning has been noted. Similarly, the submissions that are supportive of the provision of a data centre zoning at Caragh Road have been noted. As previously highlighted in this report, the zoning of lands for economic development has been informed by the SPIA which accompanies the LAP. A range of employment uses are generally 'permitted in principle' or 'open for consideration' across a range of land use zonings. This Plan seeks to guide enterprise and employment development to appropriate locations by identifying specific economic clusters, which takes cognisance of the requirements of the different enterprises. The areas have been carefully selected to ensure the land use objectives are compatible with the wider area and that adequate land has been zoned for enterprise to grow and develop.

The concerns raised in relation to the zoning of lands opposite Caragh Court as New Residential are noted. Chapter 4 of the LAP sets out the adequacy of the quantum of lands zoned for residential development to meet the requirements of the County Development Plan Core Strategy, as informed by national and regional policy. Residential zonings have regard to policy context, sequential approach, physical suitability and supporting infrastructure.

#### New Residential Zoning – C(1) – Caragh Road

In order to provide an adequate housing supply over the Plan period to implement the core strategy, new housing lands must be brought forward at locations which are serviced, accessible and sequential from the town core. The subject site is located within the CSO defined urban boundary and it is a requirement of the National Planning Framework (NPF) that at least 30% of all new housing units must be delivered within the existing built-up footprint of the town. This is in the interests of achieving compact growth which is in accordance with the principle of sustainable development.

Appendix 3 of the National Planning Framework sets out a methodology for a Tiered Approach to land zoning (which is reflected in the Sustainable Planning Infrastructure Assessment (SPIA) which accompanies the Draft LAP). Such an approach is set out to ensure that the lands zoned within an LAP are Tier 1- Serviced or Tier 2- Serviceable (within the life of the Plan). In order to assess the suitability of particular lands in Naas for future development and the potential timeline for such lands to be brought forward a SPIA was prepared to provide an evidence-based assessment to inform the future development strategy for Naas. The SPIA is an evidence based assessment to assess both the presence of physical and social infrastructure servicing various residential sites in addition to assessing a particular sites compliance with the National Strategic Outcomes and National Policy Objectives of the NPF and Regional Policy Objectives of the RSES including proximity to the town centre (i.e. the sequential approach) and percentage requirements around achieving compact growth. The principles underlying the SPIA approach are as follows:

- National/Regional/Local Policy Context (i.e. the NPF, RSES, County core strategy)
- Section 28 Ministerial Guidelines
- Flood Risk data
- Compact Growth/Sequential approach
- Physical suitability i.e. landscape and environmental features/constraints

- Supporting infrastructure (social, community and commercial, both existing and planned)
- Water, drainage and road infrastructure (existing and planned)

The lands subject to C (1) – New Residential zoning were assessed in the context of the principles above and were considered as an appropriate and suitable location for new residential development in the Draft Naas Local Area Plan 2021-2023 in the context of the NPF, RSES and their national and regional strategic outcomes with particular reference to compact growth. The SPIA has designated these lands as Tier 1, which are described in the NPF as *“Serviced Zoned Land, comprising lands that are able to connect to existing development services for which there is service capacity available and can therefore accommodate new development”*.

The subject site was previously zoned Existing Residential (B) in the Naas Development Plan 2011-2017. The specific objective of this zoning was to provide for *“appropriate infill residential development and to provide for new and improved ancillary services.... the primary aim...to preserve and improve residential amenity and to provide for further infill residential development at a density that is considered appropriate to the area”*. Therefore, while the objections to the zoning changing to New Residential are noted the precedent for residential use on this land is long established.

With respect to the various suggestions for potential amenity uses on the subject site, the proposed zoning allows for other uses as either ‘permitted in principle’ or ‘open for consideration’. Any application for such uses would be assessed on their own merits having regard to the proper planning and sustainable development of the area. The concerns in relation to the need for open green spaces in Naas are noted. The importance of retaining existing green open space for reasons relating to peoples’ health and wellbeing as well as for biodiversity is acknowledged by the Council and is a prominent feature of the draft LAP. It is a priority of the Council that any potential future residential developments will occur in tandem with the delivery of the necessary supporting social and community infrastructure. Indeed, Objective CSO 1.5 states that it is an objective of the Council to *“support the delivery of supporting physical and social infrastructure to support all residential development”*. Similarly, Objective HCO 1.1 seeks to *“support new residential development and infill development that occurs in tandem with the delivery of supporting physical and social infrastructure”*. Furthermore, Policy HC4 outlines the Council’s commitments to providing for community, sports and recreational facilities throughout the lifetime of the plan. This policy contains a range of objectives that seek to ensure the delivery of, and access to, open space, amenity and recreational areas for all of the town’s residents.

No change recommended.

#### New Residential Zoning – C(19) – Sallins Road

Appendix 3 of the National Planning Framework sets out a methodology for a Tiered Approach to land zoning (which is reflected in the Sustainable Planning Infrastructure Assessment (SPIA) which accompanies the Draft LAP). Such an approach is set out to ensure that the lands zoned within an LAP are Tier 1- Serviced or Tier 2- Serviceable (within the life of the Plan). In order to assess the suitability of particular lands in Naas for future development and the potential timeline for such lands to be brought forward a SPIA was prepared to provide an evidence-based assessment to inform the future development strategy for Naas. The SPIA is an evidence based assessment to assess both the presence of physical and social infrastructure servicing various residential sites in addition to assessing a particular sites compliance with the National Strategic Outcomes and National Policy Objectives of the NPF and Regional Policy Objectives of the RSES including proximity

to the town centre (i.e. the sequential approach) and percentage requirements around achieving compact growth. The principles underlying the SPIA approach are as follows:

- National/Regional/Local Policy Context (i.e. the NPF, RSES, County core strategy)
- Section 28 Ministerial Guidelines
- Flood Risk data
- Compact Growth/Sequential approach
- Physical suitability i.e. landscape and environmental features/constraints
- Supporting infrastructure (social, community and commercial, both existing and planned)
- Water, drainage and road infrastructure (existing and planned)

The lands subject to C (19) – New Residential zoning were assessed in the context of the principles above and were considered as an appropriate and suitable location for new residential development in the Draft Naas Local Area Plan 2021-2023 in the context of the NPF, RSES and their national and regional strategic outcomes with particular reference to compact growth. The SPIA has designated these lands as Tier 1, which are described in the NPF as *“Serviced Zoned Land, comprising lands that are able to connect to existing development services for which there is service capacity available and can therefore accommodate new development”*.

The concerns in relation to an ‘over-concentration’ of social housing in particular areas are noted. The draft LAP contains a range of policies and objectives that support the balanced and sustainable delivery of housing and promote sustainable communities. Objective CSO 1.2 seeks to monitor the scale, type, tenure and location of constructed and permitted developments, ensuring they comply with the LAP and achieve the delivery of plan-led, coordinated and balanced development. Furthermore, Policy HC2 directly addresses residential density, mix and design, outlining the Council's approach to the delivery of social housing and emphasising the Council's support for the delivery of a range of residential units to meet the needs of all residents.

In terms of the suggestions to prioritise new residential development at brownfield sites, the LAP promotes the concept of compact growth and sustainable development, in-line with National policy. The draft LAP encourages the development of infill and brownfield sites, with specific objectives such as HCO 1.3 and HCO 2.1 examples of this. The approach to new residential zoning is detailed in section 3.4 of the draft LAP. As stated, consolidation and infill development underpins the development strategy of the LAP, in accordance with NPF Objective 1 (Compact Growth). Indeed, 30% of all new housing units must be delivered within the existing footprint of the town, which is the case for all Tier 1 designated residential zonings. Due to the nature of residential development and the need to meet the targeted population and residential units, there is a requirement for greenfield development, provided it occurs in a manner that consolidates the existing urban footprint.

Concerns over the potential impact on existing transport and congestion issues on Sallins Road are noted. The Naas-Sallins Transportation Strategy was prepared with the objective to promote the improvement of public transport in terms of access and convenience. However, it also recognised that commuter traffic can only be moved away from the road network by the development of public transport that has sufficient capacity and a good level of service combined with good quality access and convenience. Whilst capacity and level of service are not controlled by the Local Authority, the Naas/Sallins Transport Strategy (NSTS) does press for their improvement and offers ideas on how this might be achieved.

Furthermore, the NSTS recognises the significant role that active travel modes can and will play in reducing the reliance on private cars and in improving overall transportation within Naas. The draft LAP contains a range of proposals aimed at improving active travel infrastructure and the overall transport network. In this respect, the lands proposed as C(19) – New Residential are seen as a medium to long term objective and one that should occur in tandem with the delivery of the Naas to Sallins greenways for pedestrian and cycle movement. As such, it is envisaged that these active travel measures will significantly reduce the pressures currently experienced on the road network, including the Sallins Road.

No change recommended.

#### F2: Strategic Open Space

The request that lands in the Northwest Quadrant (NWQ) zoned SR – Strategic Reserve are instead zoned F: Open Space and Amenity are noted, as are the suggestions of the importance of open space and amenity areas. The important role that green open spaces and recreational areas play in relation to peoples' health and wellbeing, as well as for biodiversity, is acknowledged by the Council and is a prominent feature of the draft LAP. It is a priority of the Council that any potential future residential developments will occur in tandem with the delivery of the necessary supporting social and community infrastructure, see Objective CSO 1.5, Objective HCO 1.1 and Policy HC4.

Equally, the important future role that lands designated as Strategic Reserve will play cannot be overstated. The lands identified as Strategic Reserve lands represent an opportunity for the future strategic growth within the NWQ, consolidating and connecting the employment arc with the town centre and realising the roads objective for a Bus Priority Route through these lands. The Strategic Reserve designation seeks to protect such lands from inappropriate forms of development which would impede the orderly and efficient expansion of the urban settlement, while also waiting for the finalisation of the Naas Flood Relief Scheme which affect these lands. These lands will be subject to a masterplan for the overall area on completion of the Flood Relief Scheme currently being undertaken on the NWQ (see Chapter 9). The development of these key lands is crucial to unlocking the potential for Naas as both the County Town and as a Key Town in the RSES. In order to protect the integrity of these lands and to ensure their development is plan led, no development shall be permitted on lands zoned either New Residential or Strategic Reserve until the masterplan is prepared (informed by the Naas Flood Relief Scheme currently being progressed) and integrated into the local area plan by way of a statutory amendment (See Chapter 10, Objective NWQ 1.1).

No change recommended.

#### New Residential Zoning – C(16) - Kingsfurze

The submission objecting to New Residential zoning C (16) and its request to retain the lands for their current open space use is noted.

Appendix 3 of the National Planning Framework sets out a methodology for a Tiered Approach to land zoning (which is reflected in the Sustainable Planning Infrastructure Assessment (SPIA) which accompanies the Draft LAP). Such an approach is set out to ensure that the lands zoned within an LAP are Tier 1- Serviced or Tier 2- Serviceable (within the life of the Plan). In order to assess the suitability of particular lands in Naas for future development and the potential timeline for such lands to be brought forward a SPIA was prepared to provide an evidence-based assessment to inform the future development strategy for Naas. The SPIA is an evidence based assessment to assess both the presence

of physical and social infrastructure servicing various residential sites in addition to assessing a particular sites compliance with the National Strategic Outcomes and National Policy Objectives of the NPF and Regional Policy Objectives of the RSES including proximity to the town centre (i.e. the sequential approach) and percentage requirements around achieving compact growth. The principles underlying the SPIA approach are as follows:

- National/Regional/Local Policy Context (i.e. the NPF, RSES, County core strategy)
- Section 28 Ministerial Guidelines
- Flood Risk data
- Compact Growth/Sequential approach
- Physical suitability i.e. landscape and environmental features/constraints
- Supporting infrastructure (social, community and commercial, both existing and planned)
- Water, drainage and road infrastructure (existing and planned)

The lands subject to C (16) – New Residential zoning were assessed in the context of the principles above and were considered as an appropriate and suitable location for new residential development in the Draft Naas Local Area Plan 2021-2023 in the context of the NPF, RSES and their national and regional strategic outcomes with particular reference to compact growth. The SPIA provided an assessment of each potential development site in the LAP area. Lands deemed by the SPIA to have a 'medium to high' or 'medium' level of serviceability rating were categorised as 'Tier 2'. These lands can be described as serviceable land, comprising lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the life of the Plan or where there are planned infrastructure upgrades. In such instances the sites were considered to achieve a moderate status on sustainable planning criteria also.

Policy URD1 seeks to promote the implementation of the Regeneration and Urban Development Strategy to ensure that planned growth for the town occurs in a sustainable and sequential manner while prioritising a low carbon, compact, consolidated and connected pattern of development in order to realise a vibrant and regenerated town centre. An objective (URD 1.14) of this policy requires the completion of the Gallops Avenue (MTO 3.2) in advance of or in tandem with the development of the new residential lands, C (16) to the west of Naas Racecourse. In this respect, the development of the subject lands will not occur until such a time as proposals for Gallops Avenue are accepted. Therefore, the delivery schedule for these lands is considered Medium-Long Term.

The potential role that greenfield sites and open spaces fulfil with respect to biodiversity and the natural environment are acknowledged in the LAP. Concerns in relation to developing sites such as that which is subject to C (16) zoning are noted. However, the LAP outlines the significant steps that KCC propose taking to protect and enhance biodiversity and habitats for flora and fauna throughout Naas. As outlined in section 7.3 of the LAP, the nine Green Infrastructure Corridors have been identified in the Habitat Survey and subsequent mapping of Naas. In most cases these green infrastructure routes connect to each other and the wider landscape outside of the Naas local area plan boundary. The selection of the Green Infrastructure Corridors included the consideration of the value that these areas have in terms of providing habitats for plants and wildlife. The purpose behind the identification of Green Infrastructure Corridors is to highlight the need for developers to be aware of the sensitivity of the particular areas and to consider the retention of natural features and their linkages to the wider area in any development proposal. The identified corridors are an attempt to safeguard the flora and fauna of Naas, while also facilitating sustainable growth and development to ensure Naas can meet the needs of its residents, as well as its wildlife.



No change recommended.

#### Data Centre/Warehouse – P(2)

Land use zoning objective P: Data Centre has been applied to two sites within the Naas LAP area, both of which are considered suitable for land extensive development. The zoning of lands for economic development has been informed by the SPIA, thereby applying an evidence-based approach to such designations, including data centre zoning. The LAP seeks to guide enterprise and employment development to appropriate locations by identifying specific economic clusters, which takes cognisance of the requirements of the different enterprises. The areas have been carefully selected to ensure the land use objectives are compatible with the wider area and that adequate land has been zoned for enterprise to grow and develop.

The digital economy is an increasingly important part of the overall Irish economy, providing for thousands of high-skilled jobs throughout the country. The LAP seeks to promote Naas as a destination capable of attracting and retaining high-skilled, digital economy employment. A key part of facilitating growth in the digital economy is through the provision of supporting infrastructure, such as data centres. Data Centres by their nature, are trending towards hyper scaled units and are land extensive and energy hungry developments and can have differing locational requirements depending on the type of data accessibility speeds they cater for. All Data Centres have common infrastructure requirements such as access to high voltage electricity lines, high powered fibre optic cables, good site security and accessibility. It is for these reasons that the lands subject to the P(2): Data Centre zoning objective have been selected. As per Objective EDO 1.12, data centre development will be facilitated at these lands, subject to appropriate environmental and transport impact assessments.

Kildare County Council uses the Generalised Zoning Types (GZT) which represents a consistent scheme for categorising land use zonings across all local authorities. There is no specific category for the zoning of land for data centres. However, Warehouse (C4) is a sub-category of Commerce/Industry/Enterprise/Economic Development where the primary use would be the storage of equipment. At its core, a data centre is a centralised location that houses the computing and network equipment required to collect, store, process, and distribute large amounts of data. However, in the interest of clarity it is proposed to amend the GZT associated with the data centre sites to 'P: Data Centre' (C7).

#### Lands zoned F(2) south of Kilcullen and Ballymore roundabouts

The submission in support of land use zoning F (2): Open Space and Amenity for lands south of Kilcullen and Ballymore Eustace roundabouts is noted. As stated in the LAP, the proposed zoning objective for these lands will seek to enable the development of a proposed active recreation area catering for the area's future population. The development of such facilities shall include the provision of strong links to existing and future residential lands in the surrounding area, as well as the development of the old Naas-Baltinglass/Tullow railway line Greenway. It is the intention of the Council to improve and enhance the range of green spaces and natural amenities in Naas. There are several policy objectives contained within the LAP that seek to increase, enhance and protect linkages between open space areas and other important 'green' spaces. See Objectives NE 1.1, NE 4.1, NE 4.2, NE 4.3 and NE 4.4.

With regard to the suggestion to extend the F zoning to the east of the subject lands in order to develop an amenity lake area, while acknowledged it should be noted that these lands exist outside of the LAP boundary.

No change recommended.

Office, Enterprise and Employment Zoning – Q(6)

The suggestion that the Old GAA land on Dublin Road are suited for residential development is noted. Chapter 3 of this LAP establishes the approach to residential land zoning which has been based on an assessment of future population and housing targets and has been framed in the context of the CDP, RSES and NPF. It also sets out the process by which potential development areas were identified and examined in detail in terms of their suitability for development. Phasing arrangements for the delivery of development are also provided for, to ensure development is delivered at an appropriate pace. The subject lands are not required to meet the requirements of the CDP Core Strategy as sufficient other lands have been identified for development and are considered more appropriate having regard to policy context, sequential approach, physical suitability and supporting infrastructure. No change recommended.

Lands south of Mill Lane Nursing Home

The submission suggesting land south of Mill Lane nursing home is designated as amenity and green space for allotments is noted. The lands on which the Mill Lane Nursing Home is based are zoned E: Community and Education. The proposed zoning allows for other uses as either 'permitted in principle' or 'open for consideration'. The zoning objective seeks to provide for education, recreation, community and health. Any application for such uses would be assessed on their own merits having regard to the proper planning and sustainable development of the area. The lands directly south of the nursing home are zoned B: Existing/Infill Residential, accounting for the already existing residential estates, while the lands to the west of the nursing home are zoned F2: Strategic Open Space.

It is the intention of the Council to improve and enhance the range of green spaces and natural amenities in Naas. There are several policy objectives contained within the LAP that seek to increase, enhance and protect linkages between open space areas and other important 'green' spaces. See Objectives NE 1.1, NE 4.1, NE 4.2, NE 4.3 and NE 4.4.

No change recommended.

Request for lands northeast of Newhall to be considered for Commercial use

The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) require the strategic function of national roads is maintained. Junction 10 has been recently upgraded as part of the M7 Naas-Newbridge Bypass Upgrade Scheme and the Council are required to protect the value of the investment by ensuring land use zonings in proximity to the motorway and their interchanges do not impact the strategic capacity and safety of the national road network. Therefore, additional zoning of lands at this location is not considered in the interest of proper planning and sustainable development of Naas.

The draft Plan has zoned a considerable amount of land to accommodate a variety of floorspace scenarios to ensure Naas has the ability to increase its employment base given its status as a Key Town.

No change recommended.

**Chief Executive's Recommendation**

**Proposed Material Alteration**

Amend the title of the P: Data Centre /Warehouse (C4) to 'P: Data Centre' (C7) and any consequential amendments.



Amend table 11.1 from P: Data Centre /Warehouse (C4) to P: Data Centre (C7)

Amend Table 11.1.1 from P: Data Centre /Warehouse (C4) to P: Data Centre (C7)

**EDO 1.12** Facilitate the location of Data Centre development on land designated P: Data Centre/~~Warehouse~~ at Caragh Road South and Jigginstown for the identified land use only subject to appropriate environmental and transport impact assessments.

## Miscellaneous

### Main Issues Raised

Submissions 326, 373, 457, 531, 577, 665,

#### Relevance/Accuracy of the LAP and Associated Plans

One submission argues the NPF and RSES are not fit for purpose, in terms of their relationship to the LAP, as they precede the Covid-19 pandemic. These documents fail to reflect the trends in house building being experienced in Naas, which having stalled for several years are now on upward trajectories, with Naas one of the leading towns in the country.

One submission suggests the LAP does not sufficiently account for the 'explosion' in housing developments in Naas over recent years. The suggestion is that there has not been adequate delivery of infrastructure to accommodate this growth in housing, particularly in terms of public transport provision and social/community infrastructure.

#### Scope of the LAP

A significant number of submissions state that the geographical area covered by the LAP must only incorporate Naas itself and not overlap with other areas. These submissions raise concerns about the LAP going to "full council", suggesting that the LAP should only be voted on by Naas MD Councillors.

One submission suggests that Sallins and Johnstown are included within the LAP boundary as they effectively function as part of Naas.

#### Community Engagement and Public Consultation

One submission highlights the importance of engagement with the broader community to ensure 'sectional interests do not dominate narrative'. Regular communication would ensure everyone is informed and engaged. The submission also suggests better assimilation of new residents within the community, as they can make outstanding contributions.

One submission requests consultation with communities in Sallins on any proposals for the Osberstown area and requests Sallins be considered as a location for future post-primary school developments.

In a similar respect, one submission requests the Council commit to allowing further public consultation on any proposed actions, particularly those not requiring Part 8.

#### Other

One submission believes sites labelled in the SPIA do not tally with the LAP. It should be rectified as it is misleading.

Several submissions suggest more can be done to promote the Irish language, within the LAP. It is important the language is visible and more accessible to the community.

One submission suggests the LAP should utilise more visuals, sketches and diagrams.

Submission no.31 considers the LAP timeframes as vague and lacking ambition, suggesting specific dates and designated owners of each goal.

## **Chief Executive's Opinion**

### Relevance/Accuracy of the LAP and Associated Plans

The submission suggesting the NPF and RSES are not fit for purpose, as they precede the Covid-19 pandemic, is noted. The hierarchy of planning frameworks places the NPF and RSES above the LAP, with the LAP required to adhere to the overarching aims and objectives of these higher-level frameworks. It is beyond the scope of the LAP to suggest amendments to either the NPF or RSES.

Sections 3.2, 3.3, 3.4 and 3.5 of the LAP outline the processes involved in understanding future housing targets, residential land requirements, the approach to new residential zoning and the residential capacity of Naas. The understanding of the existing residential landscape and the future housing needs contained within the LAP is informed by the NPF, RSES, CDP, as well as dedicated background assessments such as the Sustainable Planning and Infrastructure Assessment (SPIA), Social Infrastructure Assessment (SIA) and Transport Strategy.

### Scope of the LAP

The submissions questioning the geographical extent of the LAP are noted.

The submissions suggesting that voting on the Naas LAP must not go 'to full council' are noted.

### Community Engagement and Public Consultation

The submissions relating to public consultation area noted. Statutory public consultation for an LAP is governed by the provisions of Section 20(3) of the Planning and Development Act 2000 (as amended). The legislation stipulates that a draft plan must be made available for inspection at a for a period of not less than 6 weeks, and that submissions or observations in respect of the proposal made to the planning authority during such period shall be taken into consideration. With regard to any potential future development proposals, including Part 8 development, any such proposals are subject to statutory public consultation guidelines.

### Other

The Council notes the submission which suggests sites labelled in the SPIA do not tally with the LAP. Any such misrepresentations or minor errors will be rectified.

With regard to the suggestion for greater promotion of the Irish language, Kildare County Council is committed to supporting the growth of the Irish Language. The Kildare County Development Plan 2017-2023 (CDP) which the LAP must adhere to encourages the use of the Irish Language in our county's shop fronts similarly it requires that names of residential and other developments shall include the use of the Irish Language. As per the Official Languages Act the Council has a duty to ensure that the Irish language is used in signage.

The submission suggesting greater utilisation of visuals, sketches and diagrams is noted. The planning authority continuously seeks ways to improve the visual presentation and accessibility of its published plans and associated documentation.

The suggestion that the LAP timeframes are vague and lacking ambition, requiring specific dates and designated owners of each goal, has been noted.

## **Chief Executive's Recommendation**

No changes recommended.

## Supplementary Reports

### Summary of Issues Raised

#### SPIA

Submissions 346 and 357 apply.

One submission indicates that the SPIA is reasonable and coherent, and that it should inform more of the transport and zoning strategy.

Submission 346 notes that the SPIA concludes that “the 15 employment sites examined have the potential to be developed for economic uses during the lifetime of the Plan.” The submission States that the SPIA does not provide a detailed analysis of each of the sites considered or a clear rationale for the tiering allocated to sites. With respect to the Northwest Quadrant (NWQ) the submission notes that much of the Q lands are allocated a Tier 2 phasing. In this regard, the submission notes that the SPIA references sites having “no existing access infrastructure, in addition to other environmental constraints” and alludes to an opaque “planning and serviceability weighting” in assigning a tiering to lands. The submission submits that in the absence of greater detail, it is impossible to interrogate the rationale for this tiering. It also notes that the NWQ benefits from very significant infrastructural and servicing investment including, the new interchange (junction 9a), the M7 widening scheme/Sallins Bypass, the upgrade of the Osberstown WwTP and the enabling infrastructure (roads and services) within the NWQ. The submission states that significant areas of the Q zoned lands within the NWQ including ‘Q5’ are suitable for immediate development. Notes that the draft LAP states with regard to a significant area of the NWQ: *“The employment lands are strategically located alongside the M7 motorway between junctions 9a and 10 and have the necessary infrastructure to facilitate development.”* This submission concludes by recommending that Q(5) zoned land should be included in the designated Tier 1 Serviced Zoned Lands.

Submission 357 requests site identified as C (5) to be redesignated at Tier 1 lands and the Plan does not provide a justification as to why the lands have been downgraded to Tier 2. The submission also refers to lands that are zoned over previous plans that have not delivered housing. The lands are been described as ready to go lands.

- The northern portion of the Colivet Family lands are partly zoned New Residential (C5) but are designated Tier 2 in the Draft NLAP.
- However, the Sustainable Planning and Infrastructural Assessment rated these lands the 6th highest in terms of the infrastructure assessment and specifically identifies them as Tier 1 lands on this basis.
- Submit that the land (C5) be redesignated as Tier 1 as they are ‘ready to go’ in terms of infrastructure.
- Of the 10 sites identified as Tier 1, two have been downgraded (C5 and C11). Tier 2 lands have been upgraded (C7, part of C8, C10, C15, C16) which are all equal or further out from the town centre than (C5).

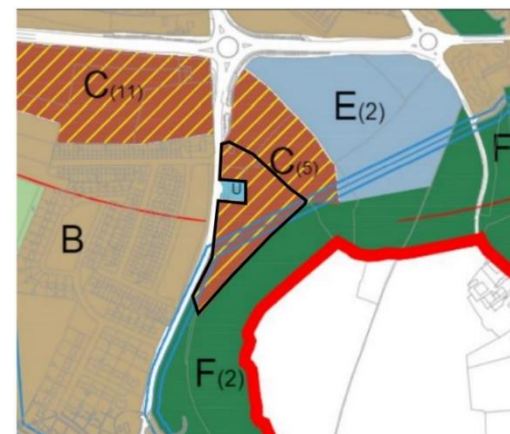


Fig No.4 Subject lands zoned New Residential, Tier 2.

- No justification in the draft NLAP or the associated supporting documents as to why the subject lands have been downgraded to Tier 2 lands.
- There are lands zoned for residential development, Tier 1 over multiple Naas plans and have never been the subject of any planning applications which suggest the landowners may have no appetite to act on these residential zonings. Such as Site C11. These lands needs serious consideration, particularly when there are other lands, such as C5, where the owner is ready to seek planning for housing.
- Under Circular PL 8/2016: Sites in key demand areas, that have been zoned for many years, are ready-to-go but are not being made available for development but which are counted as part of core strategy development potential calculations, should be examined critically to determine whether other similar well-located and ready-to-go but unzoned lands should be considered as alternative zoned lands, where the prospects for making available for development of such alternative lands are better.
- Moylan Engineering Statement attached to the submission. Statement confirming that the subject site is 'ready to go' in terms of infrastructure.
- Irish Water pre-connection enquiry response that 200 residential units can be facilitated on the wider landholding. Attached to submission.

### Appropriate Assessment

Submission 339 refers.

It is stated in this submission that the Appropriate Assessment has failed to identify the potential impacts of the RD3 / RD3A on the Grand Canal pNHA / Oldtown Water Gardens / Wetlands. It is argued there are "significant effects" to the NHA / Canal Corridor / Public Realm and Watercourses and local bio-diversity and the AA screening report has failed to identify these potential effects on flora, fauna, protected species etc. The Arup Assessment report states that there is 'no likely significant effects' identified for Objectives NE 1.2, 1.3, 1.4, 1.6 and 2.1. This AA report is not considered credible.

## **Chief Executive's Opinion**

### SPIA

In order to assess the suitability of particular lands in Naas for future development and the potential timeline for such lands to be brought forward a Sustainable Planning and Infrastructural Assessment (SPIA) was prepared to provide an evidence-based assessment to inform the future development strategy for Naas (as per the Methodology outlined in Appendix 3 of the NPF).

The principles underlying the SPIA approach are as follows:

- National/Regional/Local Policy Context (i.e. the NPF, RSES, County core strategy)
- Section 28 Ministerial Guidelines
- Flood Risk data
- Compact Growth/Sequential approach
- Physical suitability i.e. landscape and environmental features/constraints
- Water, drainage and road infrastructure (existing and planned)

A range of potential sites were identified which were further examined in terms of their suitability for zoning. Whilst various sites may present well in terms of proximity to the motorway, many were identified as having uncertainty around flood risk, did not represent consolidation of the urban form or were not serviced by public transport infrastructure.

It is important to note in response to submission 357 that the lands have not been downgraded to Tier 2 but are categorised as Tier 1 lands in the SPIA. However, they have been zoned as Phase 2 lands as the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development which are considered more appropriate having regard to policy context or have existing planning permission or are state owned land which can enable the delivery of social housing.

It is also important to note that as a result of changes in national legislation since the adoption of the Naas Development Plan 2011-2017 under the Urban Regeneration and Housing Act 2015 (as amended) allows for active land management of sites that are zoned for residential use through the application of the vacant site levy. This represents part of a continued shift in national policy towards active land management within our urban settlements, giving the Council the ability to actively pursue sites zoned for residential use which are not being acted upon. This will ensure the sustainable delivery of a continuous supply of new housing and is supported by Objective HCO 1.5 of the draft Plan.

### **Appropriate Assessment**

As outlined in Section 3.3.1 of the Appropriate Assessment Screening report:

*“Impacts on NHAs and pNHAs are not assessed within the HRA process, the purpose of which is to assess the potential effects of a plan or project on European designated sites. However, the potential for NHAs and pNHAs to support designated features of a European site is taken into account in the assessment. Impacts on NHAs and pNHAs will be considered within the SEA.”*

The consideration of ‘no likely significant effects’ on the listed objectives, is based on the assessment of the potential impact of these objectives on European designated sites and NHAs and pNHAs which support designated features of a European site.

### **Chief Executive's Recommendation**

No changes recommended.

## Typographical Errors and Chief Executive's Proposed Material Alterations

### Typographical Error No. 1

Remove site identifier codes A1(2), A1(3), A1(4) from the Town Centre zoning illustrated on Map 11.1 and Map 9.1. These codes relate to the selected sites as part of the Sustainable Planning and Infrastructural Assessment (SPIA). Replace with a single A to represent the Town Centre zoning.

### Typographical Error No. 2

Amend Section 9.4 Flood Risk Management paragraph one as follows:

The Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study included Naas as an Area for Further Assessment (AFAs). There is high uncertainty regarding the flood risk in Naas due to the lack of model calibration events and possible interconnection between fluvial and surface water drainage and canal systems. Kildare County Council in collaboration with the Office of Public Works (OPW) has appointed consultants to carry out a Naas Flood Relief Scheme **Study**. Data collection and review would be progressed as the first phase of the project. The progression of the project beyond the first stage will be dependent on the outcome of a number of factors, deciding whether the Naas Flood Relief Scheme, if required, proceeds to subsequent stages. It is estimated that the review will ~~take between one and two years~~ **be completed by the end of 2021**.

### Typographical Error No. 3

Remove Figure 5.3 Naas/Sallins Cycling Strategy Measures as it has poor legibility. Map 5.2 relates to the proposed cycling measures and is more user friendly.

### Typographical Error No. 4

The draft Plan under Section 6.6.2 states that it is an objective of the CDP to restrict significant new retail development outside of the Core Retail Area until key sites such as the unfinished shopping centre on Corban's Lane, Naas Shopping Mall and the former Penney's outlet on Blessington Road have been developed. This section needs to state exact word from Policy R7 in the CDP and refer to two sites being developed.

**R 7** Restrict the granting of permissions for both convenience and mainstream comparison floorspace in the town and its environs outside of the designated Core Retail Area until proposals for the redevelopment/regeneration of some of the following key sites have been achieved:

- Naas Shopping Centre – Corban's Lane
- The former Superquinn site
- The Naas Shopping Mall
- The former Penneys outlet on Blessington Road.

### Typographical Error No. 5

On Map Ref 9.1, remove the word 'office' from the Q zoning objective to align with the Land Use Zoning Matrix Table 11.3., i.e. Q: ~~Office~~, Enterprise & Employment

### Typographical Error No. 6

Objective MTO 2.4 should refer to a sustainable travel link rather than a bus-only link.

Amend Objective 2.4 as follows:



- MTO 2.4** Engage and co-operate with the Department of Transport, National Transport Authority (NTA), Transport Infrastructure Ireland, Irish Rail, Local Link and other stakeholders to improve the provision of public transport in Naas including the delivery of a sustainable ~~bus-only~~ travel link between Naas and Sallins Railway Station, a local bus route, additional bus stops and the provision of bus priority measures to ensure the improved movement of bus services through the town centre and local neighbourhoods.

## **Chief Executive's Proposed Material Alterations**

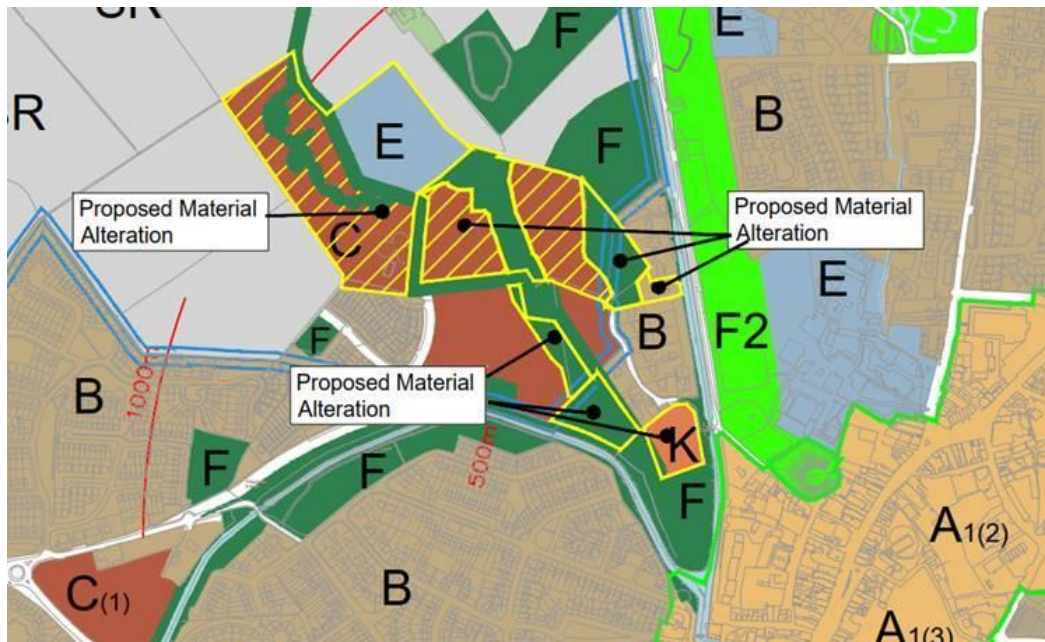
### Background

The Draft LAP is clear in its intentions regarding the future strategic direction for the expansion of Naas and sets out a clear and unequivocal commitment to the progression of the Northwest Quadrant (NWQ) lands over this plan period and beyond. This is also evident through KCCs work on Naas Flood Relief Scheme in conjunction with the OPW and the preparation of the Naas/Sallins Transport Strategy. It is noted that these lands have been identified for strategic expansion for quite some time in previous plans, however, no progress has been made in the move towards integrating this area in a meaningful way to the town centre of Naas. The demands on Local Authorities to deliver on Climate Action is unparalleled. The challenge is immense. However, through robust spatial planning and other interventions, Kildare County Council can and will play its part in achieving the national targets of zero net emissions by 2050.

Kildare County Council is committed to providing the spatial context for an opportunity to deliver a sustainable urban district and decarbonized zone in proximity to the town core and integrate same into the function of this Key Town through the Local Area Plan. The delivery of this unique planning prospect is underpinned by the Naas/Sallins Transport Strategy of which one of the priorities is a Bus Only Route through the NWQ, a Green Infrastructure/Habitat Assessment of the lands which identifies the requirement to protect areas of high biodiversity value, a detailed Flood risk Study to determine the Flood Extents to enable the avoidance of areas at risk of flooding and a Social Infrastructure Assessment which identifies the need for school places in the town and its hinterland is unprecedented. To this end, and in order to begin 'the move' towards integrating the NWQ into the town in a plan led, evidence-based manner, it is proposed to include the following as proposed material alterations.

### **Chief Executive's Recommended Proposed Material Alteration**

- 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:

- C: New Residential Phase 2.
- F: Open Space and Amenity
- K: Commercial/Retail

This extract also shows the proposed 'E: Community & Education' proposed material alteration which is recommended in response to the submission from the Department of Education. It is shown here for clarity purposes.

(b) Include new 2<sup>nd</sup> 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.*

## Summary of Submissions/Observations from Landowners Seeking Re-Zoning Requests and the Chief Executive's Opinion and Recommendations

Table 4.1 includes a summary of the 44 submissions/observations made during the public consultation period for the Draft Naas Local Area Plan 2021-2027 which contained requests for alternative land use zonings and the associated miscellaneous issues raised. The Chief Executive's opinion and recommendation is set out under each submission which addresses the main issues raised in the submissions received and any recommended changes to the Draft Naas Local Area Plan 2021-2027 as a result.

A map showing the location of all submissions seeking zoning or re-zoning of land is contained in Appendix 4 of this report.

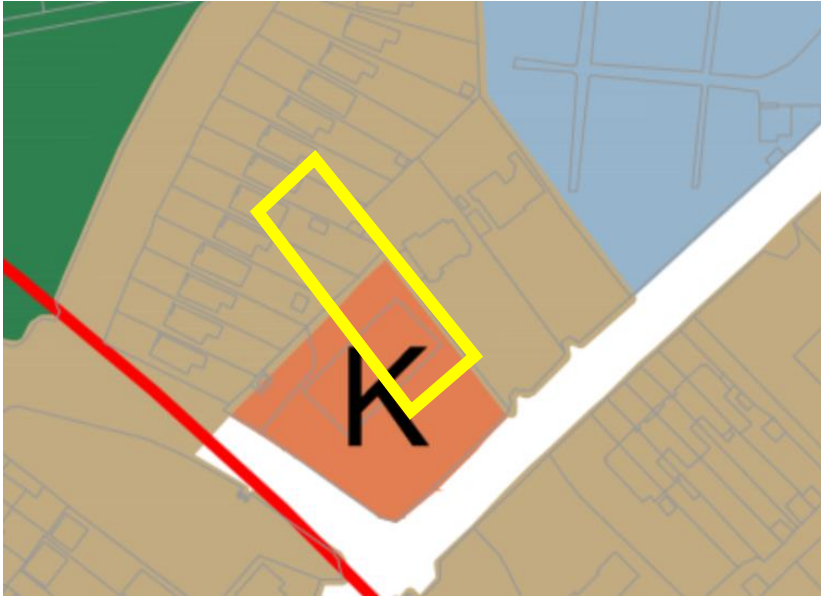
**Table 4.1 Submissions/Observations from Landowners Requesting an Amendments to the Land Use Zoning**

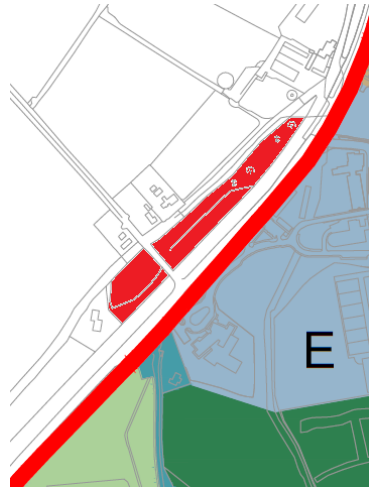
| Sub. No. | Name                                    | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| 092      | <b>Fitzpatrick's Garage (Naas) Ltd.</b> | <p>David Mulcahy Planning Consultants have prepared a submission regarding the re-zoning of lands at Fitzpatrick's Garage, Dublin Road, Naas, on behalf of Fitzpatrick's Garage Ltd.</p> <ul style="list-style-type: none"> <li>Fitzpatrick's Garage Ltd own lands of approximately c.0.13 hectares and containing a detached bungalow dwelling (Martonia) which has been vacant for "over 22 years". These lands adjoin the existing Fitzpatrick's Garage premises.</li> <li>The subject site is zoned B (Existing Residential/Infill) under the Draft LAP, the objective of which is "to protect and enhance the amenity of established residential communities and promote sustainable intensification". The submission seeks to have this site zoned Commercial/Residential (K), which is the same zoning for the lands on which the garage is based. Re-zoning would enable future expansion of the garage.</li> <li>The site upon which the current garage is based is restricted in size, with the subject site acquired in 1999 to allow for future expansion. The garage is commercially successful and urgently needs to avail of these additional lands for expansion. The subject site would be used solely for display and storage of vehicles, with no intention to construct any structures.</li> <li>The existing vacant dwelling has fallen into disrepair and there are issues with anti-social behaviour. Integrating the subject site with the existing business would address these issues.</li> <li>There exists another dwelling between the subject site and the graveyard, which would act as a buffer between the proposed extended commercial zoning (K) and the graveyard.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <ul style="list-style-type: none"> <li>• Fitzpatrick Garages (Naas) Ltd have no requirement for a repair garage on the subject site.</li> <li>• Proposed new zoning would help to consolidate existing employment in the garage and repair business and generate new employment.</li> </ul> <p>The image below is taken from the submission document and titled as Fig No.5</p> <div data-bbox="958 507 1668 1136"> </div> <p><b>Fig No.5</b> Extract from draft NLAP 2012-23 zoning map showing site zoned Existing Residential/Infill.</p> <p>An appendix to the attachment contains a letter from the Managing Director of Fitzpatrick Garages (Naas) Ltd., which states the following:</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <ul style="list-style-type: none"> <li>• Company currently employs 24 staff across two sites in Naas and they would expect these numbers to grow following plans to develop the subject site.</li> <li>• Subject site was purchased by the company in 1999 with the intention of using it to increase the space available for car display and storage, however the recession halted expansion plans.</li> <li>• The pandemic has greatly impacted the business. It has become apparent that if the business is to survive, maintain its market share and ensure the future viability and employment opportunities, it needs to expand the space available for parking and display.</li> <li>• The additional space gained by the subject site would give customers a better buying experience and generate more car sales. These sales will ensure the future viability of the business, on both sites it operates from within Naas.</li> <li>• Company is conscious it operates from a key location at the junction of Ashgrove and will strive to present the site well and make it attractive to motorists and pedestrians. Their use of CCTV systems has eliminated loitering and anti-social behaviour on the existing site, and this would be extended to the subject site.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The content of the submission specifically the request for a revised zoning from Existing Residential to K: Commercial/Residential on the subject lands is noted. The subject land has been the subject of planning application for garage/showroom and forms an established use on site. Motor Sales are not permitted on lands zoned for Existing Residential. Therefore, in order to provide for the appropriate expansion of the established business, the re-zoning of the site would be in keeping with the proper planning and sustainable development of the area. Similarly, this zoning alteration would allow for the expansion (subject to a detailed planning application) of a long-established land use in the area.</p> <p><b>Chief Executive's Recommendation</b></p> <p><b>Proposed Material Alteration</b></p> <p>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.</p> |



| Sub. No. | Name           | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| 118      | John Kinchella | <ul style="list-style-type: none"> <li>• Seeking to rezone site at Killashee, Naas (Folio number 61094F).</li> <li>• Owned site since 1992. Previous owner purchased site when Naas to Kilcullen road was constructed in 1970s, on the understanding they would get planning permission for the construction of a residential property.</li> <li>• Applied for planning permission (Ref. 1915/98) in 1998 for the construction of a residential property. Application rejected, despite permission given to a neighbour for the construction of a large B&amp;B.</li> <li>• Subject site is 2.5 acres with road frontage and a parallel road to the rear.</li> <li>• Access also available from Rathasker Road.</li> <li>• Large number of residential sites in immediate area, with four houses to the rear and a large stud farm.</li> <li>• Preference to have area rezoned as residential. Considerable access at rear for a number of houses. This would be in keeping with overall appearance of the area and any project would be completed to a high standard.</li> </ul> |

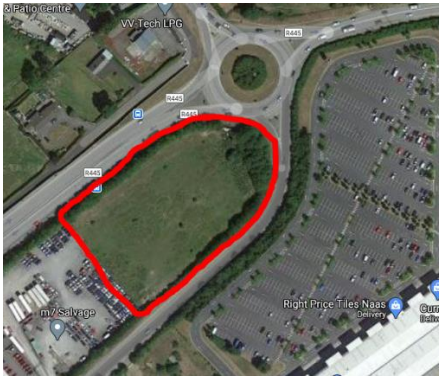
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• Second preference would be for commercial/industrial zoning for suitable start-up business units.</li> <li>• Third preference would be for recreational purposes. Willing to work with the Local Authority, educational and community groups to put together a suitable plan for all.</li> <li>• Willing to work with KCC that suitable proposal is put forward.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>No map has been provided with this submission. The Council consulted Land Direct for folio KE61094F, and the location is highlighted in red in the image below to the northwest of the Plan boundary (the continuous red line represents the LAP boundary).</p>  <p>National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and</p> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <p>Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that <i>'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens'</i>.</p> <p>Naas has a legacy of residential development located outwards in a somewhat dispersed pattern of development removed from the established town centre. The Vision for Naas 2031 and beyond is to ensure growth is planned to create a compact, consolidated and connected urban form.</p> <p>As required under objective 3(c) of the National Planning Framework (NPF) at least 30% of all new housing units must be delivered within the existing urban footprint of the town as defined by the 2016 CSO Settlement boundary. However, the situation for Naas is that in excess of 30% is achievable. The subject lands are located outside the existing CSO boundary and therefore would not contribute to a pattern of development that represents compact growth.</p> <p>Furthermore, the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development which are considered more appropriate having regard to policy context.</p> <p>The Council note the second and third preference for Employment zoning and Open Space and Amenity zoning. The Regional Spatial and Economic Strategy (RSES) places emphasis on the consolidation of the existing built urban footprint. Sites for employment and recreational should promote a pattern of development that is more conducive to public transport, walking and cycling modes. The subject lands on the periphery of the town do not represent a consolidated urban form but rather contribute to a pattern of development removed from the town centre and therefore it is not proposed to include the subject lands within the development boundary at this time.</p> |

| Sub. No. | Name        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |             | <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p>                                                                                                                                                                                                                                                                                                                                                                                                         |
| 166      | Reid Family | <p>This submission relates to a request for Industrial/Warehouse zoning on lands at Newhall, Naas. The subject sites have been identified in the image below.</p> <div data-bbox="1010 619 1680 1160" data-label="Image"> </div> <p>The zoning request is based around the following;</p> <ul style="list-style-type: none"> <li>• Need to increase employment opportunities in Naas.</li> <li>• Industrial/warehousing lands near Junction 10 are almost fully occupied.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <ul style="list-style-type: none"> <li>• Strategic location attractive for companies.</li> <li>• Size of site can accommodate a single large-scale industrial development or a multi-unit development, along with appropriate buffers to adjoining lands.</li> <li>• Lands are adjoined where 2 no. warehouses have recently been granted with no planning concerns of note raised.</li> <li>• Lack of development constraints associated with the lands.</li> <li>• The high-quality existing road infrastructure providing access to the site.</li> <li>• Lands are serviceable.</li> </ul> <p><b>Draft Naas LAP 2021-27</b></p> <ul style="list-style-type: none"> <li>• H lands are nearing capacity and there is a need for alternative sites. Reference is made to two sections in the LAP referring for the need to increase jobs and create new employment opportunities.</li> <li>• Two permissions, Ref. 20/714 and Ref.20/715 were granted for a freezer warehouse for two different applicants. The NRO had no concerns about traffic associated with the development.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are noted. The draft Plan has zoned a considerable amount of land to accommodate a variety of floorspace scenarios to ensure Naas has the ability to increase its employment base given its status as a Key Town. There are a number of undeveloped lands zoned for Industry and Warehousing proximate to the town centre compared to the subject lands which contribute to a compact urban form. The subject lands are located outside the draft Plan boundary and zoning of the lands would represent a further expansion of land located in proximity to Junction 10 Newhall, removed from the town centre of Naas on the western side of the M7 motorway.</p> <p>The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) require the strategic function of national roads to be maintained. Junction 10 has been recently upgraded as part of the M7 Naas-Newbridge Bypass Upgrade Scheme and the Council are required to protect the value of the investment by ensuring land use zonings in proximity to the motorway and their interchanges do not impact the strategic capacity and safety of the national road network. In this context</p> |

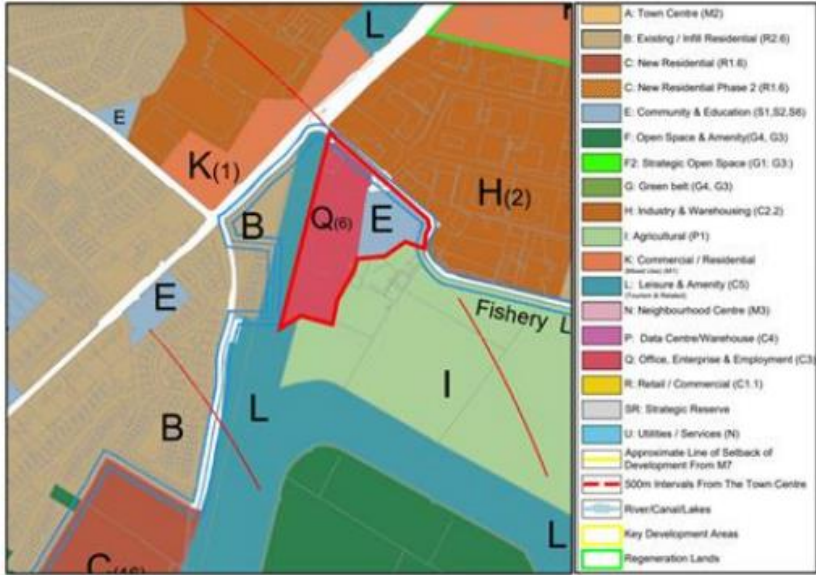
| Sub. No. | Name        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |             | <p>the subject lands were not put forward for analysis under the Sustainable Planning and Infrastructural Assessment (SPIA) which was undertaken to inform the zoning of land for 'Industry and Warehousing' and 'Enterprise and Employment' during the plan preparation stage.</p> <p>Similarly lands to the south as referred to in the submission which were not zoned in the draft Plan underwent modelling under the Naas/Sallins Transport Strategy which provides for an evidence-based approach to the formulation of the draft Plan. The development of the lands was shown to have an impact on the carrying capacity of the M7 motorway network. Therefore, in the absence of detailed modelling a precautionary approach is required in relation to the development of any additional land zonings located in proximity to Junction 10.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 210      | Lidon Group | <ul style="list-style-type: none"> <li>• Submission, on behalf of landowners, seeks to have lands at Newhall included for zoning as 'Industry and Warehousing'.</li> <li>• Submission provides following attached image.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Sub. No. | Name        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |             | <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are noted. The subject lands are currently proposed to be zoned for Industry and Warehousing in the draft Naas Plan.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 243      | Lidon Group | <p>Submission on behalf of landowners seeks to have lands outlined in red (on attached image) included for zoning in LAP as 'Industry and Warehousing'.</p> <p>Image below attached as part of submission.</p> <div data-bbox="1086 938 1608 1316" data-label="Image"> <p>An aerial photograph showing a commercial area. A large, rectangular plot of land is outlined in red. This plot is situated at a roundabout. To the north of the red-outlined plot is a large white industrial building with a blue roof. To the east of the plot is a parking lot filled with cars and another industrial building. The surrounding area includes other commercial buildings, parking lots, and some greenery. The red outline highlights the specific land subject to the submission.</p> </div> |

| Sub. No. | Name        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |             | <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are noted. The subject lands are currently proposed to be zoned for Industry and Warehousing in the draft Naas Plan.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p>                                                                                                                                                                                                                                                     |
| 245      | Lidon Group | <p>Submission on behalf of landowners seeks to have lands outlined in red (on attached image) included for zoning in LAP as 'Commercial/Residential – Mixed Use'.</p> <p>Image below attached as part of submission.</p> <div data-bbox="1137 880 1550 1283" data-label="Image"> <p>An aerial photograph showing a residential neighborhood with houses and streets. A specific plot of land, containing a large building and parking area, is outlined in red. This is the subject of the submission for zoning change.</p> </div> |

| Sub. No. | Name            | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |                 | <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are noted. The subject lands are currently proposed to be zoned for K: Commercial /Residential in the draft Naas Plan.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 260      | Castlekeel Ltd. | <p>Declan Brassil and Company Limited have made a submission on behalf of Castlekeel Ltd, in relation to the zoning of an infill development site of 4.5ha south of Fishery Lane, Naas.</p> <p>The subject site is located east of Naas Racecourse, south of Naas Industrial Estate and south-west of Maudlins Industrial Estate. It contains a disused building previously associated with Naas GAA, prior to their relocation.</p> <ul style="list-style-type: none"> <li>• The north-east of Naas has not had recent residential development, instead such development is concentrated to the south, south-east and west.</li> <li>• The site is subject to two zoning objectives in the LAP: <ul style="list-style-type: none"> <li>○ Western portion (approx. 3.2ha) is zoned Objective Q.</li> <li>○ Eastern portion (approx. 1.3ha) is zoned Objective E.</li> </ul> </li> </ul> <p>The submission proposes the following amendment:</p> <ul style="list-style-type: none"> <li>• Proposed Amendment 1 – The rezoning of c.4.45 from Objective Q 'Office, Enterprise and</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <p>Employment' and Objective E 'Community and Education' to Objective C 'New Residential'.</p> <p><b>Figure 1 Proposed Zoning Amendment 1 – Objective C</b></p>  <p>A second, alternative, amendment is suggested if Amendment 1 is rejected:</p> <ul style="list-style-type: none"> <li>Proposed Alternative Amendment – The rezoning of approx. 1.30ha from Objective E 'Community and Education' to Objective Q 'Office, Enterprise and Employment'.</li> </ul> <p><b>Planning Rationale and Justification for the Proposed Amendments</b></p> <p>The submission outlines the rationale for the proposed amendments having regard to national, regional and local planning policy.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <p>The NPF and the Eastern and Midland's RSES prioritise appropriate development in the right locations to facilitate sustainable, orderly growth. Better integration of land uses is central to the NPF and the proposed rezoning would align the LAP with the objectives of the NPF and RSES, which prioritise urban and underutilised infill sites as facilitating compact growth, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The Objective E zoning reflects the historic, obsolete use of the site by Naas GAA, who have relocated to a purpose-built facility on the Sallins Road in 2004. The SIA that informs the LAP establishes the following: <ul style="list-style-type: none"> <li>○ Childcare – Limited spare childcare capacity in Naas. LAP notes childcare facilities are provided in new residential developments, with future developments required to meet requirements on a pro-rata basis with a minimum of 20 spaces per 75 units.</li> <li>○ Primary School Education - Primary and secondary schools in Naas are at capacity. A replacement primary school is under construction with an additional primary school at site acquisition stage. An additional secondary school is to be completed in 2021, helping to alleviate issues. The LAP provides for three locations for an additional secondary school in the south and west of Naas.</li> <li>○ Medical Facilities – Naas has adequate facilities to service existing and future populations, in excess of 0.25 physicians per 1,000 population as per GMENAC.</li> <li>○ Sports and Recreation Facilities – Naas has a wide and extensive variety of sporting/recreation facilities and is adequately served by outdoor sports/recreation facilities (1.78 ha/1,000 persons). An additional 6.8ha is required to maintain the guideline standard with the LAP's additional population growth.</li> <li>○ Social and Community Infrastructure – Naas is adequately served by community services for current and future populations.</li> </ul> </li> <li>• The written statement, with regard to the SIA findings, has identified locations where the additional social infrastructure is required. Therefore, the subject site is not required for educational or community infrastructure, based on the results of the SIA undertaken to inform the LAP and having regard to the significant additional E zoned landbanks already identified and provided to facilitate the additional or expanded existing services.</li> <li>• The site represents underutilised and serviced infill lands, easily accessible to educational/medical/sporting/recreational/community infrastructure, employment areas and public transport:</li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>○ Bus stops located 400m from the site and served by routes 125 and 126. Sallins Train Station is a 10-minute cycle.</li> <li>○ Naas and Maudlins Industrial Estates immediately north/north-west and Globe Retail Park approx. 500m north.</li> <li>○ Monread Community Centre c.450m west and Men's Shed located 1km south-west. Monread Park, which accommodates playground and football club adjoining Leisure Centre, is 450m west.</li> <li>○ Medical and dental facilities located approx. 1km south-west.</li> <li>• The site is serviced, or adjoins drainage infrastructure, water supply and other utilities. Road formation, kerbs, water and sewer connections, and groundworks were completed on the site prior to the lands being dezoned. LAP notes there is sufficient water supply and foul water drainage networks to facilitate growth in Naas. Site has a flat topography and existing vehicular access onto Fishery Lane and pedestrian facilities. In this regard, the site is a Tier 1 serviced site, in accordance with NPF.</li> <li>• The site is not constrained by protected structures, archaeology, power lines, sensitive habitats, protected views or flood zones.</li> <li>• Development of the site for residential or employment uses would result in the efficient and sustainable use of underutilised Tier 1 serviced land, consolidating development within an existing footprint proximate to social and transport infrastructure. This approach is consistent with the overriding national and regional policy objectives.</li> <li>• Planning history has established that residential development on the site is acceptable in principle. Two applications were refused in 2008 and 2009 for a mixed-use commercial and residential development. The commercial element in the northern portion of the site was refused based on the extent of comparison retail contravening the zoning objective (Ref. 07/500153). The residential element was refused due to insufficient capacity at Osberstown WWTP and sub-standard design/layout (Ref. 07/500175). The principle of residential development on the subject site was considered acceptable. LAP notes there is now sufficient capacity as the Osberstown WWTP.</li> <li>• Appropriate residential development of the site would consolidate the residential area of the north-east quadrant, currently demarcated by employment/industrial areas to the north. Extensive Q zoning is provided throughout LAP lands, particularly in the north-west quadrant which has been developed as an employment</li> </ul> |

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|          |      | <p>arc and consolidation of employment in this area is critical to delivery of additional bus services in this area. While Q zoning provides less intense industry than currently exists in industrial estates, residential development would provide a more appropriate transition and buffer from the heavy industrial uses to the north/north-east of the site and the high amenity/sensitivity of Naas racecourse, identified as a regional tourism and amenity asset. The submission notes Castlekeel completed the Racecourse Gate development and it would complement residential development on the subject site.</p> <ul style="list-style-type: none"> <li>• The LAP identifies site C(16) as capable of accommodating 220-252 no. units and a density of 35-40 units/ha. The Draft LAP states development of these lands is dependent on the delivery of Gallops Avenue in advance/in tandem with the residential development (URD 1.14). LAP recognises long-term timeframe for Gallops Avenue and anticipates delivery of C(16) towards the end of the plan period. The submission notes Gallops Avenue's similarity to rejected IRR proposal. Therefore, no guarantee of delivery of these residential units within the lifetime of LAP. In contrast, the subject site is not constrained by delivery of services or infrastructure and is readily available to deliver residential units to achieve the core strategy and housing allocation of Naas within the lifetime of the LAP.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The content of the submission, specifically the request and rationale for a revised zoning on the subject lands are noted. Due to a number of infrastructural constraints associated with the site, the lands were categorised as Tier 2 under the Sustainable Planning and Infrastructure Assessment (SPIA). Therefore, the subject lands are not considered underutilised Tier 1 serviced land as stated in the submission.</p> <p>Furthermore, with respect to the request for a new residential zoning for these lands, the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development which are considered more appropriate having regard to policy context.</p> |

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|          |                        | <p>The draft Plan has identified a number of specific sites to address the deficit in open space and amenity areas. However, there is an identified shortfall within the Plan area across a range of social infrastructure types. Therefore, the Education and Community zoning, which it is important to note, allows for group/special needs housing, is considered appropriate.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p>                                                                                                                                                                                                                                                                                                                        |
| 298      | Origin Enterprises PLC | <p>Submission requests that the Draft LAP be amended to include the subject lands within the Naas Development Boundary and zone them Industry and Warehousing (H) use.</p> <div data-bbox="1079 683 1597 1058" data-label="Image"> </div> <p><b>Planning Rationale for Proposed Amendment</b></p> <ul style="list-style-type: none"> <li>• The proposal is in accordance with the National Planning Framework (NPF) as the rezoning of the subject lands will assist in creating a strategic reserve of lands to support future industry and enterprise and associated employment opportunities to balance existing and future population growth.</li> <li>• Reinforce the function of Naas as a Key Town, as designed in the Regional Spatial and Economic Strategy (RSES).</li> </ul> |

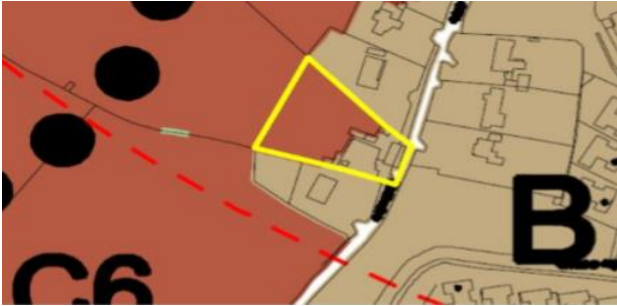
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <ul style="list-style-type: none"> <li>• Proposed zoning is consistent with RPO 4.53 which seeks to 'support an enhanced role and function of Naas as the county town of Kildare, particularly as a hub for high quality employment.</li> <li>• Further strengthen the local employment base of Naas as required under the RSES.</li> <li>• The Kildare County Development Plan 2017-2023 designates Naas as a primary economic growth town to be prioritised for local and regional enterprise. The Development Plan identifies a shortfall in zoned employment lands in Naas.</li> <li>• Section 6.4 of the Draft Naas LAP identifies J10 as a designated area for economic development. It is considered that the zoning of the subject lands for Industry and Warehousing use will assist in creating a viable landbank which will be brought forward for development.</li> <li>• The proposed zoning would maximise the opportunity presented by the motorway interchange.</li> <li>• The opportunity of sustainable transport links, including existing cycle and pedestrian infrastructure along the Naas Outer Ring Road and the future Greenway along the Canal, can be maximised.</li> <li>• The lands are highly accessible by a range of transportation modes.</li> <li>• The inclusion of the subject lands would result in an overall landbank that is of an extent, configuration and topography that, subject to appropriate protection of environmental features within and adjacent to the lands, are suitable for development for a range of logistic, industrial and manufacturing facilities.</li> <li>• The subject lands represent a natural extension of the zoned industrial lands.</li> <li>• The subject lands offer extensive frontage onto Grand Canal and provides opportunity for its development for amenity, recreation and sustainable transport purposes in accordance with PRO 4.49 of the RSES and the specific objective (62) of the Draft LAP, which is to provide a Greenway on the Corbally branch of Grand Canal linked to Naas-Sallins Greenway.</li> <li>• The boundary of the zoned lands displays no physical manifestation on the ground.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The land to which this submission refers is located outside of the Draft Plan boundary, east of the M7 Junction 10. The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) require the strategic function of national roads to be maintained. Junction 10 has been recently upgraded as part of the M7 Naas-Newbridge Bypass Upgrade Scheme and the Council are required to protect the value of the investment by ensuring land use zonings in proximity to the motorway and their interchanges do not impact the strategic capacity and safety of the national road network. In this context</p> |

| Sub. No. | Name                           | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |                                | <p>the subject lands were not put forward for analysis under the Sustainable Planning and Infrastructural Assessment (SPIA) which was undertaken to inform the zoning of land for 'Industry and Warehousing' and 'Enterprise and Employment' during the plan preparation stage.</p> <p>The Regional Spatial and Economic Strategy focuses on the densification of the existing built urban footprint around existing public transport corridors. The subject lands would represent undeveloped land on the periphery of Naas, beyond the Draft Plan boundary, and therefore do not represent a consolidation of urban zonings.</p> <p>The Draft Local Area Plan for Naas designates sufficient lands for Industry and Warehousing at appropriate locations in the town to support the development of Naas as a Key Town and to increase employment opportunities located within the town, to reduce rates of commuting and ensure new employment development contributes towards reducing carbon output which does not affect the carrying capacity or undermine the integrity of the national road.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |
| 321      | Larry Swan, Swans on the Green | <p>A submission was made by Clarke Engineers Architects on behalf of their client.</p> <ul style="list-style-type: none"> <li>• The subject lands extend to 0.2895 hectares.</li> <li>• The draft Plan provides for Retail/Commercial zoning and Residential Infill.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <div data-bbox="981 292 1704 555" data-label="Image"> </div> <ul style="list-style-type: none"> <li>• Requests that the Draft plan be amended so that the total parcel of land in the ownership of Swans on the Green is zoned 'R' Retail / Commercial (including the red hatching).</li> <li>• This portion of land (red hatching) provides valuable storage and off street car parking for both staff and customers as part of the day to day running of the business.</li> <li>• Essential for longevity of the business and to compete with supermarkets that they have the ability to expand and provide car parking for their customers.</li> <li>• Replace lost car parking from proposed cycle lanes.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The issues raised in the submission are noted. Having regard to the proximity of the site to the established retail outlet, and to the pattern of development in the area, it is considered reasonable to re-zone the subject site for the reasons stated in the submission. Furthermore, and to facilitate the potential consolidation of the urban plot, it is recommended that the dwelling to the east of the landholding be included within this zoning objective also.</p> <p><b>Chief Executive's Recommendation</b></p> <p><b>Proposed Material Alteration</b></p> <p>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' and any consequential amendments.</p> |

| Sub. No. | Name          | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 335      | Alan Cunniffe | <ul style="list-style-type: none"> <li>• Subject lands extend to 0.75 acre and have been rezoned from New Residential to Existing Residential/Infill under this Draft LAP.</li> <li>• Formally seek the re-instatement of the current zoning New Residential.</li> <li>• An application (for 10 units) is forthcoming (pre-planning meeting held with KCC in January '21) and an application is being prepared on the basis that the current zoning as New Residential would remain in situ.</li> <li>• The density as agreed in principle with KCC Planners could be undermined by a third party on the basis of the rezoning. <ul style="list-style-type: none"> <li>- the infrastructure has only recently been brought proximate to this site to allow development.</li> <li>- it is proximate to the town centre (600m).</li> </ul> </li> </ul> |

| Sub. No. | Name        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |             | <p>- The NPF supports the intensification of such sites and will assist KCC in achieving 40% of all new units on brownfield lands.</p>  <p><b>Chief Executive's Opinion</b><br/>The contents of the submission are noted. Notwithstanding the zoning objective that pertained to the site in the Naas Town Development Plan 2011-2017, it is considered that the 'New Residential' zoning objective for a backland section of this landholding would be at odds with the pattern of zoning in the area, in particular the plots located north and south of the landholding. An objective to 'protect and enhance the amenity of established residential communities and promote sustainable intensification' would be more appropriate in this instance. It should also be noted that the land use zoning objective 'B' proposed for this site allows for appropriate infill residential development through sustainable intensification while protecting the amenity of established residential communities.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |
| 343      | Emma Little | <ul style="list-style-type: none"> <li>Submission states an error was made on the land use zoning map accompanying the draft LAP and request that this be corrected as outlined in the map submitted (see below, property highlighted with red star).</li> <li>Draft Plan and Land Use Zoning Map proposed to zone her home and property as 'SR: Strategic Reserve' and 'F: Open Space'. States that the zoning in the Naas Town Development Plan 2011-2017 was 'B: Existing Residential' and requests that such a zoning be maintained.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <div data-bbox="1106 288 1597 632" data-label="Image"> </div> <p data-bbox="517 715 891 746"><b>Chief Executive's Opinion</b></p> <p data-bbox="517 772 2107 874">The contents of the submission are noted. Planning permission was granted to Emma Little (Ref 18/1157) to renovate and extend an existing bungalow on the subject site. The existing use on the site is acknowledged and therefore the re-zoning request is considered appropriate.</p> <p data-bbox="517 960 1025 992"><b>Chief Executive's Recommendation</b></p> <p data-bbox="517 1018 929 1050"><b>Proposed Material Alteration</b></p> <p data-bbox="517 1075 2163 1177">Amend Map 11.1 Land Use Zoning Map (and any consequential amendments) by replacing the Open Space and Amenity and Strategic Reserve zoning to Existing Residential for the subject lands to reflect planning permission 18/1189 only (as outlined in yellow in the image below) (see Appendix 3).</p> |

| Sub. No. | Name          | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 344      | James Fleming | <ul style="list-style-type: none"> <li>• Submission states that the likelihood that development will take place during the plan period on Tier 1 and Tier 2 sites must be questioned given the facts that many sites were similarly zoned in the 2011 Town Development Plan, the lack of development to date and absence of adequate services at the time of adoption of the Local Area Plan (LAP) in the case of the Tier 2 sites.</li> <li>• States that in the absence of a detailed and robust analysis why lands previously zoned for development have not been developed, the amount of land zoned may be deficient as there is no guarantee that these lands will be developed.</li> <li>• Submits that in order to avoid a shortage of development land to occur during the plan period of the LAP it is suggested that Tier 1 sites that have not been zoned, should be zoned in the LAP.</li> </ul> <p>The Submission includes a report entitled '<i>Tier 1 and Tier 2 zoned lands in the Draft Naas Local Area Plan 2021-2027, A report assessing Tier 1 and Tier 2 zoned lands in the Draft Naas Local Area Plan 2021-2027</i>'</p> <ul style="list-style-type: none"> <li>• The report provides an assessment of the appropriateness of the lands zoned for residential development in the Draft Plan in terms of the need to provide adequate zoned lands for the duration of the Local Area Plan.</li> <li>• The report aims to assess whether sufficient lands have been zoned for residential development to meet the population targets for the town having regard to the likelihood that all zoned lands will be developed and the need to provide for headroom as indicated in relevant planning guidelines.</li> <li>• The report assesses the lands zoned for development under the following criteria:             <ul style="list-style-type: none"> <li>○ Previous zoning status in the 2011 Town Development Plan.</li> </ul> </li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <ul style="list-style-type: none"> <li>○ Evidence of planning permissions that have not been taken up.</li> <li>○ Evidence of infrastructural or other technical difficulties.</li> <li>○ Evidence that proper criteria are applied to Tier 1 and Tier 2 zoning categories.</li> <li>• The report examines Tier 1 and Tier 2 Sites (23 sites) outlined in the SPIA and outlines conclusions as to their ability to deliver development within the life of the Plan.</li> <li>• A summary of the report's conclusions is outlined as follows: <ul style="list-style-type: none"> <li>○ Of the Tier 1 sites that have been zoned for development a number were similarly zoned in the 2011 Town Development Plan. Based on the fact that no development has taken place on these lands, the likelihood that development will take place during the plan period must be questioned.</li> <li>○ Of the Tier 2 sites that have been zoned for development a number were similarly zoned in the 2011 Town Development Plan. Given the lack of development to date and absence of adequate services at the time of adoption of the LAP, the likelihood that development will take place during the plan period must be questioned.</li> <li>○ In the absence of a detailed and robust analysis why lands previously zoned for development have not been developed, the amount of land zoned in the draft development plan may be significantly deficient as there is no guarantee that these lands will be developed.</li> </ul> </li> <li>• In order to avoid a shortage of development land to occur during the plan period of the Local Area Plan it is suggested that Tier 1 sites that have not been zoned, should be zoned in the Local Area Plan.</li> <li>• The submission states that this should apply to sites C5 and C11<sup>28</sup>.</li> </ul> |

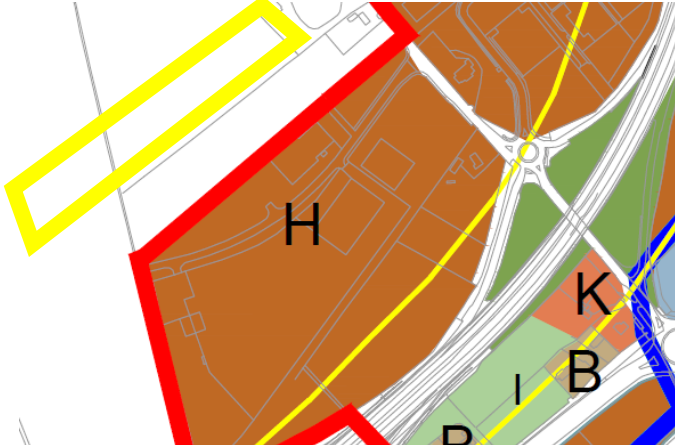
<sup>28</sup> Map inserted for clarity, not included with the submission.

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <div data-bbox="1081 288 1653 762" data-label="Image"> </div> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are noted. Changes in national legislation since the adoption of the Naas Development Plan 2011-2017 under the Urban Regeneration and Housing Act 2015 (as amended) allows for active land management of sites that are zoned for residential use through the application of the vacant site levy. This represents part of a continued shift in national policy towards active land management within our urban settlements, giving the Council the ability to actively pursue sites zoned for residential use which are not being acted upon. This will ensure the sustainable delivery of a continuous supply of new housing and is supported by Objective HCO 1.5 of the draft Plan.</p> <p>The need to provide headroom is noted in the submission. On the issue of inadequate headroom, it is noted that the current core strategy, as set out in the Kildare County Development Plan is the result of a statutory (Variation No. 1) which was adopted by the Council on 9th of June 2020. The figures contained in this varied core strategy have been taken from the National Planning Framework Implementation Roadmap (July 2018) which was issued to all Local Authorities by the Government. It is acknowledged that 50% headroom was previously provided for in the Section 28 Guidelines on Development Plans (2007). It should be noted at this stage that the NPF roadmap is explicit in relation to the universal application of 'headroom' and states that scope for up to 25% may be considered to 2026 in counties where projected population growth is above the national average. Kildare is identified as being one of those counties where headroom of up to 25% is allowable, for the purposes of transitioning</p> |

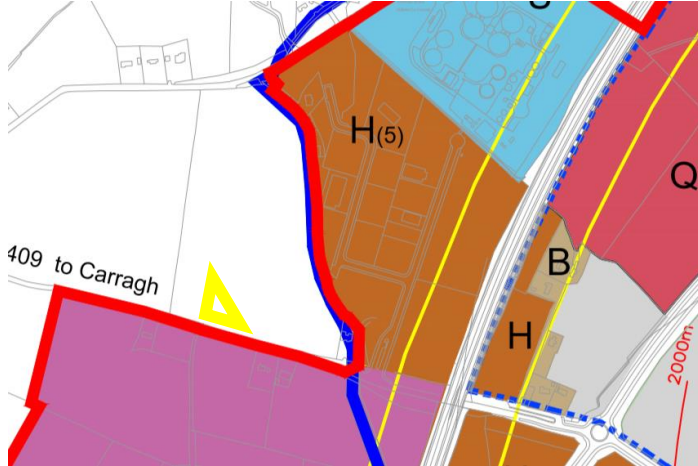


| Sub. No. | Name        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |             | <p>to the revised targets. This is further clarified in the RSES which states 'this may be supplemented by additional 25% headroom, applicable in the local authority areas that are projected to grow at or above the national average growth figure (page 5 of the NPF Roadmap). This further headroom may be applied regionally and locally, at RSES and city and county development plan stage.' In this regard, in accordance with the NPF (its Roadmap) and the RSES the 25% headroom was applied in the revised core strategy calculations set out in Variation No. 1 of the Kildare County Development Plan 2017-2023.</p> <p>The draft Plan must adhere to hierarchy of plans regarding the population growth and housing targets and therefore no additional headroom can be applied.</p> <p>The assessment, in the submission, of the various sites in each Tier is noted. However, no residential capacity was applied to a number of the town centre sites given the impediments to development that a number of the sites present with. However, in the submission received from the OPR (Submission 009) an observation was made that the potential yield from the town centre sites should be identified, notwithstanding their status as Tier 2 sites. Therefore, the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development which are considered more appropriate having regard to policy context, extant permissions, and the overall vision for Naas.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |
| 349      | Peter Kelly | Submission by Clarke & Co. on behalf of Peter Kelly (Newhall Properties Ltd) relates to a request for a portion of land located adjacent to the Junction 10 interchange at Newhall to be zoned 'H: Industrial and Warehousing' (see map below).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <div data-bbox="1055 292 1630 778" data-label="Image"> </div> <ul style="list-style-type: none"> <li>• Submission notes the context of the lands in question, their accessibility to the M7 motorway and that the lands form part of an existing industrial park with existing access roads and infrastructure.</li> <li>• Notes that the entire site was zoned for industrial uses in the last CDP (under Naas Environs) but is un-zoned and outside of the LAP boundary under the draft Plan.</li> <li>• Submission states that this is an oversight as two companies have received permission from Kildare County Council to develop the subject site under Plan Ref. 20/714 (L Queally) and Plan Ref. 20/20715 Ballymooney Foods Limited. In this regard it states that the error must be rectified as a matter of urgency as the companies cannot proceed with financing development on unzoned lands.</li> <li>• It is noted that the submission has attached letters from Liam Queally and Pat Doyle (Ballymooney Foods Ltd.) in support of the submission.</li> <li>• The submission includes a series of maps and photographs in support of its request.</li> <li>• Submission concludes by reiterating its request for the subject site to be zoned 'H: Industrial and Warehousing' noting that L. Queally and Ballmooney Foods are a valued employer in Naas for the past 42 years employing in excess of 1,000 people.</li> </ul> <p><b>Chief Executive Opinion</b></p> |

| Sub. No. | Name                                        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |                                             | <p>The contents of the zoning request are noted.</p> <p>Given that the lands which are the subject of this submission are located immediately adjacent to an existing industrial warehousing type complex and is accessed through same. It is considered appropriate to amend the land use zoning (and Plan boundary) to reflect the permitted development on these lands.</p> <p><b>Chief Executive's Recommendation</b><br/> <b>Proposed Material Alteration</b><br/>                     Amend Map 11.1 Land Use Zoning Map and LAP boundary (and any consequential amendments) to include strip of lands within the Plan boundary and zone H: Industry and Warehousing (outlined in yellow in image below).</p>  |
| 355      | <b>Liebherr Construction Equipment Ltd.</b> | Submission by David Mulcahy Planning Consultants Ltd. on behalf of Liebherr Construction Equipment Ltd. relates to a 1.01-hectare site adjoining Site 16 Osberstown Business Park (Folio No. KE54712F) (see Map below)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <div data-bbox="1041 292 1653 694"> </div> <p data-bbox="1041 694 1653 715">Fig No.9 Extract from the draft Naas LAP 2019-23 showing south-west corner unzoned.</p> <ul style="list-style-type: none"> <li>• A small portion of lands in their ownership in the south-west corner is outside of the development boundary of the draft Naas LAP 2019-23 and its therefore un-zoned. The land currently consists of scrubland.</li> <li>• Submission notes that the Council previously granted planning permission in 2008/9 (under Plan Ref. 08/311) to facilitate development for a new factory on this un-zoned potion of the lands.</li> <li>• Further notes that Liebherr Construction Equipment Ltd have recently been granted permission in 2020 (Plan Ref. <b>19/739</b>) and these lands are included in the permitted site layout plan and intend to provide employment for 40 people.</li> <li>• Accordingly, the submission seeks that the south-west corner of landholding to be zoned for 'H: Industry/Warehousing' so that it would be treated in the same manner as the rest of the site and reflect their inclusion in the planning permission for a new regional depot.</li> <li>• Submission details the planning history of the site and outlines the planning context including the provisions of the County Development Plan (CDP) relating to Industrial Development, the previous CDP (2011-2017) and the Draft Naas Local Area Plan 2021-27.</li> <li>• The submission includes a series of maps in support of its request.</li> </ul> <p data-bbox="517 1342 891 1374"><b>Chief Executive's Opinion</b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <p>The contents of the submission are noted. Planning application ref. 19/738 for boundary treatment and planning ref: 19/739 as referred to in the submission have been reviewed. It is noted that the site as outlined in red on the planning application drawings crosses over the existing natural boundary. It is therefore considered prudent to amend the zoning at this location to represent the permitted land use for the majority of the site.</p> <p><b>Chief Executive's Recommendation</b><br/> <b>Proposed Material Alteration</b><br/> 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 identifier H (5), (as highlighted in yellow below) (Appendix 3 refers).</p>  |

| Sub. No. | Name         | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| 360      | Treacy Group | <p>The Treacy Group lands (3.13 hectares) are partly zoned New Residential (C12) and partly Enterprise and Employment (Q). This submission seeks for the Q zoned lands to be zoned New Residential C12 (Tier 1) as in the previous draft Naas Local Area Plan (which was not adopted).</p> <p>The Q zoned lands (1.2Ha) have not attracted any employment use in the last 10 years. Q-zoned lands to the west of town are far more attractive to employment users.</p> <p>New Residential zoning suitability to the subject lands:</p> <ul style="list-style-type: none"> <li>• The subject lands represent underutilised, brownfield lands close to the town centre.</li> <li>• The lands are only 400m from town centre zoned lands (only 4 other areas of New Residential zoned lands this close to the town centre). The zoning of the subject lands for New Residential (Tier 1) represents sequential development from the town centre ahead of most other lands zoned New Residential in the draft NLAP.</li> <li>• The lands are within the CSO Settlement Boundary for Naas (one of only 6 New Residential zoned lands). Aligns with National Policy Objective 3c.</li> <li>• The lands are fully serviceable from a drainage perspective. Engineering Statement attached to the submission.</li> <li>• Change of the zoning from Q to C12 would fully align with national and regional policy as well as the Kildare County Development Plan 2017-23.</li> <li>• Vehicular access to the site is via IDA Business Park off the Blessington road.</li> <li>• There is an established pedestrian connection (1.2km) from the C12 zoned lands into the town centre (Popular Square).</li> </ul> |

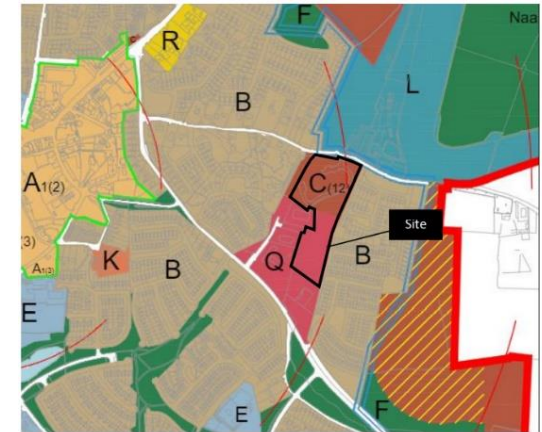
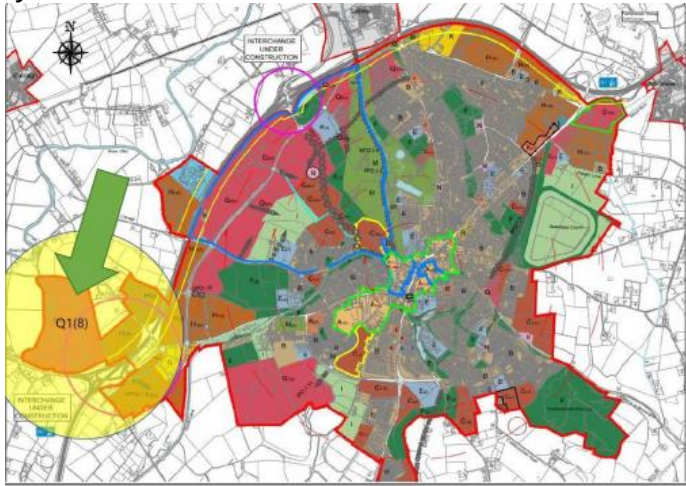


Fig No.6 Subject lands zoned New Residential and Enterprise & Employment in the draft NLAP 2021-27.

| Sub. No. | Name                 | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |                      | <ul style="list-style-type: none"> <li>• If the southern portion is zoned New Residential, then advantage can be taken of the established footpath infrastructure in the IDA Business Park which would result in a more convenient and quicker access (923m) to the town centre.</li> <li>• The 826-bus stop is located on the Blessington Road, opposite the entrance to the IDA Business Park.</li> <li>• If the Gallops Avenue proceed a significant portion of the northern site cannot be developed for housing and this should be compensated for on the southern portion of the site.</li> <li>• If the Gallops Avenue does not proceed the existing access from the southern portion of the site becomes even more important given the established pedestrian link to the town centre.</li> <li>• Residential land use is fully compatible with the established adjoining land uses.</li> <li>• No known constraints associated with the development of the subject lands for residential use.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The comments in relation to the subject lands are noted. A small portion of the land to the south of the subject lands are located in both Flood Zone A and Flood Zone B, therefore are considered unsuitable for residential use. The division between Residential and Enterprise and Employment lands is considered to be an appropriate delineation.</p> <p>Furthermore, the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 446      | Belmont Data Centres | <p>The submission relates to data centres and the zoning of lands/policy to facilitate data centre development in Naas:</p> <p><b>Positive Impact of Data Centre Investment in Ireland</b></p> <ul style="list-style-type: none"> <li>• The principles outlined in the submission were assessed in accordance with policies of NPF – Project Ireland 2040 (2018) and RSES for the Eastern and Midland Regions (2019). The submission also demonstrates that the proposed policy will have a tangible economic benefit for the local area and wider region.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <ul style="list-style-type: none"> <li>• Direct and indirect jobs can be created from the development of data centres with an estimated 1,800 people directly employed on an ongoing annual basis through the operation of data centres and a further 1,900 people employed annually in construction jobs.</li> <li>• A study / report on the economic benefits of data centres prepared by Grant Thornton states that since 2010, €2.96 billion has been directly accrued from the construction of data centres with a further €1.59 billion generated through operation expenditure.</li> <li>• Data centre investment in Ireland creates and supports an estimated 5,700 no. full time equivalent roles on an average annual basis over the study period since 2010.</li> <li>• The report also states <i>“A large number of ancillary services and roles not directly related to data centre operation have been attracted following initial data centre investments. These include finance, operations, sales, customer support and software engineers. Survey responses strongly confirmed that many Irish based data centre operators see the physical location of their data centre operations as closely strategically linked to their overall activity and operations in Ireland i.e., the presence of data centres opens up the opportunity, and in some instances necessity, to locate other ancillary services in Ireland”</i>.</li> <li>• Wide-ranging economic benefits to be accrued from data centres; enhancement of the digital infrastructure, attraction for related industries to locate in Ireland to service and interact with data centres and clustering of interconnected entities such as business suppliers and associated organisations such as educational institutions.</li> <li>• The Report also identifies key spill over effects of data centres with benefits for local suppliers' skills, productivity, and competitiveness.</li> <li>• “Enterprise Ireland confirmed that when a global data centre operator was looking to set up operations in Ireland the company was keen to meet with local suppliers ranging from construction and engineering to food and drink and training providers.</li> <li>• The use of local suppliers provides a direct benefit financially to the economy but also allows those suppliers to develop experience, innovate, become more productive and grow.</li> </ul> <p><b>Data Centre Policy under ED 1 – Enterprise and Economic Development / Land Use Zoning:</b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <ul style="list-style-type: none"> <li>The draft LAP designates two locations to be zoned for data centre / warehouse locations. It is submitted that adjoining lands to the north of junction 10 on the M7 at Newhall (map below) are more suitable for this type of development and should be zoned for data centre / warehouse locations given their superior access to common infrastructure requirements i.e., high voltage electricity lines, high powered fibre optic cables, good site security and accessibility.</li> </ul>  <p>Figure 1: Identified lands marked Q1 (B) from the Naas Local Area Plan 2021-2023</p> <ul style="list-style-type: none"> <li>The draft LAP is right to promote Naas as a sustainable international destination for ICT infrastructures such as data centres, in line with Regional Policy Objective 8.25.</li> <li>It is submitted that the lands identified to the north of Junction 10 on the M7 at Newhall (Ref: Map 10.1 in the Naas Local Area Plan 2019 – 2023), which were previously zoned for enterprise use, be designated for data centre development, given their superior access to the common infrastructure requirements of data centres, compared to adjoining lands at Caragh Road South and Jigginstown, identified in the Draft Naas Local Area Plan 2021-2027.</li> <li>The line passing this site is more secure from an electrical point of view as it connects Dunstown 400kV and Maynooth 220kV whereas the lines crossing the sites identified for Data Centre development in the draft plan only connect to Maynooth 220kV and Turlough Hill (See figure below).</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <div data-bbox="891 316 1787 858"> </div> <p data-bbox="927 884 1765 906"><i>Figure 2 – Strategic Location of Lands at Newhall Junction 10 relative to electricity grid infrastructure in place</i></p> <ul style="list-style-type: none"> <li>• Turlough Hill is not a secure source of energy and therefore the electricity lines crossing the Jigginstown site need to rely on a single connection to Maynooth.</li> <li>• The site to the north of Newhall Junction 10 is serviced by a 220kV electricity line which is serviced by two separate major substations. International Data Centres require redundancy due to cater for lines that may come out of service. This makes the lands at Newhall Junction 10 much more suitable for Data Centre development.</li> </ul> <p data-bbox="533 1219 1272 1248"><b>Data Centre Policy to be considered in the Naas LAP:</b></p> <ul style="list-style-type: none"> <li>• Reference is made to the NPF and the budget for national infrastructure investment for the next 10 years. Location of Kildare in the mid-east region is noted which have experienced high levels of population growth in recent decades (more than twice the national growth rate).</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <ul style="list-style-type: none"> <li>• Appropriate Data Centre policy would support the shared aims of the NPF by contributing to the stability of the Eastern and Midland Region and development of the local Mid-East economy through employment diversification and related infrastructure enhancements.</li> <li>• Naas, and Kildare more broadly, is strategically positioned to benefit from local, national, and international markets owing to its location, excellent transport links, access to a highly educated population and its unique natural and built heritage assets.</li> <li>• A key focus of the Naas LAP will be to ensure that the conditions for the creation of enterprise and innovation are embraced and developed.</li> <li>• The recent Government Statement on Data Centres is noted, which states; <i>"A plan-led approach will develop a range of measures to promote regional options for data centre investment, minimising the need for additional grid infrastructure. A balance will be maintained between the distributional impacts of higher energy costs on the economy and the longer-term economic impacts of utility intensive enterprise investment."</i></li> <li>• The promotion of Naas as a sustainable international destination for ICT infrastructures in line with Regional Policy Objective 8.25 is welcomed in the Draft LAP, and the acknowledgement at 6.4.5 that; <i>"Data Centres by their nature, are trending towards hyper scaled units and are land extensive and energy hungry developments and can have differing locational requirements depending on the type of data accessibility speeds they cater for. All Data Centres have common infrastructure requirements such as access to high voltage electricity lines, high powered fibre optic cables, good site security and accessibility."</i></li> <li>• Data Centre development can realistically only be enabled within a certain proximity of these infrastructure confluence areas, and as above, we submit that lands to the north of Junction 10 on the M7 at Newhall (see figure 1 above) are very suitable for this type of development, due to their relative proximity of these infrastructure confluence areas (see Figure 3 below).</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|          |      | <div data-bbox="840 288 1854 922" data-label="Figure"> </div> <p data-bbox="875 938 1818 963"><i>Figure 3 – Superior line strength at the lands at Newhall, Junction 10 (blue), compared to identified sites (purple)</i></p> <ul style="list-style-type: none"> <li>• These lands were originally designated for Enterprise but have not been identified in the Draft Plan, meaning they will fall on de-zoned land and be outside of settlement boundaries, which will directly impact Kildare's ability to attract data centre investment in the area, particularly investment which utilises existing assets in the county.</li> <li>• It is submitted that the existing, enabling infrastructure confluence at the site marked in Figure 1 makes it more suitable for development than the locations identified in the Draft Plan.</li> <li>• Due to the known positive economic impact that Data Centre developments can enable, as outlined above, a supportive policy for the delivery of Data Centres on this alternative site at Newhall, Naas Junction 10 M7, should be considered.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <ul style="list-style-type: none"> <li>• A supportive policy of this nature could include the following: <b>EDO 1.12</b> - Facilitate the location of Data Centre development on land designated P: Data Centre/Warehouse at Newhall, Naas Junction 10 M7 for the identified land use only subject to appropriate environmental and transport impact assessments.</li> <li>• Recognition that lands suitable for the development of Data Centres demand a confluence, or co-location, of required enabling infrastructure (fibre and power requirements, as well as supportive road infrastructure)</li> <li>• Specifically, potential Data Centre location sites should be located within 3 km of a transmission (110/220/400 kV) substation or 2km of an overhead line should be supported. In addition, potential development locations should be within 20km of at least one major backhaul fibre network.</li> <li>• It should be the policy of the Council to support the development of Data Centres, in these locations, subject to the usual criteria of assessment expected for this form of development, such as an assessment of design, scale, layout, visual impact, noise, flood risk, AA screening, environmental considerations and transport / access arrangements.</li> <li>• To avoid a scenario where data centre investment in Kildare is curtailed, future development must utilise existing electricity infrastructure assets where possible. Therein lies the significant opportunity for Naas, as the power security already exists in existing substations and overhead lines at Newhall, Naas Junction 10 M7.</li> <li>• The Naas LAP should indicate support for this type of development in Newhall, where the required infrastructure is already in place. Reflecting this policy would highlight Kildare's commitment to responsible, plan-led development of data centres in Ireland, thus ensuring the county can benefit from the significant economic and employment benefits that data centre development brings.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission relating to alternative land for a data centre development are noted. The Spatial Planning and National Roads Guidelines (2012) under Section 2.4 emphasise that there must be an evidence base to such developments that are proposed in the vicinity of motorway interchanges and a traffic assessment to ensure the avoidance any adverse impact on the national road infrastructure must be provided to this end. Such proposals must demonstrate, inter alia, consistency with the relevant regional and national development policy/strategy.</p> |



| Sub. No. | Name          | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |               | <p>The draft Naas Local Area Plan has been informed by a comprehensive evidence base, which included the Naas/Sallins Transport Strategy (2020). The Transport Strategy provides an evidence base for the integration of land use and transport planning, which is at the centre of the Naas plan-making process. The study examined the existing and proposed transport infrastructure, including the service provision across all modes of transport including sustainable means such as active modes (walking and cycling) in Naas and Sallins. The assessment provides an understanding of the existing constraints and modal share and also identifies the interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand and ensure the optimal transportation interventions can be planned in order to drive a shift towards sustainable movement. The study found that large scale employment zonings have the potential to generate traffic volumes to undermine the national investment in the upgrade of the M7 and Junction 10.</p> <p>The Regional Spatial and Economic Strategy focuses on the densification of the existing built urban footprint around existing public transport corridors. The subject lands would represent the development of a significant land bank on undeveloped land on the periphery of Naas, which would be heavily reliant on the national road network for access with limited access via public transport, cycle and walking and therefore would not represent a consolidation of urban zonings in accordance with the requirements of the National Planning Framework and Regional Spatial and Economic Strategy.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |
| 456      | Queally Group | <p>The submission primarily relates to land use zoning objectives and specifically to 8 sites in the ownership of the Queally Group. The submission comprises of five separate attachments, as follows:</p> <ul style="list-style-type: none"> <li>○ Initial Report.</li> <li>○ Maps.</li> <li>○ Technical Note prepared by DBFL Consulting Engineers on lands A Bluebell.</li> <li>○ Consult record of submission made under draft Naas LAP 2019-2023.</li> <li>○ Submission made under the draft Naas LAP 2019-2023 prepared by Declan Brassil &amp; Company Ltd.</li> </ul> <p><b>Queally Group Profile</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <ul style="list-style-type: none"> <li>• The submission outlines the long history of the Queally Group in Naas and the active role it plays in the local community in particular the Community Centre at Monread that was donated to KCC.</li> <li>• Supports Naas as the main hub along a corridor of companies of the N7 (from Citywest to Newbridge).</li> <li>• 790 of the 1069 employees are from County Kildare. With 391 in Naas and 44 in Sallins.</li> <li>• Many benefits of living closer to work; savings on transport costs, time, walking / cycling to work.</li> </ul> <p><b><u>General Issues</u></b></p> <p><b>Housing / Affordable Housing</b></p> <ul style="list-style-type: none"> <li>• While a significant number of houses have been built in Naas not many are in the affordable bracket. Relatively few houses available for those that cannot afford a mortgage and do not qualify for social housing. This is a concern for their workforce as they are pushed further away from Naas to more affordable parts of the county and potentially seeking work elsewhere.</li> </ul> <p><b><u>Recommendation No. 1</u></b></p> <ul style="list-style-type: none"> <li>○ The Draft Local Area Plan should provide adequate lands to meet the projected future population of Naas.</li> <li>○ The Council should ensure either by itself or in conjunction with Approved Housing Bodies or government agencies, such as the Land Development Agency, that the significant 'affordable' cohort of house buyers is not forgotten and that planning, and housing policy and practice should be oriented to ensure such housing is available in Naas.</li> <li>○ Zoned residential lands, especially within the 2016 CSO boundary of the town, should be reviewed to ensure that appropriate densities can be developed to seek to ensure the development of more affordable housing units.</li> </ul> <p><b>Community Development and Amenities</b></p> <ul style="list-style-type: none"> <li>• A specific objective R1 of the Naas Town Development Plan 2011-2017 on a Queally Group site (junction of Dublin Road and Maudlins Avenue) that <i>"no development shall be permitted within this zoning in advance of an agreement for the construction of a community building on Site E5"</i>.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• This site has been developed by the Group as a community centre. The building, some 6,000 sq. feet, was donated on completion in May 2018 to Kildare County Council. The building is an invaluable resource for the people of Naas and particularly for those on the north side of the town.</li> <li>• Provision of community facilities such as this, accessible open spaces and recreational areas will make Naas a more attractive place to live, work and do business.</li> <li>• LAP maps indicate that significant areas in the Draft LAP area are open and accessible to residents of the town when in fact they are not and may never be developed / used as open space or for recreational purposes. E.g., the lands in the Kerderen/The Knocks area, to the west of the Naas Branch of the Canal. The last two Naas town plans indicated a Future Park/Green Belt area of significant scale. In the current Draft LAP these lands have now been designated as 'Strategic Reserve' lands with open space reduced to a few small areas and which will neither function as a Green Belt nor as a Future Park as envisaged in earlier plans.</li> </ul> <p><u>Recommendation No. 2</u></p> <ul style="list-style-type: none"> <li>○ Additional community facilities and recreation areas should be planned for, funded, and developed to meet the varied needs of an increasing and diverse population.</li> <li>○ That the zoning map ref. 11.1 showing open space areas should be re-visited to clarify and differentiate between open space areas open and usable by the public and other open space areas that are privately owned and</li> <li>○ existing and possible future open space areas.</li> </ul> <p><b>Motorway Building Line</b></p> <ul style="list-style-type: none"> <li>• Reduce the motorway building line constraints. MTO 3.7 of the draft Plan requires a 91-metre building line setback from the motorway and associated junctions.</li> <li>• However, maps indicate this 91-metre building line has been breached on many occasions in and around Naas.</li> <li>• The wording and the setback shown on the Plan maps introduce significant uncertainty to developers that wish to develop their zoned lands for employment purposes.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <ul style="list-style-type: none"> <li>• Specific reference is made to one location (discussed in more detail later) in the Monread Road Business Park where the site extends to 8 hectares and if the building line of 91 meters were applied it would reduce the area by 2.3 hectares to 5.7 hectares. This is contrary to the principles of proper planning and sustainable development as lands are serviced, zoned for employment in a key town/growth driver that could help produce some of the 3,329 jobs needed in Naas by 2027.</li> <li>• The Draft LAP states given recent upgrade of the M7 that “no further upgrades are envisaged in the near future” (section 5.4). It is therefore proposed that the wording of MTO 3.7 be re-worded for industrial/warehousing/commercial development.</li> </ul> <p><u>Recommendation No. 3</u></p> <ul style="list-style-type: none"> <li>○ Amend MTO 3.7 as follows: To ensure a 91-metre building line setback from the motorway and associated junctions for residential development and other noise sensitive uses such as offices, schools, and nursing homes from the nearest roadside edge to protect against transportation noise.</li> <li>○ Under certain circumstances other uses such as industry and warehousing will be considered within this setback zone and no closer than 45 metres from the road edge in recognition of local conditions and the nature of the proposed activity and in the interests of sustainable and economic development.</li> <li>○ Ancillary uses to the main use on a site may be permitted within 45 metres of the motorway where the future development of the motorway network would not be impaired.</li> </ul> <p><b>Gallops Avenue</b></p> <ul style="list-style-type: none"> <li>• One of the proposals in the Draft Plan to improve the circulation around the town is the objective MTO 3.2 to develop The Gallops Avenue between the Dublin Road and the Blessington Road.</li> <li>• The review of the design, of what was formerly termed the Naas Inner Relief Road, should ensure that the proposed Avenue is not only more attractive but will also fulfil its functions as a key element of urban infrastructure and enable the implementation of significant public realm infrastructure in the town centre and its approaches.</li> <li>• The lack of a design for the former Inner Relief Road was one of the reasons given in the Council’s refusal of planning permission for a neighbourhood development on a site that would have included a supermarket and</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <p>three shop units (Ref: 18/880). It is expected that the re-design of the Gallops Avenue will not be used as a reason to prevent timely development in the area.</p> <p><u>Recommendation No 4</u> - retain text and policy/objective MTO 3.2 regarding the development of the Gallops Avenue.</p> <p><b>Junction 9 (Maudlins) KDA and Naas Industrial Estate:</b></p> <ul style="list-style-type: none"> <li>• Important for businesses to give a positive image of Naas.</li> <li>• Important that the area in the vicinity of various facilities looks well.</li> <li>• One of the significant detractors to the visual appearance of Naas has been the gateway entrance to the town from Dublin - dereliction of the former Cemex and Donnelly Mirrors sites.</li> <li>• Proposals to zone these lands for commercial use and to seek the regeneration of these two critical gateway sites and to outline an urban design concept on how the lands might be re-developed in Figure 10.29 are very welcome and encouraging.</li> </ul> <p><u>Recommendation no 5</u> - Retain Junction 9 (Maudlins) Key Development Area in the Naas LAP and the Council to use its powers to secure the regeneration of the Maudlins Key Development Area and to seek national urban regeneration funds to assist in this process as appropriate.</p> <p><b><u>Specific Issues (Land Use Zoning):</u></b></p> <p>Reference is made to nine separate sites around Naas in the ownership of Queally Group.</p> <p><b>QG1 - Brophy House Site and Surrounding Lands Dublin Road (see map below)</b></p> <ul style="list-style-type: none"> <li>• Lands are zoned 'K Commercial/Residential' with a specific objective Site K1 which states "<i>any development of this site shall be of a high standard of design and quality having regard to its strategic location off the Maudlins Interchange (Junction 9) and gateway into the town</i>".</li> <li>• It is hoped a high-quality development for the former Brophy house site will be brought forward during the lifetime of the Plan complementing the existing two office blocks and the adjoining Maudlins Hotel and provide additional employment workspace.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <div data-bbox="1458 323 1883 802" data-label="Image"> </div> <p data-bbox="577 775 1451 807"><u>Recommendation No. 6</u> - retain 'K: Commercial/Residential' zoning.</p> <p data-bbox="528 908 1429 940"><b>QG2 - Retail / Commercial Site at Dublin Road / Maudlins Avenue</b></p> <ul data-bbox="577 970 2168 1335" style="list-style-type: none"> <li>• 1.33-hectare site located at junction of Dublin Road and Maudlins Avenue.</li> <li>• Zoned R – Retail / Commercial in Naas Plan 2011-2017 with an objective to provide for and improve retailing and commercial activities.</li> <li>• No development was to be permitted on this site until an agreement for the construction of a community building on Site E5. This was built and handed over to KCC.</li> <li>• However, in 2018 Lidl were refused permission on this site as it would contravene policies R2 and R7 in the Kildare CDP 2017-2023. Being peripheral from the town centre. It was also premature pending the route selection for the Naas Inner Relief Road.</li> <li>• It appears the objective to provide a community building has been overtaken by developments in retailing and infrastructure.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <ul style="list-style-type: none"> <li>• The 2017-2023 CDP restricts <i>“the granting of permissions for both convenience and mainstream comparison floorspace in the town and its environs outside of the designated Core Retail Area until proposals for the redevelopment regeneration of some of the following key sites have been achieved: Naas Shopping Centre – Corban’s Lane; the former Superquinn site; the Naas Shopping Mall; the former Penney’s outlet on Blessington Road”</i>.</li> <li>• This is no longer applicable as in the last few years these sites have largely been re-developed, or plans are at an advanced stage.</li> <li>• Given the lapse of time and the positive change of circumstances for the sites identified in policy R7 in the CDP that they should not stymie progressing a neighbourhood retail development on site ‘R1’ on the Dublin Road.</li> <li>• The other reason for refusal was the development being premature pending route selection of the Naas Inner Relief Road. While Naas MD did not approve of the proposal the design of the road and its junction with the Dublin Road is known and there is no longer a reason to contend that the development of the site would be premature.</li> <li>• The draft Naas LAP 2021-2023 changed the zoning of the site from R1 (Retail / Commercial) to K (Commercial / Residential). This is extremely disappointing that once the specific objectives of the council were met by the Queally Group (community centre) at considerable expense the council then changed its policy to the detriment of the group and the local area.</li> <li>• An appropriately scaled and walkable new facility in the north east quadrant near existing and developing residential areas would represent sustainable planning and development and would not be detrimental to the retail function of the town centre.</li> <li>• Reinstating the former zoning would accord with Ministerial Guidelines in relation to local shopping which is stated to be <i>“shopping at the most local level provided by a mixture of neighbourhood shops in suburban areas and village stores/post-offices in rural areas”</i>.</li> <li>• A Local Centre or Neighbourhood Centre is defined as comprising <i>“a small group of shops, typically comprising newsagent, small supermarket/general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population”</i>. The proposal by the Queally Group would fulfil this definition.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <p><u>Recommendation No. 7 –</u></p> <ul style="list-style-type: none"> <li>○ Re-instatement of the retail / commercial zoning objective or alternatively change the zoning of the site to 'N: Neighbourhood Centre' where the objective would be “to provide for new/existing neighbourhood centres and associated facilities” as envisaged in the Retail Planning Guidelines 2012.</li> <li>○ Omit Policy R7 from the existing Kildare CDP as it has been overtaken by more recent events i.e., the redevelopment and/or plans for the redevelopment of the sites in Naas identified in the policy. The lack of movement on just one identified site in the town centre can have a disproportionate negative effect on obstructing welcome and needed development elsewhere in the town and where the owners of these other suitable sites have neither the influence nor the powers to bring town centre sites forward for development.</li> </ul> <div data-bbox="958 678 1736 1129" data-label="Image"> </div> <p>(site in peach colour)</p> <p><b>QG3 – Maudlins Avenue (Residential Site – (see map above)</b></p> <ul style="list-style-type: none"> <li>• 0.46-hectare site is zoned B (Existing / Infill Residential) in the draft LAP with an objective “to protect and enhance the amenity of established residential communities and promote sustainable intensification”.</li> <li>• Development was permitted for 9 units on the site in 2018.</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <p><u>Recommendation No. 8</u> - Retain this zoning/objective.</p> <p><b>QG4 – Former Kinlon Site (Monread Road – See figure 4 below)</b></p> <ul style="list-style-type: none"> <li>• 0.4-hectare site is zoned B (Existing/Infill Residential) in the draft Plan.</li> <li>• The residential zoning is a historic one when a house since demolished occupied the site.</li> <li>• The zoning is considered an anomaly given the location of the site and adjoining uses i.e., significant industrial and commercial units, wastewater treatment plant, bus/truck parking and servicing.</li> <li>• It is considered more appropriate that the industrial zoning of Maudlins Industrial Estate; 'H – Industry and Warehousing' - should be extended to include this site.</li> <li>• Employment uses would be better suited to the site and to the immediate area than residential development.</li> <li>• Any residential development on the site would probably have to be accessed off the industrial estate road (rather than the Monread Road) which would not be an attractive proposition for prospective housing developers or future residents.</li> <li>• Development of the site would consist of employment uses which would have minimal impact on the existing residential area further to the west and would also strengthen the role of Naas as a Key Town and as a significant employment location.</li> </ul> <p><u>Recommendation No. 9</u> - change the zoning of the former 'Kinlon' site, Monread Road from 'B – Existing/Infill Residential' to 'H – Industry and Warehousing' to provide for industrial, manufacturing, distribution and warehousing uses in the Key Town of Naas.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <div data-bbox="981 288 1711 751" data-label="Image"> </div> <p><b>QG5 – Monread Business Park (see figure 4 below)</b></p> <ul style="list-style-type: none"> <li>• 8 hectares located near M7 and IDA Industrial Estate.</li> <li>• Lands are zoned 'H – Industry and Warehousing' in the Draft Naas Plan.</li> <li>• Lands were formerly divided by Naas TC area and KCC area. Applications were made to both authorities for development in the past.</li> <li>• Queally Group now intends to resubmit applications for the overall development of these lands for employment purposes building on the infrastructure already in place.</li> <li>• The 91-metre building line from the motorway is a significant constraint affecting the sustainable development of the Queally Group's zoned and serviced lands in the Monread Road Business Park which adjoins the M7.</li> </ul> <p><u>Recommendation No. 10</u> - Retain the Draft Plan zoning of the lands as 'H – Industry and Warehousing' to provide for industrial, manufacturing, distribution and warehousing uses in the Key Town of Naas.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <div data-bbox="1070 288 1704 707" data-label="Image"> <p>A map showing an industrial estate with several buildings. One large building complex is highlighted in orange. A red arrow points to it from a red text box that reads 'QG-Site 5 Monreel Business Park 21.2 Acres 8.5 Hectares'. The map also shows surrounding residential areas and roads.</p> </div> <p><b>QG6 – Naas Industrial Estate Sites / Units</b></p> <ul style="list-style-type: none"> <li>• This occupies over 180,000 square feet of modern production, cooking, packing, and warehousing.</li> <li>• Lands in the industrial estate are zoned ‘H – Industry and Warehousing’ in the Draft LAP.</li> </ul> <div data-bbox="1115 834 1559 1158" data-label="Image"> <p>A map showing an industrial estate with several buildings highlighted in pink. A red arrow points to one of the buildings from a red text box that reads 'QG-Site 6 Naas Industrial Estate'. The map also shows Fishery Lane and surrounding areas.</p> </div> <ul style="list-style-type: none"> <li>• Older industrial estates like this face challenges, they are underused / disused sites with poor-quality public realm e.g., lack of adequate footpaths for pedestrians.</li> </ul> <p><u>Recommendation 11 –</u></p> |

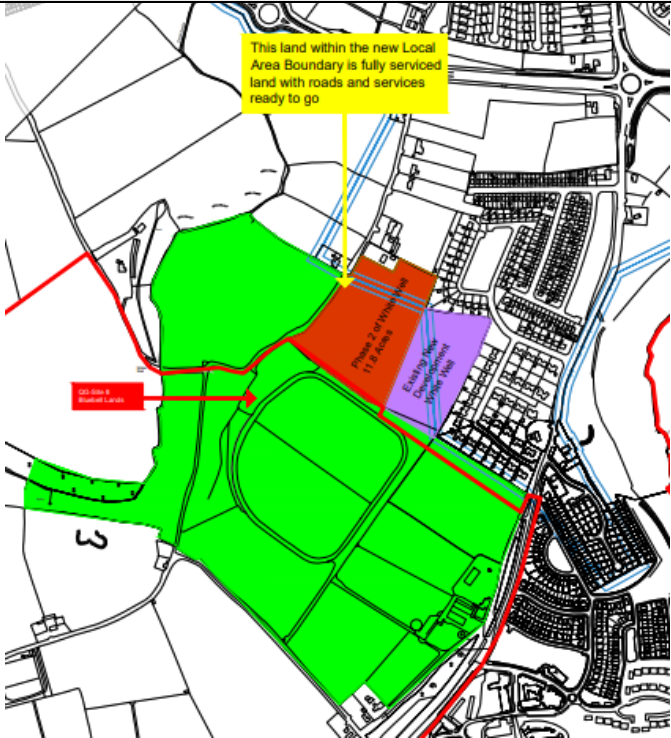
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |      | <ul style="list-style-type: none"> <li>○ Survey and upgrade possible supplementary route (noted in figure 10.29 of the LAP) through Naas Industrial Estate from the Junction 9 (Maudlins) Key Development Area to Fishery Lane.</li> <li>○ Include objective for Naas Industrial Estate to be taken in charge.</li> <li>○ Include objective to upgrade/seek the upgrading of older industrial areas and to regenerate them so that they continue to provide modern, valued, and sustainable employment locations in the town and proximate to residential areas.</li> </ul> <div data-bbox="949 571 1742 1145"> </div> <p><b>QG7 – Fishery Lane Lands</b></p> <ul style="list-style-type: none"> <li>• 5.3 hectares of land deemed to be primarily agricultural in the previous two CDP's since 2011.</li> <li>• The lands were zoned low density residential in 2005-2011 CDP.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <ul style="list-style-type: none"> <li>• The LAP does not follow the same boundary as the former town council, and it is deemed appropriate to now re-zone this land for low density residential development given the pattern and character of low-density one-off housing in the area.</li> <li>• This would meet the demand of one-off rural housing in a cluster style format and be a more sustainable alternative than dispersed sites in rural areas further from the town.</li> </ul> <p><u>Recommendation No. 12 –</u></p> <ul style="list-style-type: none"> <li>○ Revise the LAP boundary and include these lands (owned by Queally Group) and adjoining lands within the plan area.</li> <li>○ Zone the lands for residential use with a Specific Zoning Objective to provide for low density cluster style housing development for applicants fulfilling the criteria set out in the County Development Plan.</li> </ul> <div data-bbox="875 719 1816 1203"> </div> <p>(site highlighted in Green)</p> <p><b>QG8 – Lands at Bluebell / White Well</b></p> <ul style="list-style-type: none"> <li>• 5 hectares of a total landholding of 48.4 owned by Queally Group in Bluebell.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <ul style="list-style-type: none"> <li>• Lands bounded to the east by new residential development of 125 houses and apartments – White Well - being completed by Ardstone Homes, to the west by the Rathasker Road, to the south by agricultural lands, and to the north by the Broadfield View residential development and one-off dwellings along Rathasker Road.</li> <li>• Lands are strategically located and represent an urban infill and consolidation site. The new White Well development which Ardstone is completing and the Queally proposal would represent a logical Phase 2 extension. (This new housing development has brought an access road to the site boundaries and has allocated open spaces to enable an appropriate and straightforward extension and consolidation of this area).</li> <li>• The site is linked by footpath and cycle links to the town centre and adjoining established residential, employment, educational, recreational and community uses.</li> <li>• The site is serviced, has extensive road frontage along the Rathasker Road which can be used for recreation and will be readily accessible from the Kilcullen Road (R448), and is unconstrained by any requirement for infrastructure provision or upgrades.</li> <li>• The lands are immediately available to deliver quality housing, subject to appropriate zoning and planning permission and will be of critical importance to meeting Regional, County and LAP housing targets for the town.</li> <li>• Planning Authorities are required to ensure that sufficient and suitable lands are zoned for residential uses to meet the requirement of the Housing Strategy and <i>'to ensure that a scarcity of residential land does not occur at any time during the period of the plan'</i>.</li> <li>• The lack of suitable and especially affordable housing in Naas has created issues for major employers and employees of those companies, including the Queally Group.</li> <li>• Based on current trends since 2016 the housing targets outlined in the LAP will be met years ahead of the Plan period leading to a shortage of new housing in the coming years. This would be contrary to Ministerial Guidelines.</li> <li>• The site has the capacity to deliver new housing in the short term which will assist in alleviating the existing housing shortage and will facilitate the Planning Authority in at least partially meeting its regionally directed housing targets.</li> <li>• The lands are Tier 1 Serviced Lands and therefore can be considered for development within the lifetime of the LAP.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <ul style="list-style-type: none"> <li>Given the timeframe of the LAP, the extent of Tier 2 and Strategic Reserve lands in the Draft LAP, and the constraints associated with those lands and likely timeframe for their release, it is submitted that the NPF mandates the Council to prioritise Tier 1 lands such as this for release and development within the lifetime of the LAP.</li> <li>There is a clear need for the prioritisation and zoning of Tier 1 lands.</li> <li>The lands are part of a larger Queally landholding at Bluebell where some additional land could be designated for recreational purposes.</li> </ul> <p><u>Recommendation No. 13</u> - Change zoning of the 5-ha adjoining the new White Well housing development to the east and the Rathasker Road to the west from 'I: Agriculture' to 'C: New Residential' to facilitate the extension, consolidation and enhancement of the adjoining established and developing residential neighbourhood at Bluebell, Pipers Hill and Killashee.</p> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      |  <p><b>QG9 – Industrial and Warehousing Lands at Newhall (no map attached)</b></p> <ul style="list-style-type: none"> <li>• Queally Group supports a submission being made to the planning authority on the Draft Naas LAP by Ronan Clarke, Consultant Engineer, on behalf of Peter Kelly / Newhall Properties Ltd. The submission relates to a 2.6 ha site (part of a 3.3 ha holding) at Newhall and adjoining the existing business park to the west of the Rathangan Road.</li> <li>• Previously zoned for industrial and warehousing uses in CDPs from 2005 to 2017. The lands were not zoned in the 2017-2023 CDP and therefore it was anticipated they would be included in the Naas LAP boundary.</li> <li>• It is suggested that this was an oversight on behalf of the council as planning permission has been given for separate substantial developments on these lands in February 2021.</li> </ul> |

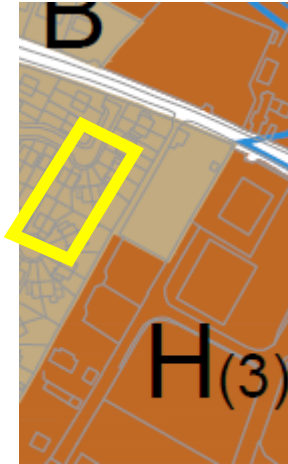
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• The fact that the lands are no longer zoned for industry/warehousing presents a significant obstacle to the funding and development of the lands for employment uses.</li> <li>• It is recommended to revise the LAP boundary to include the Kelly holding within the Plan area and to re-instate the former industrial and warehousing zoning on the lands and zone the lands as 'H: Industry and Warehousing' in the amendments to the Draft Naas LAP.</li> </ul> <p><b>Note;</b> An additional supporting document from Declan Brassil &amp; Associates on the Naas LAP 2019-2023 accompanied the submission to the Draft Naas LAP 2021-2027.</p> <ul style="list-style-type: none"> <li>• It is proposed in the submission that the subject site located in Bluebell, Kilcullen Road, Naas, which extends to 4.8ha be zoned New Residential.</li> <li>• The Queally Group and other employers have faced difficulty in retaining skilled staff; this is due to a shortage of suitable and affordable housing. The Group has now entered a commercial arrangement with Ardstone Homes to develop its landbank.</li> <li>• Queally Group encourages and supports the provision of additional community and social infrastructure in Naas.</li> <li>• Phase 1 is the Strategic Housing Development (An Bord Pleanála (ABP) Reg. Ref. 303023-18) for 125 units on a zoned site of 3.5ha immediately adjoining the subject lands.</li> <li>• Subject to confirmation of the proposed zoning of the lands, an application will be expedited to develop both sites concurrently.</li> <li>• The submission considers that the lands are suitable for consideration being Tier 1 land.</li> <li>• It proposes a zoning objective: 4.8ha of land to be zoned '<i>New Residential (objective C)</i>' to facilitate the extension, consolidation and enhancement of the adjoining established residential development at neighbourhood at Bluebell, Pipers Hill and Killashee.'</li> </ul> <p><b>Physical Context</b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |      | <ul style="list-style-type: none"> <li>• Lands are strategically located and represent an urban infill and consolidation site.</li> <li>• Proximate to public transportation infrastructure, schools, and a range of employment opportunities.</li> <li>• Existing footpath and cycle infrastructure, extensive road frontage and highly accessible to a range of employment opportunities for instance the Queally Group.</li> </ul> <p><b>Assessment of the Suitability of Lands</b></p> <ul style="list-style-type: none"> <li>• Based on the accompanying Technical Note prepared by DBFL Consulting engineers, the subject lands can be classified as a Tier 1 site in accordance with the NPF.</li> <li>• Need – housing shortage and this site can be considered for development within the life of the Plan and are Tier 1.</li> <li>• A need for additional housing is outlined based on the national housing crisis, the Rebuilding Ireland document (2016) and issues facing local employers in Naas.</li> <li>• Reference is made to the NPF in terms of encouraging population growth and the designation of Naas as a Key Town in the RSES which have the capacity and potential to accommodate above average growth.</li> <li>• Reference is made to the County Development Plan 2017-2023 and that 14.9% of future population growth for the county is allocated to Naas which equates to a new dwelling completion rate of 692 units per year for the 2016-2023 period.</li> <li>• Reference is made to the Draft Plan in terms of the Core Strategy and Housing Targets and the Infrastructural Assessment Report.</li> <li>• The submission notes that the Tier 2 zoned lands are generally reliant on the provision of significant roads infrastructure as identified on the Land Use Zoning Objectives Map of the LAP.</li> <li>• Tier 2 lands identified as C2 (20), C2 (21), C2 (3) and C1 (4) do not currently appear to have direct vehicular, pedestrian or cycle access in the short to medium term.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <ul style="list-style-type: none"> <li>• Naas West KDA (C1 (2)), are identified as being within 'Northwest Quadrant' (NWQ), which has been designated as a component of the long-term development vision of the development of Naas up to 2040, far beyond the immediate 4-year timeframe of the Draft LAP.</li> <li>• Road Objective SP01.7 (Northwest Quadrant Link) is required to service the tier 2 residential lands in the Northwest Quadrant which is after the Naas Transportation Strategy.</li> <li>• Outlines that the NWQ is to be subject to a masterplan and further flood risk assessment compared to the subject lands which are ready within the lifetime of the Plan.</li> <li>• The subject lands have a range of characteristics that make it physically suitable; accessibility, site form and area, topography, servicing, not in a flood zone or contaminated and therefore available to readily facilitate development that would ensure that the Planning Authority has a realistic prospect of achieving its housing targets.</li> <li>• The site adheres to the sequential test as per the Development Plan Guidelines.</li> <li>• The subject site would not impact on any built and natural heritage designation.</li> <li>• The figure below illustrates the sites context in relation to other developments / amenities.</li> </ul> <p><b>(1) Technical Report prepared by DBFL Consulting Engineers</b></p> <ul style="list-style-type: none"> <li>• The report sets out a brief overview of servicing considerations associated with the subject lands.</li> <li>• Report comprises an overview of the site servicing considerations associated with the proposed development lands at Bluebell in terms of access and transportation, foul drainage, water supply and surface water drainage.</li> <li>• It advises that the Osberstown Wastewater Treatment Works have capacity to serve the development and would avail of a pumping station that was approved as part of PL.09.302130.</li> <li>• The subject lands would be accessed via the previously approved 122-unit residential scheme.</li> <li>• The report refers to the Eastern CFRAM maps and that there is no indication of fluvial flooding. The SFRA does not indicate any risk of flooding.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <p><b>Chief Executive's Opinion</b></p> <p>The content of the submission by the Queally Group are noted, in particular the comments in relation to the nine individual sites and the four re-zoning requests are noted.</p> <p>The housing targets for Naas are set out in Variation No. 1 of the Kildare County Development Plan 2017-2023. As the higher order plan the Naas Local Area Plan must comply with the allocation provided. Any change to the housing allocation as a result of the review of the County Plan will be reflected in a statutory amendment to the LAP (CDP 1.1, refers) in appropriate. The Urban Regeneration and Housing Act 2015 (as amended) allows for active land management of sites that are zoned for residential use through the application of the vacant site levy, through this mechanism the Council will have the ability to actively pursue sites zoned for residential use which are not been acted upon, thereby ensuring the sustainable delivery of a continuous supply of new housing (Objective HCO 1.5, refers). The residential densities as provided for in the draft Plan are proposed to be amended in response to the submission received from the OPR (Submission #009, refers).</p> <p>As noted in the submission the lands to the west of the Naas Branch of the Grand Canal have been identified as Strategic Reserve. These lands will be subject to a masterplan in conjunction with the significant landbank in the Northwest Quadrant. No decision has been made on the use of these lands and there is no requirement to retain previous objectives for the land parcels contained under previous plans. It is also important to note that Section 3.5.1 of the SIA which accompanies the Plan highlighted that that the inclusion of the Craddocktown Golf Club would skew the figures and therefore were not included in the calculations for sports facilities and amenities. However, the Open Space and Amenity zoning reflects the current use as a golf course. Similarly, it is important to note that in the evaluation and assessment of open space, lands with no public access such as Oldtown Demense were also excluded from the overall calculations.</p> <p>The comments with respect to the 91-metre set back and in particular that development has occurred within the 91-metre setback previously are noted. During the preparation of the draft Plan this issue was discussed at length with Transport Infrastructure Ireland (TII) who are responsible for the protection and maintenance of the motorways. It was considered that the setback of 91-metres was adequate to protect the national road network and associated junctions. While no further upgrades are envisaged in the near future, it is the role of the Council to protect national investment in infrastructure beyond the lifetime of many land use plans. As noted under Objective MTO 3.7 the setback relates to building line only and under certain circumstances ancillary development may be considered within the setback zone in recognition of local conditions and the nature of the proposed activity.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p>The comments in support of the Gallops Avenue are noted, in particular the significant public realm infrastructure in the town centre and on its approaches, that may be delivered as a result of the implementation of this connection.</p> <p>The comments in relation to QG 2 in particular the restriction of significant new retail development outside of the Core Retail Area until key sites in Naas are developed is noted. In this regard, the draft plan must adhere to the policies and objectives contained in the hierarchy of Plans. Furthermore, the County Plan does not identify additional retail floorspace for Naas. The draft Plan for Naas focuses on the protection and promotion of the vitality and viability of the Core Retail Area (Objective EDO 3.2, refers) and it is critical that there should be no provisions contained in the Plan that would act undermine the town centre/core regeneration areas.</p> <p>The anomaly in relation to QG4 – Former Kinlon Site on Monread Road is noted and accepted. This site was assessed under the Sustainable Planning and Infrastructural Assessment (SPIA) which accompanied the draft Plan identified as H (3) and which was categorised as Tier 1 and it is recommended that this should be addressed as a proposed material alteration.</p> <p>The comments are noted in relation to the Naas Industrial estate (QG6). The supplementary exit route through Fishery Lane to serve Maudlins KDA will be examined through the preliminary traffic modelling to be undertaken by the Council in respect of Junction 9 (Maudlins) (Objective URD 1.12, refers). It should be noted that the taking-in-charge of estates as provided for under the Planning and Development Act 2000 (as amended) concerns the construction of two or more houses and does not provide for the taking in charge of industrial estates. Furthermore, it is an objective of the draft Plan under EDO 1.4 to facilitate the regeneration and redevelopment of the lands to the east of the Dublin Road roundabout.</p> <p>The comments in relation to the Fishery Road site (QG7) and the lands at Bluebell/White Well (QG8) are noted. In accordance with national guidance the expansion of low-density development around our cities and towns cannot continue therefore low-density cluster type development on the periphery of a Key Town as proposed at Fishery Road would not be considered a sustainable use of land. The Bluebell lands lie partially outside of the defined settlement boundary on the periphery of Naas and therefore do not represent sustainable compact growth and further development to the south of the town, at a location which is ca. 4km from the train station is contrary to the overall Vision for Naas. Furthermore, the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and</p> |

| Sub. No. | Name       | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |            | <p>RSES as sufficient lands have been identified for development which are considered more appropriate having regard to the national and regional policy context.</p> <p>The support in relation to the industrial and warehousing lands at Newhall (QG9) are noted. Please refer to Submission 349 for the Chief Executive's Opinion and Recommendation.</p> <p><b>Chief Executive's Recommendation</b><br/> <b>Proposed Material Alteration</b><br/> 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 (outlined in yellow below)</p>  |
| 467      | Cairn PLC. | <p><b>Request to rezone lands at Jigginstown from I: Agricultural to Residential use</b></p> <ul style="list-style-type: none"> <li>Submission by John Spain Associates on behalf of Cairn PLC. ('Cairn') relate to lands situated to the south of the Ring Road with an access onto the Roundabout and Junction with John Devoy Road to the north (see map</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                          |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <p>at end of summary). The submission notes that the lands subject of this submission are currently indicated in the Draft LAP as 'I-Agriculture' with an objective 'to retain and protect agricultural uses.' The submission notes that Cairn is seeking the change in zoning from Agriculture to Residential use of the subject lands as it represents an opportunity to deliver a coherent urban precinct in this area of Naas.</p> <ul style="list-style-type: none"> <li>• States that the zoning as currently presented in the Draft LAP represents a lost opportunity from a planning perspective as the lands are considered to be an appropriate infill site and highly suitable for residential development and can make a positive contribution to the need for new additional residential zoned land in Naas.</li> <li>• The submission contains an Executive Summary which provides an overview of the points summarised below.</li> <li>• The submission contains two appendices, as follows: <ul style="list-style-type: none"> <li>○ Appendix 1 – Cairn PLC Submission on the Kildare Draft Development Plan Issues Paper</li> <li>○ Appendix 2 – DBFL Technical Note</li> </ul> </li> <li>• Submission outlines the work of Cairn as Irish Housebuilder founded in 2014 actively engaged in in the delivery of some 15,000 homes over the coming years across several counties including the Greater Dublin Area. Submission outlines the delivery of new houses to day and provides an overview of its activities across several sites in the town including provision as part of its Part V obligations.</li> </ul> <p><b><u>Strategic Policy Context and Justification</u></b></p> <p><b><u>NPF and Tiered Approach to zoning</u></b></p> <ul style="list-style-type: none"> <li>• Submission provides an overview of the role of Naas within the National Planning Framework noting its role as an employment and services centre and its strategic location along the M7 corridor.</li> <li>• Notes the provisions of the NPF regarding the need for a Tiered Approach to zoning. Submits that the lands should be designated as 'Tier 1' for several reasons, as follows; they are able to connect to existing development services and there is capacity available; all the necessary services are available; there is easy access to the town centre (c. 1km) via the Devoy Link Road; the lands are spatially sequential and contiguous to the existing development and; they benefit from existing transport infrastructure of the South Ring Road.</li> </ul> <p><b><u>The Case for Higher Growth</u></b></p> <ul style="list-style-type: none"> <li>• It is submitted that the LAP needs to reflect the up-to-date position in relation to population growth and housing needs for Naas as if not addressed, this would result in a material exacerbation in the existing housing crisis in the County (and in the region).</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |      | <ul style="list-style-type: none"> <li>Notes that the NPF population projections were based on the 2011-2016 Census data, which coincided with a period of low growth and emigration which has had the effect of significantly under-estimating growth in population for the period up to 2040. Refers to Circular FPS04/2018 (July 2018) which confirms that the Roadmap will be subject to review in the course of the NPF period. States that no review has been undertaken to date by the Department, which is unhelpful to the current review of Development Plans by Planning Authorities as it undermines population projections, and potentially future allocations indicated in the new County Plan, to the detriment of the delivery of new housing.</li> <li>Suggests that the common good requires the prioritisation of the delivery of housing and a sufficient supply of zoned land in the Key Town of Naas.</li> <li>It is submitted that the Draft LAP must ensure a continuity of supply of zoned residential land, by providing that enough land will be available to meet residential needs for the next nine years' as set out in the Section 28 Guidelines on Development Plans 2007, which the Planning Authority is required to be consistent with. States that in this regard the LAP inconsistent with Section 28 Guidelines but crucially there will be significant under provision of housing supply for the key town of Naas.</li> <li>Notes that Development Plan Guidelines (2007) further state that under Section 95 (1) of the Act, planning authorities are obliged to ensure that sufficient land is zoned for residential development, to meet the requirements of the housing strategy and to ensure that a scarcity of residential land does not occur at any time during the period of the plan. In this regard, the submission notes that there remains a very significant gap between new housing construction levels and the need for new houses nationally and in the region.</li> </ul> <p><b>Shortfall of Suitable Housing – The Evidence</b></p> <ul style="list-style-type: none"> <li>Notes that housing supply has remained significantly less than the equilibrium demand and this has resulted in 'crowding' in existing homes within urban areas. States that such problems need to be addressed and this 'catchup' housing must be provided in the new Core Strategy.</li> <li>States that all statistical evidence available points to the housing crisis resulting in "crowding" within existing houses in urban areas and an undesirable trend of increased household size forced upon people, arising from the significant shortfall in the provision of new housing prior to providing new growth in housing (submission refers to Appendix 1 – Cairn PLC Submission on the Kildare Draft Development Plan Issues Paper).</li> </ul> <p><b>Headroom</b></p> <ul style="list-style-type: none"> <li>Submission reiterates the points outlined above relating to headroom stating that there is a need</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|          |      | <p>To adhere to the National Section 28 guidelines, which to allows an element of headroom of the order of 50% of land requirement, to provide a sustainable usable landbank over a 9 year horizon to ensure the delivery of houses in the short to medium term.</p> <p><b>Household Size</b></p> <ul style="list-style-type: none"> <li>• Notes that the increasing trend of single person households without children across the EU in the EU is likely to be reflected in household formation in Ireland in the future resulting in a higher demand for dwellings over the period to 2040 and beyond.</li> <li>• States that the Draft LAP uses 2.79 persons per household, which is exceptionally high. Notes that the NPF speaks of future housing will be required to serve smaller households. Further notes that the Kildare Housing Strategy uses a more appropriate figure of 2.39 persons per household and therefore submits that the adopted LAP Core Strategy uses a more appropriate lower persons per household of 2.39.</li> </ul> <p><b>RSES</b></p> <ul style="list-style-type: none"> <li>• The submission provides an overview of the provisions of the Regional Economic and Spatial Strategy (RSES), with regard to Naas, highlighting its hinterland area location, its key town status and the growth enablers applicable to the settlement.</li> <li>• With reference to the delivery of housing and taking account of existing plans the submission refers to the provisions of the RSES which requests that Planning Authorities; take steps that may be necessary to implement strategic planning aims and above all avoiding the hoarding of land and/or planning permissions and tackle excessively slow delivery using vacant site levy and the release of alternative lands where permitted development, without any wider delivery constraints, is not being brought forward. Further notes that the RSES state that Planning Authorities to avoid creating “an unreasonable dependency” on certain sites which would impede the bringing forward of other suitable lands with better prospects for delivery in the short term, if the strategic sites are not being brought forward by their owners. In this regard the submission states that it is important that the adopted LAP does not constrain the delivery of housing noting that Cairn is seeking the change in zoning from Agriculture to Residential use to being serviced, of delivering housing in the short term.</li> <li>• More specifically, where sites are serviced, and in proximity to relevant amenities (social and retail), then there should not be an undue constraint on the capability of such sites delivering housing for a key town.</li> <li>• Notes that the RSES acknowledges that achieving good performance (in delivering growth) -” <i>will require a range of more active land management measures, beyond just zoning land.</i>”</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <ul style="list-style-type: none"> <li>• Submits that “a suitable pipeline of development opportunities” will require flexibility in the allocation of zoned land in Naas and is the most appropriate mechanism to avoid the hoarding of land and/or planning permissions and a future shortfall in land supply for housing.</li> <li>• States that the Council assessed the individual sites (on for example an asset-based criteria) to provide suitable sites for development. While a Sustainable Planning &amp; Infrastructure Assessment was undertaken, no specific assessment is evident as having been undertaken in respect of the subject site</li> <li>• It is submitted that Naas, as a designed Key town in the RSES, and which has had significant investment in infrastructure is strategically placed to cater for the growth envisaged by National Policy Objective (NPO) 9. Submits that it's incumbent on the Planning Authority to ensure that the significant investment in public infrastructure is used to facilitate housing, particularly when there is a shortage of suitable housing.</li> </ul> <p><b><u>Planning Rationale for Zoning of Cairn Lands</u></b></p> <ul style="list-style-type: none"> <li>• States that it is critical that the Planning Authority addresses the deficit identified above and allocates sufficient zoned land in a sequential manner to enable Naas to fulfil its role and designation in the settlement hierarchy and as a Key Town.</li> <li>• Submits that in order to meet the housing allocation and population projections as identified in the Kildare CDP 2017-2023, there is a clear requirement to zone additional lands in Naas. To this end the submission requests that the lands at Jigginstown in the ownership of Cairn, are changed from Agriculture (I) to New Residential (C) zoning to help address this need.</li> <li>• Reiterates that the lands are effectively an infill site. Notes that the lands are no longer attractive for agricultural use in this regard as this would represent an unsustainable use of land in this location.</li> <li>• Reiterates the importance and need to deliver residential development in such a Key Town settlement.</li> <li>• Reiterates its view that ‘I: Agriculture’ lands are considered to be Tier 1: Serviced Lands in the context of the NPF Tiered Approach to Zoning Lands Methodology owing to its proximity to serviced lands to the north and other adjacent zoned land, and existing and enhanced servicing infrastructure links in terms of transport, water and drainage facilities.</li> <li>• Notes that the lands at Jigginstown are strategically located in terms of road access and proximity to the town centre and directly adjoin lands which are currently under construction by Cairn to the north (Whitethorn) and east and as such is considered to be the next logical location for additional residential lands.</li> </ul> <p><b>Confirmation of the Suitability of the lands for Residential Use</b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <ul style="list-style-type: none"> <li>• States that the subject lands are consistent with the zoning guidance as set out in the DoHPLG's LAP Manual in that it is an extension of outward expanding residential zoning and is contiguous to existing residential and zoned development land that such an approach is also consistent with Section 3.4.6 of the Kildare CDP 2017-2023 which states that all towns should be developed in a sequential manner and that:</li> <li>• Reiterates requirement for additional providing additional zoning of between 33% and 50% to fulfil headroom provision as set out in the Development Plan Guidelines (2007) where the lands should be considered to be at the top tier of lands suitable for residential zoning and priority 1 lands in respect of development potential.</li> <li>• Outlines the provisions of Section 95 (1) of the Act, where planning authorities are obliged to ensure that sufficient and suitable land is zoned for residential, to meet the requirements of the housing strategy.</li> <li>• Outlines the provisions of the Development Plan Guidelines (2007) with regard to criteria for zoning residential development and submits that the Jigginstown lands fulfil this criteria.</li> <li>• If rezoned from Agriculture to New Residential, the subject lands in our client's ownership have the ability to deliver (subject to planning permission) a sustainable community with adjacent social infrastructure. Cairn has recently commenced development on the residential lands to the north (Whitethorn). They would envisage, subject to the change in zoning, commencing the development of the agricultural lands following completion of the lands to the north.</li> <li>• Reiterates that the lands are well-served by road infrastructure and public transport and are located less than 2 kilometres to the east of the M7 Economic Corridor which provides access to Dublin City Centre and are approximately 5 kilometres from Naas / Sallins Railway Station. Notes that The lands are also well served by local facilities such as shops and supermarkets</li> <li>• Notes that the subject lands do not contain any protected structures and are not identified as being of an environmental significant in terms of protected views or prospects. States that according to Map 9.1 of the Draft LAP, the lands are not susceptible to flooding.</li> <li>• States that it is further highlighted that the lands directly abut lands already zoned as 'New Residential' in the County Development Plan.</li> <li>• States that Green Infrastructure Corridor occupying the northwest part of the site can be preserved and enhanced through appropriately designed landscaping as part of residential development at the location.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <ul style="list-style-type: none"> <li>• Submits that connections through the site to the South Ring Road and the Key Development Area to the north can also be made by the rezoning of the lands, aligning with the aims and objectives of the CDP and the draft LAP.</li> <li>• Notes that Cairn have a proven track record for acquiring and delivering high quality housing developments with constructing usually commencing within 2 – 3mths of a grant of permission.</li> <li>• Restates that the zoning change of the subject lands in our client's ownership from 'I: Agriculture' to 'C-New Residential' will directly contribute to achieving the housing allocation and population targets as set out in the Kildare CDP 2017-2023 and the draft Naas LAP.</li> </ul> <p><b><u>Draft LAP – Specific Comments and Recommendations</u></b></p> <p><b>Naas Development Strategy</b></p> <ul style="list-style-type: none"> <li>• Refers to Figure 2.4 of the Draft Plan and note that Cairn's lands have been identified as "<i>strategic open space</i>". Submits that there is an inconsistency in identifying our client's lands, in this regard, particularly as the majority of our client's landholding is outside the identified Key Green Infrastructure Corridor (see Figure 4.3 below).</li> <li>• Strongly objects to this designation of lands which are serviced, with excellent access and in proximity to the town centre. States that this designation would effectively sterilise lands which include a road objective to the west – which would serve the adjoining proposed 'E' Educational zoned lands to the north west and the 'P(2)' Data centre zoned lands further to the west.</li> <li>• Submits that the designation of these lands as Strategic Open Space would result in the loss of the return in the significant investment in enabling public infrastructure as well as Cairn as part of the delivery of the Devoy Link Road adjacent to the site.</li> <li>• Whilst noting that the western part of the lands are proposed to be zoned F – Open Space, it is submitted that this is not required, as any future proposal for a development would be required to incorporate the riparian strip to the scheme design. Notes that an opportunity exists to provide a landscaped route along the eastern boundary.</li> </ul> <p><b>Core Strategy</b></p> <ul style="list-style-type: none"> <li>• Outlines serious concerns in relation to the core strategy figures identified for Naas. Acknowledges that the Planning Authority is somewhat constrained by population figures arising from the NPF and RSES, it is submitted that the metric should be the construction of units.</li> </ul> <p><b>Apparent Inconsistencies in the Core Strategy Calculations</b></p> |

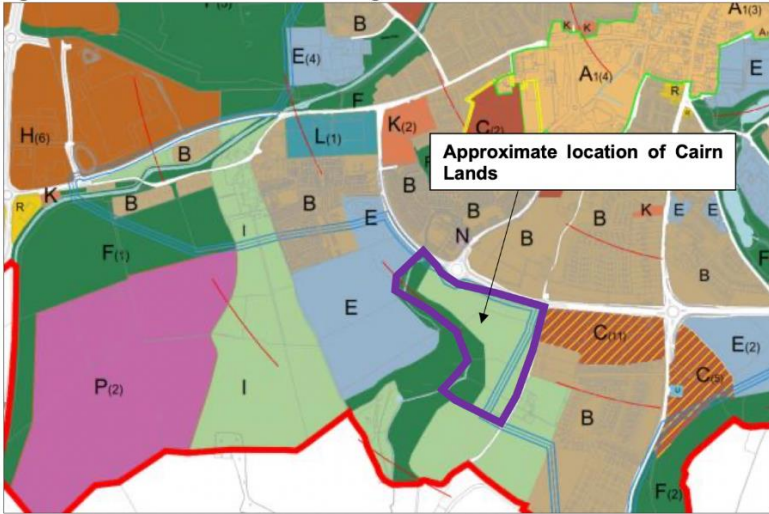
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• States that Draft LAP identifies some 2,394 units between 2021 and 2027. Table 3.4 identifies 964 units developed since 2016 to 2020. It is submitted there is no requirement to subtract these units from the overall total as the vast majority of same, were constructed prior to the adoption of variation no. 1 in June 2020. After all the Draft LAP confirms that the figures were based on the KCC variation, which are new allocations and should not be subtracted from the overall total. The effect of this approach is an immediate reduction of 40% of future zoned land,.</li> <li>• States that due to the approach of not including headroom zoned land this results in an immediate 40% shortfall of housing delivery.</li> <li>• Submission notes that Table 3.4 identifies some 877 no. units relating to extant permissions. It is highlighted that there is no guarantee of extant permissions actually being delivered. Notes that this constraint is confirmed in the Draft LAP in respect of lands zoned for development (provides example of lands on Blessington Road – which requires the phased delivery of the Inner Relief Road).</li> <li>• The LAP identifies some 252 no. units for the Gallops site (currently zoned F Open Space). Submits that such extant developments and future zoned lands (dependent on Gallops Avenue) should not form part of the future housing need for Naas.</li> <li>• States that there is real doubt on the delivery of Gallops Avenue which should be taken into account in the adopted LAP and such lands omitted from the calculations, which combined amount to some 637 no. units which are not guaranteed of being delivered without a separate part 8 development. It is submitted these lands could not be considered Tier 1 in that context, appear to fail the NPF Tiered methodology to zoning of land.</li> <li>• With regard to the above, the submission states that it is incumbent on the Local Authority to ensure that only lands which are capable of being delivered should be included in the calculations for future growth.</li> <li>• Notes that the Naas Town Development Plan 2011 – 2017, stated that 136 Ha of undeveloped residentially zoned land in Naas with capacity to deliver 4,488 units. In this regard it is noted that while some sites have been active and are under construction, some 64 hectares of land were not constructed representing c. 47% of the total. Notes that of the sites reviewed, some are still under construction, demonstrating that the timelines are even longer than the 6 year LAP cycle. States that with a time period of 10 years (2011-2021) just 53% of the sites were active in Naas</li> </ul> <p><b>Sustainable Planning and Infrastructure Assessment (SPIA)</b></p> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <ul style="list-style-type: none"> <li>• Requests that the Sustainable Planning and Infrastructure Assessment (SPIA) for the adopted Local Area Plan assesses our client's landholding as it is submitted that from a sequential perspective the subject site would score higher than many of the sites identified for development. Notes that some sites in the eastern part of the town are located significantly further from the town centre and therefore would not promote sustainable placemaking.</li> <li>• Submits that the SPIA is too narrow in its focus in the criteria used and that it would benefit from a clearer scoring for individual sites rather than the colour coding which is somewhat lost. States that the "County Development Plan Core Strategy Compliance" criteria arguably would be broadly the same for all sites as they are located in a Key Town etc., and difficult to differentiate and identify suitable sites. In this regard, we would recommend that the following would be suitable criteria and a ranking from 1-5 should be given to individual sites as follows: <ul style="list-style-type: none"> <li>• Proximity to Town Centre</li> <li>• Proximity to Local Retail Facilities and social infrastructure</li> <li>• Proximity to Education</li> <li>• Access to Green Routes (cycling and walking)</li> <li>• Infill Opportunity</li> <li>• Roads and Transportation</li> <li>• Water Supply</li> <li>• Wastewater</li> <li>• Drainage, potential for Flood Risk</li> <li>• Sequential Development</li> </ul> </li> <li>• It is submitted that the above criteria that this would provide an appropriate classification which would bring together the various strands that make a site suitable for development.</li> </ul> <p><b>Transportation</b></p> <ul style="list-style-type: none"> <li>• Notes that the road objective contained on Map 5.1 which traverses the subject site is supported by Cairn. States that the road will facilitate access to the newly proposed 'E' Educational zoned lands and 'P2' Data Centre lands. Submission refers to the enclosed technical note prepared by DBFL (Appendix 2 of the Submission) in respect of the benefits of the road objective.</li> <li>• The attached DBFL note recommends that the Jigginstown road proposal is extended past the proposed 'P(2)' Data Centre lands to R445 at the Aldi Distribution Centre, see below.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|          |      | <ul style="list-style-type: none"> <li>Notes that details of the new Jigginstown road type has not been provided in the Draft LAP but DBFL would suggest that a Link Street is provided with segregated cycle and pedestrian facilities in compliance with DMURS, which will mirror the high standard/quality of the Devoy Link Road, create a safe route for children to the 'E' Education lands and create permeability/connectivity from John Devoy Road to Newhall Retail park and Lidl.</li> </ul> <p><b>Green Infrastructure</b></p> <ul style="list-style-type: none"> <li>Notes that the link Street would provide the necessary pedestrian and cycle facilities, in the short-medium term, for the residents of this area who wish to travel on sustainable modes and provide a link/connection to the proposed Corbally Branch Greenway of the Grand Canal. States that as part of the suggested extension of the Jigginstown road proposal, the existing Aldi Distribution Centre priority junction on the R445 would be upgraded to a signalised junction, providing for the safer movement of HGVs onto the local / national road network.</li> <li>Notes that Chapter 7 includes a number of key Green Infrastructure Corridors including the Yeomanstown and Naas Hospital stream in the vicinity of the subject site. With reference to the subject site the submission states that the Yeomanstown Green Infrastructure corridor appears to be the rationale for the inclusion of some of the as 'F' zoned lands.</li> <li>Notes that to the east, the lands relating to the Naas Hospital Stream, in contrast have been afforded a residential land use zoning (Phase 2) and Educational land use zoning. Considers that this approach is somewhat inconsistent as the vast majority of the lands to the east are substantially covered by the Naas Hospital Stream Key Infrastructure Corridor. Notes that it also includes some of Cairn's Craddockstown development which was zoned F Open Space and which formed part of the development under construction by Cairn. Notes that further to the east, lands relating to the Craddockstown and Castlesize stream are similarly zoned for residential development.</li> <li>With regard to the above the submission notes that the only site outlined above which was designated with an F zoning was our clients lands and we would submit an inconsistency in that regard, particularly as the majority of our client's landholding is outside the identified Key Green Infrastructure Corridor.</li> </ul> <p><b>Appendix 1: Cairn PLC Submission on the Kildare CDP Issues Paper</b></p> <p><b>Issues Raised</b></p> <p>An extensive report was submitted addressing four themes from the issues paper which are as follows:</p> <ul style="list-style-type: none"> <li>- Healthy Placemaking; People and Places</li> <li>- Climate Action; Environment, Climate Change and Adaptation</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <ul style="list-style-type: none"> <li>- Sustainable Mobility; Movement and Transport</li> <li>- Enhance Amenity and Heritage, Landscape and Green Infrastructure</li> </ul> <p><b>Appendix 2: DBFL Technical Note</b></p> <ul style="list-style-type: none"> <li>• Document notes that DBFL Consulting Engineers have been engaged to carry out a review of the Draft Naas Local Area Plan 2021- 2027 and, in particular, the potential impacts both positive and negative to the Elsmore/Oakpark areas and lands to the north of Castlepark.</li> <li>• States that the technical note is based on a review of available information and a general inspection of the site environs.</li> <li>• Document provides and overview of the characteristics of the area with regard to permeability and public transport.</li> <li>• It notes that the Newbridge Road (R445) has no cycle facilities from the Naas Inner Relief Road/R445 junction to the Newhall Retail Park to the west. There are also no controlled pedestrian crossing facilities along the R445 west of the Inner Relief Road to Newhall Retail Park.</li> <li>• Notes the provisions of the Transport Strategy to provide a greenway parallel to the R445 (the Corbally Branch Greenway of the Grand Canal) in the short to medium term (1-5 years). However, it states that the strategy does not contain a permeability strategy from the residential areas of Elsmore and Castlefarm west to the Newhall Retail park, the M7 Business Park and Lidl.</li> <li>• Notes that the Elsmore and Oakpark areas will become a densely populated residential zones in the near future and therefore, DBFL welcome the Jigginstown road objective illustrated on Map 5.4, which traverses the subject site.</li> <li>• Suggests that the Jigginstown road proposal is extended past the proposed 'P (2)' Data Centre lands to R445 at the Aldi Distribution Centre, see Figures 2.2 &amp; 2.3 in Appendix A.</li> <li>• Notes that details of the new Jigginstown road type has not been provided in the Draft LAP. DBFL would suggest that a Link Street is provided with segregated cycle and pedestrian facilities in compliance with DMURS, which will mirror the high standard/quality of the Devoy Link Road as outlined in the main body of the submission above.</li> <li>• Regarding public transport the document notes that Chapter 5.3 of the Draft Naas LAP refers to the Naas/Sallins Transport Strategy proposals for local bus routes, bus interchange and bus priority measures for Naas town.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• Notes that there are currently very limited existing or proposed public transport routes to serve the Elsmore and Oakpark areas within the Final Naas/Sallins Transport Strategy.</li> <li>• Notes that the existing bus stop on the Newbridge Road (R445) is some 500-800m from residential properties in Elsmore. Also, the existing East-West bus route, which links key trip attractors along the Newbridge and Dublin Road with the town centre, is not one of the preferred bus routes for the public transport network in the Transport Strategy. States that this may affect the number of bus routes and frequencies of the buses along the R445</li> <li>• States that the ongoing residential development within Elsmore and Oakpark will generate significant travel demands, and therefore, it is requested that public transport routes and bus stops are provided within this area as part of the public transport objectives. Such measures could include feeder bus service (or expansion of existing) between Elsmore/Oakpark area and Sallins Train Station.</li> <li>• Document includes Appendix A which illustrates Map 5.4 from the Draft Naas LAP and suggested link street/ cycling and pedestrian infrastructure through the site.</li> <li>• Document includes Appendix A which illustrates bus catchment areas and Naas Public Transport Strategy.</li> </ul> <div data-bbox="958 855 1731 1394"> <p><b>Figure 1.1 – Location of Cairn Landholdings</b></p>  </div> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p><b>Chief Executive's Opinion</b></p> <p>The content of the submission from Cairn PLC is acknowledged. The population projections and associated housing unit target contained in the draft Plan are in accordance with Variation No. 1 of the Kildare County Development Plan 2017-2023, adopted in June 2020, which are based on the population projections set out in the NPF Roadmap (2018) and confirmed in Appendix B of the RSES adopted in June 2019. It should be noted that under the provisions of the Planning and Development Act 2000 (as amended) Kildare County Council must use the projections outlined in these strategic documents until such a time as the projections are reviewed or amended. Similarly, the Naas Local Area Plan 2021-2027 must also align with the hierarchy of plans.</p> <p>On the issue of inadequate headroom, it should be noted that the current Core Strategy and associated housing targets, as set out in the Kildare County Development Plan is the result of a statutory (Variation No. 1) which was adopted by the Council on 9th of June 2020. The figures contained in this varied core strategy have been taken from the National Planning Framework Implementation Roadmap (July 2018) which was issued to all Local Authorities by Government. While, it is acknowledged that 50% headroom was previously provided for in the Section 28 Guidelines on Development Plans (2007), the NPF roadmap is explicit in relation to the universal application of 'headroom' and states that scope for up to 25% may be considered to 2026 in counties where projected population growth is above the national average. Kildare is identified as being one of those counties where headroom of up to 25% is allowable, for the purposes of transitioning to the revised targets. This is further clarified in the RSES which states 'this may be supplemented by additional 25% headroom, applicable in the local authority areas that are projected to grow at or above the national average growth figure (page 5 of the NPF Roadmap). This further headroom may be applied regionally and locally, at RSES and city and county development plan stage.' In this regard, in accordance with the NPF (its Roadmap) and the RSES the 25% headroom was applied in the revised core strategy calculations set out in Variation No. 1 of the Kildare County Development Plan 2017-2023. It should also be noted that the Variation took the higher range of growth targets in order to ensure adequate and continued housing supply for County Kildare.</p> <p>The occupancy rate figure used in the Core Strategy is 2.8 persons, which was based on the figure for the county as reported by the Census 2016. This rate was used to represent a logical and evidence base for the purposes of the Core Strategy. The rate for Naas in Census 2016 was 2.79 therefore it aligned with that included in the Core Strategy. Census 2016 is the most recent analysis of household size and until such a time as the next Census is carried out is the most valid rate to apply.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <p>The submission makes reference to the Kildare Housing Strategy and the rate of 2.39. As stated in the Strategy this was the rate recorded in 2015, down from 3.01 in 2006. Therefore, this figure is not the most recent analysis, the figure from Census 2016 is more up to date.</p> <p>The comments in relation to the hoarding of land and/or planning permissions and the creation of a future shortfall in land supply for housing is noted. However, the Urban Regeneration and Housing Act 2015 (as amended) allows for active land management of sites that are zoned for residential use through the application of the vacant site levy. This represents part of a continued shift in national policy towards active land management within our urban settlements, giving the Council the ability to actively pursue sites zoned for residential use which are not been acted upon. This will ensure the sustainable delivery of a continuous supply of new housing and is supported by Objective HCO 1.5 of the draft Plan.</p> <p>The subject lands were not put forward for assessment and categorisation under the Sustainable Planning and Infrastructural Assessment as the subject lands are located outside of the defined settlement boundary, on undeveloped land and at a remove from high quality public transport and active travel facilities and therefore do not represent a consolidation of the existing urban form and are not required to meet the unit housing allocation for Naas.</p> <p>The comments in relation to the apparent inconsistencies in the Core Strategy calculations are noted. Census 2016 represents the base year for the number of units constructed in Naas and this is reflected in the Variation to the County Plan Core Strategy. The Core Strategy also represents the growth in population and unit target to the year 2026. Therefore, the units constructed after April 2016 must be considered in order to assess the quantum of the target to 2026 which has already been met. The comments in relation to extant permission being implemented is noted. However as detailed under Section 3.3 of the draft Plan there has been a high level of commencement and construction across the plan area. Many of the sites with extant permissions are currently active on site, however, at the time of survey many units were not yet complete. In relation to the site on Blessington Road the Council is cognisant of the condition relating to the Inner Relief Road. Therefore, only the first phase of this permitted development is included within the unit target as detailed in Table 3.4, to ensure that sufficient housing is delivered during the lifetime of the Plan and so that the plan fully reflects the potential delivery estimates. Furthermore, these lands have not been classified as Tier 1 lands as referred to in the submission, but rather Tier 2.</p> |



| Sub. No. | Name                                              | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |                                                   | <p>Further clarification regarding the core strategy calculations is set out in Table 3.3 of the Kildare County Development Plan 2017-2023 (as varied).</p> <p>The comments in relation to permeability strategy from Elsmore and Castlefarm west to Newhall and the proposed link street and associated walking and cycling measures are noted, however is considered premature in the context of the land use zonings contained in the draft Plan. The road objective at this location is indicative only and when progressed shall include for detailed design which will be subject to the Part 8 process which includes for a separate public consultation process. The indicative route as detailed in the draft Plan was selected to ensure no impact on the national road network and the associated road network in the Newhall/Bundle of Sticks area.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |
| 482      | <b>Larchfield Park Nursing Home (Sara Dillon)</b> | <p>Submission made by Ronan Clarke &amp; Co. on behalf of Larchfield Park Nursing Home (Sara Dillon). The submission requests that lands at Larchfield Park Nursing Home, Monread Road, Naas be rezoned from 'E: Community and Educational' to R: Retail/Commercial.</p> <div data-bbox="1079 896 1610 1264" data-label="Image"> </div> <p>Figure 2. – Relevant part of zoning map from Naas Draft Local Area Plan 2021-2027.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|          |      | <ul style="list-style-type: none"> <li>• Submission notes the property is part of a successful family owned and run nursing home care centre and is strategically located with access to the motorway network and all areas of the town of Naas itself.</li> <li>• The submission notes the provisions of the land use zoning matrix in relation to its proposed 'E; Community and Education' zoning and states that in order to continue to provide world class care for the residents it is essential to have the flexibility of introducing other business models without being constrained by an 'E' zoning which only permits community based activities.</li> <li>• Further notes that a nursing home is only 'open for consideration' in this land use and this in any business proposal is acting as a restraint to raise funding.</li> <li>• The submission states that the development aspirations for the lands is: for 0.6 ha to be provided for Nursing Care Facilities: 0.2 Ha for bakery and retailing of same and: 0.2 ha for Artesian/Farmers' Market Outlet.</li> <li>• With regard to the above, the submission requests that the draft Plan be amended so that the subject lands be zoned 'R: Retail Commercial'. The submission notes that the subject site is located in an area with a mix of uses comprising of Retail/Commercial lands to the southeast of the lands, Industrial lands to the north and Existing Residential to the west.</li> <li>• Further notes that the lands are well located in relation to public transport, pedestrian access, future cycleways and serviced by existing servicing infrastructure.</li> <li>• A number of maps and photographs illustrating the location and context of the lands are included as part of the submission.</li> <li>• The submission concludes by reiterating the request to rezone the lands to 'R: Retail/Commercial' and noted that the Nursing Home has a presence in the town for the last 33 years, employees in excess of 70 people and has strong ties to the local community.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The request for the re-zoning of the subject lands are noted. Section 6.4 of the draft Plan outlines the locations for economic development which have been carefully selected to ensure the land use objectives are compatible with the wider area and receiving environment. The Core Retail Area (Map 6.1) which forms part of the Naas Town Centre is the preferred location for</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p>retailing and the draft Plan seeks to protect and improve its vibrancy through associated land use zoning objectives and development objectives.</p> <p>As stated in the submission nursing homes are Open to Consideration on lands zoned for Community and Education in the draft Plan. It is considered from a full review of all similar zoned sites that the zoning matrix can be amended to Permit in Principle, nursing homes.</p> <p><b>Chief Executive's Recommendation</b></p> <p><b>Proposed Material Alteration</b></p> <p>Amend Table 11.3 Land Use Zoning Matrix as follows:</p> |

| Sub. No. | Name                                   | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                         |                    |                            |                         |                          |               |                           |                |                           |                      |                         |                            |                            |                      |                       |
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|          |                                        | LAND USE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | A: Town Centre | B: Existing Residential | C: New Residential | E: Community & Educational | F: Open Space & Amenity | F2: Strategic Open Space | G: Green Belt | H: Industry & Warehousing | I: Agriculture | K: Commercial/Residential | L: Leisure & Amenity | N: Neighbourhood Centre | P: Data Centre / Warehouse | Q: Enterprise & Employment | R: Retail/Commercial | U: Utilities/Services |
|          |                                        | Nursing Home                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Y              | Y                       | Y                  | ⊖Y                         | N                       | N                        | N             | N                         | N              | O                         | N                    | N                       | N                          | N                          | N                    | N                     |
| 504      | Millennium Properties Partnership Ltd. | <p>This submission was prepared by RPS Group on behalf of their client Millennium Properties Limited Partnership.</p> <p><b>Naas Northwest Quadrant</b></p> <p><b><u>1. INTRODUCTION:</u></b></p> <ul style="list-style-type: none"><li>• Millennium Properties Limited Partnership has invested significantly in public infrastructure, which serves the Naas Northwest Quadrant on the basis of long-standing sustainable public planning policies.</li><li>• All the necessary major infrastructure to serve the development of these lands is now in place or under construction.<ul style="list-style-type: none"><li>• Planning and subsequent funding (through a combination of public and private contributions) for the M7 Millennium Park Interchange (directly serving the Naas Northwest Quadrant) and the R407 Sallins Bypass has been secured and construction is now complete.</li><li>• M7 Naas to Newbridge Motorway Widening Scheme, is now completed - (total cost of all M7 and Sallins Bypass works c. €110million);</li></ul></li></ul> |                |                         |                    |                            |                         |                          |               |                           |                |                           |                      |                         |                            |                            |                      |                       |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <ul style="list-style-type: none"> <li>• Upgrade of Osberstown Wastewater Treatment Plant from 80,00PE to 130,000PE (total cost in excess of €80million); and</li> <li>• Enabling infrastructure (roads and services) within the Northwest Quadrant (total cost c.€53m).</li> <li>• There has been significant commercial, residential and other development within the NWQ including Kerry Group Global Technology and Innovation Centre employing approximately 1,200 no. people.</li> <li>• It is vital that the Naas Local Area Plan 2021 – 2027 provides appropriately for the development of Naas. This will enable the sustainable growth of the town and ensure the large-scale infrastructure now in place to support such growth is not rendered redundant.</li> </ul> <p><b><u>2. TWO DECADES OF SUSTAINABLE PLANNING IN MILLENIUM PARK</u></b></p> <ul style="list-style-type: none"> <li>• The following key principles underpin land use planning policy within Ireland including (1) The need for sustainable development; (2) Integrated land use and transport policies; and (3) Recognition of the importance of towns and cities of a certain scale to drive employment and economic well-being.</li> <li>• The following transport and land use policy frameworks have guided the development of Naas for close to twenty years.</li> <li>• <b>National Spatial Strategy 2002 -2020;</b> Naas was designated as a 'Primary Development Centre' on a National Transport Corridor.</li> <li>• <b>Strategic Planning Guidelines for the Greater Dublin Area (GDA) – 1999;</b> Naas was one of the designated growth areas in the Hinterland.</li> <li>• <b>Naas Integrated Framework Plan for Land Use and Transportation (2003);</b> Land use policy in Naas for almost the last twenty years has been supported by the Naas IFPLUT. Specific Objectives contained in the IFPLUT framework have directly guided the development of the NWQ and significant investment in public infrastructure within Millennium Park. This integrated land use and transport framework has supported significant public and private investment and the delivery of the necessary infrastructure to enable Naas to develop in accordance with long standing, sustainable planning policy. The framework established by the IFPLUT should be respected, and reflected in the new Local Area Plan</li> <li>• <b>2005 Naas Town Development Plan;</b> This Plan had as a specific objective the preparation of a Masterplan for the NWQ lands.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <ul style="list-style-type: none"> <li>• <b>Northwest Quadrant Masterplans 2007;</b> The 2007 Masterplan set out a local policy framework providing for the strategic growth of Naas in accordance with the designation of Naas as a Primary Development Centre providing employment, educational facilities, local amenities and new housing. A network of cycle and pedestrian routes linking all areas of the NWQ with Naas Town Centre and Sallins and Naas Railway Station was proposed.</li> <li>• <b>The Town Development Plan (2011)</b> supported the implementation of the 2007 Masterplan.</li> <li>• <b>Development of Naas and NWQ in accordance with Planning Policy;</b> In the period since the adoption of the 2007 Masterplan, significant progress has been made in bringing forward the vision for development of the NWQ and Naas as set out in these national, regional and local planning policy documents. Millenium Properties Partnership Ltd. has provided significant funding for the delivery of the NWQ infrastructure. Such a level of public and private investment has been achieved due to the relatively stable and consistent application of a long term plan for the development of Naas and the NWQ.</li> </ul> <p><b><u>3. CURRENT PLANNING POLICY;</u></b></p> <ul style="list-style-type: none"> <li>• <b>Project Ireland 2040 National Planning Framework (NPF);</b> The NPF provides for the growth of towns, such as Naas, which have supporting infrastructure in place as sustainable centres with a balanced growth of employment and population and of sufficient scale to attract foreign direct investment.</li> <li>• <b>Eastern &amp; Midland Regional Assembly Regional Spatial and Economic Strategy 2019 – 2031;</b> Naas is designated a 'Key Town'. In considering the future development of Naas RSES objective RPO 4.2 is key. The RSES provides for significant growth in Naas and identifies the NWQ as central to this growth.</li> <li>• <b>Transport Strategy for the Greater Dublin Area 2016 – 2035;</b> The Strategy includes a number of specific transport upgrades which improve connectivity and support the growth of Naas. Economic activity and population growth in Naas is vital to the maximisation of benefits associated with these public transport upgrades.</li> <li>• <b>Kildare County Development Plan 2017 – 2023.</b><br/> <b>Population:</b> The current level of population growth and housing in Naas is not considered to be consistent with its designation as a key town.<br/> <b>Economic;</b> The Development Plan supports significant employment growth in Naas.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <p><b>Transport;</b> The Development Plan includes a number of objectives and policies supporting infrastructure and services which will support the growth of NWQ including “PTO 4, MO 2, PTO 7, NR 6, MO 3, RS 7, “MT 8 and PTO 6.</p> <p><b>Northwest Quadrant:</b> The Development Plan notes that a strategic land bank has been zoned at the NWQ and the “Sectoral Opportunity” for “High quality high-density indigenous and Foreign Direct Investment” in the NWQ.</p> <ul style="list-style-type: none"> <li>• <b>Naas Town Development Plan:</b> The Town Development Plan identified the NWQ as: “a major opportunity to achieve the coordinated and comprehensive development of enterprise, commercial, housing and associated recreational, educational and community facilities in Naas.” (Page28). There are a number of objectives within the Town Development Plan which provide explicitly for the development of the NWQ these include “RPO2, RPO3, RPO6, STO7 and STO9. The Town Development Plan fully supported the implementation of the 2007 Naas Northwest Quadrant Masterplan.</li> <li>• <b>Northwest Quadrant Masterplan (2017);</b> The 2017 Naas Northwest Quadrant Masterplan (2017 Masterplan) does not alter the ethos or vision of the 2007 Masterplan but provides a more refined and appropriate framework for the sustainable growth of Naas with the Northwest Quadrant remaining the key opportunity site. The 2017 Masterplan does provide greater detail on the development of the NWQ including: <b>(a)</b> A mixed-use community with significant resident and working population served by community facilities including schools, childcare, a medical centre and a neighbourhood centre; <b>(b)</b> A strategic public transport link to extend from Naas Town Centre and provide a direct link, via the central spine of the Northwest Quadrant and Millennium Park Interchange, to the railway network at Sallins (and in the future a new rail station and potential strategic park and ride to the west of Sallins, accessed from the Sallins Bypass); <b>(c)</b> Reservation of crossing over the Grand Canal at the Canal Harbour for public transport and cycle and pedestrian movement only; and <b>(d)</b> A rich and permeable urban realm, with appropriate provision for pedestrians and cyclists at all levels.</li> <li>• <b>Current Regional and Local Planning: Summary Naas;</b> The NWQ continues to be identified as the logical location for the future growth of the town as a centre for employment and new residential development.</li> </ul> <p><b><u>4. LOCAL AREA PLAN RELIANT ON PARTIAL ANALYSIS</u></b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <p><b>Transport Planning</b></p> <ul style="list-style-type: none"> <li>• The Naas/Sallins Transport Strategy was presented as a comprehensive analysis of the current transport situation in Naas/Sallins.</li> <li>• A Strategic Traffic Model (STM) in the software VISUM was developed by AECOM to test the impacts of future land-use proposals along with future transport interventions. The transport (traffic) model developed for Naas/Sallins reflected 2018 traffic base year conditions and was calibrated and validated according to the TII's Project Appraisal Guidelines.</li> <li>• The 2020 Naas/Sallins Transport Strategy clearly indicates in page 10 of Appendix B Strategic Transport Modelling Report/B.1 VISUM Model Development Report that "the model has been developed using the macro simulation software VISUM, version 18.02-13. The model has been developed as a Highway model, meaning it can assess highway schemes, changes in demands such as local plans etc. <u>However, the model does not have the functionality to assess changes in mode choice as a result of planning or policy proposals</u>".</li> <li>• The results from the NTA's multimodal Eastern Regional Model have not been taken into account in the preparation of the transport (traffic) model developed for Naas/Sallins. Therefore, the impact of the improved transport networks across the Greater Dublin Region have not been reflected in this exercise.</li> <li>• A highway-based computer model that only takes into consideration vehicular trips; that is not linked to the wider multimodal Eastern Regional Model; that does not take into account public transport, cycling or walking within Naas and which cannot even assess the variation of mode choices as a result of planning policy and public transport investment; has been used to assess future land zoning scenarios from a sustainable development point of view, as part of the preparation of the Draft Naas Local Area Plan 2021-2027.</li> <li>• <b>Recommendation 1;</b> <i>We therefore recommend the Council use a multimodal transport model linked to NTA's Eastern Regional Model and uses sustainability comparators (such as CO2 emissions per capita) as a valid tool in order to assess the real impact of alternative land use scenarios for the future of Naas. In addition, we recommended that alternative, more complementary land-use proposals for the Northwest Quadrant lands be tested, including the 2017 Masterplan Update proposal. In the absence of this we strongly recommend the Council to adhere to the blueprint established by the Naas Integrated Framework Plan for Land Use and Transportation and adopted by the subsequent development plans.</i></li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|          |      | <p><b>Naas Northwest Quadrant Flood Risk Review;</b></p> <ul style="list-style-type: none"> <li>• The Flood Risk Management Plan (FRMP) for the River Liffey &amp; Dublin Bay was adopted by KCC in July 2018.</li> <li>• It was recognised within the FRMP that there is a high level of uncertainty regarding the flood risk in relation to parts of Naas.</li> <li>• FRMP recommended that further hydrometric data collection and flood mechanism analysis should be progressed either at the first phase of a Flood Relief Scheme for Naas, or as an initial study in advance of a Flood Relief Scheme. KCC has recently appointed a consultant to undertake this task and this analysis is ongoing. It is currently in the data collection stage with the design and planning for a potential design option scheduled (subject to change) to be completed by November 2022.</li> <li>• As indicated in Section 6.2.1 (page 21) of the Strategic Flood Risk Assessment this modelling exercise and associated flood extent mapping will inform future SFRAs for the town and for the masterplan of the strategic lands in the North-west Quadrant. Once completed the study will inform any amendment or future local area plan, at which time an update of this current SFRA can be produced.</li> <li>• In terms of the Enterprise and Employment Lands at the Northwest Quadrant the Strategic Flood Risk Assessment, in section 7.2.9 (page 40), concludes that “KCC carried out a Justification Test and found that it is considered appropriate to retain the pre-existing zoning.” However, any future significant development should be subject to a SSFRA.</li> <li>• <b>Recommendation 2;</b> <i>We therefore recommend the Council retain the pre-existing zoning in the NWQ while not pre-empting any outcome based on the current CFRAM flooding risk mapping of the area that is currently under review by KCC due to “its high level of uncertainty” as indicated in the Flood Risk Management Plan for the River Liffey &amp; Dublin Bay.</i></li> </ul> <p><b>Sustainable Planning and Infrastructural Assessment</b></p> <ul style="list-style-type: none"> <li>• KCC has put forward a methodology for the assessment of Sustainable Planning and Infrastructural Assessment that is based on their own interpretation of the NPF.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|          |      | <ul style="list-style-type: none"> <li>• <b>Incomplete Irish Water Input;</b> The Infrastructural Assessment has been produced in the absence of any meaningful input from Irish Water, in terms of the reasonable estimate of costs.</li> <li>• <b>Inappropriate Sustainable Traffic Modelling;</b> It is indicated that the Naas/Sallins Transport Strategy provides a framework for the planning and delivery of transport infrastructure and services in the town. As indicated in previous sections (see above), the model used as a base for the future implementation of a sustainable transport model for Naas has been developed as a highway-based computer model that only takes into consideration vehicular trips; that is not linked to the wider multimodal Eastern Regional Model; that does not take into account public transport, cycling or walking within Naas. Therefore, the bulk of the recommendations from a land use and infrastructure point of view have been assessed with a methodology that prioritises vehicular movements and focuses on junction and link saturation. The validity of the scoring system based for the different sites assessed, starting with the choice of sites and continuing with the infrastructure required to develop the sites does not comply with the spirit of the NPF in terms of a tiered approach for the zoning of lands.</li> <li>• <b>Existing Infrastructure Provision;</b> Section 4.1.2 (page 6) of the Infrastructural Assessment states that: <i>“There are a number of sites located in the Northwest Quadrant which currently have no existing access infrastructure, in addition to other environmental constraints. In this regard, the lands in the Northwest Quadrant shall be subject to an agreed Masterplan which shall be informed by the Naas/Sallins Transport Strategy on completion of the OPW Flood Study.”</i> This statement does not reflect the reality on the ground. Enabling infrastructure (roads and services) within the NWQ has been provided since the approval of the original masterplan. To state in the Infrastructural Assessment that “there are a number of sites located in the Northwest Quadrant which currently have no existing access infrastructure” is a selective presentation of the existing situation and fails to acknowledge that Millennium Park is serviced.</li> <li>• <b>Flood Risk Review:</b> KCC carried out a Justification Test and found that it is considered appropriate to retain the pre-existing zoning of the Enterprise and Employment Lands at the Northwest Quadrant due to “the high level of uncertainty” of the CFRAM mapping used for the Assessment. Therefore, no assumption should be made in terms of environmental constraints at the lands at Millennium Park.</li> <li>• <b>Application of Assessment Process;</b> Each site within the study area was assessed against the criteria set out by KCC in order to assess the overall suitability for zoning within the Naas Local Area Plan 2021-2027. Stage one assessed the sustainability of a site; stage two assessed the infrastructural provisions to service</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p>the site. As indicated earlier, enabling infrastructure (roads and services) within the NWQ have been provided since the approval of the original 2007 NWQ Masterplan. Therefore, all colours in tables 4.1 and 4.2 should reflect the reality on the ground; that the NWQ has the infrastructure in place to allow for immediate development.</p> <p><b><u>5. COMMENTARY ON THE DRAFT NAAS LOCAL AREA PLAN 2021 – 2027:</u></b></p> <ul style="list-style-type: none"> <li>• The Draft LAP does not adequately provide for the growth of the NWQ to meet the need for increased housing supply and the provision of additional employment opportunities. A number of specific areas of concern and recommendations to address such concerns are set out below.</li> </ul> <p><b>'Q' - Land Use Zoning - Permitted Uses;</b></p> <ul style="list-style-type: none"> <li>• The Land Use Zoning Matrix in the Naas LAP is extremely prohibitive in the range of land uses which are 'permitted in principle' within Enterprise &amp; Employment zoned lands, namely. It is considered that the very restrictive land uses 'open for consideration' or 'permitted in principle' within Enterprise &amp; Employment zoned lands shall render the provision of large-scale employment within the lands extremely difficult.</li> <li>• The Draft LAP zoning of such an extensive area of land in Naas for a very narrow range of uses does not provide appropriately for balanced, sustainable growth in the coming years.</li> <li>• The land uses permitted in principle with Enterprise &amp; Employment zoned lands in the Draft LAP are not consistent with the much broader range set out in the Naas Development Plan 2011 – 2017.</li> <li>• <b>Recommendation 3:</b> <i>There is a requirement that the uses permitted in principle or at a minimum uses open for consideration within the Northwest Quadrant on lands zoned Enterprise &amp; Employment be expanded to correspond more closely with the existing position and include the following additional and complementary land uses:</i> <ul style="list-style-type: none"> <li>• <i>Logistics &amp; Warehousing;</i></li> <li>• <i>Repository, Store, Depot; and</i></li> <li>• <i>Hotel.</i></li> </ul> </li> </ul> |

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|          |      | <p><b>Management of Motorway Network;</b></p> <ul style="list-style-type: none"> <li>• The use of the M7 Millennium Park Interchange and R407 Sallins Bypass to support the development of the NWQ has always been understood and has been expressly acknowledged in local statutory planning policy documents and in the An Bord Pleanála Inspector's Report for the M7 Osberstown Interchange and R407 Sallins Bypass Scheme (ABP Reg. Ref. 09.HA0046 M7, 09.MA0013 and 09.KA0031).</li> <li>• The recognition that the Millennium Park Interchange Sallins Bypass Scheme including the enhanced pedestrian and cyclist linkages were constructed in part to facilitate the development of the NWQ lands should be adequately acknowledged in the Draft LAP.</li> <li>• <b>Recommendation 4;</b> It is recommended that the Draft LAP should include an acknowledgment that the M7/J9a Millennium Park Interchange has been constructed inter alia with the purpose of facilitating the development of Naas and the NWQ in an environmentally friendly and sustainable manner. Specifically, it is recommended that the Draft LAP be amended as follows: 6.4.2 Northwest Quadrant (NWQ): “<b>6.4.2. Northwest Quadrant (NWQ):</b> <i>“The employment lands are strategically located alongside the M7 motorway between junctions 9a and 10 and have the necessary infrastructure, including the Millennium Park Interchange and Sallins Bypass, to facilitate development. However, the development of the area needs to be carefully considered having regard for any potential to impact negatively on the capacity and function of the motorway network. Development proposals will be required to carefully consider their impact on the motorway network through the preparation of a Traffic and Transport Assessment and consultation with Transport Infrastructure Ireland (TII) will be required.”</i> <p><b>EDO 1.11</b> <i>“Ensure that the development of employment lands do not undermine and has regard for the function and carrying and operational capacity of the N7 / M7 motorway network, by requiring that Traffic and Transport Assessments are submitted for larger developments with the potential to impact on the network.”</i></p> <p><b>91m Development Setback;</b></p> <ul style="list-style-type: none"> <li>• It is noted that within Naas there is considerable existing development within the 91m setback.</li> <li>• <b>Recommendation 5:</b> It is recommended that objective MTO 3.7 be amended to read as follows:</li> </ul> </li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <p><b><i>'MTO 3.7 To ensure a <del>91</del> 50-metre building line setback from the motorway and associated junctions from the nearest roadside edge to protect against transportation noise and to ensure the future protection of the motorway network. Under certain circumstances Ancillary development may will be considered within the setback zone in recognition of local conditions and the nature of the proposed activity.'</i></b></p> <p><b>NWQ Masterplan;</b></p> <ul style="list-style-type: none"> <li>• It is noted that a comprehensive Masterplan for the NWQ was prepared in 2007 and the implementation of the Masterplan is supported in the current Town Development Plan.</li> <li>• More recently in 2017 an updated Masterplan has been prepared and submitted to Kildare County Council. The 2017 Masterplan provides an appropriate local guide for the development of the NWQ lands but we would be accepting of a review and updating of the Masterplan being undertaken following the adoption of the Naas LAP.</li> <li>• <b>Recommendation 6;</b> <i>It is recommended that Objective NWQ 1.1 (d) be omitted from Naas Local Area Plan 2021 – 2027.</i></li> </ul> <p><b>Land Use Zoning proposed adjacent to Millennium Park Interchange;</b></p> <ul style="list-style-type: none"> <li>• Should KCC not be minded to follow Recommendation 2 in retaining the pre-existing zoning in the NWQ we have particular concerns regarding the zoning now proposed on lands proximate to the Millennium Park Interchange. These lands are currently zoned in the Town Development Plan 'Q – Enterprise and Employment'.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <p>The Draft LAP now proposes that lands to the east of the interchange be zoned 'F - Open Space and Amenity' as shown in Figure 5-1.</p>  <p><b>Figure 5-1: Lands Proposed to be Zoned F: Open Space and Amenity <sup>8</sup></b></p> <ul style="list-style-type: none"> <li>• The proposed zoning of the above land may be resultant from concerns regarding the potential for flooding in these lands.</li> <li>• However, the Strategic Flood Risk Assessment for the Draft LAP for lands in the Northwest Quadrant, states "it is considered appropriate to retain the pre-existing zoning".</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|          |      | <ul style="list-style-type: none"> <li>• <b>Recommendation 7:</b> <i>The strategically located area of land adjacent to the Millennium Park Interchange should continue to be zoned Q: Enterprise &amp; Employment and not be rezoned F: Open Space and Amenity.</i></li> </ul> <p><b>Population, Placemaking and Residential Zoned Lands</b></p> <ul style="list-style-type: none"> <li>• The new Naas LAP and County Development Plan offer an early opportunity to reconsider population growth within the town and county informed by Housing Supply Target Methodology for Development Planning Guidelines (Housing Guidelines) published by the Department of Housing, Local Government and Heritage dated 18th December 2020.</li> <li>• Significant new housing within Naas is particularly appropriate. Naas is designated a “key town” in the Eastern &amp; Midland Regional Assembly Regional Spatial and Economic Strategy 2019 – 2031.</li> <li>• <b>Recommendation 8</b> <i>It is recommended that in view of the acute housing shortage, and the acknowledged need for an increase in housing output as outlined in the Ministerial letter to local authorities accompanying the Housing Guidelines the very limited quantum of land zoned ‘C-New Residential’ should be reviewed with a view to increasing the availability of lands for residential development.</i></li> </ul> <p><b>Naas / NWQ / Sallins-Naas Train Station;</b></p> <ul style="list-style-type: none"> <li>• There is a need identified in the Draft LAP to ensure there are linkages between Naas town centre and the Northwest Quadrant and beyond to the Sallins-Naas Train Station.</li> <li>• An indicative route for the Northwest Quadrant Link is shown on the Movement and Transportation Map Public Transport Measures. This new route objectives does not link with the town centre.</li> <li>• The Draft LAP notes that the route could in the future be extended to link into the Town Centre via a bus-only bridge (with ‘bus gate’) over the canal.</li> <li>• <b>Recommendation 9</b> <i>It is recommended that a direct indicative pedestrian, cyclist and public transport route connecting the Northwest Quadrant to Naas Town Centre be included as an objective of Naas LAP 2021 – 2027.</i></li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The submission from Millennium Properties Partnership Ltd. and in particular the nine recommendations are acknowledged.</p> |



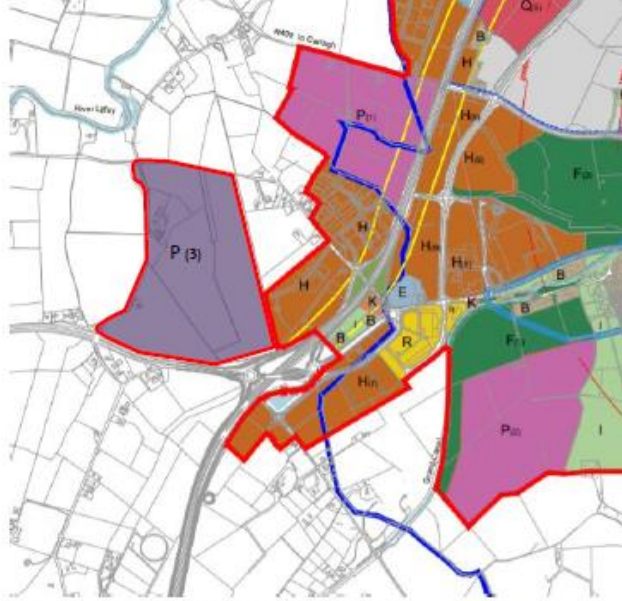
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p>The comments in relation to Transport Planning and Recommendation No. 1 in the Northwest Quadrant are also noted. The use of the NTA's Eastern Regional Model for the Naas/Sallins Transport Strategy was not considered appropriate as the zone structure and level of detail within the ERM is not significantly refined in the Naas/Sallins area to reflect the intricacies of traffic movements or local public transport improvements. Additionally, as there are no planned/committed schemes within the NTA's GDA Strategy that have a direct impact on transport demand within Naas and Sallins the use of the NTA's ERM was not considered essential for the Naas/Sallins Strategy. More appropriate analysis tools such as catchment/permeability analysis in GIS were utilised extensively as part of the Naas/Sallins Transport Strategy to assess and inform the walking, cycling and permeability elements of strategy and also to assess and inform local bus service improvements.</p> <p>It should be noted however that the NTA's ERM, particularly its multimodal functionality, was utilised at a strategic level to assess the potential benefits of a future bus service improvement to link Naas to the train station in Sallins. As the Sallins line connects to the larger national rail network linking to Dublin's City Centre, this was considered the best approach for assessing this particular measure.</p> <p>Appendix B.2 of the Naas/Sallins Transport Strategy has assessed a range of land use scenarios for the future year 2030 for the Northwest Quadrant. Whilst the full build out of zoned lands was seen to create issues at Junction 9a, an alternative scenario (referred to as the "Preferred Scenario" in Appendix B.2) was outlined as being more appropriate. The preferred scenario allowed for 2,810 jobs (total) in the Northwest Quadrant as opposed to 4,230 in the full build out scenario. Therefore, significant future development potential has been allowed for in Northwest Quadrant. These lands will be the subject of a detailed masterplan for the significant land bank in the Northwest Quadrant (Section 10.7 and Objective NWQ 1.1 of draft Plan, refers). The masterplan shall include and be informed by a number of studies including but will not be restricted to a Transport Impact Assessment that will comprehensively address the potential of traffic generation. The masterplan will be integrated into the Naas LAP by way of a statutory amendment under Section 20 of the Planning and Development Act 2000 (as amended).</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <p>The comments and recommendation No. 2 are noted in relation to flood risk in the Northwest Quadrant. In response to a recommendation made by the OPR the Council have been requested to amend land use zonings in the Northwest Quadrant in respect of the associated flood risk. Please see response and recommendation in relation to submission #009.</p> <p>The comments in relation to the Sustainable Planning and Infrastructural Assessment (SPIA) and the suggestion that there is an absence of any meaningful input from Irish Water are noted. The SPIA is an evidence based assessment to assess both the presence of physical infrastructure servicing various sites in addition to assessing a particular sites compliance with the National Strategic Outcomes and National Policy Objectives of the NPF and Regional Policy Objectives of the RSES including proximity to the town centre (i.e. the sequential approach) and percentage requirements around achieving compact growth. While costings from Irish Water would be desirable the absence of such information were included across all sets categorised within the SPIA and therefore comprised of a uniform approach to all sites.</p> <p>It is of significance to note that Irish Water were intrinsically involved in the development of the SPIA tool across County Kildare and the assessment of lands therein for Naas. Furthermore, Submission #010 from Irish Water states that “Irish Water (IW) welcomes the opportunity to comment on the Draft Naas Local Area Plan. Following on from previous meetings and correspondence between IW and KCC and IW welcome the inclusion of our comments and assessments in both Chapter 9 (Infrastructure) and in the Sustainable Planning and Infrastructural Assessment document.</p> <p>Similarly, the Roads and Transportation Section of the Council provided detailed commentary on each site categorised in the SPIA, examining both the Naas/Sallins Transport Strategy and the existing infrastructure on the ground.</p> <p>The land uses were quired under Recommendation No. 3 and it is considered that the land uses ‘permitted in principle’ and ‘open to consideration’ within the Q:Enterprise and Employment land use zoning have been carefully considered to ensure the development of the Northwest Quadrant can continue to occur without a negative impact on the carrying capacity of the national road network and without infringing on areas which are at risk of flooding. Notwithstanding this, the proposed</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|          |      | <p>masterplan for the subject lands shall comprehensively address the nature, mix, density/intensity of uses within the masterplan area.</p> <p>The comments in relation to the Osberstown Interchange (Recommendation No. 4) and the suggested wording in the Plan that the new interchange road infrastructure has been built to facilitate the development of Naas are noted. The Council is cognisant of their obligations to comply with Section 28 Guidelines as they relate to protection of the carrying capacity of motorways and associated interchanges. Similarly, the Council through the draft Plan for Naas must encourage, facilitate and provide the necessary infrastructure to create a modal shift in favour of more sustainable modes of transport including public transport, cycling and walking, in order to facilitate the long term development of Naas. Therefore, in this context it is considered that the suggested wording is inappropriate. However, the suggested insertion of text under EDO 1.11 relating to N7/M7 is noted and accepted.</p> <p>The comments are noted on the 91-metre set back (Recommendation No. 5) and in particular that development has occurred within the 91-metre setback previously. During the preparation of the draft Plan this issue was discussed with the Transport Infrastructure Ireland (TII) and it was considered that the setback of 91-metres was adequate to protect the national road network and associated junctions. As noted under Objective MTO 3.7 the setback relates to building line only and under certain circumstances ancillary development may be considered within the setback zone in recognition of local conditions and the nature of the proposed activity.</p> <p>The recommendation that NWQ 1.1 be removed from the draft Plan (Recommendation No. 6) is not accepted. There have been considerable changes in national and regional policy since the preparation of the previous masterplans for the area. Such changes relate to the increasing emphasis on evidence-based planning, compact growth, the requirement to integrate climate action considerations into land use policy, and the need for infrastructural assessments. The proposed masterplan for the Northwest Quadrant will be accompanied by a suite of evidence-based assessments which will provide a robust and comprehensive justification for the preferred development strategy for the overall area.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p>The Council note recommendation No. 7 in the submission. The subject site is zoned Open Space and Amenity given the flood risk associated with the area (Map 9.1, refers) on a portion of the site. The subject site is also located within the Osberstown Green Infrastructure Corridor where it is noted the corridor contains a mix of wetland and grassland habitats centred around an artificial lane and shares connectivity to the Grand Canal green infrastructure route via the local hedgerow and tree-line system. It is also considered an appropriate zoning given the artificial lake on site, as it would best serve as an urban design feature of the business area, providing a focal point to the entrance of Millennium Park. This amenity space would benefit the existing and future employees while enhancing the campus style setting of this employment arc.</p> <p>The comments in relation to recommendation no. 8 and the Guidelines on the Housing Supply Target Methodology and the housing supply targets for Naas are noted. The population projections and associated housing unit target contained in the draft Plan are in the line with Variation no. 1 of the Kildare County Development Plan 2017-2023, which are based on the population projections set out in the NPF Roadmap (2018) and confirmed in Appendix B of the RSES adopted in June 2019. It should be noted that under the provisions of the Planning and Development Act 2000 (as amended) Kildare County Council must use the projections outlined in these strategic documents until such a time as the projections are reviewed or amended. Similarly, the Naas Plan 2021-2027 must also align with the hierarchy of plans.</p> <p>The recommendation to include a direct indicative pedestrian, cyclist and public transport route connecting the Northwest Quadrant to Naas Town Centre be included as an objective of the Plan is noted. However, this is considered premature in the absence of a detailed masterplan for the Northwest Quadrant. The masterplan will provide detailed specifications for the development strategy for these lands.</p> <p><b>Chief Executive's Recommendation</b></p> <p><b>Proposed Alteration</b></p> <p>Amend Objective EDO 1.11 as follows:</p> |

| Sub. No. | Name                      | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                 |
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|          |                           | <p><b>EDO 1.11</b> Ensure that the development of employment lands do not undermine the carrying and operational capacity of the N7/<b>M7</b> motorway network, by requiring that Traffic and Transport Assessments are submitted for larger developments with the potential to impact on the network.</p>                                                                        |
| 506      | Crylock Developments Ltd. | <p>Submission in relation to lands at Newhall prepared by John Spain and Associates.</p> <p><b><u>Section 1.0 Introduction and Summary</u></b></p> <ul style="list-style-type: none"> <li>• Subject lands extend to 65 ha and 2km from Naas Town Centre adjacent to Newhall and contiguous to employment uses.</li> <li>• Subject lands are illustrated as P(3) below.</li> </ul> |

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|          |      |  <p data-bbox="577 906 1178 930"><b>Figure 6.1: Proposed Amendment to Land Use Zoning Map 11.1</b></p> <ul data-bbox="577 970 2119 1273" style="list-style-type: none"> <li>• Lands are traversed by high voltage electricity transmission lines, gas infrastructure, and also benefit from access to high quality telecommunications infrastructure.</li> <li>• Access to a high standard of wastewater infrastructure due to proximity to the Osberstown wastewater treatment plant.</li> <li>• Recently completed sewer line traverses the lands and provides a connection to Osberstown.</li> <li>• Site has not been zoned under the draft LAP.</li> <li>• Submission will put forward a case to zoned P: Data Centre / Warehouse.</li> <li>• Submission is accompanied by an Engineering Statement.</li> </ul> <p data-bbox="528 1337 1184 1361"><b><u>Section 2.0 Planning and Development Context</u></b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• Subject lands were zoned previously under the Draft Naas and Environs LAP 2019-2023 with specific objective for a data centre.</li> <li>• Zoned for industrial and employment development under Kildare County Development Plan 2011-2017 and the Kildare County Development Plan 2005-2011.</li> <li>• Draft LAP proposes zone two new substantial landholdings for data centre development, whilst excluding any zoning on the Newhall site.</li> <li>• Several forward planning submissions have been regarding the subject lands across various plans; Draft CDP 2017, Naas and Environs LAP 2018, RSES, draft Naas LAP 2019, Variation 1 to CDP 2017, draft Naas/Sallins Transport Strategy and pre-draft submission to CDP 2023-2029.</li> <li>• Permission granted under 06/707 for 11 sites for industrial development and one manufacturing unit, which expired. Impacted by the economic environment and costs of infrastructure which has now been installed or in the process of being installed.</li> <li>• Following, the expiry of the permission and the omission of the Naas Environs zoning from the 2017-2023 CDP, made a S. 247 request for a new warehousing / logistics development. However, the application was not pursued as the new Naas LAP was under preparation at that time and it was anticipated that the zoning of the subject lands would be addressed under the new LAP.</li> <li>• Subject lands identified as suitable for data centre development, but not provide for in the draft LAP.</li> <li>• It is noted that permission has been granted for freezer warehouses on land nearby that was zoned under the CDP 2011 for industrial / warehousing development. The KCC Planner's Reports in assessing both applications considered that the lands are currently zoned under the Kildare County Development Plan 2011-2017.</li> <li>• Part 8 application P82021.05 to south-west of subject lands, entrance to the development lands is to be upgraded to a large diameter roundabout which will significantly increase the capacity of the junction and address traffic safety concerns. proposed layout as per the Part 8 drawings requires a significant land take from our clients in order to facilitate these upgrades.</li> <li>• Submission notes that Section 10(8) of the 2000 Act, as amended, provides that there should be no presumption in law that any lands zoned in a particular Development Plan or LAP remain so in any subsequent plan.</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|          |      | <ul style="list-style-type: none"> <li>Obligation to furnish reasons for its decisions, including in this instance the proposal to zone alternative lands for the same use, as it deprives the landowner in these circumstances of an effective opportunity of making meaningful submissions.</li> </ul> <p><b>Section 3.0 Draft Naas LAP as it relates to lands at Newhall /Data Centre Development</b></p> <ul style="list-style-type: none"> <li>This section reiterates points previously made or outlines points that will be discussed further in the submission.</li> <li>Reference is made to text and objectives contained in the draft LAP relating to data centres under Section 6.4.5 and Section 6.4.4. Particular reference is made to Objective EDO to facilitate data centre development at Caragh Road South and Jigginstown.</li> <li>The submission states that the draft LAP place emphasis on the road network with respect to the locations selected for data centre development, presumably based on the Transport Strategy.</li> <li>The submission states that the accompanying report from OCSC demonstrates that the subject lands are highly suitable data centre development and that their zoning will not adversely impact on the national road network.</li> <li>Any traffic and transport related concerns raised by the TII, NTA and OPR in respect to the identification of lands for employment generating development in proximity to the Motorway and Motorway junctions at the edge of Naas, are appropriately addressed through a proposed zoning of the subject lands for Data Centre development only, as supported by OCSC's Report.</li> </ul> <p><b>Section 4.0 Requested Amendments to the Draft LAP and Rationale for same</b></p> <ul style="list-style-type: none"> <li>Request that subject lands should also be zoned P: Data Centre along with the other sites identified even though the other lands were never previously zoned for industrial purposes.</li> <li>Section 6.4.5 of the Draft LAP should be updated as follows:<br/> <i>Three Two locations have been zoned for Data Centre/Warehouse locations within this Plan. Land has been designated to the north of Junction 10 at Newhall. The site will be served by the existing local road network, the planned upgrade to the R445 (separate Part 8 application being progress) and potentially through the adjacent</i> </li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <p><i>'H' zoned lands to the east. Given the nature of the proposed use, limited trip generation and connections to the surrounding road network, the particularly infrastructural characteristics of the subject lands and suitability for data centre development, that the impacts on the motorway junction, in conjunction with the other identified data centre sites, will be minimal.</i></p> <ul style="list-style-type: none"> <li>Section 6.4.4 of the draft LAP should read as follows:<br/> <i>"The land bank at this location comprises a mix of zoning; Retail/Commercial (R), and Industry and Warehousing (H) and P: Data Centre / Warehouse. There is currently a mix of uses provided within the Newhall Retail Park and the M7 Business Park. This Plan provides for circa 14.2 hectares of undeveloped land for Industry and Warehousing to the southwest of the Newhall Retail Park and a 'P(3): Data Centre zoning objective for lands previously partly zoned NE1 Industry / Warehousing to reflect their particular suitability for large scale data centre development, given the particular infrastructural assets of the lands and noting the similar locational characteristics to other large scale data centre campuses in the Greater Dublin Area."</i></li> <li>Amend Objective EDO 1.12 to include the word Newhall.</li> <li>Insert text under Section 3.7.2 Employment - <i>specific zoning for the development of Data Centres has been applied to three two sites which are considered suitable for land extensive development and with significant infrastructural characteristics making the sites particularly suitable for such development notwithstanding their proximity to the national road network.</i></li> <li>Refer to Newhall north of the R445 under Section 6.4 Locations for Economic Development.</li> </ul> <p><b>Rational for Requested Amendments to the draft Naas LAP</b></p> <ul style="list-style-type: none"> <li>Zoning of an additional site for Data Centre development, which was zoned under previous plans, is appropriate in planning policy terms, notwithstanding the location of the site to the north of a junction on the M7 Motorway which serves Naas and Newbridge.</li> </ul> <p><b>National Planning Framework</b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |      | <ul style="list-style-type: none"> <li>• NPF strong support for data centres. NPF envisages the relocation of space extensive employment uses, including warehousing and logistics uses, from within the built-up area of Dublin to appropriate greenfield locations outside of the M50 ring.</li> <li>• Newhall outside M50 and can accommodate space extensive uses.</li> <li>• Naas is required to counterbalance outward commuting and to meet the employment needs of planned population growth, with the population of the town likely to reach c. 40,000 to 50,000 over the timeline of the NPF.</li> <li>• The NPF states that focusing and concentrating employment, support services and cultural offerings, in tandem with population growth in key settlements such as Naas, is needed to optimise regional performance.</li> <li>• The inclusion of land use zonings and policies to support data centre development in the environs of Naas would reflect (and bring the new LAP into closer alignment with) the NPF.</li> </ul> <p><b>Spatial Planning and National Road Guidelines (2012)</b></p> <ul style="list-style-type: none"> <li>• Space extensive employment use, such as data centre development, on lands proximate to the national road network would not prejudice the efficient operation of the road network, due to the comparatively low employment intensity and car parking requirements associated with data centre development.</li> <li>• Suitable development proximate to national road network and junctions.</li> <li>• Accompanying OCSC report provides precedents of schemes proximate to national roads and interchanges.</li> <li>• LAP appropriate mechanism to designate subject lands for data centre, as previous CDP identified part of the subject lands under NE1 zoning in the Naas Environs.</li> </ul> <p><b>Regional Spatial and Economic Strategy</b></p> <ul style="list-style-type: none"> <li>• Naas is a Key Town and therefore suitable for hyperscale type data centre development.</li> <li>• RSES promotes increased employment and improved local economies and data centre development offers a land use strategy which will deliver this.</li> <li>• RSES seeks to 'Align to national strategy and approach for data centres – right location for use and energy demand.'</li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>• RPO 8.25 states to promote Ireland as a sustainable international destination for ICT infrastructures.</li> <li>• The RSES states to protect the Eastern Bypass and the Leinster Outer Orbital Route the zoning of the subject lands would not prejudice the roads infrastructure.</li> <li>• Subject lands benefit from high quality services and infrastructure.</li> </ul> <p><b>Government Statement on the Role of Data Centre in Irelands Enterprise Strategy June 2018</b></p> <ul style="list-style-type: none"> <li>• Data centres central to digital economy and contribute to job creation.</li> <li>• Generate significant added economic benefit.</li> <li>• Plan-led approach will develop a range of measures to promote regional options for data centre investment, which will help minimise the need for additional grid infrastructure, acknowledging that the energy demands of data centres are one of the key challenges to the future planning and operation of such development.</li> <li>• Inclusion of a 'P- Data Centre' zoning on the subject will accord fully with this Government policy statement.</li> </ul> <p><b>Locational and Infrastructural Characteristics of the Subject Lands</b></p> <ul style="list-style-type: none"> <li>• Proximate to high-capacity strategic roads infrastructure while leading to comparatively low trip generation.</li> <li>• Site traversed from north to south by a 380 KVA powerlines and from east to west by a 110 KVA powerlines and the development can break into the transmission lines and connect to a new substation. Other proposed data centre sites do not have this provision.</li> <li>• Site serviced by natural gas.</li> <li>• Unrivalled connectivity to the telecommunication network.</li> <li>• Close proximity to Osberstown WwTP and linked by the sewer line from Newbridge to the north corner of the subject lands.</li> <li>• Delivery of a hyperscale data centre campus on the Newhall lands would help attract further data centre development on the other two proposed data centre sites.</li> </ul> <p><b>Traffic and Transport Justification for Data Centre Development / Zoning</b></p> <p>The OCDSC report contained in Appendix 2 of the submission is summarised (in the submission) as follows:</p> <ul style="list-style-type: none"> <li>• Subject lands well located to access high quality roads infrastructure.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <ul style="list-style-type: none"> <li>• Relatively well served by public transport with potential for a transport hub.</li> <li>• Cycle lanes included in the Part 8 design for Newhall Crossroads will provide access to the site.</li> <li>• Trip generation from data centre low to other uses on the same extent of land.</li> <li>• Further mitigation can be used by off-setting working time from peak hours.</li> <li>• Reference is made to the TII and NTA submission on the draft LAP requested a fact-based evidence approach to proposals but neither stated that the zoning of the subject lands was inappropriate.</li> <li>• The Transport Strategy was suggested to provide the fact-based analysis, which recommended against the development of the subject lands.</li> <li>• Detailed assessment of the national road infrastructure, in particular the M7 interchanges, was not carried out as part of the Strategy.</li> <li>• Issues with the Strategy's methodology and the information presented which raise serious concerns as to the validity of these conclusions.</li> <li>• Conclusions against the development of the subject lands do not align with other available assessments that included more detailed analysis of the national road infrastructure and interchanges.</li> <li>• Analysis carried out as part of the design of the M7 Naas to Newbridge By-Pass Upgrade Scheme clearly indicated a notable level of reserve capacity at the upgraded Junction 10 interchange adjacent to the subject lands, even when allowing for traffic growth up to the year 2030. The submission provides this information as set out in Technical Note 10 prepared and issued by the designers of the roads project and appended to the submission.</li> <li>• Traffic data available for both the M7 and R445 (pre-Covid) indicates a notable level of reserve capacity on both which is more than sufficient to cater for the proposed development.</li> <li>• Long-term impact of the Covid 19 pandemic, is expected to result in reduced traffic levels due to working from home and commuting traffic reduces.</li> <li>• The impact on economic activity is expected to result in reduced traffic growth in the coming years which was not considered as part of the recent road upgrades resulting in additional reserve capacity in the local road network.</li> <li>• A planning application for the site would require a bespoke traffic assessment in accordance with TII guidelines, clearly outlining potential impact on M7 and Junction 10.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• Precedent for both zoning of lands and planning permissions granted for data centre and similar low trip generating developments adjacent national roads and associated interchanges, including in the vicinity of subject lands.</li> <li>• No impact on the Leinster Outer Orbital Road.</li> <li>• The detailed information show there is capacity and would not be a detriment to the national roadway. No detailed analysis has been provided for the contrary.</li> </ul> <p><b>Relevant Precedents for the site of Data Centre Developments</b></p> <ul style="list-style-type: none"> <li>• Sites zoned in the Plan do not provide the optimal solution for hyperscale data centres.</li> <li>• Electricity is a key factor.</li> </ul> <p><b>M3 Clonee – Meath</b></p> <ul style="list-style-type: none"> <li>• Land zoned in the 2013-2019 DP adjacent to motorway and interchanges and a Facebook data centre (76,200sqm) is operational.</li> <li>• Board's report (PL17.245347) states the fact that only 115 persons are to be employed on site which will not give rise to of 52 significant trip generation.</li> <li>• The Board in granting permission did not consider the location to M3 and interchanges a planning concern.</li> <li>• An extension to the Facebook data centre was granted in 2018.</li> <li>• Meath have designated additional lands for data centres at this location.</li> <li>• Opportunity for Kildare to offer similar planning certainty.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|          |      | <div data-bbox="533 292 1261 742"> </div> <p data-bbox="533 746 1008 762">Figure 4.2: Map of datacentre site at Clonee, County Meath</p> <p data-bbox="533 802 925 826"><b>Data Centres near Motorway</b></p> <ul data-bbox="577 863 2141 1193" style="list-style-type: none"> <li>• Permission granted for data centre adjacent to M1 motorway at the Drogheda Business and Technology Park, March 2020.</li> <li>• Datacentre granted in proximity to M11 near Arklow, February 2021.</li> <li>• Data centre granted in proximity to motorway interchange of the M6 and M17/18, which is identified as a Strategic Economic Corridor (SEC) in the Galway CDP. ABP said it was acceptable in terms of traffic safety and convenience, strong basis for the location of the SEC chosen and the data centre was consistent with what was envisaged for the SEC.</li> <li>• The Inspector states the traffic impact presented is robust in terms of methodology and provides for a comprehensive assessment and the existing road network is capable of accommodating the development.</li> </ul> <p data-bbox="533 1201 1496 1225"><b>Planning for Datacentre Development in the new Naas LAP 2021-2027</b></p> <ul data-bbox="577 1262 2128 1327" style="list-style-type: none"> <li>• The zoning of the subject lands will facilitate significant inward investment and economic growth for the county over the LAP period, leading to increased employment and a significant spin-off / multiplier effect in</li> </ul> |



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|          |      | <p>terms of support services, construction employment, and ancillary employment associated with the operation of such development.</p> <ul style="list-style-type: none"> <li>• Examples used indicate the zoning of site proximate to the national road network have been accepted by the OPR /TII / Department.</li> <li>• Accords with the Guidance Note on Core Strategies 2010 which states that planning authorities should undertake an appropriate level of analysis to ensure that sufficient lands are identified for employment purposes at suitable locations.</li> <li>• The subject lands at Newhall would be equally, if not better suited to the delivery of datacentres, when compared to the precedents / examples, having regard to infrastructure availability in certain areas of the county, and the highly skilled workforce available in Kildare.</li> </ul> <p><b>TII, NTA and OPR Submissions of the Draft LAP 2019-2021</b></p> <ul style="list-style-type: none"> <li>• The submission notes the concerns raised by the prescribed bodies.</li> <li>• TII fail to acknowledge the low intensity employment / trip generating characteristics of data centre development.</li> <li>• The submission believes that their submission addresses the concerns of the OPR / TII /NTA. <ul style="list-style-type: none"> <li>○ Limited traffic impact</li> <li>○ Established precedents near national motorway network/junctions.</li> <li>○ Inconsistent approach by KCC to sterilise the Newhall lands from development when other sites within the boundaries of the proposed LAP will have similar impacts on the motorway junctions, including some sites that were not previously zoned for development.</li> <li>○ Not an intensive land use to generate traffic.</li> <li>○ Consistent with the Spatial Planning and National Roads Guidelines which require “provisions, including zoning and standards, which ensure that land uses in the vicinity of the network are compatible with the safe and efficient operation of national roads and associated junctions”.</li> <li>○ Other planning authorities and ABP have accepted the principle of providing large data centre campus developments in other locations in Ireland which are</li> </ul> </li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <p>similarly located in proximity to the motorway network and associated junctions.</p> <ul style="list-style-type: none"> <li>○ The planning application and planning policy history of the subject lands identified them as being appropriate for industrial / warehousing development and this should be a relevant planning consideration in identifying suitable lands for low intensity employment uses, such as data centre, in the new LAP.</li> <li>○ Restricting data centre development on the subject lands are not based on factual, detailed assessment which included a comprehensive analysis of the impact on the national road network as requested by both the NTA and TII.</li> </ul> <p><b>Alternative Zoning Request</b></p> <ul style="list-style-type: none"> <li>• If the site is not going to be zoned for a Data Centre, request to reinstate the Industry and Warehousing zoning.</li> <li>• Acknowledge the history of zoning and permission granted on the site and provide an opportunity for the landowner to bring forward a data centre application on the southern portion of the landholding to meet an element of the demand for such uses on the subject lands.</li> </ul> <p><b>Appendix 1 - Location of lands in ownership of Crylock Developments</b></p> <p>The submission outlines the location of the site relative to the town and the surrounding context. The existing entrances to site are discussed and opportunities for other vehicular connections. Reference to the LOOR, powerlines, gas, telecommunications, Osberstown, previous site zoning and adjacent recent planning applications as raised earlier in the documents are highlighted again.</p> <p><b>Appendix 2 – Engineering Statement Prepared by OCSC.</b></p> <p>A supporting document has been submitted as part of the submission which has been discussed throughout the main part of the submission. The report looks at the viability of the subject lands to cater for a data centre development (215,000 sqm of GFA) from a traffic and transportation perspective, with particular focus on potential impact on the local road network including</p> |

| Sub. No. | Name                           | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |            |                                |                |  |                |  |          |            |          |            |         |     |     |     |    |    |
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|          |                                | <p>the M7 and associated Junction 10 interchange. The report considers there is sufficient capacity available in the local road network, including the M7 and associated Junction 10, to cater of the development of the subject lands as a data centre. It states that there is nothing to indicate based on the available data that such a development would be to the detriment the integrity and function of the national road infrastructure.</p> <ul style="list-style-type: none"><li>• The report examines the characteristics, local area and infrastructure available for the site.</li><li>• The Site accessibility is examined in terms of bus services, including the feeder bus from Sallins Rail Station. IT examines cycling infrastructure in the context of the NTA Cycle Network Plan.</li><li>• Potential traffic impact in terms of the trip generation potential from the datacentre is examined. It is stated that there is low staffing requirements for data centre and shift work is employed. It is acknowledged that TRICS data is not available for data centres, however, assessments carried out for four separate data centre in the GDA were provided for schemes ranging from 30,000 to 110,000, two within Dublin City, one in Math and one in Fingal. The estimated results are as follows:</li></ul> <table><tr><th rowspan="2">GFA (m²)</th><th rowspan="2">Max Staff On-Site (No. People)</th><th colspan="2">A.M Peak Hour</th><th colspan="2">P.M. Peak Hour</th></tr><tr><th>Arrivals</th><th>Departures</th><th>Arrivals</th><th>Departures</th></tr><tr><td>215,000</td><td>530</td><td>272</td><td>104</td><td>46</td><td>99</td></tr></table> <p><i>Table 2: Estimated Trip Generation Potential of Data Centre Development on Subject Lands</i></p> <ul style="list-style-type: none"><li>• The submission examined the local network capacity in terms of the R445 including the proposed Part 8, the M7 in particular junction 10 which has been designed for future traffic flow with growth up to 2030 and the Osberstown interchange which will reduce traffic volumes on both the M7 Maudlins and relocated Newhall Interchange. The report states that the considering the relatively low trip generation potential of the subject lands when allowing for data centre development, the associated traffic impact would not be expected to be minor with respect to the capacity of such a significant piece of new infrastructure as the upgraded interchange. The traffic generated from the development would represent just 4% of the A.M. peak hour</li></ul> | GFA (m²)   | Max Staff On-Site (No. People) | A.M Peak Hour  |  | P.M. Peak Hour |  | Arrivals | Departures | Arrivals | Departures | 215,000 | 530 | 272 | 104 | 46 | 99 |
| GFA (m²) | Max Staff On-Site (No. People) | A.M Peak Hour                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |            |                                | P.M. Peak Hour |  |                |  |          |            |          |            |         |     |     |     |    |    |
|          |                                | Arrivals                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Departures | Arrivals                       | Departures     |  |                |  |          |            |          |            |         |     |     |     |    |    |
| 215,000  | 530                            | 272                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 104        | 46                             | 99             |  |                |  |          |            |          |            |         |     |     |     |    |    |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <p>capacity and 2% in the P.M. peak hour capacity of the M7. The report also looked at the TII data for years 2017/2018 and the development would represent a tiny fraction of the existing traffic.</p> <ul style="list-style-type: none"> <li>• The submission makes reference to Technical Note 10 dated 2014 and looked at the capacity of Junction 10 of the previous iteration. The report states that there is notable reserve capacity available and negligible queuing at both roundabouts which comprise the current Junction 10 interchange, even when assessed for the year 2030 with associated traffic growth allowed for in the interim.</li> <li>• The submission details that the long terms of the Covid-19 pandemic needs further consideration, where working from home will lead to a reduction in commuter traffic, with the NTA stating that daily trips could be up to 8% lower than previous projections.</li> <li>• HGV access was examined in the report – ideal location for HGVs with easy access to the M7 via the R445 and the subject lands house a haulage company office and depot which have operated without issue to date.</li> <li>• Development proposal would upgrade the connecting road between the R445 to Rathangan Road.</li> <li>• The report examines the NTA /TII submission on the previous Draft LAP and states data centres are low intensity and is expected to have limited impact and reserve capacity is available on Junction 10 at the year 2030.</li> <li>• The report states that there are serious concerns with the Naas/ Sallins Transport Strategy and inconsistent with the results of the capacity assessment carried out by Roughan &amp; O'Donovan and AECOM previously.</li> </ul> <p><b>Naas/Sallins Transport Strategy</b></p> <ul style="list-style-type: none"> <li>• The report raises concerns in terms of the conclusion and methodology uses in the Strategy; particularly in relation to the extent of area modelled, limited allocation of job growth to the subject lands, and that the subject lands not considered in isolation to assess their true impact. The exact boundaries considered at the subject lands were considered vague and therefore unclear how the subject lands were represented in the Strategy. The report also examines the modelling results presented and queries the conclusion outlined and that Covid-19 impact on travel has not been considered either. Overall, the Strategy has not been demonstrated that the development of the subject lands as a data centre would compromise the integrity and function of the national roads.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <p><b>Draft LAP Content</b></p> <ul style="list-style-type: none"> <li>The report states that no evidence-based case has been made for the proposed Data Centres sites in the draft LAP and queries why the proposed sites are acceptable when the subject lands are not.</li> </ul> <p><b>Potential Further Mitigation</b></p> <ul style="list-style-type: none"> <li>Mobility Management/Travel Planning.</li> <li>Traffic and Transport Assessment.</li> </ul> <p><b>Leinster Orbital Route</b></p> <p>The report makes reference to the fact the Transport Strategy did not account for the Leinster Orbital Route, it is not planned for implementation under the NTA Strategy for 2016-2035, the subject lands do not impact on any part of the identified route corridor and the proximity of the LOR would be a benefit which would reduce traffic flows both on the M7 and through the Newhall Interchange, thereby making available further reserve capacity on the local road network.</p> <p><b>Summary and Conclusions</b></p> <ul style="list-style-type: none"> <li>Trip generation low.</li> <li>Transport Strategy did not consider national road infrastructure sufficiently.</li> <li>Conclusions in Transport Strategy are contradictory to the design information and associated assessments carried out as part of the M7 Naas to Newbridge By-Pass Upgrade Scheme.</li> <li>Road capacity improved as a result of traffic pattern due to Covid-19.</li> <li>No bearing on the delivery of the Leinster Orbital Route as per the Corridor Protection Study.</li> <li>No reason in terms of transportation that would prevent the subject lands from being appropriately zoned.</li> </ul> |

| Sub. No.                | Name                   | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |          |              |              |                        |                        |               |       |       |                 |       |       |                   |       |       |                         |       |       |
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|                         |                        | <p><b>Technical Note 10</b></p> <p>The submission also contains Technical Note 10 which was referred by OCSC in their Engineering Statement. The Note was prepared by Roughan O'Donovan and AECOM in relation to the M7 Naas to Newbridge By-pass Upgrade Scheme in terms of the M7 Interchange – Capacity Assessment. The Note provides an overview of the capacity assessments and junction analysis that was undertaken for the scheme. The impact of the proposed M7 Osberstown and R407 Sallins Bypass Scheme upon the capacity and operation of the M7 interchanges is also looked at. The report looks at the capacity of J11, 10 and 9 examining data from the NRA traffic counters in March 2014.</p> <p><u>M7 /M9 Interchange (J11)</u></p> <p><i>Table 4-1 Peak Hour Traffic - M7 East of the M7/M9 Interchange</i></p> <table> <tr> <th rowspan="2">Scenario</th><th>M7 Eastbound</th><th>M7 Westbound</th></tr> <tr> <th>AM Peak Hour Vehicles*</th><th>PM Peak Hour Vehicles*</th></tr> <tr> <td>2014 Observed</td><td>3,100</td><td>3,600</td></tr> <tr> <td>2030 Do-Minimum</td><td>4,000</td><td>4,100</td></tr> <tr> <td>2030 Do-Something</td><td>4,200</td><td>4,400</td></tr> <tr> <td>2030 Capacity (3 lanes)</td><td>4,800</td><td>4,800</td></tr> </table> <p><i>*Highest Peak Flows in Direction</i></p> <ul style="list-style-type: none"> <li>Existing capacity issues at interchange relate to limited capacity of the M7 mainline to the east of M7/M9 Interchange.</li> <li>3rd lane will allow for safer merging.</li> <li>Additional capacity westbound allows the safe diverging of traffic from the M7 and M9.</li> <li>Average speeds at peak will improve due to extra lane.</li> <li>No additional capacity issues with the M7/M9 interchange as a result of the additional traffic associated with the M7 Osberstown Interchange.</li> </ul> | Scenario | M7 Eastbound | M7 Westbound | AM Peak Hour Vehicles* | PM Peak Hour Vehicles* | 2014 Observed | 3,100 | 3,600 | 2030 Do-Minimum | 4,000 | 4,100 | 2030 Do-Something | 4,200 | 4,400 | 2030 Capacity (3 lanes) | 4,800 | 4,800 |
| Scenario                | M7 Eastbound           | M7 Westbound                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |          |              |              |                        |                        |               |       |       |                 |       |       |                   |       |       |                         |       |       |
|                         | AM Peak Hour Vehicles* | PM Peak Hour Vehicles*                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |          |              |              |                        |                        |               |       |       |                 |       |       |                   |       |       |                         |       |       |
| 2014 Observed           | 3,100                  | 3,600                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |          |              |              |                        |                        |               |       |       |                 |       |       |                   |       |       |                         |       |       |
| 2030 Do-Minimum         | 4,000                  | 4,100                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |          |              |              |                        |                        |               |       |       |                 |       |       |                   |       |       |                         |       |       |
| 2030 Do-Something       | 4,200                  | 4,400                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |          |              |              |                        |                        |               |       |       |                 |       |       |                   |       |       |                         |       |       |
| 2030 Capacity (3 lanes) | 4,800                  | 4,800                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |          |              |              |                        |                        |               |       |       |                 |       |       |                   |       |       |                         |       |       |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p><u>Newhall Interchange (J10)</u></p> <ul style="list-style-type: none"> <li>• Junctions that forms the Newhall Interchange are operating above capacity and will increase overtime so improvements are required.</li> <li>• Overall demand through the Newhall Interchange would reduce of the M7 Osberstown Interchange and R407 Sallins By-pass Scheme were to proceed, significant queuing during peak periods would still occur on both of the existing Newhall off-ramps in the absence of the proposed Newhall Interchange Upgrade.</li> </ul> <p><u>Maudlins Interchange (J9)</u></p> <p>The increase in capacity on the M7 as a result of the proposed widening will remove bottleneck at this location, providing the additional capacity required to cater for the forecast level of traffic. Traffic which utilised the local road network via Kill and Johnstown to access Naas in order to avoid the congestion on the M7 transfers onto the M7 as a result of the widening.</p> <p><u>Summary</u></p> <ul style="list-style-type: none"> <li>• Sufficient capacity at the M7/M9 Interchange to cater for the forecast demand with the proposed widening of the M7. The marginal increase in traffic as a result of the M7 Osberstown Interchange and R407 Sallins By-pass will be catered for with the widening of the M7 in place.</li> <li>• Newhall Interchange requires an upgrade.</li> <li>• Existing capacity of the junctions that form part of the Maudlins Interchange can cater for the forecast flows in the design year. The introduction of the M7 Osberstown Interchange and Sallins By-pass reduced flow through the Maudlins Interchange and has a positive impact on congestion on Monread Road.</li> </ul> <p><u>Appendix A – Vissim Modelling Report</u></p> <p>This part of the report looks at the simulation modelling that was undertaken.</p> <p><u>Appendix A – Model Calibration</u></p> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <p>Am and PM Calibration figures have been provided.</p> <p><u>Appendix B – Model Validation</u></p> <p>Am and PM Validation figures have been illustrated.</p> <p><u>Appendix B – PICADY Results</u></p> <p>Detailed calculations / figures which were on the capacities, queues and delays have been provided.</p> <p><u>Appendix C – ARCADY Results</u></p> <p>Calculations on the assessment of roundabout capacities and delay.</p> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are noted. The draft Naas Plan has been informed by a series of comprehensive evidence based assessment, which included the Naas/Sallins Transport Strategy (2020). The Transport Strategy provides an evidence base for the integration of land use and transport planning, which is at the centre of the Naas plan-making process. The study examined the existing and proposed transport infrastructure, including the service provision across all modes of transport including sustainable means such as active modes (walking and cycling) in Naas and Sallins. The assessment provides an understanding of the existing constraints and modal share and also identifies the interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand and ensure the optimal transportation interventions can be planned in order to drive a shift towards sustainable movement. The study found that large scale development in the location referred to in the vicinity of the Newhall Interchange would exacerbate issues at the Newbridge Road Roundabout and therefore cannot be justified in the draft Plan.</p> <p>The assertion that <i>“a detailed assessment of the national road infrastructure, in particular the M7 interchanges, was not carried out as part of the Strategy”</i>, is factually incorrect. A detailed traffic modelling exercise including analysis on the M7 and its interchanges was undertaken as part of the strategy. Full details can be found in the “Naas/Sallins Transport Strategy Future Year Traffic Modelling Report” which is available on Kildare County Council website.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <p>The Regional Spatial and Economic Strategy focuses on the densification of the existing built urban footprint around existing public transport corridors. The subject lands would represent the development of a significant land bank on undeveloped land on the periphery of Naas, which would be heavily reliant on the national road network for access with limited access via public transport, cycle and walking and therefore would not represent a consolidation of urban zonings in accordance with the NPF and RSES.</p> <p>The Engineering Statement prepared by OCSC is noted. <i>Comment on the viability of the subject lands to cater for a data centre development from a traffic and transportation perspective, with particular focus on potential impact on the local road network including the M7 and associated Junction 10 interchange.</i>” However, in developing this statement it appears that O'Connor Sutton Cronin's focus is to justify development in this location rather than examine the appropriateness of the location in the context of the principles guiding the LAP or indeed national and regional planning policy.</p> <p>As provided for in the RSES in terms of the integration of land use and transport, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations and it is also stated that a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life, should be delivered. In this context, the subject site is in a rural location outside the boundary of the draft Naas Plan, with no dedicated pedestrian or cycle infrastructure or high-quality local bus stops. The rural location, rather than peripheral location, of the site remote from any residential development would only serve encourage car usage for workers commuting to the site. Similarly, the subject site is located immediately next to the M7 motorway which forms a barrier to active mode travel. Whilst it is accessible from the R445 (Naas/Newbridge Road) this road is dual carriageway linking directly in M7 junction 10. The difficulty in accessing the site by active mode travel has not been considered in the OCSC Report.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <p>A key principle of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) is that development should be plan led and the strategic function of the national road network must be protected. The Naas/Sallins Transport Strategy was developed to outline a policy-led overall strategy for future integrated land use and transport development in the Naas/Sallins Area. Rather than adhering to appropriate planning principles and examining the appropriateness of the subject site for development, it appears that the approach is to select the site for development due to its proximity to the national road network and then retrospectively justify the development on the subject site.</p> <p>The comments in relation the subject lands location with respect to access from existing, high quality roads infrastructure which has seen significant upgrade in recent years to add substantial capacity to the network is noted. However, the subject site is in a rural location outside the boundary of the Naas LAP, with no dedicated pedestrian or cycle infrastructure or high-quality local bus stops. Furthermore, there is no footpath on the road bridges across the M7 at Junction 10 which means it would be impossible for pedestrians to safely access the site from Naas. The rural location of the site remote from any residential development would only serve encourage private car usage for workers commuting to site.</p> <p>It is noted the report which accompanies the submissions states that the site is well served by public transport with the potential for a transport hub and also reference to the Part 8 which includes for cycle lanes for the Newhall Crossroads Upgrade. There is currently no dedicated high-quality pedestrian or cycle infrastructure or high-quality local bus stops in proximity to the site. The Naas/Sallins Transport Strategy contains plans for public transport hub close to the town centre. The reality of developing a public transport hub in a large industrial development remote from the town Centre is questioned. Whilst cycle lanes are provided for in the design of the upgrade of the Newhall Crossroads, these are for future proofing purposes and the delivery of connecting cycle infrastructure is a longer-term goal.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <p>The comments in relation to the trip generation potential of a data centre development is shown to be low relative to other uses on the same extent of land is noted and accepted. However, notwithstanding this, the appropriateness of the development of a rural site a distance from Naas is considered contrary to national and regional policy.</p> <p>The criticism of the Naas/Sallins Transport Strategy in terms of an inadequate study of the national road network, in particular the M7 Interchanges, the Strategy's methodology are noted. The Naas/Sallins Transport Strategy was developed to outline a policy led overall strategy for future integrated land use and transport development in the Naas/Sallins Area. It is not the function of the strategy to look at individual development proposals in isolation but rather to develop an over-arching strategy that promotes modal shift to active travel and public transport modes and reduces reliance on private vehicular travel.</p> <p>A state-of-the-art macro simulation model in the software VISUM was developed to assess the impact of future land use proposals in the Naas/Sallins Transport Strategy. The assessment undertaken utilising the VISUM model, and its queuing outputs, has shown that significant impacts would occur on the R445 as a result of development in the subject site on the local road (particularly in the PM peak). These impacts on the local road network, in close proximity to M7 Junction 10, have the potential to negatively impact not just on the local road network but also on the strategic road network.</p> <p>Technical Note 10 and the reserve capacity on the M7 is noted. The traffic survey data underpinning the analysis of the capacity of the upgraded Newhall Interchange (as set out in Technical Note 10 M7 Interchanges – Capacity Assessments) was collected in 2012. In 2012, Ireland was still in a recession and traffic level across the country (both general traffic and freight traffic) had dropped to their lowest levels in years<sup>29</sup>. For the purposes of the</p> |

<sup>29</sup> CSO Road Traffic Volumes (Table 5.1 Road Traffic Volumes of National Fleet by Vehicle Type 2008 – 2019)

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p>appraisal and design of the M7 Naas to Newbridge By-Pass Upgrade Scheme, traffic growth was projected forward to 2030 (assumed Design Year) from 2012 and the overall projected growth was approximately 26%.</p> <p>Between 2012 and 2018 (the base year for the Naas Transport Strategy) vehicle kilometres of travelled nationally increased by 17%<sup>30</sup>, while traffic levels on the M7 grew by 19%<sup>31</sup> over the same period. Additionally, both the level of projected demand growth (approximately 30%) and the location of this growth within and around Naas has changed considerably compared to the assumptions underpinning the M7 Naas to Newbridge By-pass Upgrade Scheme. This higher level of growth has reduced the spare capacity at Junction 10, below the expected levels forecasted in 2012, and therefore traffic movements at this junction should prioritise the strategic movement of long-distance traffic and not local access.</p> <p>The comments in relation to the long-term impact from Covid-19 on the traffic volumes is noted. The accuracy of any future travel demand scenario relies on explicit projections of population, settlement patterns, employment and job locations, and the potential impact of increased home working will not be uniform across the road network. Following the end of the pandemic, demand may reduce across all travel modes (car, rail bus etc.), while people who previously travelled to work by rail/bus 5 days a week, may choose in the future to drive to work 2-3 days a week instead. With increased home working, travelled demand on the strategic road network may reduce, however, as seen during the COVID-19 pandemic local travel increased most notably during inter-peak periods. The potential long-term impact of increased home working on the capacity and operation of the road network is Naas is highly uncertain and should not be assumed to uniformly reduce demand across the road network.</p> |

<sup>30</sup> CSO Road Traffic Volumes (Table 5.1 Road Traffic Volumes of National Fleet by Vehicle Type 2008 – 2019)

<sup>31</sup> TMUS M07 045.0E (trafficdata.tii.ie)

| Sub. No. | Name                            | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |                                 | <p>The precedent applications for both zoning of lands and planning permissions granted for data centre adjacent national roads and associated interchanges set out in the submission are noted. However, the location of the site is contrary to the over-arching guiding principles on the integration of land use and transport as set out in the RSES, which informed but the Naas Sallins Transport Strategy and the draft Plan.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 508      | <b>Glenveagh Properties PLC</b> | <p>Submission by McCutcheon Halley Chartered Planning Consultants on behalf of Glenveagh Properties PLC relates to lands at Millennium Park Naas (see Map at end of summary).</p> <p>This submission includes two recommendations namely, a site-specific review of land in the Northwest Quadrant and the rezoning of the subject lands to residential use.</p> <ul style="list-style-type: none"> <li>• Submission states that Glenveagh Properties is one of the biggest housing developers in the Country and are significant stakeholders given the prominence and scale of their land and development assets elsewhere in Kildare and Nationwide.</li> <li>• Notes that Glenveagh PLC have an excellent track record in bringing forward residential development in strategic locations throughout the country and therefore seeks that the subject site at Millennium Park is brought forward for residential development in the short to medium term.</li> </ul> <p><b>Planning Context</b></p> <ul style="list-style-type: none"> <li>• Submission notes the Kildare County Development Plan 2017 – 2023 (CDP) and the subsequent June 2020 Variation (Variation No. 1) to the CDP is relevant in the context of the setting of the subject site within Naas which is identified within the CDP as a Key Town. Submission notes the role and function of Key Towns.</li> <li>• Notes Variation No. 1 of the CDP has allocated Naas with has been allocated a population growth percentage of 14.9% with a dwelling target of 898 units between 2020 and 2023.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |      | <ul style="list-style-type: none"> <li>Notes the provisions the Naas Town Development Plan for the subject site which was identified as a mixed-use area with residential (Ref: C) and Urban Village (Ref: G). In this regard, the site was partially designated as a 'New Residential' area with a purpose to "to provide new residential development and other services incidental to residential development". Notes that the Plan states that while housing is the primary use in this zone, recreation, education, crèche/playschool, community buildings and sheltered housing will also be permitted by the Council with Limited local shopping facilities to be considered to serve the local needs of the residents.</li> <li>Further notes that the provisions of the LAP also state that residential areas should be developed in accordance with a comprehensive plan. In terms of the urban village designation, the objective seeks "to provide for a mix of uses including retail, community and social facilities for the population of the Northwest Quadrant of Naas and to support and complement the attractiveness of the area as a major centre for high quality employment". Furthermore, in terms of the White Land designation, the aim is "to provide for White Lands to ensure the consolidation of future development outside the period of this Plan".</li> <li>Notes that the Draft LAP proposes that subject lands be included in the 'Enterprise and Employment' zoning at Millennium Park. States that this represents an expansion of the area to the north which has historically been zoned for this use.</li> <li>Notes that a further analysis of the site context within the current Draft LAP references the wider Millennium park site which is identified within a Regional Policy Objective (RPO 51) of the Regional Spatial and Economic Strategy (RSES).</li> <li>States that it is important to note that the subject site is identified within the boundary of the Northwest Quadrant (NWQ), and refers to Draft LAP which states "the Northwest Quadrant provides a unique opportunity to provide a sustainable urban district and decarbonized zone in proximity to the town centre."</li> <li>Notes the CDP/LAP provisions for the population of Naas to increase by 5,866 in the period to 2026. States that there is a need for residential development to come forward in the short term to meet the increase in demand.</li> <li>Notes the provisions of the Draft LAP relating to its vision for Naas 2031 and beyond and the role that the importance of the role NWQ will have in the fulfilling the vision.</li> </ul> <p><b>Land Use Zoning</b></p> <ul style="list-style-type: none"> <li>States that in terms of the overall context of the draft LAP, the proposed land use zoning of the site as 'employment and enterprise' is a significant departure from the mixed-use approach within the previous Town</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p>Plan, not least given the range of uses previously proposed in the vicinity of the subject site such as Community and Education.</p> <ul style="list-style-type: none"> <li>• Whilst acknowledging that the RSES places the Millennium Park site as an area for “strengthening the local employment base”, states that this broad designation does not account for the potential development of the site for residential use.</li> <li>• Reiterates that the site is also designated within the Northwest Quarter, which has its own vision and strategy, contingent on a Masterplan being prepared and in this context the submission requests clarity within the Draft LAP as to who is intended to be responsible for the preparation of the NWQ Masterplan given the multiple land ownerships involved.</li> <li>• States that it is Glenveagh’s view that the NWQ has the potential to be a key contributor in realising the vision of a sustainable community, not least given the opportunity to enhance the linkages between Naas Town Centre as promoted elsewhere in the draft Plan. Therefore, submits that Policy NWQ 1 be modified to provide greater clarity on the timeframes associated with preparation of the masterplan and confirm that this preparation of the masterplan will be led by the Council.</li> <li>• States that the NWQ provides significant opportunities to achieve the broader objectives for Naas, which should form part of the LAP.</li> <li>• Further states that it is their view that the NWQ is an opportunity to provide a sustainable live/work community and the objectives of the Draft LAP should reflect this overriding vision.</li> <li>• Considers that the current approach does not take into account the suitability of the subject site as a residential hub as per the previous Town Plan or indeed the ability of our client to deliver much needed housing within the short-medium-term.</li> </ul> <p><b>Recommendation: A site specific review of land within the Northwest Quarter, to ensure a targeted and appropriate approach to development within the environs of Naas to ensure a mix of uses is achieved to create a sustainable urban district as referenced within the supporting text of the Draft Plan.</b></p> <p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Notes that the Draft LAP also identifies a development strategy for Naas (Figure 2.4 of the Draft Plan), and states that in terms of the NWQ, there are a number of initiatives including, new connecting routes to Naas town centre and green infrastructure links. The NWQ area is also identified as a focus of long terms growth.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <p><b>Residential Zoning</b></p> <ul style="list-style-type: none"> <li>• Reiterates that the site benefitted from a partial residential zoning within the previous Town Plan and states that while the importance of land for 'employment &amp; enterprise' use is recognised, the availability of suitable land for residential use should not be reduced.</li> <li>• The submission goes on to detail the suitability of the site for residential development as follows: <ul style="list-style-type: none"> <li>○ <b>Location:</b> Notes the greenfield nature of the site and its central location between the built-up area of Naas and the M7 providing a sustainable location to establish a residential hub for the expansion of the NWQ area. States that the site is approximately 2km from Naas town centre and is therefore suitably located for residential development.</li> <li>○ <b>Connectivity:</b> States that the site is well served by a high-quality road network with access from the nearby road network already provided to the site. The site also benefits from its location approximately 600m from a new junction of the M7 which as noted within the Draft Plan "will provide a new 'entry point' or gateway to Naas and its environs and it is likely to enhance the profile of Millennium Park and the NWQ generally." States that the site is currently well connected and is proposed to have this connectivity strengthened further and that the land in the area must also provide a range of uses, such as residential to ensure the sustainability of the area.</li> <li>○ <b>Sustainability:</b> States that the subject site is within a sustainable location, given the above points, but also compounded by the proposed future vision of the NWQ which includes for a new mixed-use area to serve the future needs of the NWQ. Further notes that the subject site is a greenfield site and is situated away from the existing enterprise and employment uses in the area. Therefore, there is an opportunity to create a sustainable mixed-use area which will in turn drive the further expansion and achieve the vision of the NWQ.</li> </ul> </li> </ul> <p><b>Recommendation:</b> The site should be zoned for residential development to ensure the vision and objectives of the NWQ are met.</p> <p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• The submission includes a conclusion which states that the current land use zoning of the subject site does not take into account the site-specific characteristics of the site and is a significant departure from the previous Town Plan.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <ul style="list-style-type: none"> <li>• Reiterates the points made above in relation to the suitability of the subject site for residential development noting that a residential zoning of the site would add to the available residential zoned land and reduce the deficit in housing units and help address the current deficit in housing provision in Naas, a designated Key Town.</li> <li>• States that in terms of delivery Glenveagh can commit to delivery of housing units in the short to medium future, ensuring this delivery in the lifetime of the proposed plan and requests that the proposed recommendations should be given full consideration and form the basis of a site-specific approach within the draft LAP.</li> </ul> <div data-bbox="945 517 1751 967" data-label="Image"> </div> <p><b>Chief Executive's Opinion</b></p> <p>The points raised in the submission from Glenveagh Properties PLC are noted. National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that 'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens'.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p>The draft Plan has acknowledged under Section 1.4 that residential development in Naas has tended to locate outward in a somewhat dispersed pattern of development removed from the town centre and the sustainable growth of Naas should be carefully managed to resist sporadic isolated developments which do not integrate with the surrounding urban fabric or maximise the efficient use of land. The Vision for Naas 2031 and beyond, is that growth occurs in a sustainable and sequential manner, while prioritising low carbon, compact, consolidated and connected pattern of development.</p> <p>The subject lands are a considerable distance from the town centre (stated in the submission as 2km), are not located within or contiguous to the defined settlement boundary, are reliant on connectivity through the road network and do not provide for the consolidation of the existing urban form. As detailed under Section 10.7 of the Draft LAP, the Northwest Quadrant provides a unique opportunity to provide a sustainable urban district and decarbonized zone in proximity to the town centre.</p> <p>The issues raised regard departure from the zoning under the Naas Town Development Plan 2011-2017 (Residential) is noted. In this regard, it should be noted that the Town Development Plan was prepared taking into account the policy context in place at that time, which did not include the National Planning Framework, the Regional Spatial and Economic Strategy and certain objectives relating to compact growth and climate mitigation. It is important to note that Sections 10(8) and 19(6) of the Planning and Development Act 2000 (as amended) provide that there shall be no presumption in law that any land zoned shall remain so zoned in any subsequent plan.</p> <p>Notwithstanding this, the subject lands form part of the overall landbank that will be included in the masterplan for the Northwest Quadrant. As part of the masterplan process, a review of all the land use zonings will be carried out to ensure the masterplan reflects the OPW Flood Study to ensure a cohesive approach to the development of the overall landbank is provided for. The timeframe for the masterplan cannot be established at this time given the requirement to finish the OPW Flood Study which is outside the control of the Council.</p> |

| Sub. No. | Name         | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |              | <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 524      | Westar Group | <p>This submission is accompanied by a Planning Submission and an Engineering Report (Site Services, Transportation and Flood Risk).</p> <p>Summary of Key Issues:</p> <ul style="list-style-type: none"> <li>• Westar Group are the owners of c. 11.95ha of land within the Draft LAP area. These lands are strategically located to support the compact growth of Naas, in particular a stronger, connected, sustainable and vibrant town centre. This would align with the intended vision for Naas in RSES, which focuses on sustainable and sequential growth, prioritising low carbon, compact, consolidated and connected pattern of development.</li> <li>• The Draft LAP does not ensure sufficient land will be available to meet residential needs for the next nine years, as set out in Section 28 Development Plan Guidelines. The consequences of including population headroom (as per the Implementation Roadmap) and not land supply headroom is that there will be significant under provision of housing supply. Additional lands should be zoned to ensure population targets are met.</li> <li>• The Draft zonings do not reflect the contribution of this landholding to a compact, consolidated and connected pattern of development.</li> <li>• Figures should be adjusted to take into account sites which are not really Tier 1 sites (e.g. Site with permission 15/1060 for 385 units that is dependent on delivery of IRR and the site which is being zoned C New Residential for 252 units that is subject to a Part 8).</li> <li>• A more appropriate figure of 2.39 persons per household should be used in line with the Kildare Housing Strategy and the NPF.</li> <li>• The requirement for c. 500 social units for Naas will not be delivered and therefore the social housing list will not be reduced.</li> </ul> <p>Naas Sallins Transport Strategy 2020</p> <ul style="list-style-type: none"> <li>• The Transport Strategy considered this landholding as strategically placed to provide linkages between the town centre and NWQ/ &amp; Sallins. A portion of the public transport link can be developed on the landholding. The importance of the landholding is not reflected in the zonings within the Draft LAP.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <ul style="list-style-type: none"> <li>The rationale for the strategic reserve zoning appears wholly unwarranted and mismatched given the strategic transport links identified for the landholding.</li> </ul> <p>Recommended Zonings for Landholding</p> <ul style="list-style-type: none"> <li>The landholding is addressed in this submission as Areas 1, 2, 3 and 4 as per map below.</li> </ul>  <ul style="list-style-type: none"> <li>Area 1: A 'Town Centre' Zoning is suggested here to promote a mix of uses, subject to key objectives in relation to bus terminus/mobility hub; residential and commercial developments creating public plazas; linear linkages and provision of public park in Canal Harbour area.</li> <li>Area 2 and Part Area 3: The 3.85ha of the landholding zoned for residential development is welcomed. However, this is not deliverable until such time as the masterplan work is complete which requires the preparation of a flood risk study. This postpones the delivery of housing on a site that is ready to go with no infrastructural constraints or flood risk (see below). The masterplan and Flood Risk study should be omitted.</li> <li>Remainder of Area 3: The proposed 'Strategic Reserve' does not provide any definitive zoning function with the LAP timeframe or beyond. This should be reviewed as this approach is contract to National and Regional planning policy given the proximity to the town centre. The impact of CSO1.9 is to sterilise substantial portions of land from development, for reasons relating to haphazard or piecemeal development, which can be avoided by more pro-active development control policies. The zoning given to this site in the Draft 2019 LAP should be allocated.</li> <li>Area 4: This should be re-zoned to B: Existing / Infill Residential.</li> </ul> |



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|          |      | <ul style="list-style-type: none"> <li>The overall landholding provides a strategic opportunity for linkages and synergies between the town centre and lands to the west/Millennium Park and beyond. Amended zonings are requested to have regard to the foregoing (mixed use zoning close to town centre; residential and canal side linear park).</li> </ul> <ol style="list-style-type: none"> <li><u>Location of Landholding</u> <ul style="list-style-type: none"> <li>The lands are serviced, within 500m of Naas town centre, undeveloped at present, are underutilised strategic landbank and have canal frontages.</li> </ul> </li> <li><u>Zoning History</u> <ul style="list-style-type: none"> <li>In the 2011-2017 Naas Town Development Plan the lands were primarily zoned New Residential (Area 3) and lands that would be the subject of a future Local Area Plan (Areas 1 and 2).</li> <li>In the Draft 2019 Naas LAP, the landholding was zoned town centre (Area 1) New residential (Areas 2 and 3) and were included as part of a Key Development Area (including regeneration lands). The Draft 2019 LAP acknowledged the strategic importance of the landholding. The OPR in their submission to that Plan did not raise concern about the proposed zoning and supported the need to create a strong connected, vibrant town centre with an emphasis on public transport and sustainable forms of movement.</li> <li>The rationale for Draft zonings in the 2021 LAP are unclear and contradictory to the recommendations of the OPR's 2019 Report and to National and Regional planning policy relating to compact growth, consolidation and connected patterns of urban development. The owner is committed to the delivery of these lands, including public transport hub at undercroft level, a hotel, offices, retail, public realm etc.</li> </ul> </li> <li><u>Inappropriate Approach to Zoning</u> <ul style="list-style-type: none"> <li>The Draft LAP does not identify an evidence-based assessment for the zoning of lands in the manner identified, contrary to the principles of national and regional planning policy, and there is a disconnect between public transportation strategies and zonings.</li> <li>Area 1 (as per map above) could be zoned Town Centre to consolidate and support existing town centre retail uses.</li> <li>In Area 2, 3.85ha is zoned C3 New Residential. However, this is not deliverable as it is the subject of a future Masterplan, Flood Risk Study and Variation. This postpones the delivery of housing and therefore this should be omitted from the Plan.</li> <li>This landholding is the only Strategic Reserve lands located in close proximity to the town centre. The rationale for de-zoning and sterilisation of the remainder of the landholding is unclear.</li> </ul> </li> </ol> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <ul style="list-style-type: none"> <li>The flooding information on which the draft zoning is based is not up to date, predicated on CFRAM information and requires further refinement. JBA consulting argue there is no impediment in terms of flooding to the future development of these lands.</li> </ul> <p><u>Sustainable Planning and Infrastructure Assessment (SPIA)</u></p> <ul style="list-style-type: none"> <li>The rationale and basis of ranking of the landholding is underscored as it is argued that the landholding should be reclassified as Tier 1 and not Tier 2 and the SPIA should be reviewed.</li> <li>In terms of Core Strategy Compliance, Sites A1 and C3 should be afforded higher scores given their proximity to town centre and sequential potential.</li> <li>In terms of Strategic Outcomes of the NPF, it is argued sites A1 and C3 should be marked higher as the landholding supports compact growth, enhances connectivity and provides a sustainable and integrated community. It is argued there is no impediment in terms of flood risk, water or wastewater connections. Subject lands meet Naas/Sallins Transport Strategy objectives.</li> </ul> <p><u>Core Strategy Calculations</u></p> <ul style="list-style-type: none"> <li>In Table 3.4, 877 units are assigned for extant permissions however there is no guarantee these will be delivered. Two sites are referred to (C8 and C16) that require a separate Part 8 process and as such cannot be considered as Tier 1 lands.</li> <li>964 units are identified as being built between 2016 and 2020. These 964 units should not form part of the calculations. The impact of the inclusion is a reduction of c. 40% of housing numbers in the Key Town.</li> <li>The persons per household figure of 2.79 is considered too low and 2.39 persons per household is suggested, as per the Kildare Housing Strategy and to reflect NPF.</li> </ul> <p><u>Naas Sallins Transportation Strategy</u></p> <ul style="list-style-type: none"> <li>The Baseline Report of the Strategy acknowledges the strategic nature of the landholding (as 'KDA West').</li> <li>The Strategy identifies several transport objectives channelled through the landholding as follows: PT2 (Bus Interconnection at Naas Harbour); PT4 (local Bus Route); PT11 (Bus link to Sallins By-Pass); RD3 (Millbridge Street road link); C1 (Naas to Sallins Greenway); and C16 (NWQ link road cycle route).</li> <li>The importance of the client's landholding is not reflected in the proposed zonings. The rationale for strategic reserve appears wholly unwarranted.</li> </ul> <p>4. <u>Rationale for Amending Proposed Zonings</u></p> |

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|          |      | <ul style="list-style-type: none"> <li>• Figure 10.26 Design Framework for CRA 6 refers to the Canal Quarter Masterplan. The proposal put forward does not constitute the optimal use of this portion of the clients' lands in the context of objectives CQ1.1, CQ 1.4 and CQ 1.8. Town centre zoning and mixed uses in conjunction with amenity addressing the canal would be preferable to add vibrancy, to support integrated land use and transport planning.</li> <li>• The intended Masterplan area includes strategic reserve lands. A complete masterplan could not be completed within the LAP plan period, which will delay the delivery of the canal quarter. There is a risk the lands will remain undeveloped.</li> <li>• All lands within 1,000m of the town centre should be rezoned for development and removed from strategic reserve with clear and specific development control objectives. The approach to land zoning in close proximity to the town centre must be called into question.</li> <li>• Northwest Quadrant Masterplan: The Westar lands should not form part of any future NWQ Masterplan, as these lands can be master planned as part of a development proposal. The lands have no infrastructural constraints and can provide much needed residential development located centrally within Naas.</li> </ul> <p>5. Strategic Planning Policy supporting review of Zonings</p> <ul style="list-style-type: none"> <li>• The 2019 Draft LAP zoning for this landholding would constitute an appropriate form of zoning in close proximity to Naas town centre and would align with the RSES vision.</li> <li>• It is critical that the LAP allocated sufficient zoned land to enable Naas develops as a Key Town, to provide for compact growth on lands sequentially located proximate to the town centre.</li> <li>• This would help deliver housing, as set out in Rebuilding Ireland and in particular Pillar 3.</li> <li>• The proposed development accords with NPFs core principles for housing delivery: being prioritised in existing settlements; at a sustainable location (NPO 33); with access to services and within a 10 minute walk of the town centre; in close proximity to new transport infrastructure; promoting walking and cycling; sequential development; promoting compact urban form.</li> <li>• Section 28 Development Plan Guidelines require planning authorities to ensure continuity of supply of zoned residential land to meet needs for the next 9 years.</li> <li>• The consequences of including population headroom and not land supply headroom is that there will be significant under provision of housing supply for Naas. Additional lands should be zoned. 'Leap frogging' sequential sites is contrary to the principles of proper planning.</li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>• This approach to land use zoning will exacerbate the lop-sided nature of development. Serviced lands close to the town centre should be zoned.</li> </ul> <p>6. Lands located to the West in Finlay Park</p> <ul style="list-style-type: none"> <li>• The 0.25 ha part of the landholding now zoned 'F: Open Space in the Draft Plan should be zoned 'B: Existing Residential' as it is fully serviced (foul, water, access); it represents a natural infilling and it's within 500m from Naas town Centre. The parent permission for Finlay Park includes more than 15% public open space and this additional zoned Open Space is not required to serve surrounding residents.</li> </ul> <p>7. Conclusion</p> <ul style="list-style-type: none"> <li>• The Draft zonings for this landholding should be re-examined given their close proximity to Naas town centre as they promote compact, consolidated growth in a sequential manner.</li> <li>• The Draft Zonings are contrary to the recommendations of the OPRs submission to the 2019 Draft LAP, contrary to National and Regional planning policy relating to compact growth, consolidation and patterns of urban development.</li> <li>• The Draft zonings do not make optimal use of lands identified as core material consideration in the Naas Sallins Transport Study.</li> <li>• The landholding should be zoned as per the 2019 Draft LAP.</li> </ul> <p>Summary of Accompanying Engineering Report</p> <ul style="list-style-type: none"> <li>• The SPIA identifies sites C3 and A1 as Tier 2 sites. This report submits information to support a reassessment of the scoring used in relation to: Drainage/SuDS/Flooding; Water Supply; Wastewater and Roads.</li> <li>• Flooding: there is high uncertainty regarding flood risk in Naas due to poor availability of modelled data and possible interconnection between fluvial and surface water drainage and canal systems. The CFRAM report noted the Grand Canal system had not been fully modelled for CFRAM analysis. JBA document indicated that:             <ul style="list-style-type: none"> <li>○ A full hydraulic model was developed for the site, triggered following review of CFRAMs.</li> <li>○ The source of flood risk is the Bluebell Stream, which overtops the Grand Canal and subsequently the site during a flood event.</li> </ul> </li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>○ A site specific flood model has been developed incorporating the Grand Canal and Bluebell Stream based on LIDAR data.</li> <li>○ Sites C3 and A1 are fully located in Flood Zone C.</li> <li>• There's unlimited potential for SuDS to comply with best practise.</li> <li>• Water Supply: Subject lands have direct access to existing water services with capacity, confirmed by Irish Water.</li> <li>• Wastewater: Both sites are well serviced by sewers now directed to Osberstown.</li> <li>• Roads Infrastructure: Both sites are serviceable from Finlay Park development.</li> <li>• Conclusion: Sites C3 and A1 have been significantly underestimated by KCC, resulting in a Tier 2 classification and should be reconsidered.</li> <li>• Accompanied by Ground Investigation Report, Confirmation of Feasibility from Irish Water, Technical Note on SSFRA by JBA Consulting and Systra Transport Assessment Scoping Document.</li> <li>• Systra Document concludes: <ul style="list-style-type: none"> <li>○ The landholding can play a key role in delivering required infrastructure, the first step of unlocking development in the NWQ.</li> <li>○ Both sites are excellent locations to support sustainable travel.</li> <li>○ Infrastructure has been designed to support proposals set out in Naas Sallins Transport Strategy including PT2, PT11, C1, C16, C36, C37 and RD3.</li> <li>○ Site is highly accessible, proximate to the town centre, accessible by walking, cycling and public transport.</li> <li>○ A modest extension to the Caragh Road would be required to provide road access into the northern site. Development further north in the NWQ cannot proceed without these transport measure and this landholding can unlock further development.</li> </ul> </li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The submission received from the Office of the Planning Regulator (OPR) requires the Council to re-zone the part of the site identified as C (3) in the draft Plan that it at risk from flooding (Submission 009, refers) for water compatible use. Any amendments to the zoning of the subject lands as referred to in the submission are considered premature at this time until</p> |

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|          |                 | <p>further flood analysis for the area has been carried out. The OPW flood risk study is currently underway and will inform the masterplan for the Northwest Quadrant lands (Objective NWQ 1.1, refers).</p> <p>The issue in relation to the 'Strategic Reserve' zoning not providing any definitive zoning function within the Plan timeframe or beyond is noted, however is not accepted.</p> <p>In this context, the identification of the lands at the Northwest Quadrant as "Strategic Reserve" reflects the short-medium term physical infrastructural and environmental constraints associated with the development of this overall area including (but not limited to) the completion of the Naas Flood Study. Notwithstanding the foregoing the LAP clearly acknowledges that the future strategic direction for the expansion of Naas will be focused around the Northwest Quadrant area and its designation as "Strategic Reserve" will serve to protect the integrity of these regionally important lands pending completion of the required assessments.</p> <p>Attention is also drawn to Objective CDP 1.1 in respect of changes to the Core Strategy as part of the review of the Kildare County Development Plan 2017-2023 and which any changes to the housing unit allocation will be reflected in a statutory amendment to the Plan.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 548      | Ballymore Group | <ul style="list-style-type: none"> <li>Ballymore Group own a site off the Blessington Road which has planning permission for 385 houses and a neighbourhood centre (Ref 15/1060). Condition No. 4 of this permission refers to phasing of the development and requires no works to commence on Phase 2 until a contract has been signed for the Link Distributor Road from the Blessington Road to the Dublin Road, or as otherwise agreed with the planning authority.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• Ballymore Group welcomes the zoning of this land as set out in the Draft Plan as it reflects the planning permission granted. However, four detached houses were granted planning permission immediately west of the neighbourhood centre (15/1060) on land that is shown as 'F: Open Space &amp; Amenity' in the Draft Plan. It is requested that this zoning objective should be changed accordingly to reflect the residential use.</li> <li>• The inclusion of the Naas Inner Relief Road objective is welcomed. This has been an objective of the Planning Authority for decades and predates the development of any housing west of the racecourse, including The Gallops and Kings Court. These two schemes were predicated on them delivering a portion of the distributor road. This road is part of a larger, town-wide integrated transportation strategy designed to promote sustainable transport, reduce traffic congestion in the town centre and create space for pedestrian/cycle facilities and bus service.</li> <li>• It is suggested that the Plan should be worded so that there is no scope for 'ransom strips' or for the delivery of housing or other development to become decoupled from the delivery of the road. This could be achieved by identifying lands in the vicinity of the road as being part of a KDA, as suggested in the image below. It is suggested the following be written into the Plan: <ul style="list-style-type: none"> <li>(i) The development of the racecourse (C16) is contingent on the delivery of that part of the Inner Relief Road that traverses the racecourse lands from The Gallops to the Tipper Road.</li> <li>(ii) The development of the C12 lands is contingent on the delivery of the portion of the Inner Relief Road linking the IDA lands to the Tipper Road.</li> <li>(iii) The development of Phases 2 to 5 of the Ballymore lands (C8) would be dependent on the delivery of the Racecourse lands (C16) and associated road, or as otherwise agreed with the Planning Authority.</li> </ul> </li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <div data-bbox="1144 292 1532 917" data-label="Image"> </div> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are acknowledged in particular the support for the Gallops Avenue. In response to the submission from the OPR (Submission 009, refers) it is recommended that the land use zoning on the subject lands, which includes the land on which the four detached houses referred to in this submission are located, is amended (see Appendix 3).</p> <p>As detailed under Objective URD 1.14 of the draft Plan, the completion of the Gallops Avenue is required in advance of or in tandem with the development of the new residential lands, C(16) to the west of the Racecourse. This is also referred to under Section 3.5.2 highlighting the lands adjacent to the Racecourse are fully dependent on the delivery of the Gallops Avenue.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |



| Sub. No. | Name             | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 552      | Conlon New Homes | <p>The issues raised in this submission are:</p> <ul style="list-style-type: none"> <li>• The overarching policy objective that lands closest to the town core should be developed in a sequential manner is logical and desirable. However, the lands closest to the core are not proceeding to development thereby blocking the development of appropriately zoned contiguous lands.</li> <li>• Our proposed housing development at Rathasker Road (no map submitted with the submission) is a perfect example of this anomaly. The ABP Inspector noted that the subject site is potentially sequentially preferable to those emerging developing areas located further south along the Kilcullen Road.</li> <li>• The proposed change of zoning of the land to C Phase 2 Residential with the addendum that Phase 2 land could possibly be zoned for New Residential when the revised population growth figures are factored in, is frustrating. The problem remains that as long as the closest to core lands remain undeveloped the further out lands are deemed premature or un-sequential.</li> <li>• This is not a sustainable position for urban regeneration and urban development and needs to be seriously reviewed.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The points raised in the submission are noted. National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that '<i>Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens</i>'.</p> <p>Naas has a legacy of residential development located outwards in a somewhat dispersed pattern of development removed from the town centre. The Vision for Naas 2031 and Beyond is to ensure growth is planned which creates a compact, consolidated and connected urban form, which is in accordance with national and regional policy.</p> <p>Furthermore, there have been a number of changes in national legislation since the adopting of the Naas Development Plan 2011-2017, one of which is the Urban Regeneration and Housing Act 2015 (as amended), which allows for active land management of sites that are zoned for residential use through the application of the vacant site levy. This represents part of a continued shift in national policy towards active land management within our urban settlements, giving the Council the ability to actively pursue sites zoned for residential use which are not being acted upon. This will ensure the sustainable delivery of a</p> |

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|          |                | <p>continuous supply of new housing and is supported by Objective HCO 1.5. This will ensure that those sites that are closest to core lands are developed.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 594      | Richard Godsil | <p>The submission relates to 'Leinster Mills' and provides an attached report prepared by RPS Group on behalf of their clients, Richard Godsil and Ward Frisby. The submission is in addition to those made at Issues Paper stage in 2017 and the previous Draft LAP in 2019.</p> <p><b>Site Location and Context</b></p> <ul style="list-style-type: none"> <li>• Client owns lands of 1ha at Leinster Mills, Osberstown, as highlighted in the image below.</li> <li>• Lands are strategically situated on western bank of canal, adjacent to existing and proposed employment areas and comprise a protected structure (RPS Ref: NS-19-088). The site is vacant and underused since 1981. No planning applications lodged on site since closure. Clients are keen to reintroduce active use to these lands.</li> <li>• Vehicular access point along western boundary linking to the Kerry Foods access road, which in turn links to the new M7 interchange. Significant investment in this area recently has resulted in improved road, pedestrian and cycle access that should be capitalised on.</li> <li>• Canal greenway and associated footfall represents the site 'coming full circle'. The canal can enliven the building again and prove an attraction.</li> <li>• Suggests carefully managed development of Mills and grounds represents a unique opportunity to provide services, attract residents/workers/visitors and complements other proposals in respect of Cultural and Castle Quarters, Naas Harbour and the greenway.</li> <li>• Notes the following emerging context: <ul style="list-style-type: none"> <li>○ Increasing workforce in Naas and in 1km radius of site (c.8,000 – 12,000)</li> <li>○ Construction of Sallins Interchange.</li> <li>○ New vehicular and pedestrian access to Mills and existing access from Millennium Park onto Canal.</li> <li>○ Canal greenway to Naas will provide an excellent amenity for locals and potential tourists, including those arriving by train.</li> </ul> </li> </ul> |

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|          |      | <div data-bbox="819 292 1877 683" data-label="Image"> </div> <p data-bbox="819 699 1473 722"><b>Figure 2: Aerial View (indicative subject site outlined in plum)</b></p> <p data-bbox="819 730 999 754"><i>Source: Google Earth</i></p> <p data-bbox="528 842 672 874"><b>Proposals</b></p> <ul data-bbox="577 906 2161 1377" style="list-style-type: none"> <li>• Potential to capitalise on this vacant site's location, with owner's intention to bring the Mill back to active uses.</li> <li>• Walkway along this section of canal has become an excellent and busy amenity. Leinster Mills presents an opportunity amenity for these walkers/cyclists.</li> <li>• Proposed plans for site include: <ul style="list-style-type: none"> <li>○ Renovation of buildings ensuring protection for future generations and attractive canal backdrop.</li> <li>○ Introducing active uses would enliven the area and provide service for residents/tourists, such as cafes, retail, tourism and community use.</li> <li>○ Opportunity to introduce a unique residential development providing homes and enlivening area day and night.</li> <li>○ Commercial development comprising start-up, quality office spaces for those working closer to home.</li> <li>○ Outdoor themed retail, outdoor shops, bicycle shops and capitalise on associated greenway leisure.</li> </ul> </li> <li>• Buildings are in disrepair and need maintenance, which is costly for Protected Structures. Advised the cost to restore and refurbish Mill buildings is in the region of €6 million and does not include fitout. The commercial and residential elements outlined are vital for redevelopment viability. Considers the proposals as the optimal use for the buildings, commercially supporting renovation and having least impact on Protected Structures.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <p><b>Observations on the Draft LAP</b></p> <ul style="list-style-type: none"> <li>• Site vacant since 1980s and since then no viable scheme achievable under policies contained in previous LAPs and plans. Policies pertaining to the site would not provide for viable development and this should be addressed.</li> <li>• Current LAP will further reduce the residential and commercial potential of the site, and likelihood of a viable scheme. If adopted, the LAP would ensure the site is unused for lifetime of the plan.</li> <li>• Suggests range of uses permitted on the site should be increased to enable viable development.</li> <li>• Requests removal of site from the Northwest Quadrant Masterplan area.</li> </ul> <p><b>Land Use Zoning</b></p> <ul style="list-style-type: none"> <li>• LAP proposes land use zoning objective 'F – Open Space and Amenity' and submission provides image showing this.</li> <li>• Highlights the range of uses permitted in principle and open for consideration under this zoning objective.</li> <li>• Suggests these uses would not provide the sufficient financial return required to renovate or maintain building.</li> <li>• Suggests viability of proposals for building are accounted for in the LAP, otherwise building will remain unused.</li> <li>• Requests a Specific Objective is added to LAP to broaden the list of uses to include those more commercially profitable, enabling renovation.</li> <li>• Proposes reintroduction of Specific Objective M1, previously contained in 2019 Draft LAP. Requests following text added: <i>"M1: Leinster Mills: To support and promote Leinster Mills complex and site as an integrated tourism, cultural and amenity destination with complementary ancillary commercial and limited residential uses."</i></li> <li>• Quotes from section 7.4.1.1 of the 2019 LAP which reiterates the objective and outlines renewal of the site which includes possible ancillary commercial and residential uses.</li> <li>• The proposed objective would provide for the following: <ul style="list-style-type: none"> <li>○ Established office use and Leinster Mills and additional office uses.</li> <li>○ Hotel use providing accommodation for those visiting the wider area for work or leisure.</li> <li>○ Residential use providing sustainable mix of apartments and tenures, attracting visitors and downsizers.</li> <li>○ Food hall and café destination allowing local and national producers to sell produce.</li> <li>○ Retail opportunities for craft workshops, markets and leisure activity retail.</li> <li>○ Integration of industrial heritage into proposals.</li> </ul> </li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>• Considers an integrated commercial, residential and tourism destination is the best way to ensure viable redevelopment, generating additional footfall to area day and night, creating vibrancy and passive surveillance.</li> </ul> <p><b>Northwest Quadrant Masterplan</b></p> <ul style="list-style-type: none"> <li>• LAP shows Leinster Mills as within the Northwest Quadrant lands (Figure 10.30). Notes section 10.7.5 indicates a masterplan will be prepared for quadrant.</li> <li>• Quotes Objective NWQ 1.1 which states individual applications for smaller sections in NWQ will not be considered until masterplan is integrated within LAP.</li> <li>• Believes NWQ 1.1 imposes a moratorium on planning applications in the NWQ until masterplan adopted. No reading of this policy suggests it relates to certain scale or uses.</li> <li>• Questions whether it is within the scope of LAP to remove ability to submit an application or remove ability of Planning Authorities to consider one.</li> <li>• Requests land at Leinster Mills are removed from masterplan area.</li> <li>• Considers NWQ 1.1 is not in the interest of the preservation of Leinster Mills and would further delay new viable uses for the building.</li> </ul> <p><b>Tourism</b></p> <ul style="list-style-type: none"> <li>• LAP emphasises desire for regenerations/renewal of buildings/sites that enhance Naas' marketability. It identifies several opportunity sites, including Leinster Mills.</li> <li>• LAP states there is significant potential in Leinster Mills for development of tourism or cultural uses.</li> <li>• Refers to Policy ED 2 – Tourism and Objective EDO 2.6, both of which seek to optimise the opportunity sites that include Leinster Mills.</li> <li>• Refers to proposals in the LAP to liaise with owners of Leinster Mills to investigate future feasibility of development of lands for cultural and tourism uses.</li> <li>• States support for regeneration and reuse of site as tourism/cultural destination and the inclusion of the aforementioned policy and objectives in the LAP. Welcomes any discussions with KCC and believes guidance can bring Leinster Mills back to modern use.</li> <li>• However, suggests commercial and residential uses are required for viability and reiterates that wording of 'M1: Leinster Mills' objective is included.</li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>Residential and commercial uses on site would ensure consistent footfall day and night and allow the site to generate its own local economy. Buildings originally constructed to exploit the canal and introduction of these uses would reinstate that connection.</li> <li>Vision for the site is to create a vibrant and viable canal side destination; accommodating a broad mix of uses, giving diversity to the site and ensuring the population of Naas has greater choice of places of work, rest, live, and be entertained.</li> </ul> <p><b>Protected Structure</b></p> <ul style="list-style-type: none"> <li>Highlights the LAP policies and objectives relating to Protected Structures, namely 'Policy BH1: Protected Structures', Objectives BH1.1, BH1.2, BH1.3, BH1.4 and the associated Actions.</li> <li>Welcomes these policies and objectives. Highlights Objective BH1.2, specifically its statement to "operate flexibly with regard to the use of these buildings to facilitate their ongoing use</li> <li>Requests that this is kept in mind when considering the reintroduction of the requested stated objective relating to Leinster Mills.</li> <li>Suggests that flexible policies and objectives permitting a wide range of uses will enable a viable use for Leinster Mills is found and it can be used in line with modern conservation practices.</li> </ul> <p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>Considers the site represents an unique opportunity to provide services, draw visitors and encourage use of this amenity area. The carefully managed development of the site will facilitate the continued use of Leinster Mills and provide a focus of interaction between the canal and its walkways.</li> <li>Requests LAP includes specific objective for Leinster Mills which would provide for the following: <ul style="list-style-type: none"> <li>Established office use and Leinster Mills and additional office uses.</li> <li>Hotel use providing accommodation for those visiting the wider area for work or leisure.</li> <li>Residential use providing sustainable mix of apartments and tenures, attracting visitors and downsizers.</li> <li>Food hall and café destination allowing local and national producers to sell produce.</li> <li>Retail opportunities for craft workshops, markets and leisure activity retail.</li> <li>Integration of industrial heritage into proposals.</li> </ul> </li> </ul> |

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|          |      | <ul style="list-style-type: none"> <li>• Suggested wording for the specific objective is: "To support and promote Leinster Mills complex and site as an integrated tourism, cultural and amenity destination with complementary ancillary commercial and limited residential uses".</li> <li>• The suggested objective's flexibility of uses is supported by LAP Objective BH1.2.</li> <li>• Site's inclusion in the NWQ means KCC will not consider application until masterplan adopted. Considers this limits the potential redevelopment of the site and harm the Protected Structure. Requests Leinster Mills removed from masterplan area.</li> <li>• Leinster Mills represents element of historic fabric of Naas. Clients intend future development is balanced with need to enhance built and natural heritage. Overall strategy is to support sustainable protection of lands by permitting development that facilitates the repair and reuse of the historic buildings.</li> <li>• Suggests Leinster Mills development can provide pivotal role in connecting NWQ to the west and Millennium Park to the east. Success relies heavily on delivery of integrated commercial, residential and tourism destination.</li> <li>• Consider LAP policies overly restrictive and would not permit uses that enable sufficient financial return for renovation/redevelopment. LAP is opportunity to encourage site development or leave it further deteriorate.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The Council recognise the potential of the Leinster Mills site, which is acknowledged throughout the draft Plan. Objective EDO 2.6 refers to encouraging appropriate development proposals for Leinster Mills and to investigate the tourism, cultural and amenity potential for the sites. Similarly, it is an action of the Council (see, Section 6.5 Tourism) to liaise with the owners of Leinster Mills to investigate the feasibility of future options for the integrated development of these lands for the purpose of tourism and cultural uses.</p> <p>Notwithstanding this, the subject lands are located in an area at risk of flooding (Map 9.1, refers). Therefore, the land use zoning contained in the draft Plan is appropriate given the requirement under national policy to ensure lands at risk of flooding are substituted with water compatible, less vulnerable land uses.</p> <p>The OPW in collaboration with Kildare County Council are currently undertaking a Flood Relief Scheme for Naas. Once this study is complete the masterplan for the Northwest Quadrant can be finalised. As provided for under Objective NWQ 1.1 the masterplan will be integrated into the Naas Plan by way of a statutory amendment, pursuant to Section 20 of the Planning and Development Act 2000 (as amended). Any change to the flood risk pertaining to the subject lands can be reflected in the land use contained within the masterplan.</p> |



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|          |      | <p>The issue highlighted regarding Objective NWQ 1.1 (d) in relation to individual applications for smaller sections of the Northwest Quadrant is accepted and proposed to be deleted.</p> <p><b>Chief Executive's Recommendation</b><br/> <b>Proposed Material Alteration</b><br/> Delete item (d) of Objective NWQ 1.1, as follows:</p> <p><b>NWQ 1.1</b>      Require the preparation of a masterplan (to be developed in conjunction with relevant environmental/flood risk/transport assessments) for the NWQ giving full consideration to the type and intensity of development relative to future transport options and in particular public transport. The masterplan shall be subject to the considerations and specifications outlined in the Urban Development Strategy detailed in Chapter 10, to ensure that the future development of the Northwest Quadrant takes place in a co-ordinated and integrated manner.</p> <p>(a) No development shall take place on the lands identified within the Northwest Quadrant (zoned Strategic Reserve or New Residential) until such time as a masterplan is prepared and integrated into the Naas Local Area Plan by way of a statutory amendment to the Local Area Plan, pursuant to Section 20 of the Planning and Development Act 2000 (as amended).</p> <p>(b) No masterplan shall be completed until the OPW Flood Study has been finalised for the lands in the Northwest Quadrant.</p> <p>(c) The masterplan shall include (but not be restricted to):</p> <ul style="list-style-type: none"> <li>vi.      A phasing infrastructure programme including physical, social, transport and economic infrastructure.</li> <li>vii.     Site-Specific Flood Risk Assessment for the masterplan lands.</li> <li>viii.    Transport Impact Assessment.</li> <li>ix.      Water and wastewater network requirements including assessments regarding the capacity of receiving environments.</li> <li>x.       Associated Environmental Assessments and appropriate climate proofing measures</li> </ul> |

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|          |                 | <del>(d) Individual applications for smaller sections of the Northwest Quadrant masterplan lands shall not be considered by the Planning Authority or An Bord Pleanála until the masterplan is integrated into the Local Area Plan in accordance with (a) above.</del>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 598      | O'Reilly Family | <p>Planning Consultants have made a submission on behalf of the O'Reilly family, in relation to the O'Reilly lands of c.3.9ha adjacent to the R445, as highlighted in the image below.</p> <p><b>Context</b></p> <ul style="list-style-type: none"> <li>• Subject lands are bounded by Cemex site, the R455 and the River Morell, adjacent to Johnstown Village.</li> <li>• Lands fall from R455 towards the river and are mainly agricultural use, apart from maintained south-east portion adjoining river.</li> <li>• Proposed Key Development Area K (3) – Mixed Development excluding residential use is to south-west. Area to the east is proposed category G – Greenbelt, similar to the south.</li> </ul>  <p><i>Figure 2: O'Reilly land at Maudlins, outlined in blue (annotated satellite image) Source: Google.</i></p> |

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|          |      | <ul style="list-style-type: none"> <li>Refers to Table 10.3 Junction 9 Maudlins design brief which sets out the vision for the area as a gateway site. It recognises the need for traffic management, with potential queuing to occur within the site, entered from roundabout and one-way exit to southwest corner. Design brief also considers pedestrian/cyclist access at intervals along Dublin Road, suggesting provision for Johnstown to Dublin Road cycle lane along the perimeter of site to avoid cyclist using roundabouts.</li> <li>Refers to Figure 10.29 which highlights landscape option envisaging setback along eastern side of site c.10-15 metres minimum to provide for linear park and protect riparian corridor. This area included in K (3) zoning and is supplemented by area to southeast which is proposed 'F-Open Space and Amenity'.</li> <li>Client suggests a more productive use of their lands could be facilitated by rezoning to a combination of mixed-use K (3) and F-Open Space, resulting in a more sustainable and environmentally appropriate edge to south-eastern boundary of their lands. It would also provide additional amenity facilities for local residents and any occupiers of adjoining mixed-use development at the Maudlins Key Development Area.</li> </ul> <p><b>Submission</b></p> <ul style="list-style-type: none"> <li>In 2019 a feasibility study for area comprising three parcels of land was conducted and a version submitted to KCC in 2020. Provides an adapted image from this document, illustrating the proposed vision for Maudlins, which includes O'Reilly lands.</li> <li>The vision proposed mixed-use development on portion of O'Reilly lands with new amenity area and amenity route accessed from R445, continuing south-east along river to Naas. Amenity route could be accessed from south-west boundary of O'Reilly lands.</li> <li>Requests KCC revisit the Maudlins strategy and revises the LAP to an alternative zoning strategy whereby: <ul style="list-style-type: none"> <li>Western portion of O'Reilly lands adjacent to smaller roundabout be amended to K(3) zoning.</li> <li>Lands to north-east adjacent to Johnstown and south-east adjoining Morell River is revised to zoning F – Open Space and Amenity', with a vision for biodiversity friendly amenity and an off-road pedestrian/cyclist route adjacent to river and linking with proposed Open Space to east of Cemex/Donnelly sites. The Morell River linear park.</li> </ul> </li> <li>Suggests pedestrian/cyclist access at Johnstown, with playground area, would increase connectivity and have additional benefit of increasing active travel options via proposed Morell River Linear Park.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <ul style="list-style-type: none"> <li>• Suggests proposed route could facilitate journeys between Naas and footbridge over the M7, providing a safe route to sports/amenity areas north of M7 and areas around Johnstown Garden Centre and Palmerstown House.</li> <li>• Notes flood risk assessment indicates lands adjoining Morell River fall within Flood Risk A and B. Clients have owned lands for half a century and have no memory of flooding. Notes that clients are willing to be consulted regarding proposals at Morell River in relation to Flood Relief Plan. Suggested amenity area is based on providing both amenity and biodiversity uses that accommodate area's distinct characteristics.</li> <li>• Provides images of subject lands that illustrate site topography and are suitable for a linear park.</li> <li>• Provides images in the appendix that showcase Clogheenmilicon Walkway in Cork which has amenity/biodiversity sanctuary which allows for seasonal flooding and is an example from proposed amenity area along Morell River.</li> </ul> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>• Requests revision of proposed zoning strategy for subject lands, whereby: <ul style="list-style-type: none"> <li>○ Western portion of O'Reilly lands adjacent to smaller roundabout be amended to K(3) zoning.</li> <li>○ Lands to north-east adjacent to Johnstown and south-east adjoining Morell River is revised to zoning F – Open Space and Amenity', with a vision for biodiversity friendly amenity and an off-road pedestrian/cyclist route adjacent to river and linking with proposed Open Space to east of Cemex/Donnelly sites. The Morell River linear park.</li> </ul> </li> <li>• Proposed revision would result in a more sustainable and productive use of O'Reilly lands.</li> <li>• Proposal provides biodiversity favourable amenity area adjoining river and could facilitate journeys between Naas and footbridge over the M7, providing a safe route to sports/amenity areas north of M7 and areas around Johnstown Garden Centre and Palmerstown House.</li> <li>• Would provide opportunity for safe, off-line pedestrian link between Naas, Johnstown and towards proposed F5 Amenity areas. It would adhere to objectives to increase modal shift to more active travel.</li> <li>• Acknowledges objectives to retain unbuilt areas between settlements but suggests proposals would result in retention of an area of beneficial open amenity space between Maudlins and Johnstown, facilitating greater</li> </ul> |

| Sub. No. | Name       | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|          |            | <p>access to proposed Morell River Linear Park. Area would also result in increased biodiversity value and offset proposed mixed-use development at O'Reilly lands adjacent to Cemex.</p> <ul style="list-style-type: none"> <li>• Supports proposed masterplan for K(3) at Maudlins, particularly the development of Cemex and Donnelly sites and the potential for O'Reilly lands to contribute towards a more cohesive solution to Maudlins site. Extending the K(3) zoning over more of their lands will complement by potential linked amenity space and connectivity.</li> </ul> <p>Trusts the request for zoning of lands to part mixed development K(3) and part F-Open Space and Amenity will be considered by KCC.</p> <p><b>Chief Executive's Opinion</b></p> <p>The subject lands are located in an area that requires a flood risk assessment given that part of the lands are located within both Flood Zone A (probability of flooding from rivers is highest, greater than 1% or 1 in 100) and Flood Zone B (probability of flooding from rivers is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding) as detailed in the OPW's Easter Catchment Flood Risk Assessment and Management (CFRAM mapping). The proposed Gren Belt land use zoning is a water compatible use and in accordance with Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).</p> <p>Furthermore, the purpose of the Green Belt zoning is to maintain a clear distinction between Naas and Johnstown to prevent urban sprawl and the coalescence of built up areas to protect the character of each settlement. Therefore, it is not considered appropriate to extend the commercial land use zoning at this location.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 615      | John Kehoe | <b>Proposal to change zoning from Agricultural use to Residential.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <div data-bbox="801 347 1890 999" data-label="Image"> </div> <ul style="list-style-type: none"> <li>• The subject site is located adjacent to the northern boundary of Naas (see above) and at present it is zoned for agricultural use.</li> <li>• It has an overall area of c.15 acres.</li> <li>• The site is deemed suitable for residential use.</li> <li>• The site is located between Sallins (1km) and Naas (2.8km) and is in close proximity to social and physical infrastructure.</li> <li>• The subject site fulfils the criteria for Tier 1 Serviced Land according to Appendix 3 of the National Planning Framework. Due to its position, the subject site should be treated as infill development.</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <ul style="list-style-type: none"> <li>• The subject site is close to the village centre of Sallins and its associated services. It is considered preferable to develop land closest to the centre of services before developing peripheral areas.</li> <li>• A significant portion of the subject site will remain green space because of the 90m setback from the M7 and a 60m setback from the canal.</li> <li>• The development of the subject site could not be described as a 'greenfield sprawl' and would be in accordance with section 2.6 of the National Planning Framework (NPF), which states '<i>a preferred approach would be compact developments and an increase in the developments of settlements.</i>'</li> <li>• Section 6.6 of the NPF recommends that local authorities '<i>allow for a choice of location, type, tenure and accommodation in responding to need.</i>' The Framework also states that it's aim is for a balanced provision of good quality housing.</li> <li>• The subject site is on a very popular walking route, with a good footpath and leading to a much frequented canal walk. The site is situated adjacent to the Grand Canal ensuring suitable modes of transport, social exercise and cycling along the canal.</li> <li>• Development of this site would be in keeping the NPF's recommendation that '<i>shorter travel distance will reduce transport and energy demand</i>' and also '<i>Local planning, housing, transport / accessibility...meeting the needs and opportunities of an ageing population</i>'.</li> <li>• The development of the subject site would also be in line with the recently launched Government blueprint of 'Our Rural Future'.</li> <li>• The proposed development would also be in accordance with Section 6 of the RSES.</li> <li>• Sufficient land for housing and other uses is essential in the Sallins area to cater for the projected population growth of 12% in the next 10 years.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The comments raised in the submission are noted. The subject lands are located outside the boundary of the Draft Naas LAP and north of the M7 motorway. The lands are zoned for Agriculture in the Sallins Local Area Plan 2016-2022 and act as a buffer between the two settlements. National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031</p> |

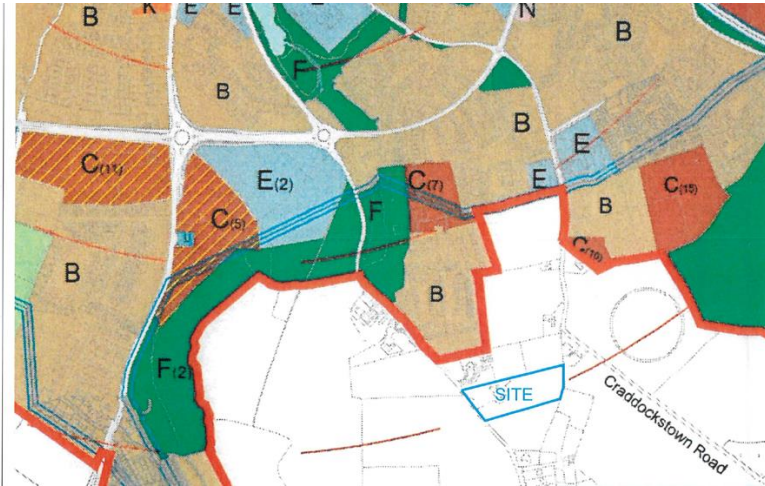


| Sub. No. | Name               | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |                    | <p>reinforces this approach stating that '<i>Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens</i>'. It is considered that the site should remain outside the development boundary for Naas as it does not consolidate the existing urban form or does not represent infill lands as the subject lands are severed from the town of Naas by the heavily trafficked M7 motorway.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 646      | Springwood Limited | <p><b>Lands at Oldtown Demesne, Sallins Road</b></p> <p>Springwood Limited are fully in support of the proposal to change the Land Using Zoning Objective from M Future Park/Green Belt to C New Residential (C19).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Sub. No. | Name         | Summary of Submission, Opinion and Recommendation                                                                                                                                                |                                                                                                                                                                                                                                                         |
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|          |              |                                                                                                                                                                                                  |  <p><b>Chief Executive's Opinion</b></p> <p>The comment in the submission is noted.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 656      | Joan Purcell | Submission by D O'Sullivan Consultant Engineers on behalf of Joan Purcell relates to the zoning of lands (Folios KE8456 Plan 1 and KE8062 Plan 14) at Craddockstown North, Naas (see map below). |                                                                                                                                                                                                                                                         |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <div data-bbox="855 292 1834 786" data-label="Image"> </div> <ul style="list-style-type: none"> <li>• Naas has been identified as a Key Town in the draft RSES and outlines its role.</li> <li>• Under the Naas LAP 2011 – 2017 the lands were zoned mainly agricultural with a small sliver of land zoned as E: Community and Education. Notes that under the Naas LAP 2019-2023 the land has been zoned E: Community and Education and F(2): Open Space and Amenity and that no section of land has been proposed for residential use.</li> <li>• States that the lands in question would be more appropriately suited to providing a balanced development within the existing context of residential development.</li> <li>• States the location of the site as a greenfield site at the urban edge of Naas represents a logical expansion of the Naas Urban Area.</li> <li>• Submission provides an outline of the policy context outlining the relevant provisions of the NPF, the Draft RSES, the Kildare County Development Plan 2017-2023 and the Draft Naas local Area Plan (LAP) as they apply to the town.</li> <li>• Notes again the zoning of the site and its locational context.</li> <li>• Outlines comments on the proposed land use noting the provision for (Community and Education) schools in the town.</li> </ul> |

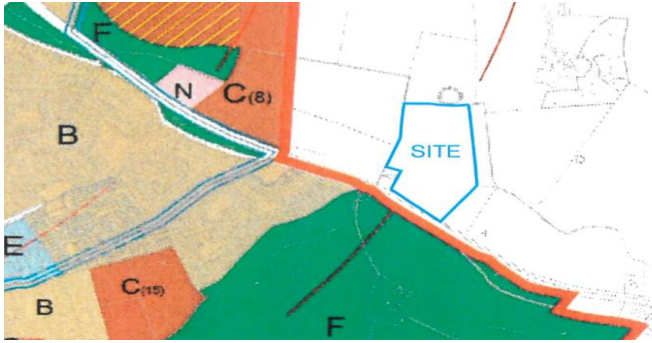
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <ul style="list-style-type: none"> <li>• States that planning has been granted for a number of developments to provide for educational needs and to provide for a large scale post primary development at Millennium Park. Believes that this post primary school will provide the post primary needs of the town given the projected population increase well beyond 2023.</li> <li>• States that the plan provides no justification for the locating of the site in question for education use and no comments of the positive/negative impacts on the town have been provided.</li> <li>• Notes that lands surrounding Millennium Park could provide an alternative option with a more balanced educational zoning, in keeping with good town planning.</li> <li>• States that zoning the subject site will only exacerbate the existing haphazard development pattern for schools in Naas. Notes the site is no suitable for an educational facility.</li> <li>• Outlines residential as a possible other use for the lands consisting of a mix of types, sizes and tenures. States that this would be considered the most appropriate for the site given its proximity to the town centre and existing utilities in the area.</li> <li>• Notes further that the site is surrounded by residential development and states that the area to the rear which is proposed as open space and amenity will provide a natural fit for such a residential zoning.</li> <li>• Submission concludes by reiterating the points outlined above and emphasising the opinion that the size of the land proposed for educational use on the sites in question is excessive. Also states that the Plan is not in keeping with the overall housing objectives, as set out in the Kildare County Development Plan</li> </ul> <p><b>Appendix A</b></p> <ul style="list-style-type: none"> <li>• Submission includes Appendix A which details the following: <ul style="list-style-type: none"> <li>• A satellite image of the subject site (see below)</li> <li>• A map of the zoning of the site, as set out in the Naas Local Area Plan 2011-2027</li> <li>• A map of the proposed zoning of the site, as proposed in the Draft Naas Local Area Plan 2019-2023.</li> </ul> </li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The comments raised in the submission are noted. The Community and Education zoning on the subject lands provides for a myriad of uses, such as community/recreational/sports buildings, group/special needs housing, health centre and not solely for</p> |

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|          |               | <p>the provision of educational facilities. As detailed in the Social Infrastructure Audit which accompanied the draft Plan, schools in Naas are operating above capacity at both primary and post primary level. As detailed under Section 4.5.2 of the draft Plan the Department of Education are currently in the process of acquiring a site for a 24 classroom primary school and have stated notwithstanding the construction of the post-primary school at Millennium Park an additional post-primary school is required having regard to the population projections for Naas. Furthermore, the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development which are considered more appropriate having regard to policy context.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 657      | Fergus Phelan | <p>Submission by Maguire and Associates Chartered Engineers and Town Planners on behalf of Fergus Phelan relates to the zoning of a 2.197 ha site at Craddockstown North, Naas (see map below).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|          |      | <ul style="list-style-type: none"> <li>• Submission proposes that the lands be rezoned from 'I: Agricultural' to 'C' low density residential. States that the density of residential units in the town should be 5 in total and that the lands would be accessed from the Naas to Ballymore Eustace (R411)</li> <li>• Notes that there is a single detached bungalow dwelling occupying the northwest corner of the site and that the rear portion of the lands is currently used to graze horses while the front third is occupied by the bungalow and paddock. States that the lands are undulating in nature.</li> <li>• States that the site has two entrances, one for the dwelling and another farm entrance to the site.</li> <li>• Outlines the key provisions of the NPF, RSES (Naas as a Key Town) and the Draft Naas Local Area Plan 2021-2027. Noting the tiered approach to zoning, Policy HC1, Objective HCO 1.1 along with the provisions of Chapter 9.</li> <li>• Regarding infrastructure and servicing, the submission notes the substantial investment in the roads and wastewater treatment capacity in Naas over recent years.</li> <li>• Notes the planning history of the site regarding applications for one-off dwelling in the 1990's.</li> <li>• Notes the location of the Oak Park housing estate to the north of the subject site.</li> <li>• Outlines an infrastructural assessment of the lands noting that the Ballymore Road is considered adequate. States that existing availability of wastewater and water supply services.</li> <li>• States that lands in close proximity to large towns should be rezoned to accommodate low residential development which would enable people to build houses on individual sites in close proximity to facilities. States that this would prevent the proliferation of dwellings in the county and reduce urban sprawl and ribbon development.</li> <li>• Sets out the rationale behind the zoning proposal as follows; <ul style="list-style-type: none"> <li>○ the location of the site in close proximity to the town centre (2km) and infrastructural services,</li> <li>○ the pattern of development to the north (states that there is a single residential unit with permission granted for six more),</li> <li>○ The necessity to provide different types of residential units for people with their own landholding,</li> <li>○ Allowance must be provided in plan for adequate residential zoning</li> <li>○ The need to develop Naas in an orderly manner</li> <li>○ adjacent to new public park</li> </ul> </li> </ul> <p><b>Appendix 1</b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <ul style="list-style-type: none"> <li>Submission includes Appendix 1 which includes a site location map of the subject site and the land use zoning objectives map which details the location of the site in relation to the rest of the town (see below).</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that <i>'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens'</i>.</p> <p>The Urban Development and Building Heights Guidelines (2018) refer to the expansion of low-density development around our cities and towns as not being sustainable and cannot continue. The increased level and cost of infrastructure it generates, the energy intensive transport systems needed to feed it, and the loss of prime green land which once developed is irreplaceable, all indicate that a low-density, peripheral proposal such as is contrary to the principles of proper planning and sustainable development.</p> <p>The subject lands on the periphery, removed from the town centre of Naas do not facilitate consolidation of the existing urban form and low-density residential development on the outskirts of Naas is not considered appropriate having regard to the national and regional policy context.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No changes recommended.</p> |



| Sub. No. | Name                        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| 658      | Glengolden Builders Limited | <p><b>Planning rationale for change of zoning of lands at Tipper South, Blessington Road</b></p> <ul style="list-style-type: none"> <li>• Additional residential land should be zoned to ensure that the goals, policies and objectives of the future Naas Local Area Plan 2021-2027 Plan will be achieved.</li> <li>• Rezoning of these lands will help to address the growing population of Naas.</li> <li>• Close proximity to Naas Town Centre, which will help the sequential growth of the town.</li> <li>• Government policy requires an adequate amount of residential zoned land in Naas.</li> <li>• The proposal is small-scale.</li> <li>• On a major regional route (R410).</li> <li>• Well serviced by infrastructural services.</li> <li>• Close proximity to Craddockstown Golf Club.</li> <li>• Site is located on a public transportation route.</li> <li>• Close to community, recreational and social services.</li> <li>• It is a sustainable proposal.</li> </ul>  <p><b>Chief Executive's Opinion</b></p> <p>National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that</p> |

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|          |                               | <p><i>'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens'.</i> The subject lands on the periphery, removed from the town centre of Naas do not facilitate consolidation of the existing urban form, promote urban sprawl and are therefore not considered appropriate for residential development having regard to the national and regional policy context.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No changes recommended.</p> |
| 666      | Naas Racecourse PLC           | <ul style="list-style-type: none"> <li>• Submission made by BCA Consulting Engineers on behalf of Naas Racecourse PLC, who welcome the publication of the LAP.</li> <li>• Supports zoning C (16), as per zoning map 11.1.</li> <li>• Looks forward to working with KCC in achieving goals and objectives of LAP.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The comments raised in the submission are acknowledged.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No changes recommended.</p>                                                                                                                                                                              |
| 667      | Joe, David and Robert Osborne | <p>BCA Consulting Engineers have prepared a submission on behalf of their clients Joe, David and Robert Osborne.</p> <ul style="list-style-type: none"> <li>• The submission is a request for KCC to reconsider a prior submission requesting the zoning of the client's land holding of 9.5ha at Craddockstown Demense to 'New Residential'.</li> <li>• The submission includes a copy of the previous submission made.</li> </ul>                                                                                                                                                                                                                                                           |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |      | <ul style="list-style-type: none"> <li>• The subject lands are located within 300m of a community school, 1km of Ballycane Church, national school and neighbourhood centre. It is stated the zoning of these lands allows for sequential growth.</li> <li>• The submission also provides an 'Engineering Constraints and Feasibility Report' for the subject lands, which concludes the land is ideally suited for development. Lands immediately north have recently been developed by KCC. Water, foul sewer and surface water services pass-by or adjoin the subject lands. The lands are elevated and not identified as a flood risk in the CFRAMS.</li> <li>• Suggests clients are willing and able to immediately develop the lands to provide much needed housing. Requests KCC review these lands previously zoned for residential, but not developed, and discount them in the population growth matrix calculation.</li> <li>• Concludes by asking KCC to reconsider the LAP and include subject lands for New Residential Use. Site adjoin recently developed lands and are within 1km of schools, a neighbourhood centre and church. They are free from flood risk and have services passing or adjoining. Suggests these lands provide for the proper and sustainable development of Naas.</li> </ul> <p><b>Appendix A – Previous Submission</b></p> <p>This attachment is an application on behalf of the clients to have their land holding rezoned for New Residential use.</p> <p><u>Introduction</u></p> <ul style="list-style-type: none"> <li>• KCC published a public consultation and issues paper in relation to the LAP in 2017. It sets out a population target for Naas of 29,402 and additional 5,533 units by 2024.</li> <li>• The submission is in response to the need for additional units and the consequential need for appropriate residential land zoning.</li> <li>• Proposes the client's lands be rezoned from 'Agricultural' to 'New Residential'.</li> </ul> <p><u>Regional and County Planning Context</u></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <ul style="list-style-type: none"> <li>Provides an overview of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, which identified the Metropolitan and Hinterland policy zones in Kildare, with Naas part of the Hinterland. The strategy for the Hinterland is based on strong and dynamic urban centres which absorb population growth and are key centres for service provision. The RPG settlement strategy ranks settlements, with Large Growth Centres at the top and Naas the only Level 1 Large Growth Centre in Kildare.</li> <li>Refers to table 2.2 of the Core Strategy of the Kildare CDP 2017-2023, identifying Naas as a key town supporting surrounding areas. It is Council policy to provide new housing in accordance with a settlement hierarchy. The CDP supports the development of strategic growth centres as focal points for critical mass.</li> <li>Refers to section 3.4 of the CDP which identifies Level 1 Growth Towns as having potential populations of up to 50,000, of which Naas is the only one in Kildare. To achieve the population targets of the Issues Paper for 2024, additional residential zoning is required. Suggests significant additional residential zoning required to meet population of 50,000. Notes the absence of appropriate housing is identified as a constraint on economic investment and employment growth.</li> </ul> <p><u>Proposed Re-Zoning</u></p> <ul style="list-style-type: none"> <li>Provides an attached image (Drawing 1) to highlight subject lands, which are currently zoned 'Agricultural' and benefit from a circular sand gallop. Proposes these lands are re-zoned for 'New Residential' use.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <div data-bbox="1050 288 1637 874" data-label="Image"> <p>Drawing No 1. Subject Lands marked "A" and outlined in Red, 9.5 hA</p> </div> <ul style="list-style-type: none"> <li>• Subject lands located on Craddockstown Road, adjacent to lands which received planning permission for mixed residential (ref. 15/176) and Part 8 consent by KCC for residential development.</li> <li>• Development of subject site would represent sequential extension to the permitted residential development. The approach is in keeping with the principles set out in section 2.2 of the 'Guidelines to Planning Authorities on Sustainable Residential Development in Urban Areas'.</li> <li>• Envisages the pattern and character of the permitted development would be continued in any future development of the subject lands and would comply with the residential design standards set out in section 4.4 of the CDP.</li> <li>• Provides an image (Drawing 2) showing future possible development concept drawings for subject lands.</li> <li>• Access to subject lands available off Craddockstown Road. Site has considerable road frontage and could facilitate realignment/improvement of this road, a transport objective of several Naas Town Plans.</li> <li>• Lands are 0.3km from a school and 0.7km from a church and retail outlets.</li> <li>• Lands are within the 2km radius of Naas town centre, set out in Naas Town Plan 2011-2017.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <ul style="list-style-type: none"> <li>• Water, wastewater and storm water services located adjacent to the site.</li> <li>• CFRAM and PFRA studies indicate no history of flooding and the lands are not located in flood plains of any watercourses.</li> </ul> <p><u>Summary</u></p> <ul style="list-style-type: none"> <li>• Development of lands represent sequential extension of residential development in accordance with best practice.</li> <li>• Access available from Craddockstown Road, for which the improvement/realignment has been an objective of several plans. Development of lands would facilitate delivery of elements of this objective.</li> <li>• Lands are within 2km of the town centre and in close proximity to school, church and retail outlets.</li> <li>• Water, wastewater and storm water services in close proximity to the site.</li> <li>• CFRAM and PFRA studies indicate no flood risks associated with site.</li> <li>• Requests KCC consider having these lands re-zoned for New Residential use.</li> </ul> <p><b>Appendix B – Engineering Constraints and Feasibility Report</b></p> <p><u>Introduction</u></p> <p>Donnachadh O'Brien &amp; Associates Consulting Engineers have prepared an Engineering Constraints and Feasibility Report for the subject lands at Craddockstown Demesne. The purpose of the report is to support an application to KCC for the re-zoning of the subject lands.</p> <p><u>Existing Greenfield</u></p> <p>A description of the site is provided, noting the site's topography which falls from west to east. Access to the site is off the Craddockstown Road, with approximately 435m of the site fronting this road. Lands are bounded by a KCC residential development to the north, Craddockstown Road to the west, Craddockstown Golf Club to the east and greenfield to the south.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p><u>Site Development Constraints</u></p> <ul style="list-style-type: none"> <li>• Road infrastructure – Describes the surrounding road infrastructure and notes Craddockstown Road likely to provide the main access point for any future development. Refers to the Naas Town Development Plan 2011-2017 indicating a potential new road objective along this road. Refers to the NSTS which was at consultation stage but did not recommend any proposed road improvements or objectives for the Craddockstown Road. Recent developments include Naas Community College and social/affordable housing units. Access to Stoneleigh is from Craddockstown Road. Describes the condition of the road within, and beyond, the development boundary, noting the proposed zoning of the lands may require road widening, which may require agreement of third parties, with consideration also required for the mature trees in existence.</li> <li>• Sight Lines – Craddockstown Road has a speed limit of 60kmph, requiring minimum sight lines for the site of 90m, according to the 'Design Manual for Roads and Bridges'. It is suggested the required sight lines are achievable. However, a further detailed analysis and topographical survey would be required to provide a full assessment. States that any future application will be subject to a Traffic Impact Statement and Road Safety Audit.</li> <li>• Water Supply – Maps for the area indicate an existing pipe west of the study area. The watermain serves properties along Craddockstown Road and is sufficient to cater for new residential development. The integrity of the watermain to serve a new development would be subject to a formal pre-connection enquiry with Irish Water. A further review of planning applications indicates a watermain running along the north of the site, serving the social housing development. Suggests the subject site could be connected to the watermain that serves the adjacent residential development. Provides an image showing the existing watermain.</li> <li>• Flooding – Refers to the Flood Risk Management Guidelines which define three flood zones (A, B and C). The submission utilises the CFRAM study, providing maps from this report, and indicates how the subject site is located in Flood Zone C. Flood Zone C is where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000). Lands in this flood zone are suitable for vulnerable development such as residential. It is suggested flood risk is unlikely and will not form a constraint on development.</li> <li>• Surface Water – Surface water maps do not indicate any existing drainage network adjacent to the site. OSI maps indicate no watercourse on the subject lands, with any identified streams to the east and incorporated</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|          |      | <p>within the watercourses of Craddockstown Golf Course. Likely that some shared boundaries with the golf course facilitate drainage easterly from the site. Drainage from the golf course discharges to Blessington Road, which has significant flooding issues. Suggests future development sees no increase in flows, compared to greenfield rates, which could lead to increased flooding. A more comprehensive study is suggested as required. Planning applications for surrounding developments indicate the presence of surface water drainage in the adjacent social housing development. Suggests an opportunity to connect to this network.</p> <ul style="list-style-type: none"> <li>○ Refers to clause SW18 of the CDP which requires un-serviced sites demonstrate compliance with the Greater Dublin Strategic Drainage Study and SUDs. Outlines that site suitability requires a soakway test to determine infiltration rates. If infiltration is not possible the construction of attenuation structures may be required. Soakway tests would enable a decision on the approach. Proposed SUDs measures include restricting site discharges to greenfield rates; underground attenuation storage; and, bypass petrol interceptors.</li> <li>○ Suggests the disposal of surface water is feasible and unlikely to be an impediment to future development, but subject to further detailed studies.</li> </ul> <ul style="list-style-type: none"> <li>• Foul Drainage – There appears to be no existing foul drainage adjacent to the site. Surrounding planning applications reveal a foul drainage network serving the adjacent social housing development; however, this is not included on IW maps. The topography of the site falls east. The potential outfall manhole is north of the site and 3.24m deep. A full topographical survey is required to establish feasibility of gravity connection. If gravity drainage is not possible a pumping station may be required. It is suggested foul water for the site could be discharged to the existing system in the adjacent residential development.</li> <li>• ESB, Gas and Eir – Suggests there are no ESB cables crossing the site, but further investigation required. The adjacent residential development is served by utilities which can be extended to the proposed site.</li> </ul> <p><u>Conclusions</u></p> <ul style="list-style-type: none"> <li>• The report concludes by suggesting the site is serviceable for future development, and outlining the following: <ul style="list-style-type: none"> <li>○ Surrounding road infrastructure will require improvements, such as widening. Sight lines appear achievable and DMURS compliant design will ensure access is not problematic.</li> </ul> </li> </ul> |

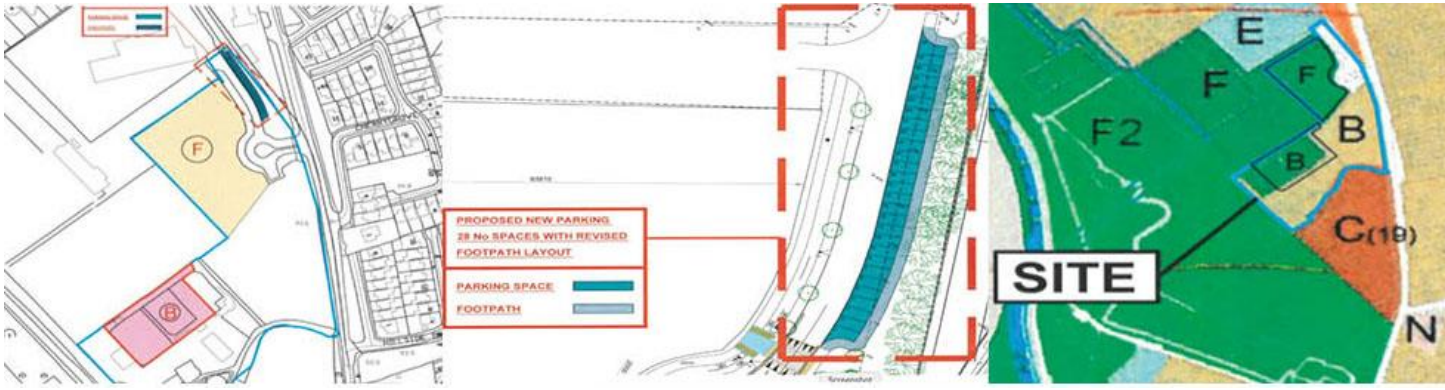
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <ul style="list-style-type: none"> <li>○ There are two feasible watermain connections but will require pre-connection enquiries.</li> <li>○ The adjacent social housing development is served by a foul network. Further studies are required to determine the type of system required for the subject site.</li> <li>○ Disposal of surface water could occur through natural drainage, stormwater drainage pipes, or infiltration techniques.</li> <li>○ Based on CFRAMS, flooding constraints are not expected.</li> </ul> <p>Appendices to the report provide Irish Water maps, KCC maps and CFRAM maps used for the study.</p> <p><b>Chief Executive's Opinion</b></p> <p>The comments raised in the submission are acknowledged. National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that <i>'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens'</i>.</p> <p>Naas has a legacy of residential development located outwards in a somewhat dispersed pattern of development removed from the town centre. The Vision for Naas 2031 and Beyond is to ensure growth is planned which creates a compact, consolidated and connected urban form.</p> <p>As required under objective 3(c) of the National Planning Framework (NPF) at least 30% of all new housing units must be delivered within the existing urban footprint of the town as defined by the 2016 CSO Settlement boundary. However, the situation for Naas is that in excess of the 30% is achievable. The subject lands are located outside the existing CSO boundary and therefore would not contribute to a pattern of development that represents compact growth.</p> |

| Sub. No. | Name        | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |             | <p>Furthermore, the subject lands are located outside the Draft LAP boundary and are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development which are considered more appropriate having regard to policy context.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No changes recommended.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 668      | Jimmy Kelly | <p>Submission made by BCA Consulting Engineers on behalf of Mr. Jimmy Kelly.</p> <ul style="list-style-type: none"> <li>Submission seeks to have land holding of 26.9ha in the townland of Tipper West, Blessington Road, rezoned from its current zoning of 'Agricultural' to 'New Residential'.</li> </ul> <p><b>Background</b></p> <ul style="list-style-type: none"> <li>KCC published a LAP Public Consultation and Issues Paper in 2017</li> <li>Several strategic planning documents have been published in the interim, the most significant of which are the NPF and RSES.</li> <li>Draft LAP is based on policies and objectives of NPF, RSES and CDP 2017-2023.</li> <li>Submission sets out how the sequential residential development of the subject site complies with the policies and objectives of these plans to facilitate population growth to 266,500 by 2031.</li> </ul> <p><b>Proposed Re-Zoning</b></p> <ul style="list-style-type: none"> <li>Provides an image (Drawing 1) which shows the subject site the submission relates to, which is marked 'A'. These lands have not been included in the LAP. They are currently zoned 'Agricultural'.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      |  <ul style="list-style-type: none"> <li>Proposes lands rezoned from 'Agricultural' use to 'New Residential' use and the Naas town boundary is extended to include these lands.</li> <li>Basis for proposal is Kildare population projections set out in Appendix B of the RSES, which show an increase from 222,500 to 266,500 by 2031 and will require significant additional zoning. As a 'Key Town', Naas will accommodate much of this population increase.</li> <li>Subject site meets criteria for Tier 1 Residential Zoning as set out in Appendix 3 of NPF.</li> <li>If the proposal cannot be facilitated, requests KCC consider reintroducing the 'white land' zoning used in previous plans to indicate where sequential future development is located.</li> <li>Subject lands have road frontage onto the Tipper and Blessington roads and are adjacent to lands granted planning permission for mixed residential (Ref. PL 09.247411).</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <ul style="list-style-type: none"> <li>• Development of these lands represents sequential extension of the existing residential use permitted under planning reference PL 09.247411. This approach in keeping with principles set out in Section 2.2 of Guidelines to Planning Authorities on Sustainable Residential in Urban Areas’.</li> <li>• Envisages the pattern and character of the approved adjacent development would be continued on subject lands.</li> <li>• Any future residential development will comply with the residential design standards of Section 4.4 of the Kildare CDP 2017-2023.</li> <li>• Access to the site available off both Tipper and Blessington roads. Proposed site has considerable road frontage and could facilitate Outer Relief Road between these two roads.</li> <li>• Lands within walking distance of permitted neighbourhood centre (PL 09.247411). Notes the site layout plans submitted under the permitted application contain proposals for future connections to the subject lands.</li> <li>• Lands are within the 1.5km radius of the town centre, as set out in the Naas Town Plan 2011-2017.</li> <li>• Water, wastewater and stormwater services are located adjacent to the subject site.</li> <li>• References Map 9.1 of the LAP, which identifies lands where development proposals will be subject to Flood Risk Assessment (FRA) appropriate to development type and scale. Southern portion of the site are subject to FRA requirement.</li> <li>• Notes adjacent lands also subject to FRA have been subject of planning applications 15/176 and 15/1060 and a Part 8 consultation process. Both planning applications and Part 8 contained proposals to address flood risk which were deemed acceptable by planning authorities. Intends to use a similar approach to address flood risk on any future applications for subject lands.</li> </ul> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>• Additional residential zoning required to meet projected population growth</li> <li>• Development of subject lands represents sequential extension of residential development in accordance with best practice as set out in Section 2.2 of Guidelines to Planning Authorities on Sustainable Residential in Urban Areas’.</li> <li>• Lands meet criteria for Tier 1 residential zoning as per NPF.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <ul style="list-style-type: none"> <li>• Site access available off both Tipper and Blessington roads. Proposed site has considerable road frontage and could facilitate Outer Relief Road between these two roads.</li> <li>• Lands located within 1.5km of town centre. Lands in close proximity to proposed new neighbourhood centre.</li> <li>• Water, wastewater and stormwater services in close proximity to site.</li> <li>• Potential flood risk to southern portion of site can be eliminated by adoption of measures already approved for similar developments in area.</li> </ul> <p>Requests KCC consider the application to have lands rezoned for new residential use. Failing this, requests the reintroduction of 'white land' zoning or Strategic Reserve zoning used in previous plans.</p> <p><b>Chief Executive's Opinion</b></p> <p>The comments raised in the submission are acknowledged. National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that <i>'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens'</i>. In line with national and regional policy the vision for Naas is to ensure that the growth planned for the town up to 2031 and beyond occurs in a sustainable and sequential manner, while prioritising a low carbon, compact, consolidated and connected pattern of development.</p> <p>Furthermore, it is noted that the southern section of the landholding is affected by flood risk (Zones A and B) and therefore a residential zoning would not be appropriate at this location.</p> |

| Sub. No. | Name               | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|          |                    | <p>The subject lands are removed from the existing urban form of Naas, a distance from the defined settlement boundary and with land currently undeveloped between the subject lands and existing built urban form. Therefore, the development of the subject lands would represent leapfrogging of land and as such, would not contribute to the sequential development of land which would be contrary to national and regional policy.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p>                                                                                                               |
| 675      | Springwood Limited | <p><b>Change of zoning of lands at 'The Orchard', Oldtown Demesne, Sallins Road</b></p> <p><b>There are three parts to this the submission</b></p> <ol style="list-style-type: none"> <li>1. Lands marked B and coloured purple to be provided to Naas GAA to accommodate a half sized GAA pitch.</li> <li>2. The provision of 28 additional car parking spaces along the access route into Naas GAA and Scoil Bhride.</li> <li>3. The rezoning of lands marked F coloured fawn from F Open Space and Amenity to New Residential Phase 1.</li> </ol>  |



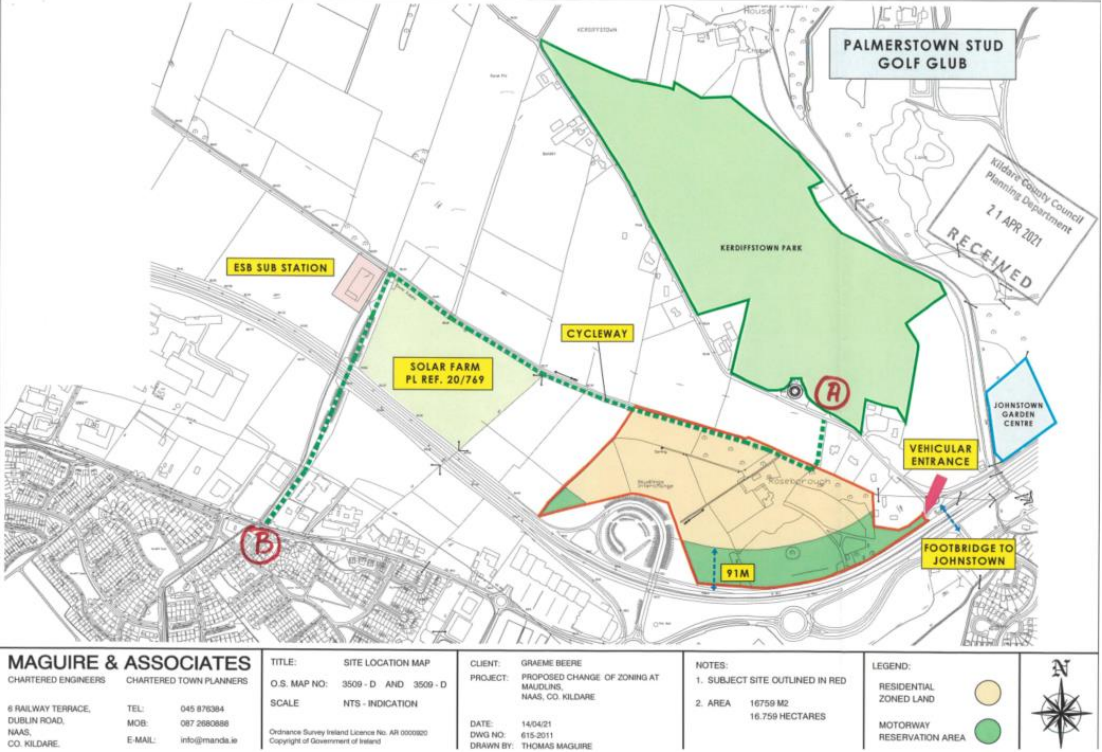
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|          |      | <p><b>Compliance with Planning Policy</b></p> <ul style="list-style-type: none"> <li>• Naas is designated as a 'Key Town'.</li> <li>• Naas has the potential to accommodate commensurate levels of population and employment growth.</li> </ul> <p><b>Relevant Recent Planning History</b></p> <p><b>17/1451</b> Permission sought by Springwood Limited for half-sized GAA pitch and full-sized tennis court in Walled Garden. Further information was requested, which was not responded to. Application deemed withdrawn.</p> <p><b>19/330;</b> Permission sought by Springwood Limited for new site entrance to lands. Permission refused for 3 reasons due to prematurity.</p> <p><b>The Key Reasons for Rezoning of Lands from F Open Space and Amenity to New Residential are as follows;</b></p> <ol style="list-style-type: none"> <li>1. Proximity of lands to the town centre (800 metres).</li> <li>2. Proximity of lands to Sallins Train Station (1800 metres i.e. walking distance)</li> <li>3. The lands F directly adjoins the Orchard Housing Estate to the south and the lands D forms part of the Orchard Housing Scheme.</li> <li>4. Availability of bus feeder route to Naas-Sallins train station.</li> <li>5. Small scale of the proposal.</li> <li>6. All infrastructural services in place including Foul sewer, Surface Water, Water, Gas, Electricity and Eircom.</li> <li>7. Infill lands / Brownfield site.</li> <li>8. Community and recreational facilities are in close proximity including GAA and Scoil Bhride.</li> <li>9. Social facilities available in the area.</li> <li>10. Site entrance to the Sallins Road is existing.</li> <li>11. Site is strategically located.</li> <li>12. Will provide additional lands for Naas GAA.</li> </ol> |

| Sub. No. | Name             | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |                  | <p>13. Provide additional car-parking for Scoil Bhride and Naas GAA.<br/> 14. Proximity to major employers in Naas Town.<br/> 15. Will provide additional public car parking in the area.<br/> 16. Good walking and cycling infrastructure are readily available</p> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are noted. While it is noted that the subject lands are located within the defined settlement boundary of Naas, the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for residential development.</p> <p>The lands marked B and coloured purple are zoned for Open Space and Amenity, playing fields are 'permitted in principle' within the land use zoning. Any planning application on the subject site will be assessed in accordance with Section 34 of the Planning and Development Act 2000 (as amended) and the planning history and associated conditions pertaining to the site.</p> <p>It is outside the remit of this report or Draft LAP to comment on a proposal for car-parking. It is noted that the land is zoned for K: Commercial /Residential under the draft Plan.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 676      | Dorothy Kinirons | <p>Maguire and Associates have made a submission on behalf of Dorothy Kinirons.</p> <ul style="list-style-type: none"> <li>• The submission states the proposed change of the client's lands from zoning objective 'I – Agricultural' to 'H – Industrial and Warehousing' is deemed acceptable.</li> <li>• The submission provides a copy of a site location map showing the subject lands.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| Sub. No. | Name                      | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                 |
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|          |                           | <div data-bbox="1146 288 1529 842" data-label="Image"> </div> <p><b>Chief Executive's Opinion</b></p> <p>The content of the submission is noted.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 678      | Graeme and Margaret Beere | <p>Maguire and Associates have prepared a submission on behalf of their clients Graeme and Margaret Beere. The submission requests a change of zoning of lands at Maudlins.</p> <p><b>Background</b></p>                          |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <ul style="list-style-type: none"> <li>• The 'Background' section states the impetus for the submission is due to the emergence of significant new factors, including: <ul style="list-style-type: none"> <li>○ Inclusion of the subject lands within the Naas Town urban boundary.</li> <li>○ Commencement of contract for Kerdiffstown Park, where progress that includes the upgrading of Link Road from Johnstown has been made.</li> <li>○ Delivery of Irish Water contract 2B which has resulted in the subject lands being serviced for water and wastewater.</li> <li>○ Heightened emphasis on sustainable transport modes. Opening of subject lands will facilitate new connections from Monread Road to Kerdiffstown Park, Sallins and Johnstown through woodlands, adding to amenity infrastructure.</li> <li>○ Completion of solar farm on lands to west can provide renewable power source and herald an innovative carbo neutral development.</li> </ul> </li> <li>• Proposes rezoning of these lands to low density residential, which will facilitate the development of a small number of high-quality houses. Clients are happy to facilitate challenging zoning conditions in terms of high environmental design, minimal (if any) removal of trees, interweaving of housing with the mature trees and unique rolling landscape.</li> <li>• Benefit of rezoning is reduction in demand for one-off individual housing in hinterlands of surrounding towns/villages. The proposals represent a more sustainable approach to housing policy.</li> <li>• The low densities will avoid conflict with RSES zoning parameters.</li> <li>• Proposed development has advantage of public transport in Johnstown and would provide a secure proximate presence to Kerdiffstown Park, a national exemplar remediation project. Compliments KCC councillors and officials on the unique Kerdiffstown project and accordingly, both projects would be a good fit in terms of innovation/sustainability/biodiversity.</li> <li>• Offers an opportunity to provide a cycleway and footpaths that utilise existing agricultural crossing on Monread Road to connect with lands north, including Kerdiffstown, through meandering woodlands and rich landscapes. The clients are in a position to facilitate such an objective.</li> </ul> <p><b>Executive Summary</b></p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p>Submission demonstrates the lands should be zoned New Residential Low-Density C in the interest of proper planning and sustainable development, having regard to:</p> <ul style="list-style-type: none"> <li>• Provision of sufficient subject lands, in conjunction with lands available to KCC, allows the Monread Road to Kerdiffstown Park cycleway to be completed and provide connectivity between Naas and Kerdiffstown. Indicates cycleway route shown on drawing in Appendix.</li> <li>• An infrastructural assessment of subject lands considers them Tier 1 for infrastructure. All physical infrastructure is available, including foul, water and surface water together with a new road network and cycleways in the area connecting the lands to Kerdiffstown and surrounding areas.</li> <li>• Proximity to Kerdiffstown Park, with pitches, changing rooms, playground and services provide social infrastructure in the vicinity of the site.</li> <li>• The ESB sub-station and solar farm on lands to the west of the subject site ensures renewable power care service the site.</li> <li>• The adjacent Johnstown Interchange provides good road connectivity. Johnstown pedestrian walkway provides connectivity to a public transport corridor, shops and facilities in Johnstown Village. Johnstown Garden Centre is within walking distance.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      |  <p><b>CLIENTS VISION FOR THE LANDS</b></p> <p>The lands will provide a sustainable low-density residential scheme within a parkland setting with solar panels providing green electricity. The connecting cycling route through the lands ensure good cycling and walking routes for residents and connectivity with Kerdiffstown and the wider area. Johnstown pedestrian overpass provides access to public transport, shops and other facilities.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|          |      | <p><b>Site Location</b></p> <ul style="list-style-type: none"> <li>• Lands located north of M7 Junction 9 with direct access to the site from Junction 8. Lands located west of Johnstown village with a connecting pedestrian road bridge. Johnstown Garden Centre is to the east, Kerdiffstown Park to the north and the M7 to the south.</li> <li>• The lands are within the LAP boundaries.</li> <li>• The proximity of the lands to Sallins Train Station</li> </ul> <p><b>Site Description</b></p> <p>Lands measure 16.759ha and consist of parkland supporting a bloodstock enterprise. Access is via a single gate.</p> <p>Grounds characterised by open fields interspersed with mature trees in two significant belts. The Maudlins Traffic Interchange dominates the south-west corner of site.</p> <p><b>Key Proposals in the NPF</b></p> <ul style="list-style-type: none"> <li>• National Policy Objective 1b refers to an additional 490,000-540,000 people in the EMRA.</li> <li>• National Policy Objective 1c refers additional 320,000 people in employment in EMRA.</li> <li>• Refers to Chapter 9: Realising Our Sustainable Future.</li> <li>• National Policy Objective 54 refers to integrating climate action and the planning system to support climate targets.</li> <li>• National Policy Objective 55 promotes renewable energy use and generation to achieve a low-carbon economy.</li> <li>• National Policy Objective 58 refers to green infrastructure and ecosystem services being incorporated to statutory land use plans.</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p><b>Key Proposals in the EMRA RSES</b></p> <p>Highlights the key towns for the EMRA, with Naas a key town in the Core Region.</p> <p><b>Key Proposals in the KCC CDP 2017-2023</b></p> <ul style="list-style-type: none"> <li>• Naas is a Category One – Height order growth town and a ‘Key Town’, defined as economically active, providing employment for surrounding areas with high-quality transport links.</li> <li>• Development strategy for Naas informed by RSES and based on building strong urban centres and protecting rural hinterlands. A focus on achieving critical mass in Naas.</li> <li>• Naas has potential for population and employment growth, facilitated by its location and aligned with investment in services, amenities and transport. Growth of Naas will require sustainable, compact and sequential development and urban regeneration.</li> </ul> <p><b>Key Proposals in the Draft LAP</b></p> <ul style="list-style-type: none"> <li>• Refers to figure 2.4 showing green infrastructure links to Kerdiffstown Park.</li> <li>• Refers to 3.4 ‘Approach to New Residential Zoning’, which discusses balancing housing provision with infrastructure delivery.</li> <li>• Refers to 3.4.1 ‘A Tiered Approach to Zoning’ and provides the definition of Tier 1 Serviced Zoned Land. Highlights the undertaking of SPIA to comply with NPF.</li> <li>• Refers to Policy HC1 – Residential Development.</li> <li>• Refers to Objective HCO 1.1.</li> <li>• Refers to 4.4 ‘Residential Density, Mix and Design’ which anticipates a demand for mixed housing types.</li> <li>• Refers to ‘Low Energy Buildings’ where the role new buildings have in reducing energy demand is outlined.</li> <li>• Refers to 4.5 ‘Social Infrastructure’ where Kerdiffstown Park and its associated amenities and infrastructure are outlined.</li> <li>• Refers to and provides copy of Figure 4.3 ‘Social Infrastructure Provision’.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <ul style="list-style-type: none"> <li>• Refers to Policy MT1 – Walking and Cycling and Objective MTO 1.1, which seek to support and promote sustainable and active transport.</li> <li>• Notes LAP Action which commits to a feasibility study to identify access and connections to Kerdiffstown Park from Monread.</li> <li>• Refers to the core aim of Chapter 7 – Natural Environment and Climate Change. Provides direct quotes from section 7.1 which highlight how climate change is one of the biggest issues facing our environment, outlines the causes of climate change and recognises the key role climate change will have on the built environment. Also refers to Environment and Climate Change as one of seven Core Themes of the LAP and its aims.</li> <li>• Refers to section 7.6 'Green Infrastructure' which highlights the role of open spaces and parks to achieve carbon offsets.</li> <li>• Refers to Chapter 9 'Infrastructure and Environmental Services' and its core aim to phase future growth with the capacity of supporting infrastructure.</li> <li>• Provides a direct quote from section 9.1 which outlines the future infrastructural needs of Naas and that a SPIA was carried out to inform the LAP.</li> <li>• Provides a direct quote from section 9.4 'Energy Supply and Communications' where the requirement for renewable energies to meet the needs of Naas is discussed and a 110kv/MV Monread electricity station is identified.</li> <li>• Highlights Policy 14 – Energy and Communications and Objective IO 4.5 which seeks to promote the use of renewables for small, medium and large developments.</li> <li>• Refers to section 11.2 'Infrastructure Delivery Schedule' where partnerships are considered key to delivering on LAP objectives.</li> <li>• Highlights the strategic infrastructure for the plan area section which identifies the development of Kerdiffstown Park in the Medium Term.</li> </ul> <p><b>Infrastructural Assessment of Lands</b></p> <p>Notes that no review of the subject lands was carried out by KCC as part of the LAP. The submission provides a summary of existing infrastructure as follows:</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <ul style="list-style-type: none"> <li>• Roads and Transportation – Existing site entrance at roundabout in eastern end with cycleways and footpaths connecting to other developments. Pedestrian footbridge adjacent to site entrance provides connection to transport routes.</li> <li>• Water Supply – Existing water main.</li> <li>• Wastewater – Existing foul sewer.</li> <li>• Surface Water – Existing stream along northern boundary providing outlet for surface water.</li> <li>• Other Infrastructure – ESB sub-station to west and planning permission granted for solar farm to lands in the west (ref. 20/769).</li> <li>• Kerdiffstown Park – A 31.22ha public park with various facilities and services is in the immediate vicinity of the site and provides social infrastructure for the area.</li> <li>• Cycleway and Footpath – An indicative cycleway crossing the N7 along the route of 'Farmers Bridge'. Suggests it is easily extended to Kerdiffstown Park, as noted in drawing 615-2011. Almost all lands for this route are in KCC ownership, with the exception of a portion of the subject site. Suggests client will make provision for this cycleway, marked AB on the aforementioned map. Suggests cycleway may be further extended through the client's lands to connect with existing cycleway by roundabout on Johnstown/Kerdiffstown Road.</li> </ul> <p><b>Summary</b></p> <p>Suggests an assessment of the LAP in conjunction with the infrastructure assessment provided in the submission demonstrates the lands are Tier 1 and should be considered for rezoning to low density with a density of 40 units. Small number of units will have minimal impact on units proposed in the LAP.</p> <p><b>Key Reasons for Rezoning from Agricultural Use to Low Density Residential Use</b></p> <ol style="list-style-type: none"> <li>1. Number of proposed houses (40) will have little impact on units provided for Naas.</li> <li>2. Lands located within the boundaries of LAP.</li> <li>3. Lands zoned Agricultural I.</li> </ol> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      | <p>4. Additional residential land should be zoned to ensure goals, policies and objectives of LAP are achieved.</p> <p>5. Rezoning to Low Density Residential will enable sufficient zoning to accommodate population growth.</p> <p>6. Lands will enable sequential development of Naas.</p> <p>7. Allowance for this type of low density residential zoning must be made to comply with government policy.</p> <p>8. Proximate to Kerdiffstown Park.</p> <p>9. Proximate to Johnstown Village Centre and N7.</p> <p>10. All infrastructure services readily available. Future investment in service and amenity infrastructure will take place in vicinity of site, ensuring all infrastructure in place for future development.</p> <p>11. Need to develop Naas in an orderly manner.</p> <p>12. Connectivity to Bus Route 126.</p> <p>13. Connectivity to Kerdiffstown park and playing pitches.</p> <p>14. Close to community, recreational and social services.</p> <p>15. Make better use of existing physical infrastructure.</p> <p>16. Proximity to solar farm which can provide renewable energy.</p> <p>17. Tier 1 infrastructure lands.</p> <p>18. Will alleviate pressure for individual housing sites in countryside.</p> <p>19. Housing will provide security to Kerdiffstown Park.</p> <ul style="list-style-type: none"> <li>• Appendix 1 provides site location map no: 615-2011.</li> <li>• Appendix 2 provides the LAP Land Use Objective Map</li> <li>• Appendix 3 provides Discovery Series Map no: 615-2013.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are noted. National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that '<i>Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens</i>'. The subject lands are do not represent</p> |

| Sub. No. | Name                    | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |                         | <p>consolidation of the defined settlement boundary of Naas and are severed from the town of Naas by the heavily trafficked M7 motorway.</p> <p>The Urban Development and Building Heights Guidelines (2018) refer to the expansion of low-density development around our cities and towns as not being sustainable and cannot continue. The increased level and cost of infrastructure it generates, the energy intensive transport systems needed to feed it, and the loss of prime green land which once developed is irreplaceable, all indicate that a low-density, peripheral proposal such as is contrary to the principles of proper planning and sustainable development. Furthermore, the Strategic Flood Risk Assessment for the Draft Plan indicates Flood Zone B along the northern section of the landholding.</p> <p>The subject lands, which are located on the periphery of Naas, outside of the Draft Plan boundary and removed from the town centre, do not facilitate consolidation of the existing urban form and promote urban sprawl. These lands are not considered appropriate for residential development having regard to the national and regional policy context contained in the NPF and RSES.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |
| 679      | Clare Cleary and Family | <p>Maguire and Associates have prepared a submission on behalf of their clients Clare Cleary and Family. The submission requests a change of zoning of lands at Rathasker Road.</p> <p><b>Introduction</b></p> <p>Maguire and Associates make this submission to KCC on behalf on their client in respect to lands at Rathasker Road, amounting to 2.0088ha (4.96 acres).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <p><b>Proposal</b></p> <ul style="list-style-type: none"> <li>• The submission requests the change in land use zoning from 'Agricultural' to 'Existing/Infill Residential', in respect of the existing house and site.</li> <li>• There is an entrance from Rathasker Road to the existing house and site.</li> <li>• Requests the balance of the land holding 'Agricultural' land use zoning is amended to be included as 'C – New Residential – To provide for new residential development'.</li> <li>• Proposed site entrance will be from the Rathasker Road.</li> </ul> <p><b>Location of Lands</b></p> <ul style="list-style-type: none"> <li>• Refers to attached OS Map showing lands edged in blue. Lands are currently located within the CSO settlement boundary and LAP boundary and is zoned 'Agricultural'.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |      | <div data-bbox="1034 288 1653 884" data-label="Image"> </div> <p><b>Site Location</b></p> <p>Site located east of Rathasker Road, adjoining Broadfield View estate. Three dwellings to north of site and single dwelling to south. Two farm entrances to site along western boundary and existing residential access to house in site's south-west corner.</p> <p><b>Site Description</b></p> <ul style="list-style-type: none"> <li>Site comprises single storey dwellings in south-west corner with associated outbuildings. Mixture of hedgerows and mature trees surrounding the dwelling with a site entrance providing vehicular access with brick walls and cattle grid.</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|          |      | <ul style="list-style-type: none"> <li>• Remainder of site is grass with land sloping from south-east corner to north-west corner. Mature hedgerows and treelines on all site boundaries, as well as timber posts and fencing. Southern boundary adjoining dwelling comprises a grass bank with mature hedgerow containing post and fence. A 38kv pylon located in south-eastern corner.</li> <li>• Eastern boundary adjoining Broadfield View contains mix of boundaries to rear of houses, while a belt of mature trees with timber posts and fencing exists on field site. A gate providing access is located in north-east corner.</li> <li>• Northern boundary adjoining three dwellings comprises mature hedgerows. Roadside boundary comprises two farm entrances with mixture of mature hedgerows and trees.</li> </ul> <p><b>Key Proposals in the NPF</b></p> <ul style="list-style-type: none"> <li>• National Policy Objective 1b refers to an additional 490,000-540,000 people in the EMRA.</li> <li>• National Policy Objective 1c refers additional 320,000 people in employment in EMRA.</li> </ul> <p><b>Key Proposals in the EMRA RSES</b></p> <p>Highlights the key towns for the EMRA, with Naas a key town in the Core Region.</p> <p><b>Key Proposals in the KCC CDP 2017-2023</b></p> <ul style="list-style-type: none"> <li>• Naas 'key town'.</li> <li>• Development strategy for Naas informed by RSES and based on building strong urban centres and protecting rural hinterlands. A focus on achieving critical mass in Naas.</li> <li>• Naas has potential to accommodate commensurate population and employment growth, facilitated by its location and aligned with investment in services, amenities and transport. Growth of Naas will require sustainable, compact and sequential development and urban regeneration.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|          |      | <p><b>Key Proposals in the Draft LAP</b></p> <ul style="list-style-type: none"> <li>• Refers to 3.4 'Approach to New Residential Zoning', which discusses balancing housing provision with infrastructure delivery.</li> <li>• Refers to 3.4.1 'A Tiered Approach to Zoning' and provides the definition of Tier 1 Serviced Zoned Land. Highlights the undertaking of SPIA to comply with NPF.</li> <li>• Refers to Policy HC1 – Residential Development and Objective HCO 1.1, which highlight support for new/infill residential development in tandem with supporting infrastructure.</li> <li>• Refers to Chapter 9 'Infrastructure and Environmental Services' and its core aim to phase future growth with the capacity of supporting infrastructure.</li> <li>• Provides a direct quote from section 9.1 which outlines the future infrastructural needs of Naas and that a SPIA was carried out to inform the LAP.</li> </ul> <p><b>Planning History on Site</b></p> <p>Refers to permission ref. no. 75/8 granted on 31<sup>st</sup> March 1975 for erection of house.</p> <p><b>Existing Situation in the Area</b></p> <p>Lands to immediate north and immediate east zoned B Existing Residential/Infill. It may be concluded the subject site adjoins Existing Residential/Infill Land Use Zoning.</p> <p><b>Infrastructural Assessment of Lands</b></p> <p>Notes that no infrastructural assessment of the subject lands was carried out by KCC as part of the LAP. Evident that the dwelling has existing infrastructure servicing it as it has existed for over 40 years. Lands adjoining the house to the north are considered Tier 2, meaning that it is easily serviced within medium term of 3-5 years.</p> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|          |      | <p>The submission provides a summary of existing infrastructure as follows:</p> <ul style="list-style-type: none"> <li>• Roads and Transportation – Rathasker Road considered sub-standard for development but could be easily upgraded to service the subject site.</li> <li>• Water Supply – Existing water supply on Ring Road to north.</li> <li>• Wastewater – Existing wastewater supply on Ring Road to north.</li> <li>• Surface Water – Existing surface water supply on Ring Road to north.</li> </ul> <p><b>Planning Permissions in the Area</b></p> <ul style="list-style-type: none"> <li>• Notes Ardstone Homes Limited recently granted permission (ref. 18303023) for 125 residential units almost directly south of subject site.</li> <li>• Notes lands to the north zoned Existing Residential/Infill were subject of planning application (ref. 20/90, ABP-307340-20), refused as being premature with poor housing design.</li> </ul> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>• Existing house and lands within CSO settlement boundary.</li> <li>• Existing house has been in residential use since 1970s and should be zoned Existing Residential/Infill. Particularly when one considers the individual houses to the north of site have been zoned as such.</li> <li>• Taking the above into consideration, requests site “coloured buff” is zoned as Existing Residential/Infill.</li> <li>• Regarding Ardstone development to the south and New Residential zoned land (C11) to the north, the balance of the lands coloured brown on maps should be considered for New Residential lands Tier 2 under the Infrastructure Assessment and should be rezoned from Agricultural to New Residential Tier 2.</li> </ul> <ul style="list-style-type: none"> <li>• Appendix 1 provides OS Drawing no: 606-1811.</li> <li>• Appendix 2 provides extract from the LAP Land Use Objective Map.</li> </ul> |

| Sub. No. | Name                     | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|          |                          | <p><b>Chief Executive's Opinion</b></p> <p>The issues raised in the submission are noted. The subject lands were not put forward for analysis within the Sustainable Planning and Infrastructural Assessment (SPIA) which informed the draft Plan as there were other sites in close proximity to the town centre which could meet the target housing allocation. The development of the subject lands would represent 'leap frogging' and is contrary to the Guidelines for Sustainable Residential Development in Urban Areas (2009) which states that the order and sequencing of development of small towns and villages must avoid significant so called "leap-frogging" where development of new residential areas takes place at some remove from the existing contiguous town/village and leading to discontinuities in terms of footpaths lighting or other services which militates against proper planning and development.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 680      | Edevale Property Limited | <p><b>SUBJECT SITE</b></p> <p>The subject site is considered a strategically important site at the gateway to Naas and has been acknowledged as such in the Draft LAP. It is the former Magna Donnelly site and currently consists of mostly industrial buildings to the south east of Maudlins Interchange.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|          |      | <div data-bbox="981 288 1659 820" data-label="Image"> </div> <p><b>Current Planning Context</b></p> <p>Under the Naas Development Plan (see zoning map above), a section of the site is zoned for Q; Enterprise &amp; Employment. The remainder of the site is covered by the Naas Environs Plan, which is incorporated into the KCDP2011-2017, where it is zoned 'RE10; Enterprise &amp; Employment'. Development of the subject site was identified in these statutory plans for high quality knowledge-based enterprises focussing on high tech development ICT, R&amp; D, office-based industry and manufacturing.</p> <p><b><u>Proposed Planning Context – Draft Naas Local Area Plan 2019-2023:</u></b></p> <ul style="list-style-type: none"> <li>• Under the current Draft LAP the site is zoned for commercial / residential yet there are no uses permitted in principle under the matrix listed in the Draft Development Plan. The council must clarify this matter.</li> <li>• Residential is specifically <b>not</b> permitted under this zoning.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|          |      | <ul style="list-style-type: none"> <li>• Policy objectives note the requirement to carry out preliminary modelling to inform the 'use, quantity, and intensity of development on site.</li> <li>• A key development area design brief provides indicative development parameters regarding the future development of the site.</li> </ul> <p><b><u>Development Ambition – Gateway Location</u></b></p> <ul style="list-style-type: none"> <li>• A mixed-use development, with a component of residential development (likely in apartment format), alongside office and other appropriate uses, should be unconditionally supported by the Council in the final LAP. The current Draft of the LAP is a barrier to the progress of the development of the site.</li> <li>• There is a lack of clear evidence for the imposition of a full restriction on residential development. Concerns regarding traffic generation is addressed by the Transport Insight Study (see below), which states that 'including a residential component in the land use mix in the former Donnelly Mirrors site would contribute to mitigating the overall traffic impact of the full buildout of the site....which would be aligned with the recommendations of the Naas / Sallins Transport Strategy.'</li> <li>• It is premature of the Planning Authority to explicitly restrict residential development.</li> <li>• Requests that Policy HC1 be implemented and remove the restriction on residential uses at this location.</li> <li>• Under the Key Development Area Diagram in the Draft LAP there is no entrance to the subject site and the developer of the subject site is wholly reliant on a third-party access point. The one- way system proposed and reinforced in this LAP is unworkable.</li> </ul> <p><b><u>Transport Submission from Transport Insights (Transport Planning Consultants):</u></b></p> <ul style="list-style-type: none"> <li>• Transport Insights has been commissioned by Edevale Property Limited to prepare a Transport Submission in response to the Draft Naas Local Area Plan 2021-2027. The submission relates to the site owned at Maudlins, Naas.</li> <li>• The potential impact of development of Maudlins KDA on the traffic on the adjacent public road network, has been viewed as a challenge (however development of the Maudlins KDA has been analysed alongside other</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|          |      | <p>development areas within the urban area, with the Maudlins KDA representing a small component of the overall development, analysed within each scenario.).</p> <ul style="list-style-type: none"> <li>• The Maudlins KDA's capacity for internal queuing has been viewed as an opportunity to enable managing development's traffic impact;</li> <li>• Trip generation of any development should not exceed the relevant assumptions of the Naas / Sallins Transport Strategy – however it is unclear which of the land use scenarios supporting the Strategy should be understood as the benchmark.</li> <li>• The Naas / Sallins Transport Strategy provides no information in relation to population allocation to the Donnelly Mirrors and Cemex Sites. The basis for not considering residential development at the forementioned sites has not been supported. The zoning of the subject site should be amended so that residential land use is permissible as part of a mixed-use development. This is deemed to be justified, based on the evidence provided, which includes a trip generation analysis and a sustainable accessibility analysis, which have been undertaken in relation to the subject site. Based on these the following observations are made.</li> <li>• Employment related land use generates relatively more traffic in the AM peak hour, compared to the PM peak hour, with the former being the more critical period from the perspective of the road network capacity constraints identified in the subject site's vicinity.</li> <li>• Employment related land use generates predominantly incoming trips in the AM peak hour and outgoing trips in the PM peak hour, with the inverse being the case for the residential land use. Therefore employment related development of the Maudlins KDA is more likely to contribute to the AM peak queuing on the off-ramps at the Maudlins interchange compared to residential development. Moreover, the AM peak traffic impact of employment-related development would be more challenging to mitigate by limiting traffic discharge onto public road network and exploiting the site's capacity for internal queuing.</li> <li>• In terms of the overall number of generated trips in the more critical AM peak hour (relative to the PM peak hour), it appears that Maudlins KDA could accommodate up to ca. 250 dwellings without its trip demand exceeding that of the Maudlins KDA's full build-out for employment-related purposes. 100-150 dwellings could be accommodated without exceeding the trip generation threshold in the low-intensity development scenarios.</li> </ul> |



| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <ul style="list-style-type: none"> <li>• The subject site is deemed highly accessible by sustainable travel modes, including walking, cycling and public transport. The site is well suited for a variety of land uses, including residential, with employment and amenities within its catchment, making it a location that would have reduced reliance on the private car.</li> <li>• Having regard to the above, it is considered a residential development would generate low volumes of traffic and if part of a mixed-use scheme, could contribute in mitigating the full buildout of the Maudlins KDA. This would all be aligned with the recommendation of the Naas / Sallins Transport Strategy, which states '<i>either a reduction in the scale of development or a change in land use purpose with a lower trip generation</i>' in the Maudlins KDA be pursued.</li> </ul> <p><b><u>Conclusion</u></b></p> <p>It is requested that the zoning of the Subject Site proposed in the Draft LAP be amended so that residential land use is permissible as part of a mixed-use development.</p> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are acknowledged. Factors taken into account in determining which parcels of land to be put forward for categorisation under the Sustainable Planning and Infrastructural Assessment (SPIA), were sites which demonstrated compliance with the sequential approach, compatibility with the surrounding uses, and physical suitability to provide for a sense of place. The subject lands are removed from the town centre, in close proximity to the heavily trafficked national road network and located adjacent to highly industrialised areas were not considered as more appropriate located sites were located closer to the town centre to meet the target housing target.</p> <p>The Naas /Sallins Transport Strategy as detailed under Appendix 2 provided for TRICS trip rates for residential land uses and examining the AM departures residential development would be considered to have a high-level departure rate. The sensitivity of Junction 9 to increased traffic generation in the immediate vicinity of the junction is recognised in the Transport Strategy and has to be balanced by the need to develop the brownfield sites in the vicinity of this primary approach to the town and the need</p> |

| Sub. No. | Name           | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |                | <p>to protect the carrying capacity of the road network. In this regard the subject lands are not considered to be suitable for residential development.</p> <p><b>Chief Executives Recommendation</b></p> <p>No change recommended.</p>                                                                                                                                                                                                                                                                                                                                                                              |
| 686      | Colivet Family | <p>Planning Report submitted by David Mulcahy on behalf of the Colivet Family.</p> <ul style="list-style-type: none"> <li>• Relates to lands measuring approximately 10.5 hectares at Kilcullen Road, Naas.</li> <li>• The southern portion of their landholding is zoned Open Space / Amenity under the Draft NLAP, both at the upper level close to the Kilcullen Road and the lower level further away from the Kilcullen Road.</li> <li>• The submission seeks to have the upper level zoned Neighbourhood Centre.</li> </ul>  |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|          |      | <ul style="list-style-type: none"> <li>• A neighbourhood centre at this location, would provide solutions whereby the local community can buy essential items by sustainable walking / cycling and therefore significantly reducing private car journeys.</li> <li>• A Neighbourhood Centre would provide a much-needed community and sustainable transport focal point for residential estates in the immediate area.</li> </ul> <p><b>Zoning Objective</b></p> <ul style="list-style-type: none"> <li>• The lands which are subject of this submission are zoned Open Space / Amenity (F).</li> </ul> <p><b>Rationale for Altering the Zoning</b></p> <ul style="list-style-type: none"> <li>• The submission seeks for the F zoning on the upper level portion of the Colivet family lands to be removed. For clarity, it would remain on the lower level portion of the lands.</li> <li>• Please see report from Scott Cawley Ecologists enclosed as Appendix B, which concludes that this landholding is not a particularly important habitat and there is no solid reason for including this upper level portion in the F zoning. Lower level is subject to flood risk and therefore the rationale behind same makes more sense.</li> <li>• The Open Space / Amenity Lands as currently shown in the Draft NLAP would be limited in terms of passive surveillance and could lead to anti-social behaviour.</li> <li>• The upper level portion of the Colivet family lands do not need to be included to achieve a 'Green Link' along the stream. The upper level portion would also be difficult to access from the lower portion due to the level difference.</li> <li>• The Naas Social Infrastructural Audit, which informed the preparation of the Draft NLAP identifies 7 no. neighbourhood centres in the town of Naas. There is no neighbourhood centre serving the large residential area south of the southern ring road.</li> <li>• Having regard to the large amount of land, which has been identified to be zoned New Residential under the draft NLAP, it is obvious that there is a need for a neighbourhood centre.</li> <li>• At present a resident living in Bellingsfield, Naas (lands to the south of the subject site) has to walk c.1.9km to get to the closest shop.</li> <li>• The childcare facility at Bellingsfield has not been developed.</li> <li>• Drawings prepared by Demesne Architects show that a modest sized Neighbourhood Centre with a wide variety of units could be accommodated on these lands.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <ul style="list-style-type: none"> <li>• The subject lands are highly accessible and allow for sustainable modes of transport.</li> <li>• The indicative Neighbourhood Centre designed by Demesne Architects shows provision for a set down area for a bus. A letter has also been submitted from JJ Kavanagh &amp; Sons who would be prepared to offer a bus service to/from this destination, which would provide connections to Naas Town Centre and the Naas / Sallins Railway Station. The Neighbourhood Centre could also provide for various transport mode car interchange. For example, a cyclist can travel to the NC, leave their bicycle in a secure shelter, and then take the Shuttle Bus to the Naas / Sallins Railway Station.</li> <li>• The Neighbourhood Centre could be designed to provide passive surveillance of the F zoned lands at the lower level., therefore making them more attractive to pedestrians and cyclists.</li> <li>• The proposed uses envisaged would not detract from the town centre.</li> <li>• Community gain could also be achieved by the creation of a viewing platform where exceptional views and passive surveillance of the amenity area below could be achieved. The construction of a basketball court / Multi Use Games Area (MUGA) for local children is part of the proposal. It is also envisaged that the NC will encourage natural community bonds to establish thereby enabling older residents to stay in the community longer.</li> <li>• There is a need to tie the isolated residential and educational area of Piper's Hill back into the town of Naas and the provision of a NC at this location would achieve that objective, particularly with a residential zoning on the northern portion of the Colivet lands.</li> </ul> <p><b>Appendix A Engineering &amp; Transport report prepared by Waterman Moylan Consulting Engineers</b></p> <p><b>Transportation</b></p> <ul style="list-style-type: none"> <li>• There is adequate site frontage along the R448 to ensure an appropriate access arrangement (priority junction with / without turning lanes as appropriate) with adequate site visibility in accordance with DMURS standards.</li> <li>• Public Transport; There are 2 bus stop locations along Kilcullen Road immediately outside the site. These are serviced by the following services; Route 846, Route 720 and Route 717. There are also bus services at the nearby Naas hospital, Post Office and Kilashee.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <ul style="list-style-type: none"> <li>• The Sallins train station is c.4.6km north of the subject site.</li> <li>• It is noted that public transport route 10 (PT10) adjacent to the site and connecting the Piper's Hill / Kilcullen road area to Sallins Railway Station is specifically identified as a key public transport route in the Draft Naas Town Plan.</li> <li>• The type and nature of the NC proposed would complement the sites secondary function as a transport interchange.</li> <li>• A letter of support has been submitted from J.J. Kavanagh &amp; Sons Ltd, which states that they welcome the opportunity to connect the proposed Neighbourhood Centre with their route network.</li> <li>• The Kilcullen Road has been upgraded and is now serviced by an extensive footpath network and designated cycle paths. It is noted that further upgrades are proposed along the Kilcullen Road towards the town centre, north of the subject site.</li> <li>• Also noted that there is a proposed greenway along the old Naas to Dunlavin Railway route, which could be connected to the proposed NC by incorporating appropriate pathways within the area.</li> </ul> <p><b>Foul Drainage</b></p> <ul style="list-style-type: none"> <li>• It has been confirmed by Irish Water (letter attached as part of submission) that there is sufficient capacity in the adjacent foul sewer network to facilitate the proposed development.</li> </ul> <p><b>Surface Water Drainage</b></p> <ul style="list-style-type: none"> <li>• A dedicated outfall to a canal feeder stream would need to be constructed to cater for the outfall from the subject site. Sustainable Drainage Systems (SuDS) would also be required to cater for the amount of surface water runoff.</li> </ul> <p><b>Water Supply</b></p> <ul style="list-style-type: none"> <li>• Irish Water has confirmed there is capacity in the adjacent water supply network (letter attached as part of submission).</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|          |      | <p><b>Utilities</b></p> <ul style="list-style-type: none"> <li>The subject site is capable of being adequately serviced in terms of Gas Supply, ESB Services and Telecommunications.</li> </ul> <p>Appendix B – provides a layout plan for the proposed Neighbourhood Centre, which was prepared by Demesne Architects.</p> <p>Appendix D; Creating Liveable Communities</p> <ul style="list-style-type: none"> <li>The proposed Neighbourhood Centre provides an opportunity to encourage the delivery of a liveable community.</li> <li>The issues paper of the Kildare County Development Plan 2023-2029 states that it is an objective to identify lands for the Creation of Multigenerational Integrated Communities in Co. Kildare.</li> <li>The Kildare Age Friendly County Programme was launched in 2010.</li> <li>The Men's Shed Movement in Kildare has been identified as one of the 16 best global examples of the 8 domains of liveability.</li> <li>It is recommended that Kildare County Council examines the potential of new housing models such as a proposed multi-generational integrated community development.</li> <li>The submission proposes a Policy Statement and Objective within the Kildare County Development Plan 2023-2029, which would state that <i>'Kildare County Council will consider the changing age demographics in the County, and specifically how to plan for the predicted growth of the Ageing population.'</i> A second Policy Statement and Objective would state that <i>'Kildare County Council should identify appropriate urban and rural sites with the capacity to satisfy and sustain the need for such well proven Community Integration and enhancement schemes.'</i></li> </ul> <p><b><u>Appendix E; Ecological report prepared by Scott Cawley Ecologists;</u></b></p> |

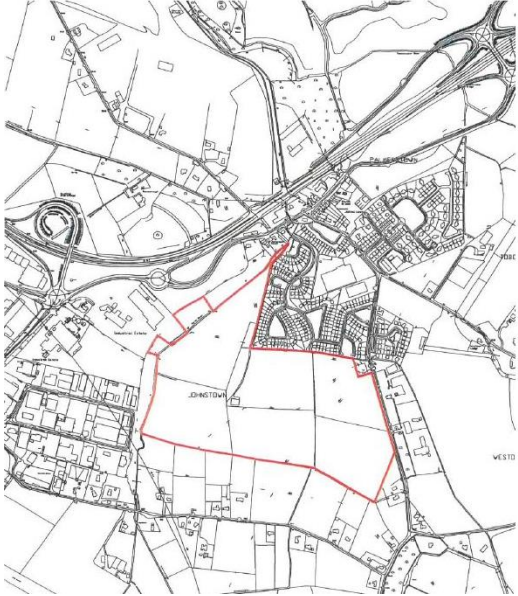
| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |      | <ul style="list-style-type: none"> <li>• A desk study of the subject site was undertaken on the 15<sup>th</sup> May 2019, to collect any available information on the local ecological environment.</li> <li>• A site walkover was conducted by Colm Clarke of Scott Cawley on the 16<sup>th</sup> May 2019. The subject report provides a high range summary of the fauna and flora noted within the subject lands during the walkover survey.</li> <li>• This report is not intended to be submitted in support of any planning application.</li> <li>• The subject lands are not located within or adjacent to any SAC's or NHA's.</li> <li>• No species listed on the third schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 were noted within the lands. The lands do however contain cherry laurel, which is an undesirable specie.</li> <li>• A full list of species by habitat has been included within Appendix 2 of this report.</li> <li>• The hedgerows along the boundaries are considered to be of local importance. The subject lands also contain a few outcrops of scattered trees, which are also considered to be of local importance.</li> <li>• A search of the NBDC database of species did not return any fauna records for the subject lands.</li> <li>• An assessment of habitat suitability for bats was undertaken and the hedgerows within the lands are considered to be suitable for foraging bats, particularly those on the eastern boundary.</li> <li>• A range of common bird species was noted within the lands in May 2019.</li> </ul> <p><b>Recommendations</b></p> <ul style="list-style-type: none"> <li>• Any plans or projects within the subject lands should fully consider the policies and objectives for Natural Heritage and Green Infrastructure contained within the KCDP2017-2023. The hedgerows and stream within the lands are considered to be the habitats of highest ecological value.</li> <li>• Several measures could be undertaken to enhance the biodiversity value of habitats within the lands. These could include the following; A move away from the use of herbicides; The retention of a verge of 2m width adjacent to existing hedgerows; Alterations to stocking rates or fencing of steeper sloped areas to prevent erosion of embankments; Protect watercourses within the lands; Creation of a 'biodiversity zone' of minimum 10m width from the bank of the stream within the lands; The implementation of measures to protect watercourses from accidental pollution works during any construction works.</li> </ul> |



| Sub. No. | Name                 | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|          |                      | <ul style="list-style-type: none"> <li>• It is recommended that a bat activity survey be carried out by a suitably qualified professional. Mitigation measures may be recommended as an outcome of such surveys.</li> <li>• The subject lands contain several common species of bird, many of which are likely to rest within hedgerows on the perimeters. It is recommended that any work involving the removal of trees or other suitable breeding and habitat be undertaken outside the nesting season.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The contents of the submission are acknowledged. The subject lands are located within the Naas Hospital Stream Green Infrastructure Corridor and there are a number of treelines and hedgerows to be protected on the site (Map 7.1 and 7.2, refers). There is a specific objective in the draft Plan pertaining to the subject lands which are identified for the development of a proposed active recreation area catering for the future population of this area of town. The development of such facilities shall include the provision of strong links to existing and future residential lands in the surrounding area, as well as the development of the old Naas-Baltinglass/Tullow railway line Greenway, which is an objective of the National Transport Authority (NTA). The Social Infrastructure Audit that accompanied the draft Plan outlines that Naas has a shortfall in the provision of sport and recreation lands and therefore in this context the Open Space and Amenity zoning pertaining to the site is appropriate. Therefore, having regard to the above it is considered that the subject lands would not be suitable for a Neighbourhood Centre and the Open Space and Amenity zoning is more suitable having regard to the sensitive nature of the green infrastructure corridor.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |
| 694      | Michael & Mary Nolan | <p>The submission was prepared by O'Loughlin Architects Ltd on behalf of their client.</p> <p>Request for subject lands (shown in blue) which extend to 2.75 ha to be zoned New Residential.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|          |      | <div data-bbox="936 288 1765 879"> </div> <ul style="list-style-type: none"> <li>• Site is 700m from Craddockstown roundabout flanked by an apartment development, then a housing scheme and then a site where permission granted for 7 detached units.</li> <li>• Pedestrian and cycle paths link pink development and linear park and the subject lands can gain connection to foul sewers through the adjacent housing scheme (pink development).</li> <li>• The 7 units are considered Phase 1 and the subject lands would be Phase 2 with ca. 20 units.</li> <li>• Gradual reduction in scale from apartments to detached dwellings is appropriate catering for all sections in Naas.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>National Strategic Outcome (NSO) No. 1 of the National Planning Framework (NPF) is Compact Growth. The NPF states that this will be achieved by managing the sustainable growth of compact cities, towns and villages. The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019-2031 reinforces this approach stating that <i>'Compact Growth and Urban Regeneration promote the regeneration of our cities, towns and villages by making better use of</i></p> |

| Sub. No. | Name                            | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|          |                                 | <p><i>under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens'.</i></p> <p>Naas has a legacy of residential development located outwards in a somewhat dispersed pattern of development removed from the town centre. The Vision for Naas 2031 and Beyond is to ensure growth is planned which creates a compact, consolidated and connected urban form.</p> <p>As required under objective 3(c) of the National Planning Framework (NPF) at least 30% of all new housing units must be delivered within the existing urban footprint of the town as defined by the 2016 CSO Settlement boundary. However, the situation for Naas is that in excess of the 30% is achievable. The subject lands are located outside the existing CSO boundary and therefore would not contribute to a pattern of development that represents compact growth.</p> <p>Furthermore, the subject lands are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development which are considered more appropriate having regard to policy context.</p> <p><b>Chief Executive's Recommendation</b><br/>No change recommended.</p> |
| 696      | Anthony, Miriam & Philip Lawlor | Submission relates to impact of the Plan on lands in their ownership adjoining the Naas Industrial estate, Donnelly Mirrors and Cemex site (map provided).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|          |      |  <ul style="list-style-type: none"> <li>• The quantity of the green belt zoning is considered excessive.</li> <li>• Subject lands in agricultural use.</li> <li>• Zoning matrix allows agricultural buildings and stable yard development under agriculture and not under Green Belt.</li> <li>• Request lands be zoned Agriculture.</li> <li>• Agriculture zoning allows the integrity of the buffer zone between Naas and Johnstown be maintained.</li> </ul> <p><b>Defining of Green Belt Zone</b></p> <ul style="list-style-type: none"> <li>• Fingal DP allows for wider variety of uses for active purposes such as playing field, parks and community uses.</li> <li>• The submission includes under Appendix 3 an extract from Fingal and the use classes related to the zoning submission.</li> </ul> |

| Sub. No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|          |      | <ul style="list-style-type: none"> <li>• The draft LAP indicates a deficit in social infrastructure, changing the matrix of the Green Belt to reflect a more active use would alleviate pressure on social infrastructure allowing for multiple uses.</li> <li>• Green zoning between Johnstown and Naas to include multiple community uses.</li> </ul> <p><b>Chief Executive's Opinion</b></p> <p>The purpose of the Green Belt zoning is to maintain a clear distinction between Naas and Johnstown to prevent urban sprawl and the coalescence of built up areas to protect the character of each settlement. Therefore, it is not considered that the Green Belt zoning is excessive, as it protects the land between both settlements. The zoning is also extended to the south to protect the Green Infrastructure Corridor associated with the Morell River. The Habitat Survey which was carried out to inform the preparation of the draft Plan outlined that the Morell River and its associated bankside habitats require protected (Section 7.3.18, Map 7.1 and Map 7.2. refers).</p> <p>The draft Plan has zoned a considerable quantity of land to address the deficit in social infrastructure which was identified in the Social Infrastructure Audit which accompanies the draft Plan. The subject lands given their distance from the town centre and from areas of considerable residential development would not be best served to accommodate social infrastructure or achieve compact growth of the urban form.</p> <p>The contents of the submission in relation to use classes in a Green Belt are noted. The Council do not consider comparisons can be made between the function and purpose of a Green Belt in Fingal to those of a land use objective between Johnstown and Naas.</p> <p>It is considered that agricultural buildings and stable yard development are both 'Open to Consideration' under Table 11.3 Land Use Zoning Matrix relating to the Green Belt zoning. As detailed under Table 11.2 land uses shown as 'Open for Consideration' are uses that are not considered acceptable in principle in all parts of the relevant use zone. However, such uses may be acceptable in circumstances where the Council is satisfied that the proposed use would not conflict with the</p> |

| Sub.<br>No. | Name | Summary of Submission, Opinion and Recommendation                                                                                                                                                                                                        |
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|             |      | <p>general objectives for the zone and the permitted or existing uses as well as being in the interests of the proper planning and sustainable development of the area.</p> <p><b>Chief Executive's Recommendation</b></p> <p>No change recommended.</p> |

## 5.0 Composite List of Proposed Material Alterations

The following is a list of composite proposed material alterations having regard to submissions received and the Chief Executive's recommendations.

### Chapter 3 Compliance with Core Strategy

#### Proposed Material Alteration

Amend Table 3.5 - Estimated Residential Capacity of Lands Zoned New Residential as follows:

| Site Ref. No.                                                  | Location                              | Site Area (Ha.)     | Estimated capacity            | Density range        |
|----------------------------------------------------------------|---------------------------------------|---------------------|-------------------------------|----------------------|
| <b>Planned Local Authority Housing Schemes<sup>32</sup></b>    |                                       |                     |                               |                      |
| C (1)                                                          | Old Caragh Road                       | 2.06                | 73                            | 35                   |
| C (10)                                                         | Craddockstown Road                    | 0.68                | 3                             | 4                    |
| A (4)                                                          | West of Rathasker Road <i>(CRA 4)</i> | 1.34                | 100                           | 75                   |
| <b>Private Landholdings</b>                                    |                                       |                     |                               |                      |
| C (2)                                                          | Devoy Barracks                        | 4.37                | <del>152</del> 175 -218       | <del>35</del> 40-50  |
| C (16)                                                         | The Racecourse                        | 6.3 <sup>33</sup>   | 220 - <del>252</del> 315      | 35- <del>40</del> 50 |
| C (12)                                                         | Tipper Road / Blessington Road        | 2.0                 | 70- <del>80</del> 100         | 35- <del>40</del> 50 |
| C (19)                                                         | Sallins Road / Oldtown                | 2.56                | <del>89</del> 102 -128        | <del>35</del> 40-50  |
| C (15)                                                         | Craddockstown                         | 4.0                 | 140-200                       | 35-50                |
| C (3)                                                          | Finlay Park                           | <del>3.85</del> 2.8 | <del>154-231</del><br>112-168 | 40-60                |
| <i>C (13)</i>                                                  | <i>Dublin Road</i>                    | <i>1.1</i>          | <i>39-55</i>                  | <i>35-50</i>         |
| <b><i>Town Centre Core Regeneration Areas<sup>34</sup></i></b> |                                       |                     |                               |                      |
|                                                                | <i>CRA 1: Main Street</i>             | -                   | <i>22/2= 11</i>               | -                    |
|                                                                | <i>CRA 2: Castle Quarter</i>          | -                   | <i>166/2 =83</i>              | -                    |
|                                                                | <i>CRA 3: Corban's Lane</i>           | -                   | <i>12/2 =6</i>                | -                    |
|                                                                | <i>CRA 4: Rathasker Road</i>          | -                   | <i>9/2 =5</i>                 | -                    |
|                                                                | <i>CRA 5: Northeast Gateway</i>       | -                   | <i>33/2= 17</i>               | -                    |

<sup>32</sup> Reference Section 3.3.1 Social Housing Requirement

<sup>33</sup> A reduction of 10% of the overall site has been reduced for the construction of the Gallops Avenue.

<sup>34</sup> Allocated unit capacity of Town Centre Core Regeneration Areas to be reduced by 50%.



|                            |                                 |                               |                                                |                                       |
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|                            | <i>CRA 6: Canal Quarter</i>     | -                             | <i>143/2=72</i>                                | -                                     |
| <b>Total</b>               |                                 | <b>27.16</b>                  | <del>1,001-1,285</del><br><b>1,228- 1,554</b>  |                                       |
| <b>Extant Permissions</b>  |                                 |                               |                                                |                                       |
| C (6) * *                  | Devoy Quarter (Devoy Link Road) | 2.24                          | 152                                            | 68                                    |
| C (7) *                    | Oak Park                        | 2.49                          | 71                                             | 29 <sup>35</sup>                      |
| C (8) **                   | Blessington Road                | <del>5.53</del> <b>10.8</b>   | <del>118</del> <b>324</b>                      | <del>21</del> <b>30</b> <sup>36</sup> |
| <i>C (7) **<br/>Infill</i> | <i>South of Oak Park</i>        | <i>1.0</i>                    | <i>7</i>                                       | <i>7</i>                              |
| <b>Total</b>               |                                 | <del>10.26</del> <b>11.26</b> | <del>341</del> <b>554</b> <sup>37</sup>        |                                       |
| <b>Combined Totals</b>     |                                 | <b>37.42</b>                  | <del>1,342-1,626</del><br><b>1,782 – 2,108</b> |                                       |

## **Chapter 4: Homes and Communities**

### **Proposed Material Alteration**

Amend HCO 2.1 as follows:

- HCO 2.1** Require that a good mix of housing types and sizes is provide in all new residential areas and in appropriate brownfield/infill areas, to meet the needs of the population of Naas, including the provision of appropriate supported housing and longer term residential care solutions designed for older people and/or people with disabilities. *All planning applications on lands zoned C: New Residential or C: New Residential Phase 2 shall be accompanied by a Housing Mix Statement illustrating compliance with this objective.*

### **Proposed Material Alteration**

Include a new Action under Section 4.6 Education, Childcare and Health Facilities as follows:

*To investigate the feasibility of the provision of a childcare facility on Kildare County Council lands during the lifetime of the Plan.*

### **Proposed Material Alteration**

Amend HCO 4.6 as follows:

- HCO 4.6** Facilitate and promote the development of a network of playgrounds, amenity spaces *(to include community gardens and allotments)* and recreational areas

<sup>35</sup> The stated units per hectare represent a portion of an overall residential scheme.

<sup>36</sup> The stated units per hectare *reflect the existing permission. The overall units incorporate Phase 1 permitted and increase at 30uph for the New Residential lands, with are tied to the delivery of the Gallops Avenue. represent a portion of an overall residential scheme.*

<sup>37</sup> These figures differ from the extant figure under Table 3.4 as some of the extant permissions are on sites zoned B: Exiting Residential.

for children of all ages which are universally designed throughout the town and its environs.

### Proposed Material Alteration

Amend Objective HCO 4.7 as follows:

- HCO 4.7**     *(a) Investigate the feasibility of the provision a small green waste composting site in the town for use by local community groups, as an action towards sustainable waste management.*  
*(b) Promote community-managed gardens/allotments at appropriate locations in Naas.*

### Proposed Material Alteration

Amend Actions listed under Section 4.7 Other Community, Sports and Recreational Facilities as follows:

Address the deficiencies in the provision of sport and recreation facilities *and investigate the feasibility of Municipal Pitches* in Naas through active engagement with the relevant clubs and The Sports Partnership.

## Chapter 5: Movement and Transport

### Proposed Material Alteration

Insert a new sub-section, Section 5.1.1 Modal Shift Targets (including consequential table numbering) as follows:

#### **Section 5.1.1 Modal Shift Targets**

*Achieving significant modal shift is dependent on a wide range of factors, much of which is outside the remit of Kildare County Council such as national economic performance, Government investment in sustainable transport infrastructure, private bus service provision and willingness to embrace change. Kildare County Council have identified a number of interventions for the town of Naas which will assist in delivering this modal shift, such as the provision of new permeability links, cycling measures and public transport measures.*

*Kildare County Council will endeavour to deliver a reduction in private car usage broadly in line with 2035 targets set out in the NTA's Transport Strategy for the Greater Dublin Area. These target mode shifts have been adapted to reflect the plan period (to 2027) and are outlined in the tables below, which contain ambitious targets for travel to work and school.*

**Table 5.1A:** Modal shift targets for work trips in Naas

| Mode share for work trips | 2016 Baseline % | 2027 Target % | 2035 Target % | Overall % Change |
|---------------------------|-----------------|---------------|---------------|------------------|
|                           |                 |               |               |                  |

|                  |       |        |       |      |
|------------------|-------|--------|-------|------|
| Car              | 79.6% | 69.8%  | 62.6% | -17% |
| Public Transport | 7.9%  | 14.8%  | 19.9% | +12% |
| Walking          | 9.8%  | 10.38% | 10.8% | +1%  |
| Cycling          | 2.7%  | 5%     | 6.7%  | +4%  |

**Table 5.1B:** Modal shift targets for education trips in Naas

| Mode share for education trips | 2016 Baseline % | 2027 Target % | 2035 Target % | Overall % Change |
|--------------------------------|-----------------|---------------|---------------|------------------|
| Car                            | 48.6%           | 43.3%         | 39.6%         | -9%              |
| Public Transport               | 18.4%           | 21.3%         | 23.4%         | +5%              |
| Walking                        | 30.6%           | 31.7%         | 32.6%         | +2%              |
| Cycling                        | 2.4%            | 3.6%          | 4.4%          | +2%              |

**Proposed Material Alteration**

Amend text in Objective MTO 2.3 and Objective MTO 2.7, (along with any consequential amendments including Map 5.3).

**MTO 2.3** Support and facilitate the implementation of the following bus priority measures, subject to the availability of funding and appropriate environmental assessment and where necessary to preserve the identified routes free from development:

- Sustainable Travel Bridge over the M7 linking Sallins and Naas.
- Morell Way bus gate to facilitate a new bus-only street.
- Left turn ban on to Main Street (from R445 towards Main Street).
- Bus priority entrance to Piper's Hill schools.
- Bus-only ~~Priority Route~~ link to Sallins Bypass through the Northwest Quadrant.

**MTO 2.7** Protect the lands zoned Q: Enterprise and Employment to the east of the Western Relief Road from haphazard development that would prejudice the future delivery of a bus-only ~~priority~~ route through the Northwest Quadrant. Proposals for development on lands zoned Q: Enterprise and Employment should protect the integrity of these lands and potential developers will be required to liaise with the Planning Authority and Roads and Transportation Department of Kildare County Council in advance of submitting development proposals.

**Proposed Material Alteration**

Insert additional text under MTO 3.1 as follows:

- MTO 3.1**      **(a)** Maintain and improve, as required, the local road network to ensure a high standard of road quality and safety in accordance with the requirements of the relevant legislation.
- (b)** Safeguard the development and carrying capacity of the national road infrastructure along the existing M7 *and associated Junctions 9, 9(a) and 10*, in accordance with the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).'

### **Proposed Material Alteration**

Insert additional objective as Objective MTO 3.3 and renumber subsequent objectives accordingly.

***MTO 3.3**      To comprehensively re-examine the design of the Gallops Avenue (R410 to R445 - Blessington Road to Dublin Road). The focus of the redesign 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 be designed to have the appearance of a street, avenue or boulevard which would provide a generous tree lined verge, including segregated cycle lanes and pedestrian paths in accordance with the Principles of Sustainable Safety to offer a safe environment for all road users including cyclists.*

*The redesign shall be carried out after consultation with local residents, stakeholders and other interested parties. The redesign will take account of best practice design guidance for sustainable infrastructure, such as the Design Manual for Urban Roads and Streets (DMURS) and the NTAs National Cycle Manual. The redesign shall include, but not be limited to, examination of the following;*

- Delivery of protected junctions with consideration for raised tables where appropriate.*
- Delivery island bus Stops in line with guidance provided in the NTAs National Cycle Manual (or any successor to same in terms of best practice).*

### **Proposed Material Alteration**

Insert text under Policy MT1 and MT2, as follows:

#### **Policy MT1 – Walking and Cycling**

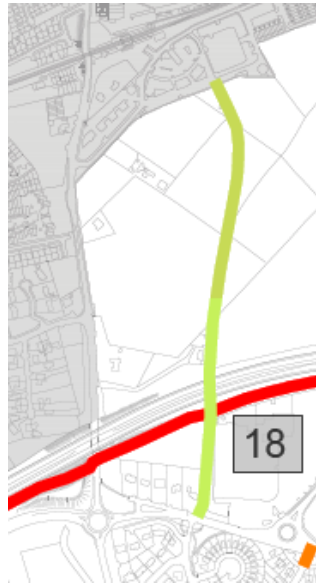
*It is the policy of the Council to promote enhanced **universal** permeability for pedestrians and cyclists within Naas in order to improve access to the town centre, local schools, residential areas, recreational facilities, public transport services and other amenities.*

#### **Policy MT 2 – Public Transport**

*It is the policy of the Council to promote the sustainable development of Naas by supporting and guiding the relevant national agencies in delivering improvements to the public transport network and to public transport services for all users.*

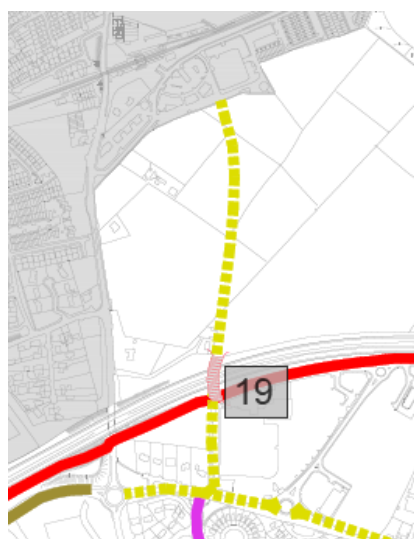
### **Proposed Material Alteration**

Amend Measure 18 on Map 5.1 to correspond correctly with PT 7 as shown on Map 5.3.



### **Proposed Material Alteration**

Amend Measure 19 on Map 5.2 to correspond correctly with PT 7 as shown on Map 5.3.



## **Chapter 6.6 Economic Development, Retail and Tourism**

### **Proposed Material Alteration**

Insert additional text under paragraph one, Section 6.4.2 Northwest Quadrant (NWQ) as follows:

An objective of the Regional Spatial and Economic Strategy (RSES) for Naas is to strengthen the local employment base through the development of Millennium Park in the Northwest Quadrant, where there is potential for high-quality high-density indigenous and Foreign Direct Investment. Millennium Park is currently home to Kerry Global Centre, Irish Commercials, the HSE and Horse Sport Ireland. The Park forms part of a larger significant land bank in the northwest of Naas, which represents a key area for the growth of the town over the longer-term vision to 2031. *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).*

### **Proposed Material Alteration**

Amend text under paragraph four under Section 6.4.3 Junction 9 (Maudlins Interchange) and Objective EDO 1.4 as follows:

These brownfield sites have also been designated as Regeneration Lands within the Plan (see Map 11.1). Proposals for development of these sites shall be of a high standard and quality having regard to their strategic location off the Maudlin's Interchange and as key gateway site to the town from the M7. A joint approach to the two landholdings shall be undertaken through the preparation of a comprehensive masterplan for the overall land parcel to ensure development does not take place in a piecemeal manner and integrates with existing development and infrastructure. It is imperative that development of the lands should not impact on the carrying capacity of the motorway network ~~and consultation with Transport Infrastructure Ireland (TII) is recommended in the preparation of a masterplan for the lands~~. Further details in respect of the overall development of these lands are set out in the Development Framework detailed in Chapter 10. It should be noted that Chapter 10 also contains two specific objectives (URD 1.12 and URD 1.13) to protect the integrity of the existing road network.

**EDO 1.4** Facilitate the regeneration and redevelopment of the lands to the east of the Dublin Road roundabout, in particular the Key Development Area at Junction 9 (Maudlins) (the former Donnelly Mirrors and Cemex Concrete sites), through a joint approach for the two landholdings through the preparation of a comprehensive masterplan comprising of an overall high quality design in recognition of its location as a key gateway site. ~~Consultation with Transport Infrastructure Ireland (TII)~~

*Adherence to the Design Framework set out in Chapter 10 is required in the preparation of any masterplan for these lands and adherence to the Design Framework set out in Chapter 10.*

### **Proposed Material Alteration**

Insert additional text in the third paragraph under Section 6.4.5, as follows:

This Plan promotes Naas as a sustainable international destination for ICT infrastructures such as data centres, in line with Regional Policy Objective 8.25. Two locations have been zoned for Data Centre/Warehouse locations within this Plan. Land has been designated between Junction 10 and Junction 9a, located centrally between two of the motorway junctions. The site will be served by the local road network which would disperse traffic between motorway interchanges to reduce any impacts on the motorway network. Another site has been selected to the southwest of the town. *Naas has been chosen as a suitable location for data centre development in recognition of its status as a Key Town. The sites identified in this LAP have the ability to cater for space extensive enterprises contiguous to the existing urban form, proximate to electricity and telecommunication infrastructure.* These lands are identified exclusively for Data Centres, to ensure the location of these types of proposals are controlled proximate to serviced areas of the county. The Council will not consider any alternative use on these lands, other than those associated with Data Centres (Objective EDO 1.12).

### **Proposed Material Alteration**

Amend EDO 1.9 of the Draft Plan as follows;

**EDO 1.9** To support and encourage the provision of ground floor live-work units and/or co-working spaces as part of mixed-use and residential developments in appropriate locations *with access to high quality public transport and/or active travel routes*, as a means of enlivening streets and to provide flexible accommodation for small businesses and remote working opportunities.

### **Proposed Material Alteration**

Amend objective EDO 1.9 as follows:

**EDO 1.9** Support and encourage *'living over the shop' initiatives, and* the provision of ground floor live-work units and/or co-working spaces as part of mixed-use and residential developments in appropriate locations, as a means of enlivening streets and to provide flexible accommodation for small businesses and remote working opportunities.

### **Proposed Material Alteration**

Amend EDO 2.2 of the Draft Plan as follows;



EDO2.2 Encourage the development of tourism activities such as water-based activities, cultural and agri-tourism, equine tourism and food markets in Naas, *including the promotion of Naas as a 'Foodie Hub'.*

### **Proposed Material Alteration**

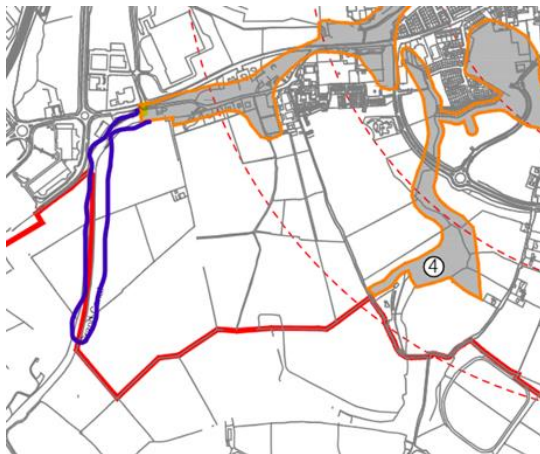
Insert the following additional objective under Section 6.6 as follows:

**EDO 3.10** *(a) Ensure no single retail convenience unit shall exceed 100sqm. Of net retail space on land that is zoned B: Existing Residential and C: New Residential.*  
*(b) Ensure no single unit shall exceed 200sqm of net retail space subject to a maximum number of three units on land that is zoned Neighbourhood Centre. The total net retail space shall not exceed 300sqm.*  
*© On land zoned for T: Mixed-Use and Q: Enterprise and Employment retail development shall be in accordance with the Retail Planning: Guidelines for Planning Authorities (2012) or any subsequent guidelines, with regards the protection of the national roads / motorways and associated junctions.*

## **Chapter 7: Natural Environment and Climate Change**

### **Proposed Material Alteration**

Amend Map 7.2 to extend the 'Green Infrastructure Corridor' for GI1 Grand Canal to include the area outlined in blue below (and any consequential amendments):



### **Proposed Material Alteration**

Amend Map 7.1 to change the reference from 'tree line' to 'hedgerow' for the section highlighted in the image below (and any consequential changes):



### Proposed Material Alteration

Amend Map 7.1 to remove the 'hedgerow' line along the western section of the Rathasker Lane Road.



### Proposed Material Alteration

Insert a new objective NE 2.3

**NE 2.3** *To support the preparation of a Biodiversity Action Plan for Naas including the development of a Community Biodiversity Toolkit.*

### Proposed Material Alteration

Insert a new objective NE 4.5

**NE 4.5** *Promote the use of pesticide-free and pollinator friendly fertilizers and other treatments used in gardens and public open spaces. Progress the reduction, and ultimate cessation, of use of such pesticides and treatments by Council staff on public lands.*

### Proposed Material Alteration

Insert a new objective NE 2.4

**NE 2.4** *Seek to develop an Invasive Species Action Plan for Naas, in collaboration with key stakeholders and community organisations.*

## **Chapter 8: Built Heritage**

### **Proposed Material Alteration**

Amend Objective BH 2.2 to include the following:

BH 2.2 Have regard to the Naas ACA Statement of Character and Kildare Shopfront Guidelines (2013) in the consideration of any shopfront or commercial proposals within the ACA. All proposals (contemporary or traditional,) must be of a high quality of design and finish, contributing positively to the established pattern, scale, materials and proportions of buildings *and should consider the use of the Irish language.*

## **Chapter 9: Infrastructure and Environmental Services**

### **Proposed Material Alteration**

Amend Map 9.1 LUZ SFRA Data Map (see Appendix 3) to include flood extents to the south of the map and to correct the labelling in the legend.

### **Proposed Material Alteration**

Insert new Objective IO 1.4 as follows:

**IO 1.4** *Any project which has the potential to significantly increase the demands on the water supply for the town (e.g. Data Centres) will be required to carry out an Appropriate Assessment to ascertain whether the project has the potential to cause adverse effects on the integrity of any European/Natura 2000 site. EPA and Irish Water abstraction licensing will also require Appropriate Assessment for a project which might significantly affect a European/Natura 2000 site.*

### **Proposed Material Alteration**

Amend Objective IO 3.1 as follows:

**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, ~~as outlined on SFRA map (Map Ref. 9.1)~~, are the subject of a site specific flood risk assessment appropriate to the nature and scale of the development being proposed.

*(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.*

Amend Objective IO 3.4 as follows:

**IO 3.4** All development proposals should apply the use of the sequential approach in terms of the site layout and design ~~and in satisfying the Justification Test (where required), the proposal will demonstrate that appropriate mitigation and management measures are put in place. The development proposals should ensure that no encroachment onto, or loss of, the flood plain, only water compatible development such as open space would be permitted for the lands which are identified as being at risk of flooding within that site.~~ *If there is a proportion of the site at risk of flooding, the sequential approach must be applied to ensure that there is no encroachment onto, or loss of, the flood plain. Only water compatible development such as Open Space should be permitted for the lands which are identified as being at risk of flooding within that site. This shall ensure that flood risk on sites can be managed through the sequential approach only, without the requirement for further mitigation measures. If this cannot be achieved the applicant must clearly show that the sequential approach cannot be followed, they must satisfy all the criteria of the Justification Test and demonstrate that appropriate flood mitigation and management measures are put in place.*

## **Chapter 10: Urban Regeneration and Development Strategy**

*Maudlin Interchange Key Development Area*

### **Proposed Material Alteration**

Insert text under paragraph two, Section 10.6.2 Junction 9 (Maudlins) Key Development Area, as follows:

The biggest constraining factor to the comprehensive redevelopment of the site has been identified as the capacity of Junction 9 which has been further highlighted in the Naas/Sallins Transport Strategy (2020). Of critical concern, is a development type that might generate a peak traffic flow, which could result in queuing on the existing public road network, specifically south bound traffic on the M7 which may cause a traffic hazard. However, it is important to note that there is significant capacity for internal vehicular queuing (up to c. 800m) – though a new internal road network to reduce or remove any impacts on the public road network. In order to address this, there shall be a requirement that any application for development within this KDA be accompanied by a shared vision for the two sites *through the preparation of a masterplan*, with a shared ingress-egress strategy and a comprehensive Traffic and Transport Assessment for the KDA in its entirety.

### **Proposed Material Alteration**

Amend objective NWQ 1.1, as follows:

**NWQ 1.1** Require the preparation of a masterplan (to be developed in conjunction with relevant environmental/flood risk/transport assessments) for the

NWQ giving full consideration to the type and intensity of development relative to future transport options and in particular public transport. The masterplan shall be subject to the considerations and specifications outlined in the Urban Development Strategy detailed in Chapter 10, to ensure that the future development of the Northwest Quadrant takes place in a co-ordinated and integrated manner.

- i) No development shall take place on the lands identified within the Northwest Quadrant (zoned Strategic Reserve or New Residential) until such time as a masterplan is prepared and integrated into the Naas Local Area Plan by way of a statutory amendment to the Local Area Plan, pursuant to Section 20 of the Planning and Development Act 2000 (as amended).
- j) No masterplan shall be completed until the OPW Flood Study has been finalised for the lands in the Northwest Quadrant.
- k) The masterplan shall include (but not be restricted to):
  - vii. A phasing infrastructure programme including physical, social, transport and economic infrastructure.
  - viii. Site-Specific Flood Risk Assessment for the masterplan lands.
  - ix. Transport Impact Assessment.
  - x. Water and wastewater network requirements including assessments regarding the capacity of receiving environments.
  - xi. Associated Environmental Assessments and appropriate climate proofing measures
  - xii. *A surface water management plan, to review the storm water network and identify areas for SuDS solutions*
- ~~l) Individual applications for smaller sections of the Northwest Quadrant masterplan lands shall not be considered by the Planning Authority or An Bord Pleanála until the masterplan is integrated into the Local Area Plan in accordance with (a) above.~~

#### Proposed Material Alteration

Amend objective NWQ 1.1, as follows:

**NWQ 1.1** Require the preparation of a masterplan (to be developed in conjunction with relevant environmental/flood risk/transport assessments) for the NWQ giving full consideration to the type and intensity of development relative to future transport options and in particular public transport. The masterplan shall be subject to the considerations and specifications outlined in the Urban Development Strategy detailed in Chapter 10, to ensure that the future development of the Northwest Quadrant takes place in a co-ordinated and integrated manner.

- m) No development shall take place on the lands identified within the Northwest Quadrant (zoned Strategic Reserve ~~or New Residential~~, *New Residential (inc. Phase 2) and Commercial/Residential*) until such time as a masterplan is prepared and integrated into the Naas Local Area Plan by way of a statutory amendment to the Local Area Plan, pursuant to Section 20 of the Planning and Development Act 2000 (as amended).



- n) No masterplan shall be completed until the OPW Flood Study has been finalised for the lands in the Northwest Quadrant.
- o) The masterplan shall include (but not be restricted to):
  - i. A phasing infrastructure programme including physical, social, transport and economic infrastructure.
  - ii. Site-Specific Flood Risk Assessment for the masterplan lands.
  - iii. Transport Impact Assessment.
  - iv. Water and wastewater network requirements including assessments regarding the capacity of receiving environments.
  - v. Associated Environmental Assessments and appropriate climate proofing measures
- ~~p) Individual applications for smaller sections of the Northwest Quadrant masterplan lands shall not be considered by the Planning Authority or An Bord Pleanála until the masterplan is integrated into the Local Area Plan in accordance with (a) above.~~

#### **Proposed Material Alteration**

Insert an additional action under Section 10.8 Urban Regeneration and Urban Development, as follows:

- *To carry out preliminary traffic modelling on the Junction 9 (Maudlins) lands to inform the use, quantum and intensity of development that would be appropriate for the site.*

#### **Proposed Material Alteration**

Amend and insert additional text under Objective URD 1.12, under Section 10.8 as follows:

- URD 1.12** Carry out preliminary traffic modelling and to produce an Access Strategy for lands zoned Commercial at the Junction 9 (Maudlins) Key Development Area ~~in consultation with relevant stakeholders including Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA).~~ These will identify the *use*, quantum *and intensity* of development that can be facilitated at the location complementary to safeguarding the strategic function and safety of the national road network, in accordance with the provisions of official policy outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). The study will also identify any improvements required to the local transport network to accommodate the extent of development proposed. *No masterplan shall be prepared for the subject lands until such time as the Council has completed and agreed the traffic modelling.*

### Proposed Material Alteration

Insert additional text under Objective URD 1.13, under Section 10.8 as follows:

- URD 1.13** Require that any application for development within the Junction 9 (Maudlins) Key Development Area (KDA) be accompanied by a shared/agreed vision for the KDA *through the preparation of a comprehensive masterplan* and by a comprehensive Traffic and Transport Assessment.

### Proposed Material Alteration

Amend the Urban and Regeneration Strategy to provide support for the Naas Town Renewal Masterplan, as follows:

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.*

*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.*

Amend the heading of existing section 10.5 Public Realm Strategy, as follows:

#### *10.5.1 Public Realm Strategy*

Insert the following new objective after objective URD 1.10 and renumber all subsequent objectives accordingly:

- URD 1.11 To prepare a Town Renewal Plan to guide the long term regeneration of Naas. This plan will incorporate a Health Check and detailed Urban Design Analysis and implement its recommendations on a phased basis over the lifetime of the Plan and beyond.*

Amend the Objective URD 1.11 as follows:

- URD 1.11** Prepare a Public Realm Strategy ~~for Naas~~, *either as part of, or an action of the Town Renewal Plan for Naas.* ~~s~~Such a strategy shall focus on the identified Core Regeneration Areas and seek to implement its provisions on a phased basis over the life of the Plan and beyond.

Insert the following action into the list of actions outlined in Section 10.8 Urban Regeneration and Urban Development:



- *To work with relevant agencies and stakeholders to prepare a Town Renewal Plan to include a retail health check survey in the town centre and identify actions to support town centre regeneration.*

This proposed material alteration may result in consequential alterations in other sections of the draft Plan.

## **Chapter 11: Land Use Zoning Objectives and Implementation**

### **Proposed Material Alteration**

Amend sites Q (5), H (4), C (3), C (8) and 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 (see Appendix 3).

### **Proposed Material Alteration**

Amend the Zoning Matrix to include for Retail Warehousing as follows:

**Table 11.3 Land Use Zoning Matrix**

| LAND USE                  | A: Town Centre | B: Existing Residential | C: New Residential | E: Community & Educational | F: Open Space & Amenity | F2: Strategic Open Space | G: Green Belt | H: Industry & Warehousing | I: Agriculture | K: Commercial/Residential | L: Leisure & Amenity | N: Neighbourhood Centre | P: Data Centre / Warehouse | Q: Enterprise & Employment | R: Retail/Commercial | U: Utilities/Services |
|---------------------------|----------------|-------------------------|--------------------|----------------------------|-------------------------|--------------------------|---------------|---------------------------|----------------|---------------------------|----------------------|-------------------------|----------------------------|----------------------------|----------------------|-----------------------|
| <i>Retail Warehousing</i> | Y              | N                       | N                  | N                          | N                       | N                        | N             | N                         | N              | N                         | N                    | N                       | N                          | N                          | O                    | N                     |

### **Proposed Material Alteration**

Amend the zoning at Junction 9 (Maudlins) KDA to 'T: Mixed Use' and all associated consequential amendments.

| LAND USE                                    | A: Town Centre | B: Existing Residential | C: New Residential | E: Community & Educational | F: Open Space & Amenity | F2: Strategic Open Space | G: Green Belt   | H: Industry & Warehousing | I: Agriculture  | K: Commercial/Residential | L: Leisure & Amenity | T: Mixed - Use  | N: Neighbourhood Centre | P: Data Centre / Warehouse | Q: Enterprise & Employment | R: Retail/Commercial | U: Utilities/Services |
|---------------------------------------------|----------------|-------------------------|--------------------|----------------------------|-------------------------|--------------------------|-----------------|---------------------------|-----------------|---------------------------|----------------------|-----------------|-------------------------|----------------------------|----------------------------|----------------------|-----------------------|
| Amusement Arcade                            | O              | N                       | N                  | N                          | N                       | N                        | N               | N                         | N               | N                         | N                    | N               | N                       | N                          | N                          | N                    | N                     |
| Agricultural Buildings                      | N              | N                       | N                  | N                          | N                       | O                        | O               | O                         | Y               | N                         | N                    | N               | N                       | N                          | N                          | N                    | N                     |
| Car Park (other than ancillary)             | Y              | N                       | N                  | O                          | N                       | N                        | N               | O                         | N               | O                         | O                    | O               | N                       | N                          | N                          | O                    | O                     |
| Betting Office                              | O              | N                       | N                  | N                          | N                       | N                        | N               | N                         | N               | N                         | N                    | N               | O                       | N                          | N                          | N                    | N                     |
| Cemetery                                    | N              | N                       | N                  | Y                          | N                       | N                        | N               | N                         | O               | N                         | N                    | N               | N                       | N                          | N                          | N                    | N                     |
| Cinema                                      | O              | N                       | N                  | N                          | N                       | N                        | N               | N                         | N               | O                         | N                    | O               | N                       | N                          | N                          | O                    | N                     |
| Community / Recreational / Sports buildings | Y              | O                       | O                  | Y                          | Y                       | O                        | N               | N                         | O               | O                         | Y                    | O               | O                       | N                          | N                          | O                    | N                     |
| Crèche/ Playschool                          | Y              | O                       | Y                  | Y                          | N                       | N                        | N               | N                         | N               | O                         | O                    | O               | O                       | N                          | O                          | O                    | N                     |
| Cultural Uses/Library                       | Y              | O                       | O                  | Y                          | O                       | O                        | N               | N                         | N               | O                         | O                    | O               | O                       | N                          | N                          | N                    | N                     |
| Dancehall/ Disco                            | O              | N                       | N                  | N                          | N                       | N                        | N               | N                         | N               | N                         | O                    | N               | N                       | N                          | N                          | N                    | N                     |
| Data Centre                                 | N              | N                       | N                  | N                          | N                       | N                        | N               | N                         | N               | O                         | N                    | O <sup>38</sup> | N                       | Y                          | N                          | N                    | N                     |
| Dwelling                                    | Y              | Y                       | Y                  | O <sup>39</sup>            | N                       | N                        | O <sup>40</sup> | N                         | O <sup>41</sup> | O <sup>42</sup>           | N                    | N               | O                       | N                          | N                          | N                    | N                     |
| Emergency Residential Accommodation         | Y              | O                       | O                  | Y                          | N                       | N                        | N               | N                         | N               | O                         | O                    | O               | Y                       | N                          | N                          | N                    | N                     |
| Funeral Homes                               | Y              | N                       | N                  | O                          | N                       | N                        | N               | N                         | N               | O                         | N                    | O               | O                       | N                          | N                          | N                    | N                     |
| Garage/Car Repairs                          | N              | N                       | N                  | N                          | N                       | N                        | N               | Y                         | N               | N                         | N                    | N               | N                       | N                          | N                          | O                    | N                     |
| Group/Special Needs Housing                 | Y              | Y                       | Y                  | O <sup>43</sup>            | O                       | N                        | N               | N                         | O               | O <sup>44</sup>           | N                    | N               | O                       | N                          | N                          | N                    | N                     |

<sup>38</sup> A data centre will only be considered on the site at Maudlins Interchange towards the eastern boundary of the site.

<sup>39</sup> Ancillary to health/community use, and/or to meet group/special needs housing.

<sup>40</sup> Subject to Rural Housing Policy as outlined in the Kildare County Development Plan.

<sup>41</sup> Subject to Rural Housing Policy as outlined in the Kildare County Development Plan.

<sup>42</sup> No residential development will be permitted within the Commercial/Residential lands at the Maudlins Interchange.

<sup>43</sup> For further information on group/special needs housing refer to Section 4.4.1 of this Plan.

<sup>44</sup> No group/special needs housing will be permitted within the Commercial/Residential lands at the Maudlins Interchange.

| LAND USE                         | A: Town Centre | B: Existing Residential | C: New Residential | E: Community & Educational | F: Open Space & Amenity | F2: Strategic Open Space | G: Green Belt | H: Industry & Warehousing | I: Agriculture | K: Commercial/Residential | L: Leisure & Amenity | T: Mixed - Use  | N: Neighbourhood Centre | P: Data Centre / Warehouse | Q: Enterprise & Employment | R: Retail/Commercial | U: Utilities/Services |
|----------------------------------|----------------|-------------------------|--------------------|----------------------------|-------------------------|--------------------------|---------------|---------------------------|----------------|---------------------------|----------------------|-----------------|-------------------------|----------------------------|----------------------------|----------------------|-----------------------|
| Guest House/Hotel/Hostel         | Y              | O                       | O                  | N                          | N                       | N                        | N             | N                         | N              | O                         | Y                    | O               | O                       | N                          | N                          | N                    | N                     |
| Heavy Commercial Vehicle Park    | N              | N                       | N                  | N                          | N                       | N                        | N             | Y                         | N              | O                         | N                    | O <sup>45</sup> | N                       | N                          | O <sup>46</sup>            | N                    | O                     |
| Hot food take-away               | O              | N                       | N                  | N                          | N                       | N                        | N             | N                         | N              | O                         | N                    | O               | O                       | N                          | N                          | O                    | N                     |
| Industry (light)                 | O              | N                       | N                  | N                          | N                       | N                        | N             | Y                         | N              | O                         | N                    | O               | N                       | N                          | O                          | O                    | N                     |
| Industry (general)               | N              | N                       | N                  | N                          | N                       | N                        | N             | Y                         | N              | N                         | N                    | N               | N                       | N                          | N                          | N                    | O                     |
| Medical Consultant/Health Centre | Y              | O                       | O                  | Y                          | N                       | N                        | N             | N                         | N              | O                         | O                    | O               | Y                       | N                          | O                          | O                    | N                     |
| Motor Sales                      | O              | N                       | N                  | N                          | N                       | N                        | N             | Y                         | N              | O                         | N                    | O               | N                       | N                          | N                          | O                    | N                     |
| Nursing Home                     | Y              | Y                       | Y                  | O                          | N                       | N                        | N             | N                         | N              | O                         | N                    | O               | N                       | N                          | N                          | N                    | N                     |
| Offices                          | Y              | O <sup>47</sup>         | O <sup>48</sup>    | N                          | N                       | N                        | N             | O                         | N              | O                         | N                    | O               | O                       | N                          | O <sup>49</sup>            | O                    | N                     |
| Park /Playground                 | Y              | Y                       | Y                  | Y                          | Y                       | Y                        | N             | N                         | O              | O                         | Y                    | O               | O                       | N                          | N                          | N                    | N                     |
| Service Station                  | N              | N                       | O                  | N                          | N                       | N                        | N             | Y                         | N              | O                         | N                    | O               | O                       | N                          | O                          | O                    | O                     |
| Place of Worship                 | Y              | O                       | O                  | Y                          | N                       | N                        | N             | N                         | N              | O                         | O                    | O               | O                       | N                          | N                          | N                    | N                     |
| Playing Fields                   | O              | O                       | O                  | Y                          | Y                       | Y                        | N             | N                         | O              | N                         | Y                    | N               | N                       | N                          | O                          | N                    | N                     |
| Pub                              | Y              | N                       | O                  | N                          | N                       | N                        | N             | N                         | N              | O                         | O                    | O               | O                       | N                          | N                          | O                    | N                     |
| Restaurant                       | Y              | O                       | O                  | N                          | N                       | N                        | N             | O                         | N              | O                         | O                    | O               | O                       | N                          | O                          | O                    | N                     |
| School                           | Y              | O                       | O                  | Y                          | O                       | N                        | N             | N                         | N              | O                         | N                    | O               | N                       | N                          | N                          | N                    | N                     |
| Shop (Comparison)                | Y              | N                       | N                  | N                          | N                       | N                        | N             | N                         | N              | N                         | N                    | N               | N                       | N                          | N                          | O                    | N                     |

<sup>45</sup> A heavy commercial vehicle park will only be considered on the eastern side(rear) of the site of Junction 9 (Maudlins) KDA.

<sup>46</sup> Any such development within the Northwest Quadrant will need to consider the overall development strategy of high-end office complexes and campus style developments for this area.

<sup>47</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>48</sup> Proposals of this nature shall be restricted to a gross floor area of 100sqm.

<sup>49</sup> Proposals of this nature shall be in excess of a gross floor area of 100sqm.

| LAND USE                           | A: Town Centre | B: Existing Residential | C: New Residential | E: Community & Educational | F: Open Space & Amenity | F2: Strategic Open Space | G: Green Belt | H: Industry & Warehousing | I: Agriculture | K: Commercial/Residential | L: Leisure & Amenity | T: Mixed - Use  | N: Neighbourhood Centre | P: Data Centre / Warehouse | Q: Enterprise & Employment | R: Retail/Commercial | U: Utilities/Services |
|------------------------------------|----------------|-------------------------|--------------------|----------------------------|-------------------------|--------------------------|---------------|---------------------------|----------------|---------------------------|----------------------|-----------------|-------------------------|----------------------------|----------------------------|----------------------|-----------------------|
| Shop (Convenience)                 | Y              | O <sup>50</sup>         | O <sup>51</sup>    | N                          | N                       | N                        | N             | N                         | N              | O <sup>52</sup>           | N                    | O <sup>53</sup> | O <sup>54</sup>         | N                          | O <sup>55</sup>            | Y                    | N                     |
| Stable Yard                        | N              | N                       | N                  | N                          | O                       | O <sup>56</sup>          | O             | N                         | Y              | N                         | N                    | N               | N                       | N                          | N                          | N                    | N                     |
| Tourist Related Facilities         | Y              | O                       | O                  | O                          | O                       | O                        | N             | N                         | O              | O                         | O                    | O               | O                       | N                          | O                          | O                    | N                     |
| Utility Structures                 | O              | O                       | O                  | O                          | O                       | N                        | O             | O                         | O              | O                         | O                    | O               | O                       | O                          | O                          | O                    | Y                     |
| Warehouse (wholesale) /Store/Depot | O              | N                       | N                  | N                          | N                       | N                        | N             | Y                         | N              | O                         | N                    | O               | N                       | N                          | N                          | N                    | N                     |

**Table 11.1 Land-Use Zoning Objectives**

*T: Mixed Use: To provide for general commercial/industrial/enterprise uses.*

### Proposed Material Alteration

Insert a Specific Objective for the amended zoning on the Junction 9 (Maudlins) KDA in Table 11.1 Land Use Zoning Objectives.

#### Specific Objective

T: Mixed -Use Junction 9 (Maudlins): *The owner/developer of the subject lands is required to prepare a masterplan for the overall land parcel, having regard to the traffic modelling carried out by the Council.*

### Proposed Material Alteration

Amend the title of the P: Data Centre /Warehouse (C4) to P: Data Centre (C7) and any consequential amendments.

<sup>50</sup> No single unit shall exceed 100sqm. of net retail space.

<sup>51</sup> No single unit shall exceed 100sqm. of net retail space.

<sup>52</sup> Retail development shall be in accordance with the Retail Planning: Guidelines for Planning Authorities (2012) or any subsequent guidelines.

<sup>53</sup> Retail development shall be in accordance with the Retail Planning: Guidelines for Planning Authorities (2012) or any subsequent guidelines.

<sup>54</sup> No single unit shall exceed 200sqm of net retail space subject to a maximum number of three units. The total net retail space shall not exceed 300sqm.

<sup>55</sup> Retail development shall be in accordance with the Retail Planning: Guidelines for Planning Authorities (2012) or any subsequent guidelines.

<sup>56</sup> Extensions to existing facilities only.

Amend table 11.1 from P: Data Centre /Warehouse (C4) to P: Data Centre (C7)

Amend Table 11.1.1 from P: Data Centre /Warehouse (C4) to P: Data Centre (C7)

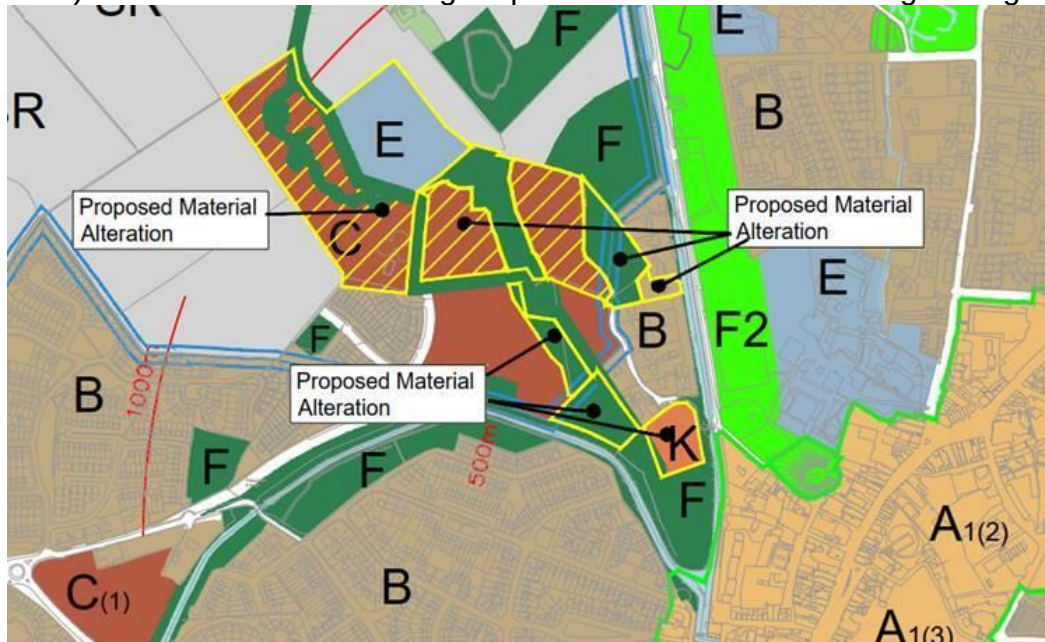
**EDO 1.12** Facilitate the location of Data Centre development on land designated P: Data Centre/[Warehouse](#) at Caragh Road South and Jigginstown for the identified land use only subject to appropriate environmental and transport impact assessments.

### Proposed Material Alteration

To change Land Use Zoning Map 11.1 by changing the zoning objective of a 2.2 ha site within the NWQ from SR to E: Community & Education. (See Appendix 3).

### Proposed Material Alteration

b) 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:

- C: New Residential Phase 2.
- F: Open Space and Amenity
- K: Commercial/Retail

This extract also shows the proposed 'E: Community & Education' proposed material alteration which is recommended in response to the submission from the Department of Education. It is shown here for clarity purposes.

**(b) Include new 2<sup>nd</sup> 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.*

Note: The proposed changes to Map 9.1 LUZ SFAR and Map 11.1 are contained in Appendix 3 of this report.