Chief Executive's Report

On Submissions/Observations Received on Proposed Material Alterations to the Draft Naas Local Area Plan 2021 - 2027





Appendix 1: Summary of Submissions/Observations Received

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The submissions / observations summarised in Appendix 1 **exclude** the submissions made by the Office of the Planning Regulator (OPR) and the Prescribed Authorities as follows:

• KCC-C37 ending – 2, 6, 7, 9, 11, 15, 16, 19, 79, 86, 132, 136 and 149.

The submission/observation received from the Office of the Planning Regulator (Reference KCC-C37-132) is summarised in Section 3 of the Chief Executive's Report.

Submissions/observations received from the Prescribed Authorities are summarised in Section 4 of the Chief Executive's Report.

Sub. No.	Name	Summary of Submission
KCC- C37-2	EPA	This is a submission from a Prescribed Authority (refer to Section 4 of the Chief Executive's Report).
KCC- C37- 3	David Monaghan	The submission states that area zoned for Town Centre uses (A) should not permit retail warehousing and smaller units only should be planned for.
KCC- C37-4	Emmet Kelly	Traffic lights are needed at Roseville Estate on the Dublin Road. Children are crossing four lanes of traffic to reach school bus. The bus stop serves a large population and crossing the road is difficult especially for those with limited mobility or who are vulnerable.
KCC- C37-5	Joanne Pender	 The submission proposes an amendment to Objective EDO 1.12 which relates to PMA No. 29. The following are the changes (in red) that have been put forward in the submission: a) Facilitate the location of Data Centre development on land designated P: Data Centre at Caragh Road South and Jigginstown for the Identified land use only subject to appropriate environmental assessments, heat mapping, transport impact assessments and consideration of the <i>cumulative</i> impact on the electricity network supply capacity and targeted reductions in greenhouse gas emissions.

Sub. No.	Name	Summary of Submission
		 b) Any data centre project will be required to include measures to generate <i>renewable</i> energy on site equal to or greater than their demand as part of the overall development proposal. c) That any data centre project can only be considered if it does not negatively impact or cause to negatively affect the goals/targets/aims set out by Kildare's Climate Change Adaptation Strategy 2019-2024.
		The submission also attaches the Commission for Regulation of Utilities consultation of Data Centre Measures and requests that it is considered as part of the submission.
		 The submission states that the Commission has given stark warning that if we do nothing to manage the supply/demand balance, the power grid is under threat from electricity required for data centres.
		 Data centres could account for a third of all electricity by 2030.
		 Measures must be implemented to protect the supply of energy.
		Data centre growth is unprecedented.
		 Growth annually equivalent to 140,000 households been added each year and set to increase by 33% yet again.
		Extremely large loads at one site.
		 To put the load in the context, a data centre with a load of 60MVA would be comparable to the load usage of a large town/small city as Kilkenny in one site.
		 Amsterdam halted building permits in parts of the city and Singapore imposed a moratorium in 2019.
		 Consideration needs to be given as to whether Naas is within a constrained or unconstrained region of the electricity supply.
		 Has any proposed data centre the ability to bring onsite dispatchable generation (and or storage) equal to or greater than their demand of energy in order to support security of supply and how sustainable is the source of this energy.
		Data centres should be flexible to reduce consumption when requested to do so in public interest.

Sub. No.	Name	Summary of Submission
		The submission calls for stronger language in the Plan, backed up by real oversight and strict implementation in relation to considering data centres. 'To consider', 'where possible' is too weak and does nothing to protect the energy infrastructure or progress our climate change targets.
		Specific targets and or thresholds for energy/water consumption based on scientific evidence should be used to ensure a data centre does not negatively impact the efforts to reduce climate emissions and reach our climate change targets.
		If 100% renewable is not possible then a target must be set that is high enough to balance the negative environmental impacts, with a plan in place with a set timeframe to meet the renewable target or else there is a significant disincentive attached and or a clause in place to shut down or reduce operations until it meets required targets.
		CRU Proposed Direction to the System Operators related to Data Centre Grid Connection (Commission for Regulation of Utilities, July 2021)
		CRU's mission to protect public interest in Water, Energy and Energy Safety.
		The document is a consultation paper, which outlines the proposed criteria to process connections to the grid.
		Data centres are having a major impact on Irish electricity system, measures must be implemented to encourage data centres to address some the risks.
		Eirgrid in a letter to CRU outlined its concerns in relation to offering further connection offers to connect data centre under the current policy and highlighted the potential impact on the worsening security of supply situation.
		The Proposed Direction is intended to allow the data centre community to collaborate with the System Operators and contribute to the mitigation of the challenges faced.

Sub. No.	Name	Summary of Submission
		 Data centres are the largest demand driver out of all the demand connected customer groups. The rate at which data centres are seeking to grow is unprecedented. Over the last four years EirGrid have seen annual increases in demand usage of around 600 GWh from data centres alone –equivalent to the addition of 140,000 households to the power system each year. In the absence of data centres, Ireland would be experiencing much more modest electricity demand growth, consistent with population growth, general economic development and the general development of industrial demand. EirGrid have highlighted the considerable challenge the electricity consumer faces over the coming years. The worst outcome of which could result in load shedding and ultimately rolling blackouts.
		 Connection Measures Location a constrained or unconstrained region of the electricity system. The ability to bring onsite dispatchable generation (and/or storage) equal to or greater than their demand, which meets appropriate availability and other technical requirements as may be specified by EirGrid, to support security of supply. The ability of each data centre applicant to provide flexibility in their demand by reducing consumption when requested to do so in times of system constraint through the use of dispatchable on - site generation (and/or storage). The ability to provide flexibility in demand by reducing consumption when requested to do so in times of system constraint through the use of dispatchable on - site generation (and/or storage). The ability to provide flexibility in demand by reducing consumption when requested to do so in times of system constraint, in order to support security of supply.
KCC- C37-6	DoECC	This is a submission from a Prescribed Authority (refer to Section 4 of the Chief Executive's Report).
KCC- C37-7	Meath County Council	This is a submission from a Prescribed Authority (refer to Section 4 of the Chief Executive's Report).

Sub. No.	Name	Summary of Submission
KCC- C37-8	Caroline McLoughlin	MTO 3.3 - The submission rejects any version of the Gallops Avenue and an alternative route to the east of the racecourse should be the only route considered.
		MTO 3.9 - An Outer Relief Road should be a stated objective rather than to 'investigate the feasibility' for the route.
KCC- C37-9	ТІІ	This is a submission from a Prescribed Authority (refer to Section 4 of the Chief Executive's Report).
KCC- C37- 10	Claudia Stone	 Strongly oppose the plan for the Gallops Avenue. Defeated democratically. Concern over impacts on the environment, noise, air, privacy and dangerous traffic volume.
KCC- C37- 11	Dept of Transport	This is a submission from a Prescribed Authority (refer to Section 4 of the Chief Executive's Report).
KCC- C37- 12	Roisin Stewart	MTO 3.3 - The submission rejects any version of the Gallops Avenue and an alternative route to the east of the recourse should be the only route considered. MTO 3.9 - An Outer Relief Road should be a stated objective rather than an investigation of the feasibility.
KCC- C37- 13	Rioghnagh Bracken	 Observation on amendment to EDO 1.12. EirGrid calculate that by 2028 data centres will be consuming 29% of Ireland's electricity. Data centres will make it impossible for us to adhere to emissions levels. One of Europe's worse carbon emissions offenders and will increase with new data centres being constructed. Water usage Naas already has difficulties. Pollution from backup generators Securing the rare earth material for building such centres.

Sub. No.	Name	Summary of Submission
KCC- C37- 14	Rioghnagh Bracken	 Modal shift Targets are not feasible as most walkers and cyclist tend to take the quicker/shorter route to their destination. Temporary cycle lanes should be put in now if the future plan is to pedestrianise the Main Street. Pedestrian measure at Jigginstown Green will disturb the water table and interfere with attenuation. No infrastructure for cycle lanes along the R445, Sallins Road and New Caragh Road.
KCC- C37- 15	ТІІ	This is a submission from a Prescribed Authority (refer to Section 4 of the Chief Executive's Report).
KCC- C37- 16	HSE	This is a submission from a Prescribed Authority (refer to Section 4 of the Chief Executive's Report).
KCC- C37- 17	Eddie Lenehan	 MTO 3.3 – object to the Gallops Avenue. Queries why included in the Plan when democratically rejected. Need for an orbital route. MTO 3.9 should be worded differently to give urgency. Plan is light on green initiatives. Questions whether Naas is cocooned from climate change and the Plan should maximise carbon reduction. The Gallops Avenue is anti-climate, anti-democratic, anti-health and welfare. A solution before climate emergency compelled us to rethink transportation.
KCC- C37- 18	Mountain View Resident's Association	 Consistently reject the Inner Relief Road /Gallops Avenue Rejected previously Bring more traffic onto the Blessington Road including HGVs. Increased pollution and noise. Safety concerns. Provide and alternative route to the east of the racecourse. Outer Orbital Route should be a stated objective rather than to investigate the feasibility.

Sub. No.	Name	Summary of Submission
KCC- C37- 19	NTA	This is a submission from a Prescribed Authority refer to Section 4 of the Chief Executive's Report.
KCC- C37- 20	Lena Lenehan	 MTO 3.3 - Completely rejects any version of a proposed Gallops Avenue. MTO 3.3 - States that an alternative route to the East of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected on numerous occasions. MTO 3.9 - States that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC- C37- 21	Pat Breen	 MTO 3.3 - Rejects any version of a proposed Gallops Avenue. MTO 3.3 - States that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9 - Submits that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC- C37- 22	Kathleen Moran	 Opposes the proposed Gallops Avenue. States that this has already been rejected by the democratically elected representatives of Naas Municipal District following elections in 2019. States that an alternative route to the east of the racecourse should be the only route considered and an outer orbital route should be a stated objective in the LAP - rather than an investigation of feasibility into such a route.
KCC- C37- 23	Carole Frost	 MTO 3.3 - Rejects any version of a proposed Gallops Avenue. MTO 3.3 - States that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9 - States that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC- C37- 24	Kevin Greene	 Out of Town Retailing (Proposed Material Alterations No. 31 and No. 51 and No. 55) States that his previous submission, on the draft LAP, drew attention to the need to ensure that there would be no more mistakes, such as the District Centre Zoning that was in the 1998 Naas Development Plan, which led to the planning permission for Tesco on the Monread Road, and the consequent loss of retail development from the town centre.

Sub. No.	Name	Summary of Submission
		 Notes that the need to ensure that our town centre is revitalized and restored commendably runs through many of the general objectives set out in the LAP and that it is heartening to see, some movement with the long-delayed town centre development beside the Main Street. Submits that the Council appears to have again missed the point – that we cannot allow any more large-scale retailing outside the town centre. Otherwise, all of the objectives of restoring out town centre will be just wishful thinking. This is why material Alterations 31 And 51 are unacceptable. Material Alteration No. 31: Notes that by inserting a "Mixed Use" zoning for the Maudlins Junction properties that were formerly Cemex and Donnelly Mirrors, would, in reality, allow for a large scale District Centre type retail development on this site. Further notes that the LAP suggests, in Material Amendment No. 55, that the owner/developer of these lands would prepare a masterplan. Unlike the situation with the North-West Quadrant, where a material amendment to the LAP would be prepared by the Council, and adopted, here there would be a non-statutory masterplan, with no input by the public at all, and indeed no input by Transport Infrastructure Ireland (despite it being beside the N7/M7 Junction 9).
		 States that the "Mixed Use" zoning allows for convenience retailing as being "open for consideration" (with no limits on the size of such a retail unit). It also stated that comparison retailing is "not normally permitted". However, it notes Material Amendment No. 51 seeks to change "not permitted" to "not normally permitted", and states that developments of this type would not be permitted "except in very exceptional circumstances". States that what this phrase means is not defined. So, the reality is that a developer could prepare a masterplan, with a large shopping centre, with both convenience retail and also potentially comparison retailing The only control on retailing that is mentioned in the Amended Draft LAP is that retailing would comply with the Retail Planning Guidelines (the very Guidelines that allows for District Centres, and it was these Guidelines that led to the development of Tesco on Monread Road, which the developer at the time argued was a "District Centre". It is therefore proposed that: Material Amendment 51 be removed, and that the following text be added to Material Amendment 31. "<i>In this Mixed Use zone, the total retail floorspace on the combined lands shall not exceed 1,200 sq metres net retail floorspace, notwithstanding anything in the Retail Planning Guidelines.</i>"

Sub. No.	Name	Summary of Submission
KCC- C37- 25	Kevin Greene	 Gallops Avenue Notes that it is regrettable that the Council did not accede to the very many objections and submissions in relation to the Gallops Avenue. States that the material amendments that are now before the public for consultation on this issue are Material Amendments 21 and 22, and are simply unacceptable to the many residents who made these objections and submissions. Notes that as the law stands, it is not possible now to go back to the draft LAP, as changes are limited to the material amendments. Outlines the following proposals are made: Renove the last bullet point in Material Alteration 21, and Re-word material Alteration 22, so that it reads as follows: "Provide an outer relief road, located on a corridor to the east of the racecourse, linking the Blessington road and Tipper Road with the Dublin Road at its junction with Fishery Lane. This outer relief road is to be provided within the period of the Local Area Plan." Requests that the elected members put forward a motion in these terms for the following Reasons: The Amended Draft plan merely seeks to "investigate the feasibility" of the outer relief road. States that this means nothing in reality given that the flawed AECOM traffic strategy dismissed alternative 1A to the so-called "Gallops Avenue", which is the alternative route to the east of the racecourse, solely on the basis of traffic levels, and completely ignored the environmental and residential disamenity impacts of the Gallops Avenue. Further states that the residents are unwilling to believe that the objective of "investigating the feasibility" of this route is other than a re-run of that flawed exercise. Notes that in the SEA Addendum report (paragraph 23) the Council specifically states that "the proposed material alteration focuses on the investigation for feasibility and does not specify that the development of the road will be completed within the lifetime of the plan.") The submission s
KCC- C37- 26	Kevin Greene	 Additional Residential Zonings Notes that the Council has significantly increased the residential densities, and therefore the number of residential units that can be expected in Table 3.5 (Material Amendment No 1). States that while this is clearly a response to the central government requirements of increasing densities, and therefore is understandable, the logical result of this increase should have been a reduction in the

Sub. No.	Name	Summary of Submission
		 amount of land to be zoned for residential purposes (both "existing residential/infill and "New Residential" Zonings). Submits that instead, the Council appears to be increasing the amount of land zoned for this purpose, from 37.2 hectares to 44.87 hectares (with a corresponding population increase from between 1,342 to 1,626 persons to a range of 1,800 to 2,222 persons amounting to approximately a 20% increase. Submits that no justification or rationale for this increase can be found in the documents put forward by the Council for consultation. States that the following proposed rezonings should be reversed: Material Amendment 61. This involves a series of re-zonings from "Strategic Reserve" to New "Residential Phase 2" and to "Retail Commercial", on lands close to the Canal Harbour, and within the North-West Quadrant area. States that these re-zonings are irrational, and indeed were specifically advised against by the Council's own flood risk consultants (page 8 of the Strategic Flood Risk Assessment Addendum Report, which states as follows "<i>It is recommended that the current zoning of Strategic Reserve is maintained until completion of the updated flood mapping and the sequential approach can accurately be applied.</i>" Material Amendment 71. States that this would lead to a loss of lands zoned for employment in the town but would not allow for immediate residential development (as it is "Phase 2"). Submits that no rationale has been given as to why this is necessary. States that if there was a shortage of lands, during the period of the Plan, that were available for residential purposes, this could be re-zoned at that time, by way of an amendment. Argues that re-zoning it now simply serves to increase its value to the landowner, to no public benefit. Material Amendment 73. This involves rezoning lands on the Kilcullen Road, of 5.2 hectares, currently New Residential Phase 2" to "New residential", thereby allowing its imm

Sub.	Name	Summary of Submission
Sub. No. KCC- C37- 27	Name Mark Noonan	 Submits that no rationale is provided for this rezoning, and the lands concerned are well outside the town. States that if truly needed as Phase 2, the lands could be zoned in a future LAP, or as a variation to the LAP, if needed and that re-zoning now simply serves to increase its value to the landowner, to no public benefit. Material Amendment 76 States that this rezoning is based on the landowner concerned offering lands to the GAA for a pitch, and some car parking, in return for the rezoning, and is located in the Walled Garden of Oldtown Demesne. Submits that this decision is irrational and is contrary to the principles set out in the Supreme Court decision of McHugh v Kildare County Council which asserted the Council is not legally entitled to take into account, in its decision-making, an offer by a landowner/developer to provide a benefit to a sports club in return for rezoning. Submits that while the area of new residential zoning is small (2.2 acres), the principle is wrong and should not be countenanced. Objects to the proposed Gallops Avenue route being proposed. States that the proposed road was rejected democratically and emphatically by the vast majority of Councillors. States that to actually see this resubmission is a disgrace and flies in the face of local democracy and is an outdated proposal. Submits that the only logical solution is a properly planned orbital route that would properly minimise traffic bottleneck and improve traffic flow and was option 6 which was rejected for some reason due to flawed methodologies. Submits the following on the proposed alterations are: MTO 3.3 - Rejects any version of a proposed Gallops Avenue. MTO 3.3 – States that an alternative route to the east of the racecourse should be the only
		 MTO 3.3 – States that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9 – Contends that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
		 MTO 3.9 – Contends that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility. Outlines further reasons for objections to the route, as follows: 1. States that the objective of The Gallops Avenue route, to take traffic away from the town is greatly oversimplified and outdated and doesn't taking into account factors such as the quality of peoples'
		lives, the health and safety of communities etc. States that congestion is being pushed from one point to another point on the Blessington Road etc. too close to the town and residential areas

Sub. No.	Name	Summary of Submission
		 Volume of Traffic - thousands of vehicles will pass by estates each day resulting in traffic chaos and creating dangerous conditions for pedestrians and families as well as impacting on the safety, security, peace and quiet of residential areas affected by the route. Submits that a Proper Outer Ring Road is required such as has been provided in Tullamore, Kilkenny etc. the ring roads are well planned and thought out and are actual ring roads. Health and Safety – States that for all involved the safety and health of residentis along the chosen route should be a primary concern for all involved not purely Engineering and Cost. Argues that to place this volume of traffic and in particular, the number of HGV's and passenger vehicles etc. that will flow along the proposed route will cause real Safety and Health concerns. States that children should be allowed to live in an environment where they are not in fear of walking or cycling out the entrance to these estates. Air Quality, Noise & Vibration – Submits that the impact of heavy pollution and noise will now be moved directly along a route affecting far more people within estates impacted than within the town or Dublin Corridor. Focus on Walking, Cycling and Sustainability – Reference the changing work and lifestyle patterns arising from COVID the submission states that the focus for planning should not be solely on developing new roads and plotting them through built-up residential areas. Submits that it would be to see a well thought out proposal with an outer road and far great more sustainable and green internal proposals for walking, cycling etc. given the urgent need to promote a greener, healthier and safer transport environment Submission concludes by stating that they will continue to join up with residents of other affected areas to campaign against this new proposal reiterating that there needs to be a fundamental rethink and revisit to the road options and objectives to ensur
KCC- C37- 28	John Kehoe	 Objects to the MTO 3.3 Gallops Avenue which is a new version of Route 2 Naas Inner Relief Road which was rejected by elected representative. States that this version still has the flaws that the inner relief road had such as increasing traffic congestion at the new junction, passing by estates with in excess of 650 residents with many young children and the environmental impact of noise and air quality from HGVs and traffic.

Sub. No.	Name	Summary of Submission
		 Doesn't dispute that a road is required but notes an inner relief road that was first mooted in the 1992 Naas Development Plan is not the solution. States that an alternative route east of the racecourse should be the plan and not the 1992 plan from when Naas was a much smaller town. Notes that such an outer orbital route would also take traffic past the residential areas of the Blessington Road where much new development is underway and in planning.
KCC- C37- 29	Cairn PLC	Submission relates primarily to PMA No. 1 and PMA No. 21 The subject lands owned by Cairn PLC are as shown in the image below.
		Recommendation on PMA No. 1 The Plan should take account of the Draft Development Plan Guidelines 2021 in respect of the
		Estimated Residential Capacity of Lands Zoned New Residential (Table 3.1), with regards the 25% additional provision for land use zoning allowable for over and above the Core Strategy population allocation. This would provide an up-to-date position in relation to population growth and housing needs. The additional provision should be undertaken on a settlement basis.

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		The Core Strategy of the CDP would benefit from updating and a reappraisal of the serviced residential lands banks in Naas is required. The Draft DPG recommend that sites can be identified to ensure sufficient choice for development potential.
		The submission states that the landholding owned by Cairn meets requirements for additional provision in respect of the 'Settlement Capacity Audit' which includes an infrastructural assessment of lands and would be considered Tier 1 as they have the required physical infrastructure. It also meets the 4-step methodology for integrating the Core Strategy, Settlement strategy and zoning function through the 'Sequential Test for Residential Zoning in Settlements'. The development of the site would reflect compact growth. The rezoning of the lands would facilitate a roads objective at this location.
		The submission also states that the trends in employment should be analysed when considering potential locations for residential zonings, so that housing and employment can be aligned. Reference is made to the jobs ratio for Naas which demonstrates the strong service and employment role of Naas.
		A re-zoning of land from Agricultural to Residential use is requested in the submission.
		Recommendation on PMA No. 21 Support the extension of the road objective that now links to the R445 via road between the Newhall Retail Park and Lidl which was identified on Maps 5.1, 5.2 and 5.4. The submission supports the inclusion of the associated text in Objective MTO 3.2.
		The submission suggest that the link street is provided with segregated cycle and pedestrian facilities in line with DMURS and create a safe route for children to the educational zoned lands and also to the commercial lands.
KCC- C37- 30	Applegreen Service Areas Ltd	The submission acknowledges the T: Mixed Use zoning at Maudlins KDA and requests a Hotel and Conference Centre to be given consideration for inclusion as permissible uses at the former Cemex site.

Sub. No.	Name	Summary of Submission
KCC- C37- 31	Barry Redmond	 The Gallops Avenue Notes that the Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017-2023 and that this proposal was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019. On this basis, it is stated that this democratic decision must be upheld and to include any such proposal in the new Kildare County Development Plan 2023-2029 flies in the face of the democratic vote taken in 2019. States that The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport Strategy, as with its predecessor the Naas Inner Relief Road, will merely traffic congestion including HGVs in very close proximity to quiet, mature residential estates. Notes that Page 120 of the non-statutory Naas / Sallins Transport Strategy outlines in summary that The Gallops Avenue will relieve "congestion on Main Street and the Dublin Road" Congestion will merely move from current traffic junctions to new proposed junctions and it will not solve any traffic congestion in Naas. Submits that the route of the Gallops Avenue follows an almost identical line to that of the now defunct Naas Inter Relief Road where a considerable portion of this route traverses by Naas Racecourse. States that the Naas Racecourse area must be preserved as the "Green Lung" of the Town for the future and maintained for recreational purposes/ States that the proposal is approximately 30 year old which is, in my opinion, completely, totally and utterly out of date. Therefore, requests that the new Kildare County Development Plan include the following specific objective which would replace the "inner relief road, Naas" objective in Table 6.1 of the current County Development Plan: "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 NT. This outer ring road for the eas

Sub. No.	Name	Summary of Submission
	Name	 Summary of Submission Notes the considerable increase in the population of Naas arising from various new developments. States that local knowledge is that there are now significant difficulties for parents in obtaining both Primary and Secondary school places for their children in Naas. States that the Plan should include a requirement to include additional education campuses within the town's environs, to encourage students to either walk or cycle to school. Active Leisure (Amenities) Welcomes the development of the Naas/Sallins Greenway, residents may see value in increasing the linkage between the Park at Kerdiffstown Park, the planned park at Sallins, the Greenway, and perhaps improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the River Liffey. States that this will be excellent for cycling, walking or running. Development of downtown Naas: Submits that in line with the National Retail Guidelines, the plan should include a provision whereby development of retail over 1,000 sq. metres gross floorspace should be prohibited outside the Centre of Naas. Suggests that if necessary, Naas Town Centre should be designated as a development zone with incentives for the creation of "Living over the Shop" to encourage the revitalisation of the town centre. Submission asks the question as to how can we support and protect traditional on – street retailing with the increase of online shopping and encourage new business looking to locate within our town
		 centres? The submission suggests the following measures: (<i>i</i>) Kildare County Council should put in a specific policy into the County Development Plan, that all comparison retailing, and all but local convenience retailing (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted outside town centres. No sites should be zoned as district centres, as the definition of a district centre in the Retail Planning Guidelines is far too loose and is unsuitable for towns of the scale that are encountered in the County. (<i>ii</i>) These town centres should, in turn, be specifically identified on maps in the various LAPs for the Key Towns of Naas and Maynooth, and also for the self-sustaining growth towns of Newbridge, Kildare, Athy and Leixlip, and the self-sustaining towns of Celbridge, Monasterevin and Kilcock. They can include, within the boundaries, brownfield lands where there is potential for

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		 regeneration, provided that they are genuinely located within the town centre areas (an example would be the lands between South Main St. and the Canal Harbour). (<i>iii</i>) The County Development Plan should make it clear that all comparison retailing, and all but local convenience retailing ((i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted, whether by new build or by conversion, in any retail warehousing development. (<i>iv</i>) The main street from the Poplar Square to Murtagh's Corner was designed for a time when traffic was slower and on-street markets took place. Today, the road is far too wide and inappropriate in a town centre environment where more use by pedestrians is being encouraged. The road width should be reduced to a single lane in each direction with the space gained given over to pedestrians and cycle lanes. An additional benefit would be that it would discourage vehicular traffic from using the Main Street thereby reducing RTAs, CO2, noise, etc. States that the experience with the development of the Monread Shopping Centre has clearly shown that permitting large scale retail in peripheral locations, outside town centres, has done huge damage to traditional on street retailing in the town. The site in question was zoned as a "district" centre in the late 1990's, yet was granted, on appeal, partly based on the argument that it was a "district centre". Concludes by stating that Kildare County Council must ensure never make such "mistakes" again.
KCC- C37- 32	C. M. Redmond	 The Gallops Avenue Notes that the Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017-2023 and that this proposal was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019. On this basis, it is stated that this democratic decision must be upheld and to include any such proposal in the new Kildare County Development Plan 2023-2029 flies in the face of the democratic vote taken in 2019. States that The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport Strategy, as with its predecessor the Naas Inner Relief Road, will merely traffic congestion including HGVs in very close proximity to quiet, mature residential estates. Notes that Page 120 of the non-statutory Naas / Sallins Transport Strategy outlines in summary that The Gallops Avenue will relieve "congestion on Main Street and the Dublin Road" Congestion will merely move from current traffic junctions to new proposed junctions and it will not solve any traffic congestion in Naas.

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		 Submits that the route of the Gallops Avenue follows an almost identical line to that of the now defunct Naas Inner Relief Road where a considerable portion of this route traverses by Naas Racecourse. States that the Naas Racecourse area must be preserved as the "Green Lung" of the Town for the future and maintained for recreational purposes/ States that the proposal is approximately 30 year old which is, in my opinion, completely, totally and utterly out of date. Therefore, requests that the new Kildare County Development Plan include the following specific objective which would replace the "inner relief road, Naas" objective in Table 6.1 of the current County Development Plan: "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 county Development Plan, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible. States that such an objective would be consistent with the existing objective MT 15 of the County Development Plan, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible. Education Notes the considerable increase in the population of Naas arising from various new developments. States that local knowledge is that there are now significant difficulties for parents in obtaining both Primary and Secondary school places for their children in Naas. States that the Plan should include a requirement to include additional education campuses within the town's environs, to
		the linkage between the Park at Kerdiffstown Park, the planned park at Sallins, the Greenway, and perhaps improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately

Sub.	Name	Summary of Submission
No.		
		 Submits that in line with the National Retail Guidelines, the plan should include a provision whereby development of retail over 1,000 sq. metres gross floorspace should be prohibited outside the Centre of Naas. Suggests that if necessary, Naas Town Centre should be designated as a development zone with incentives for the creation of "Living over the Shop" to encourage the revitalisation of the town
		centre.
		 Submission asks the question as to how can we support and protect traditional on – street retailing with the increase of online shopping and encourage new business looking to locate within our town centres? The submission suggests the following measures:
		 (i) Kildare County Council should put in a specific policy into the County Development Plan, that all comparison retailing, and all but local convenience retailing (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted outside town centres. No sites should be zoned as district centres, as the definition of a district centre in the Retail Planning Guidelines is far too loose and is unsuitable for towns of the scale that are encountered in the County. (ii) These town centres should, in turn, be specifically identified on maps in the various LAPs for the Key Towns of Naas and Maynooth, and also for the self-sustaining growth towns of Newbridge, Kildare, Athy and Leixlip, and the self-sustaining towns of Celbridge, Monasterevin and Kilcock. They can include, within the boundaries, brownfield lands where there is potential for regeneration, provided that they are genuinely located within the town centre areas (an example would be the lands between South Main St. and the Canal Harbour).
		<i>(iii)</i> The County Development Plan should make it clear that all comparison retailing, and all but local convenience retailing (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted, whether by new build or by conversion, in any retail warehousing development.
		<i>(iv)</i> The main street from the Poplar Square to Murtagh's Corner was designed for a time when traffic was slower and on-street markets took place. Today, the road is far too wide and inappropriate in
		a town centre environment where more use by pedestrians is being encouraged. The road width
		should be reduced to a single lane in each direction with the space gained given over to pedestrians and cycle lanes. An additional benefit would be that it would discourage vehicular
		traffic from using the Main Street thereby reducing RTAs, CO2, noise, etc.

Sub. No.	Name	Summary of Submission
		• States that the experience with the development of the Monread Shopping Centre has clearly shown that permitting large scale retail in peripheral locations, outside town centres, has done huge damage to traditional on street retailing in the town. The site in question was zoned as a "district" centre in the late 1990's, yet was granted, on appeal, partly based on the argument that it was a "district centre". Concludes by stating that Kildare County Council must ensure never make such "mistakes" again.
KCC-	Eoghan	The Gallops Avenue
C37- 33	Redmond	 Notes that the Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017-2023 and that this proposal was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019. On this basis, it is stated that this democratic decision must be upheld and to include any such proposal in the new Kildare County Development Plan 2023-2029 flies in the face of the democratic vote taken in 2019. States that The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport Strategy, as with its predecessor the Naas Inner Relief Road, will merely traffic congestion including HGVs in very close proximity to quiet, mature residential estates. Notes that Page 120 of the non-statutory Naas / Sallins Transport Strategy outlines in summary that The Gallops Avenue will relieve "congestion on Main Street and the Dublin Road…" Congestion will merely move from current traffic junctions to new proposed junctions and it will not solve any traffic congestion in Naas. Submits that the route of the Gallops Avenue follows an almost identical line to that of the now defunct Naas Inner Relief Road where a considerable portion of this route traverses by Naas Racecourse. States that the Naas Racecourse area must be preserved as the "Green Lung" of the Town for the future and maintained for recreational purposes/
		 States that the proposal is approximately 30 year old which is, in my opinion, completely, totally and utterly out of date. Therefore, requests that the new Kildare County Development Plan include the following specific objective which would replace the "inner relief road, Naas" objective in Table 6.1 of the current County Development Plan: "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

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	 areas, and will provide a long-term development boundary to the east/north-east of the town of Naas". States that such an objective would be consistent with the existing objective MT 15 of the County Development Plan, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible. Education Notes the considerable increase in the population of Naas arising from various new developments. States that local knowledge is that there are now significant difficulties for parents in obtaining both Primary and Secondary school places for their children in Naas. States that the Plan should include a requirement to include additional education campuses within the town's environs, to encourage students to either walk or cycle to school. Active Leisure (Amenities) Welcomes the development of the Naas/Sallins Greenway, residents may see value in increasing the linkage between the Park at Kerdiffstown Park, the planned park at Sallins, the Greenway, and perhaps improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the River Liffey. States that this will be excellent for cycling, walking or running. Development of downtown Naas: Submits that in line with the National Retail Guidelines, the plan should include a provision whereby development of retail over 1,000 sq. metres gross floorspace should be prohibited outside the Centre of Naas. Subgests that if necessary, Naas Town Centre should be designated as a development zone with incentives for the creation of "Living over the Shop" to encourage the revitalisation of the town centre. Submission asks the question as to how can we support and protect traditional on – street retailing with the increase of online shopping and encourage new business looking to locate within our town centres? The submission suggests the following measures:

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		 district centres, as the definition of a district centre in the Retail Planning Guidelines is far too loose and is unsuitable for towns of the scale that are encountered in the County. (<i>ii</i>) These town centres should, in turn, be specifically identified on maps in the various LAPs for the Key Towns of Naas and Maynooth, and also for the self-sustaining growth towns of Newbridge, Kildare, Athy and Leixlip, and the self-sustaining towns of Celbridge, Monasterevin and Kilcock. They can include, within the boundaries, brownfield lands where there is potential for regeneration, provided that they are genuinely located within the town centre areas (an example would be the lands between South Main St. and the Canal Harbour). (<i>iii</i>) The County Development Plan should make it clear that all comparison retailing, and all but local convenience retailing ((i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted, whether by new build or by conversion, in any retail warehousing development. (<i>iv</i>) The main street from the Poplar Square to Murtagh's Corner was designed for a time when traffic was slower and on-street markets took place. Today, the road is far too wide and inappropriate in a town centre environment where more use by pedestrians is being encouraged. The road width should be reduced to a single lane in each direction with the space gained given over to pedestrians and cycle lanes. An additional benefit would be that it would discourage vehicular traffic from using the Main Street thereby reducing RTAs, CO2, noise, etc. States that the experience with the development of the Monread Shopping Centre has clearly shown that permitting large scale retail in peripheral locations, outside town centres, has done huge damage to traditional on street retailing in the town. The site in question was zoned as a "district" centre". Concludes by stating that Kildare County Council must ensure never makes such "mistakes" again.
KCC-	Padraig	The Gallops Avenue
C37- 34	Redmond	 Notes that the Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017-2023 and that this proposal was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019. On this basis, it is stated that this democratic decision must be upheld and to include any such proposal in the new Kildare County Development Plan 2023-2029 flies in the face of the democratic vote taken in 2019.

Sub.	Name	Summary of Submission
No.		
		 States that The Gallops Avenue, which was introduced in the recent non-statutory Naas / Sallins Transport Strategy, as with its predecessor the Naas Inner Relief Road, will merely traffic congestion including HGVs in very close proximity to quiet, mature residential estates. Notes that Page 120 of the non-statutory Naas / Sallins Transport Strategy outlines in summary that The Gallops Avenue will relieve "congestion on Main Street and the Dublin Road" Congestion will merely move from current traffic junctions to new proposed junctions and it will not solve any traffic congestion in Naas. Submits that the route of the Gallops Avenue follows an almost identical line to that of the now defunct Naas Inner Relief Road where a considerable portion of this route traverses by Naas Racecourse. States that the Naas Racecourse area must be preserved as the "Green Lung" of the Town for the future and maintained for recreational purposes/ States that the proposal is approximately 30 year old which is, in my opinion, completely, totally and utterly out of date. Therefore, requests that the new Kildare County Development Plan include the following specific objective which would replace the "inner relief road, Naas" objective in Table 6.1 of the current County Development Plan: "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 NT. 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". States that such an objective would be consistent with the existing objective MT 15 of the County Development Plan, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road

Sub.	Name	Summary of Submission
No.		
		 Welcomes the development of the Naas/Sallins Greenway, residents may see value in increasing the linkage between the Park at Kerdiffstown Park, the planned park at Sallins, the Greenway, and perhaps improved utilisation of the canal as a Blueway between Naas and Digby Bridge, ultimately heading for the River Liffey. States that this will be excellent for cycling, walking or running. Development of downtown Naas: Submits that in line with the National Retail Guidelines, the plan should include a provision whereby development of retail over 1,000 sq. metres gross floorspace should be prohibited outside the Centre of Naas. Suggests that if necessary, Naas Town Centre should be designated as a development zone with incentives for the creation of "Living over the Shop" to encourage the revitalisation of the town centre. Submission asks the question as to how can we support and protect traditional on – street retailing with the increase of online shopping and encourage new business looking to locate within our town centres? The submission suggests the following measures: (i) Kildare County Council should put in a specific policy into the County Development Plan, that all comparison retailing, and all but local convenience retailing (i.e. up to no more than 1,000 sq. metres gross floorspace) is not permitted outside town centres. No sites should be zoned as district centres, sa the definition of a district centre in the Retail Planning Guidelines is far too loose, and is unsuitable for towns of the scale that are encountered in the County. (ii) These town centres should, in turn, be specifically identified on maps in the various LAPs for the Key Towns of Naas and Maynooth, and also for the self-sustaining growth towns of Newbridge, Kildare, Athy and Leixlip, and the self-sustaining towns of Celbridge, Monasterevin and Kilcock. They can include, within the boundaries, brownfield lands where there is potential for regeneration, provided that they are genuine

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		 a town centre environment where more use by pedestrians is being encouraged. The road width should be reduced to a single lane in each direction with the space gained given over to pedestrians and cycle lanes. An additional benefit would be that it would discourage vehicular traffic from using the Main Street thereby reducing RTAs, CO2, noise, etc. States that the experience with the development of the Monread Shopping Centre has clearly shown that permitting large scale retail in peripheral locations, outside town centres, has done huge damage to traditional on street retailing in the town. The site in question was zoned as a "district" centre in the late 1990's, yet was granted, on appeal, partly based on the argument that it was a "district centre". Concludes by stating that Kildare County Council must ensure never make such "mistakes" again.
KCC- C37- 35	Keith Proctor	 MTO 3.3 - Rejects any version of a proposed Gallops Avenue. MTO 3.3 - States that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9 - States that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC- C37- 36	Naas Combined Residents Group	 MTO 3.3 Discusses a material alteration to redesign the Gallops Avenue. Submits that this proposed route was rejected by NMD councillors in 2019 not because of the unsuitability of the proposed design but actually because of the unsuitability of the proposed route. States that this is evident in the minutes the Naas NMD on 17/06/3019 where 3 councillors (Moore, Breen and Sammon) specifically name the outdated route as their reason to reject this proposal. Further notes that four members of the CRG attended this meeting and are clear from the discussions they witnessed at this meeting, that the proposed route rather than the proposed design was the primary rationale for the rejection of this proposal. Outlines frustration that this proposed route continues despite being rejected and categorically opposed to by the local community. Submits that previous utterances from KCC senior management have highlighted a democratic deficit in Naas. States that it is not unprecedented for KCC to amend plans and not proceed with routes when change is required e.g. the proposed link road between the Craddockstown Road and the Blessington Road through Lakelands and Sundays Well, and St. Ita's Place as the 'new' Rathasker Road.

Sub. No.	Name	Summary of Submission
		 MTO 3.3 - Final point in paragraph: 'Consider providing an alternative route located on a corridor on the east of the racecourse' States this proposed material alteration is welcomed; however, it is important to emphasise that it is due full and proper consideration and requires a blank slate review and not just a rehash of old consultants' reports. States this alternative should be the only route receiving consideration. Submits that there is merit at a minimum to widening the existing Fishery Lane and through the racecourse where adequate space already exists. MTO 3.9 – Welcomes investigating the feasibility of an outer ring road however the inclusion of this Outer Orbital Route as a stated objective within the LAP is required. Questions if this will amount to a full and proper review. Notes with disappointment that the timing of calls for submissions frequently coincide with holiday time. Whilst recognising that all required legal engagement is met within the chosen timing, one cannot help but feel an element of cynicism as to the timing on each and every occasion and wonder as to KCC's true appetite for engagement with local community.
KCC-	Louise	Gallops Avenue / Outer Relief Road
C37- 37	Donnelly	 Strongly objects to the proposed "Gallops Avenue" route. This proposal has already been rejected democratically and emphatically by the vast majority of Naas Councillors, on behalf of Naas Residents. This resubmission is an insult to local democracy. The residents along this proposed route are the people who are already most affected by the traffic congestion on the Blessington Road and the Dublin Road. States that as residents they know that a solution is needed and would welcome a suitable relief road to link the Blessington Road to the N7/M7 but has the common sense to know that re-routing this traffic through estates as a short cut is not a "solution". States that the only logical solution is a properly planned orbital route. The Submitter objects to the proposed route on the following grounds: The stated objective of the "Gallops Avenue" route, to take traffic away from the town centre, is oversimplified, outdated and contradictory. Notes that route was first proposed 30 years ago. States that KCC state that this route will take traffic away from the "town centre" while also stating that Naas has "no through traffic" and that these statements make no sense. Submits that the traffic congestion is caused by the lack of an alternative link from Blessington to the N7/M7.

Sub.	Name	Summary of Submission
No.		
		 Submits that reasons relating to Health, Safety, Quality of life and future proofing has not been taken into account. States that this route proposes that congestion, including high volumes of HGVs, be rerouted through residential areas which will have devasting impacts on the heath and well-being of residents relating to noise and traffic pollution. Notes that the multiple large, complex junctions that are proposed will make it even more unsafe and discouraging for pedestrians and cyclists to walk or cycle from these estates to schools, shops, work etc. States that speeding is currently a huge problem on the Blessington and Dublin Roads. To propose that this speeding traffic be re-routed though residential areas is reckless. Argues that KCC's utter disregard for greener transport is well illustrated in Table 5.1 B (of the Strategy), where a target reduction in private car usage for Education trips has been set at just 9% over 19 years. Submits that this target reflects the importance KCC continues to place on private car usage over all other means of transport. States that the "Gallops Avenue" is just another manifestation of this attitude of prioritising private car usage over healthier, greener alternatives. Submits that there is a need to prioritise and welcomes pedestrians, cyclists and public Transport within the Naas area and keep heavy traffic flow to the periphery. States that Gallops Route will effectively create an Inner and Outer Naas. Submits that this will isolate of houses and only serve to increase private car usage in and around the town. Notes that this type of planning in Naas has already been publicly criticized by the Office of the Planning Regulator where the Deputy Regulator reflected on how poor planning has "created a disproportionate reliance on car transport in the area" and that the long-term plan for Naas must be to "promote a pattern of development that was more conducive to public transport as well as pedestrians and cyclists." Submits that a
	Versee	Naas residents is an unacceptable waste of taxpayer's money and an insult to the people of Naas.
KCC- C37-	Yvonne Codd	 Objects to MTO 3.3. which discusses a material alteration to redesign the Gallops Avenue. The proposed route was rejected by NMD councillors in 2019 not because of the unsuitability of the
38	Codu	proposed design but actually because of the unsuitability of the proposed route. This was recorded in
		the minutes of the meeting of the Naas NMD on 17/06/3019 which state that 3 NMD councillors (Cllrs

Sub. No.	Name	Summary of Submission
KCC- C37- 39	Carol Byrne	 Moore, Breen and Sammon) specifically name the outdated route as their reason to reject this proposal. States that despite all of the public consultations on this proposed route and submissions against this route, it is very disappointing that this proposed route continues to pop up again and again on all plans for Naas despite being rejected by NMD, ridiculously outdated and consistently opposed to by the local community. Notes that towards the end of MTO 3.3 there is a sentence which states: 'Consider providing an alternative route located on a corridor on the east of the racecourse' which is to be welcomes but is concerned by the oft and loose wording of 'consider'. States that this alternative route, which is the only route which should be considered, given that the proposed Gallops Avenue has been rejected, truly requires a full, detailed. and proper analysis and it absolutely should not include any revisit to previous consultants' reports. Notes that three is no need for direct access from the road bridge to the canal at this location as the bridge on the Caragh Road is being used by cyclists and pedestrians to gain access to the main Newbridge Road and to get onto the bridge itself to gain access to the ring road and that Putting another slip track of the bridge is a waste of money as there is already easy access via the current routes used only metres away. Notes that the proposals also at the cost of the biodiversity garden being ripped out for very little gain. States it will also affect the nearby residents negatively, having to potentially deal with noise pollution after the trees and planting have been ripped out and that graffiti and anti-social behaviour is always very likely at these access locations too.
KCC- C37- 40	Janice McGrath	 Proposed Pedestrian measure in estate in Monread Road (proximate to Tesco) Submission notes that when the estate (the name of which has not been mentioned in the submission) was built back in 1995 the contract signed between the builders and the purchasers stated that this cul de sac would always remain closed hence why most residents bought their houses. States that a copy can be provided if necessary.

Sub.	Name	Summary of Submission
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		 Notes that originally the estate had railings and when Tesco applied for planning permission and we objected at the time it was agreed that we would apply for planning to build the wall and the barrier that is filled with shrubs for the safety of the children due to the extra volume of traffic. Tesco then funded the building of this wall. Outlines concerns for the safety of the young children of the estate is as are many living and playing on the green area which the Council are proposing to open. The opening would leave them completely exposed to the Monread Road and the huge volume of traffic. Outlines concerns about the extra pedestrian traffic using the small road as a walkway to Tesco, O'Brien's off-licence McDonalds, Monread Fare etc. which brings huge volumes of litter, bottles and of course large groups of teenagers hanging around. Outlines previous incidence of anti-social behaviour. Outlines concerns about the extra volume of vehicular traffic that is bound to come with the opening as people will park on the Close and then walk to the shops from there as they currently do at Christmas time on the Morell Park Road through from Monread Road to Sallins Road. Concludes by noting that there is the huge problem with litter on current walkway from Tesco with litter and broken bottles and which will worsen and is just not good enough.
KCC- C37- 41	Aidan Doorey	 MTO 3.3 – Questions why look at redesigning this so called 'Gallops Avenue' it has been rejected time and time again by the residents of Naas within the framework of the democratic system as not being fit for purpose. States that the only feasible option being a route to the East of Naas racecourse which can link to Blessington Road with minimum impact on residents living in Naas.
		• MTO 3.9 – Questions the talk about the 'feasibility' of an Outer Relief Road when the reality is that Naas 'requires' an Outer Relief Road. States that this should be a stated objective of the LAP going forward as opposed to looking backwards at failed/renamed route options such as 'Gallops Avenue.
KCC-	Antoinette	MTO 3.3 - Strongly rejects any version of a proposed Gallops Avenue as this has previously been

examined in great detail and was rejected by local residents and locally elected representatives

a new road so close to the town. Submits that traffic should be routed away from the town.

• MTO 3.3 - Strongly believes that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected as it does not make sense to have

C37-

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Doorey

Sub. No.	Name	Summary of Submission
		 MTO 3.9 - Believes that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC-	Dave	Residential property on the R409 being re-zoned to Data Centre
C37-	Caffrey	Notes that the contents of the submission do not relate to any Proposed Material Alteration currently
43		under consideration but submits that in the interests of natural justice the submission should now be
		given due consideration by the Elected Members.
		• The submission notes the location of the family home at Halverstown Gate, a bungalow type dwelling, which is located west of the M7 and south of the R409 in a largely agricultural area.
		 The submission states that the issue lies with the proposed zoning of my property as P: Data
		centre/warehouse – to provide for Data Centre development and their associated infrastructure only. Utilities are 'Open for Consideration'.
		• Submits that it is both illogical and unreasonable to designate pre-existing residential land uses as data centre, and such a zoning will compromise the use of my property for residential use in the future and can only assume that the residential lands have been zoned for data centre use in error.

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		 In this regard the submitter calls upon the Elected Members to rectify this error even at this late stage in the LAP adoption process. States that before purchasing the property, a due diligence exercise was carried out by solicitors in December 2019. The solicitors noted that Kildare County Council at their meeting on the 29th of July 2019 resolved to not make the Draft LAP under Section 20 of the Planning & Development Act, 2000 (as amended). The solicitors also noted that in any event there was no risk of any adverse zoning affecting the property as Halverstown Gate was outside the Naas LAP development boundary. Outlines surprise and shock of discovery in early May 2021, i.e. past the 21st April deadline for submissions on the Draft Naas LAP 2021-2027, that the new Draft LAP moved the development boundary of Naas to encompass the property but that our family home was included in the data centre zoning along with the adjacent agricultural lands. Argues that in a case where the development boundary is being moved and an adverse zoning proposed for our property, an exception must be made for submissions after a stated deadline. Has no objections in principle to the extension of the development boundary but strongly object to the residential property being zoned for data centre use only. Submits that to propose an alternative zoning for land with an existing residential use as a data centre, a logical reason should be given. States that having read the Chief Executive's Report on the Draft LAP dated 31st May 2021, while the issue of data centre zoning is addressed. Naas Development Boundary Revision Query's the legality of expanding the Development Boundary from the 2019-2023 and the 2021-2027 Draft LAPs. States that it was believed that, not unreasonably, that as the property home lay outside the Development Boundary. Notes that no avaited the mass that environ the 201-2027 Draft LAP. Notes that no justification was given in
		Municipal District Council boundary was addressed multiple times in submissions made by members

Sub.	Name	Summary of Submission
No.		
		 of the public with regard to the Draft LAP as detailed in the Chief Executive's Report of May 2021, but not in relation to the instance of the Development Boundary extension at Halverstown. State that more public consultation should have taken place Impact of Data Centre Zoning States that of the Council approves the data centre zoning that includes our house, there will be a number of significant impacts which will devalue the property and impact adversely on the residential amenity. Submits that it unnecessary to zone our house to achieve the objective of the construction of a data centre on the adjacent lands currently in agricultural use. Reiterates opposition to the inclusion of our family home within the data centre zoning due to the impacts it will have on the enjoyment and use of the property. States that should an extension to the house be required in future that does not fall within the exempted development provisions in the Planning Regulations, then planning permission will be required. Submits that if planning permission is sought then, as the data centre zoning attaches to our lands, the Council cannot materially breach the zoning objectives of their own LAP and are bound to refuse planning permission. This would clearly be an absurd situation where we would have to appeal the inevitable refusal of permission. Refers to Section 34(6)(a) of the Planning Act that permission may be granted for development that contravenes the zoning objective attached to the land, but states that is an extremely onerous process which would be necessitated if the data centre zoning to that centre only with all the complication has this involves. This will in effect render the property unsellable or only able to be sold at below market value because of the unnecessary planning restrictions represented by the inappropriate zoning of ur land. States that clearly this is not something that should have happened and is surely not the purpose of zo
		appropriate residential zoning that should have been applied in the first instance.

Sub. No.	Name	Summary of Submission
KCC-	Cormac	 Believes that there is a mechanism for the Council to change the zoning on our land from data centre to residential under the provisions of Section 20(3)(q) of the Planning Act States relation to subsection (q)(i), given the overall extent of the data centre zoned lands in relation to our family property, the proposed change in zoning is <i>minor in nature</i>. In addition, a change in the zoning status of our lands cannot <i>have significant effects on the environment or adversely affect the integrity of a European site</i> as the Council has already zoned our lands and a change in zoning will not alter any potential impact on a European Site which the Council has previously assessed for the data centre zoning and found to be acceptable. Submits that it is clear that subsection (q)(ii) does not apply in this instance as it is a decrease and not an increase in zoned land that is requested and nor does the request to change the zoning involve a Protected Structure. Concludes by respectfully requesting the council to make this minor amendment to change the zoning of the property to residential.
C37- 44	Ahern	 States that the LAP should not contain the proposed Gallops Avenue as it is essentially the same road as the Naas Inner Relief Road that was rejected by a democratic decision on Naas Municipal District Council in 2019 and that its inclusion of this proposal is an affront to local democracy. Submits that an alternative route to the east of the racecourse should be the only route in the LAP given that the proposed Gallops Avenue/Naas Inner Relief Road has been rejected by Naas Municipal District councillors in 2019. Further submits that there should be an outer orbital route as a stated objective of the LAP rather than an investigation of feasibility of such a route.
KCC- C37- 45	Maria Hutchin	 Gallops Avenue Objects to plans for "The Gallops Ave" previously known as "The Naas Inner Relief Rd Route 2". States that it is an insult to think that by renaming a road, previously objected to by a huge majority almost two years ago. States that plans may have been moved a few feet, but it is still the same plan and route. Submits that the damage this road will do to the infrastructure of the area will be horrific with the noise pollution, air pollution, digging and destroying trees, locking people in their Estates behind 12ft walls, not to mention problems of access/egress.

Sub. No.	Name	Summary of Submission
		 Submits that all the new road will do is move the problem of congestion to another location as currently the Tipper Road is being used as a rat run and traffic is bumper to bumper at certain times of the day. States that the Woodlands Estate she will have heavy traffic through the Main St. on one side and heavy traffic from trucks, lorries, vans and cars on the other and residents will be caught in the fumes from both sides and held in with 12ft walls. Submits that this is crazy planning and dreadful for the environment and humans. Refers to the planning for new houses around this new road which will bring further traffic and pollution to the area. Reiterates that Route 6 seems to be the obvious choice for this Relief Road it would have the least amount of upheaval to the many combined residential estates involved in this unbelievably disastrous plan. States that this plan was originally drawn up over 20 years ago when Naas was a different town.
KCC- C37- 46	Brian McAdam	 Submits that the Modal shift targets are not feasible, or well thought out, most walkers and cyclists will tend to take the quicker/shorter route to their workplace and schools. States that he cannot see how anyone from Arconagh or Elsmore estates would travel over the main Newbridge Road to go over 100 metres to gain access to a canal path while it is quicker from them to travel straight in on the Newbridge Road. Asks that if the future plan is for the Main Street etc to be pedestrianised, which will include quality cycle lanes etc, would public money to put in to provide temporary ones at this juncture.

tax-payers money.

 Notes that the first proposed location at the far end of Jigginstown Green will disturb the water table which is already under pressure from the new builds in the area and new planned construction such as the proposed new data centre this will interfere with the attenuation pond in situ in that location. States that it is clear also, that there is already a pedestrian and cycle lane 50 metres up from the proposed location which is used by pedestrians to access the sports centre. Further states that there is also at this juncture no infrastructure for cycle lanes along the R445, Sallins Road and new Caragh Road which means the route will be incomplete. Submits that these changes are a complete waste of
Sub. No.	Name	Summary of Submission
KCC- C37- 47	Kingsfurze Avenue Residents' Association	 MTO 3.3: Rejects any version of a proposed Gallops Avenue. MTO 3.3: States that an alternative route to the east of the racecourse should be the only route given that the proposed. Notes that Gallops Avenue has been rejected. MTO 3.9: Submits that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC- C37- 48	Robert Kennedy	 MTO 3.3 Discusses a material alteration to redesign the Gallops Avenue. Submits that this proposed route was rejected by NMD councillors in 2019 not because of the unsuitability of the proposed design but actually because of the unsuitability of the proposed route. States that this is evident in the minutes the Naas NMD on 17/06/3019 where 3 councillors (Moore, Breen and Sammon) specifically name the outdated route as their reason to reject this proposal. Further notes that four members of the CRG attended this meeting and are clear from the discussions they witnessed at this meeting, that the proposed route rather than the proposed design was the primary rationale for the rejection of this proposal. States it is frustrating that this proposed route continues to languish on all suggestions for Naas despite being rejected and is categorically opposed to by the community. Submits that previous utterances from KCC senior management have highlighted a democratic deficit in Naas. States that it is not unprecedented for KCC to amend plans and not proceed with routes when change is required-e.g. the proposed link road between the Craddockstown road and the Blessington Road through Lakelands and Sundays Well, and St. Ita's Place as the 'new' Rathasker Road. MTO 3.3 - Final point in paragraph: 'Consider providing an alternative route located on a corridor on the east of the racecourse' States this proposed material alteration is welcomed', however, it is important to emphasise that it is due full and proper consideration and requires a blank slate review and not just a rehash of old consultants' reports. This alternative route should be the only route receiving consideration given that the proposed Gallops Avenue has been rejected. Submits that there is merit at a minimum to widening the existing Fishery Lane and through the racecourse where adequate space already exists.

Name	Summary of Submission
	 MTO 3.9 – Welcomes investigating the feasibility of an outer ring road however the inclusion of this Outer Orbital Route as a stated objective within the LAP is required. Questions if this will amount to a full and proper review. Notes with disappointment that the timing of calls for submissions frequently coincide with holiday time. States that whilst recognising that all required legal engagement is met within the chosen timing, one cannot help but feel an element of cynicism as to the timing on each and every occasion
Kildare	The following submission has been made on behalf of the Kildare Party representatives Cllr. Kenny, Cllr.
Greens	Liston, Cllr. Hamilton and Senator Vincent P. Martin
	Chapter 5: Movement and Transport
Submission	Proposed Material Alteration No. 11
	 Notes that is an objective of the draft LAP to secure the development of high quality, fully connected and inclusive walking, cycling and public transport infrastructure. A key aim is to ensure that walking and cycling become the mode of choice for local trips. Notes that the NPF, Climate Action Plan 2019 and RSES seek to reduce dependency on the private car and secure a shift towards sustainable modes of transport, including walking, cycling and public transport.
	 States the need to give priority to pedestrians and cyclists, but we also need to disincentive the use of the private car. Notes that the Climate Action Plan targets a reduction in Ireland's carbon emissions by 51% by 2030 and net-zero by 2050. Submits that not enough is being proposed by KCC to assist in achieving these targets. Submits that the Modal shift targets outlined in the Proposed Material Alteration No. 11, are not ambitious enough. As the amendment states they are broadly aligned with the current GDA Transport Strategy. However, notes that this is currently in review and the LAP should clearly state that targets will align with future GDA transport strategy as it evolves based on the 2021 Climate Action Bill Amendment and future targets and funding sources. States that Planning policy needs to look beyond catering for car dominated road space. It needs to use the 'Avoid-Shift-Improve' approach to integrating land use and transport planning. The focus
	Kildare

for walking.

needs to be on the 10-minute commute concept, which brings pedestrians and cyclists along natural desire lines. Submits that permeability measures proposed in the Draft Plan will predominantly cater



Sub. No.	Name	Summary of Submission
		 Requests more by way of widening of footpaths at the expense of roads, appropriate setbacks in rural areas, with sensitive boundary treatment and planting used to address a loss of amenity. States that there is no reference to slow-flow and yield-flow lanes, for instance. Submits that all transport schemes should incorporate high-quality urban realm design that is attractive, safe, and accessible for all individuals. Proposed Material Alteration No. 17 States that addition of the word <i>universal</i> in Proposed Material Alteration No. 17 is welcome, however submits that the current plan appears to divert cycling infrastructure away from universal access and appears to prioritise leisure pursuits. States that the location and design of cycling infrastructure in the draft LAP should reflect the natural desire lines in the same way as walking infrastructure allows for. Submits that the word 'universal' therefore should be combined with 'direct', as many of the permeability measures relating to cycling appear to go against the natural desire line. Notes that the Climate Action Plan. Notes that Monread Road, Newbridge Road, Sallins Road and the Dublin Road are proposed to have either shared street usage with both cars and HGV's, or significant gaps in cycling infrastructure along safe and natural desire lines. Submits that this disincentivises cyclists and puts further pressure on an overall reduction of carbon emissions by leaving car usage as the safest and easiest option for access to the targeted destinations. Chapter 6: Economic Development, Retail and Tourism Chapter 9: Infrastructure and Environmental Services Chapter 11: Land Use Zoning Objectives and Implementation Proposed Material Alteration No. 26 States that the site allocation for Data Centres in Material Alteration No. 26 is based on Data Centres being able to draw upon existing electrical infrastructure. Notes that the permitting any Data Centre to draw on the existing electri
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Sub. No.	Name	Summary of Submission
		 EDO 1.12 (a) Facilitate the location of Data Centre development on land designated P: Data Centre at Caragh Road South and Jigginstown for the identified land use only subject to appropriate environmental impact assessments, heat mapping, transport impact assessments and consideration of the impact on the electricity network supply capacity assessments and capacity to meet targeted reductions in greenhouse gas emissions. greenhouse emission targets. (b) Any data centre project will be required to include measures to generate energy which should be from renewable sources on site as part of the overall development proposal. In relation to (b) above, submission states that any data centre projects energy source must be self-sustaining on site, as opposed to operating a carbon offset programme. Submits that if the data centre is not capable of operating on a net zero emissions basis, its planning application should be denied. Also states that the level of risk to the domestic, public and industrial electricity supply must be calculated as part of the planning process. Proposed Material Alteration No. 41 Proposes the following insertion to 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 and a full environmental impact assessment for a project which might significantly affect a European/Natura 2000 site. States that given the demands on already limited capacity on our water supply in the midlands and greater Dublin area any proposal for increase dwater using enterprises should not have the effect of diminishing water supply or increase the risk of further reductions/ limitations on our water supply. Proposed Material Alteration No. 74 Proposes reverting to the original zoning of 'I', Agriculture, where the plan was changed to 'P', sites zoned for Data Centres.

Sub. No.	Name	Summary of Submission
		 Proposed Material Alteration No. 35 Proposes to include the following: To support the preparation of an ambitious and comprehensive Biodiversity Action Plan for all habitat types, including the development of a Community Biodiversity Toolkit. The biodiversity action plan will be in line with the "All-Ireland Pollinator Plan". The plan should also form part of the Naas Town Renewal Plan and be drawn up in line with its public consultation and collaborative process. Proposed Material Alteration No. 38 Requests that this proposed Material Alteration material be expanded as it currently limits the greenways as only active travel routes. States that the opportunity to develop ecological corridors. By joining up and interlinking the existing hedgerows and microhabitats wildlife corridors can fan out from the Deburgh estate. Submits that this is a unique opportunity to locate the centre of a biodiversity hub in the heart of the town and the spokes will complement the greenways as ecological, educational and tourist trails. Proposes that Material alteration No. 38 to include: To prioritise and progress, as part of the Biodiversity Action Plan for Naas, the delivery of ecological corridors, public amenities, tourism and educational facilities to enable the use by the public of lands in Oldtown Demesne. These would realise the vision for these lands as a future park and green infrastructure ecological corridors adjacent central to the route of the canal along the Sallins to Naas Greenway which links with Proposed Material Alteration No 34 the 'Green Infrastructure corridor' of the Grand Canal, Corbally Branch and bey public park areas including Monread Park. Chapter 10: Urban Regeneration and Development Strategy Proposed Material Alteration No. 43 Commends the Chief Executive for supporting the OPR recommendations and not approving the three motions submitted in reference to Q5, H4, and F in

Sub. No.	Name	Summary of Submission
		 Requests that the flood risk assessment for the Northwest Quarter outlined in Material Alteration No. 45 is retained in light of climate change and the known significant risk of increased flooding, rainfall and water level increases. Proposed Material Alteration No. 49 Proposes to include in material alteration No 49, guidance on the consultation process that is inclusive, community led with clear language so that stakeholders are clearly identified and can participate in the process. As such to add: The consultation process will be inclusive and will actively involve and communicate with all stakeholders in a way that identifies and encourages community involvement at all levels. States that any committees and groups that are established by KCC as part of the drafting of the Town Renewal Plan should be set up with explicit Terms of Reference/Memorandum of Understanding and should be representative of the wider Naas community. Proposes amending the Material Alteration URD1.11 to the following: Action: To work with relevant agencies and stakeholders, communities and public 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. The language used in the consultation process must be public- friendly and accessible.
KCC- C37- 50	Pat Breen	 Objects to any form of Inner Relief Road which involves exiting onto the Blessington Road near Sunday's Well. States that this will not serve any relief but will cause congestion in the area. Further states that the entrance to/from Tesco on the Blessington Road is already causing tailbacks and that adding extra traffic will only exacerbate this.
KCC- C37- 51	Kevin Mullaney	 Rejects any version of a proposed Gallops Avenue. Submits that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. Requests that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility. The Naas Inner Relief Road was a Roads priority in the Kildare County Development Plan 2017-2023. This proposal was comprehensively defeated by a democratic vote of the Naas Municipal District in June 2019. On this basis, this democratic decision must be upheld. To include any such proposal in the new County Development Plan 2023-2029 flies in the face of the democratic vote of June 2019.

Sub. No.	Name	Summary of Submission
		 States the Gallops Avenue, which was introduced in the recent non-statutory Transport Strategy, will merely move thousands of vehicles, including large volumes of HGVs in close proximity to quiet, mature residential estates. Notes that Page 120 of the non-statutory Naas/Sallins Transport Strategy outlines in summary that The Gallops Avenue will relieve "congestion on Main Street and the Dublin Road". States that congestion will merely move from current traffic junctions to new proposed junctions and will not solve any traffic congestion in Naas. States that the route of the Gallops Avenue follows an almost identical line to that of the now defunct Naas Inner Relief Road. A considerable portion of this route traverses by Naas Racecourse. The Naas Racecourse area must be preserved as the "Green Lung" portion of the Town and be maintained for recreational purposes. Notes that The Gallops Avenue proposal is approximately 30 years old and is completely outdated. States that it appears very odd at this stage that KCC continues to receive Consultants reports recommending this route. Requests that the new Kildare County Development Plan include the following specific objective: 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." States that this proposed objective is to replace the "inner relief road, Naas" objective MT 15 of the County Development Plan, which seeks to channel HGV traffic associated with landfill and extractive sites onto the regional and national road networks insofar as possible, which the defunct Naas Inner Relief objective does not.
KCC- C37-	R Burke	 Jigginstown Green (Measures 63 and 64) Agrees with a number of the proposals outlined in the draft plan but vehemently opposes the
52		proposed pedestrian/cycling entrances to the Jigginstown Green area.

Sub. No.	Name	Summary of Submission
		 States that the creation of 2 additional entrances within 100 yards of one another to create pedestrian/cycle pathway per point 63 is spurious, when already an entrance exists, and is utilized. Submits that this will potentially create 3 entrances within 200-300 yds of one another. Asserts that there currently are major issues with littering from the main road into the estate and additional entrances to the estate will only see a surge of the same. Outlines concerns relating to noise and light pollution arising from the Newbridge Rd is and has been an issue, as such a hedgerow has been grown and maintained for the past 10 years, at the personal expense of residents, in order to reduce noise and lights from tra6c and street lighting. Envisages that the new proposed pedestrian/cycling entrance and pathway will require to be lit after dark thereby directly impacting the houses located in the vicinity. States that the above points will undoubtedly create additional antisocial behaviour directly impacting on residents living within Jigginstown Green. States that such an issue currently exists in the area there currently exists an issue and that an additional pedestrian/cycle path with 2 proposed additional entrances will only encourage further antisocial behaviour/gatherings. Notes that there is an attenuation pond, located between the end houses in Jigginstown Green estate and the bridge by K Leisure. Proposals will disturb the water table which is already under pressure from the new builds in the area and will interfere with the attenuation pond in situ in that location. Re: No. 17 _ modal shift (Note: This part of the submission refers to a specific pedestrian cyclist measure) States that the Bridge on the Carragh Road is being used by cyclists and pedestrians alike to gain access to the main Newbridge Road and to get onto the bridge itself to gain access to the ring road. Questions Why should we spend any more money putting yet another slip

Sub. No.	Name	Summary of Submission
KCC- C37- 53	Fiona and Cathal Carville	 States that if the future intention is to pedestrianise the Main Street then carrying out any works would be futile and a waste of taxpayers money. PMA No. 26 (Data Centres) Refers to EDO 1.12 of the NDLAP. Notes that it is expected that by 2028 data centres will be consuming almost 30% of Ireland's electricity and submits that data centres will make it impossible for us to adhere to specified emissions levels targets. States that we have become one of Europe's worst carbon emissions offenders and face fines of up to 250 million euros for missing targets and This figure will increase with the new data centres being constructed. Further notes that other issues need to be factored in such as water usage (Naas already has its difficulties with this), pollution from backup generators and securing the supple of rare earth material for the building of such centres. Gallops Avenue States objection to the proposed Gallops Avenue in any form. Objected to this proposal at an earlier Public Meeting and again have posted objections online. State that they cannot understand why the wishes of the vast majority of local residents are being ignored again by a further attempt to impose this unwanted and unnecessary construction. Wishes to have Proposed Material Alteration No. 22 (MTO 3.3) deleted and instead support the investigation of the feasibility of an Outer Relief Road (MTO 3.9) which we feel will properly service the needs of the expanding population into the future.
KCC- C37- 54	Debby Bernadette	 Objects (as a resident of Naas and Jigginstown Green Estate), to the following proposals: Currently where the proposed plan for this slipway from the New Caragh Road to access the canal path, there is a large and diverse community garden which has been supported and tended to for many years by both the council and the residents. States that building this slipway would decimate this garden and destroy so many years of good work for nothing because this slipway does not meet the Modal Shift targets discussed. Contends that such a proposal is not environmentally friendly especially when there is already access through the Jigginstown Park estate and off the Newbridge Road and is Greenwashing and a waste of taxpayers' money.

Sub. No.	Name	Summary of Submission
		 States that most people using bikes or walking to and from schools/work will not go 100s of meters out of their way to access a canal path that in some parts does not allow for 2 people to walk abreast safely. Further states that for residents of the Arconagh and Elsmere estates to cross a busy road to access an often muddy and littered path does not make sense States that there are proposals to pedestrianise the Main Street in the town so it makes more sense to put in place a cohesive system of cycle paths which are environmentally and economically viable and not put in stop gap measures as proposed. Submits that the other proposed location for a walkway and cycle path on the other side of the estate would interfere with the attenuation pond which was put in place by KCC to combat the risk of flooding. States that any interference with this would severely impact the water table which is currently under a lot of pressure from the new estates and also further construction such as the new Data Centres. Submits that there is an already existing entrance on the Newbridge Road towards the canal and sports centre and this is not being considered. Contends that these plans are stop gap measures to meet targets and do not take in to account long term issues which will arise for the residents of these areas.
KCC- C37- 55	Orla Ahern	 Gallops Avenue Submits that The Gallops Avenue proposal is a reiteration of the Naas Inner Relief Road and that this proposal was democratically defeated in a vote by Naas Municipal District councillors on a Part 8 planning application in 2019. Submits that this is an affront to local democracy to include this proposal in the Local Area Plan. States that this has to be removed from the plan. States that in order to ensure the sustainable development of Naas over the course of the next generation an outer orbital route is required to the east of the racecourse and therefore the outer orbital route needs to be included as an objective in the Plan.
KCC- C37- 56	Fiona Masterson	 Proposed Material Alterations Nos. 11, 17, 26, 29, 32, 41 and 74 Notes that Material Alteration No. 11 sets a modal shift target that is too low to meet our targets under the Climate Act and that the Greenway appears to be the main cycle route for all commuter journeys from the Jigginstown area. States this route will not incentivise travel towards cycle journeys to school and work as it will add too much time to these journeys and prove unsafe in winter months. Further states that the cost of linking the bridge on the new Caragh Road to the greenway would be

Sub.	Name	Summary of Submission
No.		
		 better spent connecting segregated, family friendly cycle lanes on the Newbridge Road were a gap exists along the New Caragh Road to K Leisure and on the Newbridge Road adjacent to Jigginstown Green and Park. Submits that Permeability Measures to encourage this modal shift should reflect a safer route to, walkways, cycleways and public transport that do not expose families to unsafe access to HGV routes as planned in Jigginstown Green. Notes that Material Alteration No. 17 includes the word 'Universal', the term implies accessibility for all, the cycle routes proposed in the plan do not reflect universal usage, as they do not encourage family, school or work cycle trips. Submits that direct routes will encourage the modal shift needed. Consideration for universal access should include the safer routes to school's programme. Notes that Material Alteration No. 32 adjusts tree lines to Hedgerows and that the Chief Executive's Report (on Submissions Received to the Draft Plan) acknowledged submissions that requested inclusion of omitted hedgerows and tree lines. Requests again that the hedgerows and biodiversity areas in Jigginstown Green are added to Material Alteration No 32. Notes that Material Observation No. 26 identifies Naas as a Key town and as such is suitable for a data centre. Suggests this connection is not appropriate and the Naas LAP is in danger of approving Data Centres before the Commission for Regulation of Utilities report been published. The draw on electricity and water would compromise not only our carbon emissions but would adversely impact on domestic, health and business usage. Requests that Material Alteration No. 29 should include certainty for greenhouse emission targets to be met, not by offsets but by providing own sustainable green energy onsite. States that Material Alteration No. 41 should include the requirement for a full environmental impact assessment which would address amongst other concerns the use and source of w
		Data Centres in the Naas area, and request they be reverted to agricultural or open space use.
KCC-	Gilmar	States that the "renamed" Gallops Avenue in this new proposed plan has already been rejected by
C37-	Uyema	the current Kildare council members, once rejected this plan cannot be proposed again. States that
57		there is no material alteration.

Sub. No.	Name	Summary of Submission
		 Contends that the plan doesn't work as any further increase in traffic at the Naas Racecourse junction simply creates a traffic bottleneck on the Dublin Rd. Submission provides the following link of videos showing evidence of this: https://wetransfer.com/downloads/2b7284edf907e1e624 94558eb281cd20210822125036/a1cd4ec80318426bceadaae615f4e17f20210822125054/e90b90 Notes that Ballymore is breaking ground for a new development and provides the following link: https://www.independent.ie/business/irish/sean-mulryansballymore-plans-385-new-homes-for-naas-40528772.html, States the council is "under pressure" to vote and approve this new plan and states the "pressure" this developer is putting to the council members is not a reason to approve a proposal which has been already rejected and also does not work. Submits that the only viable solution to remove traffic from Naas town is for a ring road on the Naas ball/Johnstown side. States that this will allow the Ballymore development to be built without completely congesting Naas.
KCC-	Donal	• States that the Inner Relief Road was already rejected less than 2 years ago by the elected members
C37- 58	Higgins	 of the Council and simply rebranding it and trying to force it through is unacceptable. Submits that it must be rejected (again) and a proper outer relief road, to the east of the racecourse, developed instead.
KCC- C37- 59	Donal Higgins	 States that data centres use up an enormous amount of energy. So much so that it will make it impossible for us to meet our climate targets and that some estimates reckon that data centres could consume up to 29% of Ireland's electricity in the near future. Notes that after the construction stages the number of people employed in data centres is minimal so we aren't even getting an employment return on the cost of these centres. Submits that they're development here needs to be reconsidered.
KCC- C37- 60	Niall Purcell	 Gallops Avenue Strongly objects to the locating of an inner ring road skirting the Gallops and Woodlands to the Blessington Road as it is a complete waste of tax payers money, as it is not necessary, incorrectly designed, dangerous and most importantly will not serve any benefit. States that this has been rejected by councillors, a TD and a road engineer and that locating the route as proposed indicates total ignorance of the council to listen to the constituents of Naas,

Sub. No.	Name	Summary of Submission
		 elected officials and road engineers. Submits that if the road is too close to Naas and if any road were to be considered, it should be the far side of the racecourse, if its intention is to alleviate traffic coming into Naas. Further submits that siting the turn-off at the Gallops/Dublin entrance to the racecourse will cause major traffic delays States that the design is seriously flawed as the road is not a through road as it has T- junctions and traffic lights which won't assist in increasing the traffic flow. States that the Council show look at Kilkenny, where the ring road encloses the Kilkenny urban area. Submits that the fact that the council is pursuing their original agenda dating back decades speaks of the lack and will get up to date information. States that directing a road, which is not required through and urban area with so many young children raise a significant safety concern. Believes that the council should fully reflect on the points above and the strong will of the community involved that are determined to fight this proposal to the highest court if required. States that many have confirmed that they will be galvanised and prepared to contribute to whatever funds are required.
KCC- C37- 61	Karen English	 Notes disappointment that the original Naas Plan was discarded at such a late stage as Naas has now been granting a number of planning applications without a framework or strategy in place for a number of years now. Proposed Material Alteration No. 26 Rejects Proposed Material Alteration No. 26. Notes that data centres use up vast water resources for which Naas is not in abundance of currently. Water infrastructure is merely catching up with the population growth since 2006 and have not planned for it to be used for a data centre. Questions if waste heat feasibility studies been undertaken for this area? States that data centres are already putting the national grid under. States that if Naas is identified as a key town, then renewable energy resources to cater for an entire data centre should be established first and there appears to be no planning identified for this purpose. Proposed Material Alteration No. 29

Sub. No.	Name	Summary of Submission
		 Rejects Proposed Material Alteration No. 29. Submits that this is a weakly worded amendment. The term 'consideration' allows the data centres energy requirements to be ignored with no penalty and that to consider the impact is to merely think about it. Further submits that data centres are a drain on the electricity network and are largely run by fossil fuels. Notes that the National Planning Framework outlines the pathways in which Ireland need to take in regard to renewable energies. States that any data centre project will be required to include measures to generate energy on site as part of the overall development proposal. Contends that the amount on land on either site at the entrance to Naas or at Jigginstown will not be enough land to generate most of the renewable energy needs. Submits that electricity that is generated must be renewable and these lands do not facilitate this vast requirement. Notes that the proposed material alteration does not require the energy to be renewable. States that the national climate policy position requires that we transition to a low carbon society and that data centres contravene this initiative in terms of energy required / water resources and the amount of fossil fuels needed. States that it seems that the Plan has disregarded any stipulations on water resources which are already under pressure in Naas. Proposed Material Alteration No 74. Rejects Proposed Material Alteration No. 26 for the above reasons. States that the National Planning Framework identifies the need to 'integrate environmental considerations into land use planning in a way that responds to the sensitivities and requirements of the wider natural environment'.
		 Reiterates the issues with data centres relating to energy use, greenhouse emissions and water resources.
		Proposed Material Alteration to No 75.
		 Submits that the intent of the Council to increase population growth of Naas and also improve economic growth cannot be done without centres for community and education. States that if you take away land zoned for education and put in new houses it does not comply with the Access to quality childcare, education and health services strategy of the NPF.

Sub. No.	Name	Summary of Submission
		 Notes that NPF also states the policy to support regional development through continued investment in education and training and that by removing land zoned for education it allows unplanned/uneven population growth and removes necessary amenities needed in Naas. Proposed Material Alteration No. 22 Rejects Proposed Material Alteration No. 22 and states that any version of a change to the road has been already objected to by council members and residents and has been objected to for some decades now. Contends that the wording also implies that is the only option forward which it is not. States that an alternative route to the east of the racecourse should be the only option considered as the proposed 'Gallops Avenue' has been rejected. Proposed Material Alteration No. 23 Submits that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility and that alternate route options are the only way forward. States that the Council must listen to the residents after two decades of not listening.
KCC- C37- 62	Sunday's Well Residents Association	 MTO 3.3: Submits that this proposed route was rejected by NMD councillors in 2019 not because of the unsuitability of the proposed design but actually because of the unsuitability of the proposed route. States that this is evident in the minutes the Naas NMD on 17/06/2019 where 3 councillors (Moore, Breen and Sammon) specifically name the outdated route as their reason to reject this proposal. Further notes that four members of the CRG attended this meeting and are clear from the discussions they witnessed at this meeting, that the proposed route rather than the proposed design was the primary rationale for the rejection of this proposal. States it is frustrating that this proposed route continues to languish on all suggestions for Naas despite being rejected and is categorically opposed to by the local community. Submits that previous utterances from KCC senior management have highlighted a democratic deficit in Naas. States that it is not unprecedented for KCC to amend plans and not proceed with routes when change is required e.g. the proposed link road between the Craddockstown road and the Blessington Road through Lakelands and Sundays Well, and St. Ita's Place as the 'new' Rathasker Road.

Sub. No.	Name	Summary of Submission
		 MTO 3.3 - Final point in paragraph: 'Consider providing an alternative route located on a corridor on the east of the racecourse' States this proposed material alteration is welcomed; however, it is important to emphasise that it is due full and proper consideration and requires a blank slate review and not just a rehash of old consultants' reports. This alternative route should be the only route receiving consideration given that the proposed Gallops Avenue has been rejected. Submits that there is merit at a minimum to widening the existing Fishery Lane and through the racecourse where adequate space already exists. MTO 3.9 – Welcomes investigating the feasibility of an outer ring road however the inclusion of this Outer Orbital Route as a stated objective within the LAP is required. Questions if this will amount to a full and proper review. Notes with disappointment that the timing of calls for submissions frequently coincide with holiday time. Whilst recognising that all required legal engagement is met within the chosen timing, one cannot help but feel an element of cynicism as to the timing on each and every occasion and wonder as to KCC's true appetite for engagement with local community.
KCC-	Carmel	Proposed Material Alteration No. 22
C37- 63	Geissel	 Questions the purpose of this road. States that the council have said it is to provide traffic relief on the Dublin Road. Submits that residents have repeatedly said over many years that this proposal was incorrect, that traffic would not be relieved in this way, and that an Outer Relief Road is required. Questions if relieving traffic is the aim, then what is the point in examining a HGV ban on the proposed road. States that the whole concept of this road is out-dated and that changing the design of this road is disingenuous. Notes that all proposals for this road have been continuously rejected by Naas over many years and that this planning process is supposed to take residents views into account.
KCC-	Carmel	Proposed Material Alteration No. 1
C37- 64	Geissel	 Notes that this alteration proposes an increase in the housing density for proposed developments. States that there is no justification given for this increase. Asks what has changed since the original plan giving increasing quality of living for the proposed new residents by increasing the density of housing? Asks why are we planning for decreased quality of living?

Sub. No.	Name	Summary of Submission
KCC- C37- 65	Carmel Geissel	 Proposed Material Alteration No. 23 States that the Plan includes an increase of more than 10% of new residents for Naas and that the Outer Ring Road is needed to accommodate the increased size of Naas. Notes that the documents states that the development of the road would not be completed within the time frame of the plan. Submits that this is irresponsible, and that the road should be planned for and included in this plan period. Notes that the proposed alteration ties in with Proposed Alteration No. 22 and Residents have stated that the responsible future of Naas requires the Outer Relief Road and not the road proposed by alteration No. 22. Concludes by stating that it is the responsibility of the Council to plan an Outer Relief Road for the 2021-27 time frame, and not just to investigate the required road.
KCC- C37- 66	John Lennon	 Gigginstown Green States that the targets being discussed in the Plan appear ill thought out and unrealistic. Contends that most walkers and cyclists naturally use the quickest route to their workplace and/or schools. It is senseless to think that someone from Arconagh or Elsmore would cross the main Newbridge Road to access a canal path while it is quicker by far for them to travel straight to school or work by going straight down the main Newbridge Road. States that the first proposed location for access to a canal path is at the far end of Jigginstown Green and that any pathway or associated works here would disturb the water table which is already
		 under significant pressure from the several newly built developments in the area. Notes there would also be an adverse impact on the attenuation pond at this location and furthermore, there is already a pedestrian and cycle lane 50 metres up from the proposed location which is used to access the sports centre. Sees no logical reason to put in an unnecessary additional access point/pathway in the proposed location adjacent to 31/32 Jigginstown Green and states that surely this money would be better spent developing the infrastructure for cycle lanes along the R445. Connectivity Measure Carragh Road States that the Bridge on the Carragh Road is a busy road used to get to the main Newbridge Road and it makes little sense to put a slip track off the bridge at the proposed location.

Sub. No.	Name	Summary of Submission
		 Notes that the location is home to a wonderful bio-diversity garden which houses hedgehogs, as well as varied flora and fauna. Further notes that the location has several issues with regard to drainage and efforts to remediate this have included the planting of numerous trees in the area. States that there are many obstacles with regard to access and pathway capacity along that stretch of the canal, particularly under the Caragh Road and Ploopluck bridges, which would need to be examined.
KCC-	John	EDO 1.12 – Data Centres
C37- 67	Lennon	 States that Eirgrid has suggested that by 2028 data centres will be consuming 29% of Ireland's electricity. Asserts that data centres will have a huge impact on Ireland's ability to tackle our emissions levels and meet our agreed reduction targets in the years ahead. Notes that Ireland already faces fines of up to €250 million for missing targets. States that new data centres will put further pressure on this. States that water usage which Naas already has its difficulties with is also an area that would be adversely affected by having new data centres in the area. Further states that pollution from backup generators is also likely to have a negative impact on the environment. Contents that evidence suggests that data centres are prioritised in the event of reduction in capacity on broadband and associated services in the area and this would have a direct negative impact on local residents.
KCC- C37- 68	Joy Herron	 MTO 3.3 – Objects to any version of a proposed Gallops Avenue. States that the alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected previously. MTO 3.9 – Submits that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC-	Miriam	Gallops Avenue / Outer Relief Road
C37- 69	Colleran	 Disagrees with the proposed MTO 3.3 Gallops Avenue. Outlines concern that this is being proposed again because it is another interpretation of the Route 2 Naas Inner Relief Road which was rejected within the past two years. Disappointed that this inappropriate route is being proposed again given that it was rejected by Councillors so very recently. This proposed route is from an outdated plan of almost 30 years ago

Sub. No.	Name	Summary of Submission
		 Submits that it is not fit for purpose for the needs of a larger town, in particular by diverting traffic through residential areas with associated safety issues for the people living there. States that an outer orbital route should be developed instead.
KCC-	Brendan	Proposed Material Alteration No. 1 – Major increase of "Estimated Residential Capacity of Lands
C37-	Kenny	Zoned New Residential"
70		 Notes the Draft Naas Local Area Plan 2021 stated that the remaining residential unit target is 1,147 (which includes those on the social housing list that are currently resident in Naas). States that in seeking to meet the target, the Council had planned for this figure. The massive, proposed increase of over 40% on this figure is obviously hugely excessive and in no way justified. States that the thought that this huge excess of housing developed suggests that proper planning (including social and proper infrastructure) is being neglected in favour of developed driven agendas without such infrastructural context. Notes that it is acknowledged in the draft Plan, that Naas has not kept pace with the required infrastructural requirements and most residents are currently totally disenchanted with the lack of childcare provision, and open/playing space in developments for children. Refers to the absolutely ridiculous issue of "site specific" planning which has been relied upon by planning authorities in the recent two SHD applications in the Devoy area. States that the abject failure of the Council to express clear appropriate density quotas for this area of the town has been adjudged by an Bord Pleanála to mean that no standards apply. Submits that this is absolutely
		 Notes that in the most recent application, despite setting certain thresholds, the Council agreed to abandon them in favour of higher thresholds as dictated by the developer and, here there is an attempt to again raise that threshold when it is clear that these levels are totally inappropriate, and that adequate play and recreation space is needed. Proposed Material Alteration No.2 Submits that this belatedly a positive step as residents in the South West/Devoy quarter of Naas had recently to endure an ill-considered SHD planning application which, among many issues, attempted to ignore necessary transport infrastructure and also attempted to trivialise and reduce laid down necessary carparking requirements to centre-city Dublin standards.

Sub. No.	Name	Summary of Submission
		 Proposed Material Alteration No. 3 Welcomes this but it's obviously way too late in relation to Elsmore, Whitethorn and the new SHD development currently being 'pile-driven' beside the Osprey Hotel (combined total of c.800 units). State that all fail spectacularly in provision of adequate outdoor play areas for young children. Notes that taking into consideration the further high-density development planned at Old Caragh Road, West of Rathasker Road and the proposed zoning for Devoy Barracks, this will ensure that any opportunity to remedy this issue for these communities and families will be obliterated forever. Submits that such mistakes have proven costly in the past in specific areas of Dublin and Limerick and was at the root of serious further social problems. Proposed Material Alteration No. 4
		 Submits that a good mix of housing types is a very appropriate objective, but this should be then observed in the South West quarter of the town where the majority of the social housing contemplated by the Council. States that according to this objective, the new residential zonings would have to be revisited so that there would be a balance of social housing throughout all areas of the town which would be appropriate and correct. Proposed Material Alternation No. 5
		 States that this (the issue of childcare provision) is a regrettable failure that needs to be urgently addressed, rather than developers being allowed to just drive their agendas through. PMA No's 6,7,8,9,10 Agrees with PMAs and states that they should be basic tenets of the planning in any event. Submits that provision of sport and recreational facilities is a proper objective, but developers failing to provide adequate open spaces (and not inadequate areas such as a mere 15%) which should not be ignored when pursuing this objective. PMA No. 26, 29, 56 & 74
		 Submitter cannot understand why Jigginstown is being contemplated for a data centre. States that surely the outer location between Junction 10 and 9a, or a site in an area more appropriate for such industrial/ business park locations, such as the Millennium Park, would be much more appropriate for a data centre. Notes that such facilities are sited in such Business Parks and are not appropriate to be anyway near to a town centre and residential areas.

Sub. No.	Name	Summary of Submission
		 Submits that this again seems to be a developer-led idea with no regard for people living in the area with these typically dour eyesores. Requests that the environmental impacts of any such proposal should be investigated deeply prior to any proposed rezoning for same. PMA No.75 States that this is a further developer-led effort to try to make windfall profits from such a rezoning whereas Community and Education area and facilities are poorly allocated to this area of the town States that the needs of the existing residents there should not be sacrificed in the interests of lucrative and ill-judged reduction of land for badly needed social infrastructure for which the town is deficient. Conclusion Concludes the submission by hoping the suggestions outlined above will be included so that the residents of Naas and especially those of the Southwest Naas/ Devoy Quarter will have their basic needs reflected in the plan.
KCC-	Conor	Objection to Proposed Material Alterations Report in respect of Gallops Avenue
C37- 71	Prasad	 Outlines concerns to see yet another attempt to push through a so-called "Gallops Avenue". Notes that on numerous previous occasions there has been objections to this road and states that nothing in the proposed "alterations" changes this. Submits that the changes such as renaming the road an avenue - consisting of superficial, cosmetic tweaks to what is a fundamentally flawed proposal. (Notes that that these elements were already included in April 2019 and is entirely unacceptable: https://kildare.ie/CountyCouncil/media/Naas%20Inner%20Relief%20Road%20A5%20Size%20B.pdf). States that the proposed "alterations" speak of footpaths, cycle lanes, a bus stop, "greenway" and some trees. Submits that it is common knowledge that all such roads around Naas, and elsewhere, include designated footpaths, cycle paths, and some trees and does not assuage concerns. States that if the reference to including a bus stop is in response to strong and legitimate calls for

much enhanced public transport in Naas, it is clearly disingenuous.

Sub. Name No.	Summary of Submission
	 Submits that the Council's attempts to now say the ring road will have the "appearance of a street, avenue or boulevard", are frankly insulting, are greenwash and will not be accepted by the residents of Woodlands or neighbouring estates. Outlines extremely concerns about the negative environmental, safety and quality of life impact that this road would have on the Tipper Road area and also notes that it would be particularly damaging for Woodlands residents creating, inter alia; light, air, dust and noise pollution, dangerous junctions for children walking to school, decreased security and property devaluation. States that they are still not aware of any adequate and independent environmental impact assessment – but it if it has, they would like to receive a copy. Submits the proposed road would create serious congestion in other parts of Naas and simply move the problem to another area, including in the context of new housing developments in those areas. Reiterates that such repeated attempts to force through the ring road in a clearly inappropriate place also raise fundamental questions about democracy, transparency and governance in this country. Notes that they were assured just a few months ago by our local TD and the Minister for Housing the democratically-rejected road would not be used in an attempt to force this road through. States that they have requested clarity on this from our local TD and will do so via the Minister too. Notes that they have requested clarity on this from our local TD and will do so via the Minister too. Notes that Kildare County Council works for the people of Kildare, in this case the people of Naas, not the other way round and that it is about time the Council listened. Reiterates opposition to this and states that they are considering contacting the media and a legal challenge if continued attempts are made to force through this democratically rejected proposal. The submission attaches a letter from Minister for

Sub. No.	Name	Summary of Submission
KCC- C37- 72	Margharita Solon	 MTO 3.3: States that the proposed Gallops Avenue has been rejected and that we are in a democracy. Submits that an alternative route to the east of the racecourse should be the only route under consideration. MTO3.9: States that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC-	Ravi Prasad	Objection to Proposed Material Alterations Report in respect of Gallops Avenue
C37-		Outlines concerns to see yet another attempt to push through a so-called "Gallops Avenue". Notes
73		that on numerous previous occasions there has been objections to this road and states that nothing in the proposed "alterations" changes this.
		 Submits that the changes such as renaming the road an avenue - consisting of superficial, cosmetic tweaks to what is a fundamentally flawed proposal. (Notes that that these elements were already included in April 2019:
		 https://kildare.ie/CountyCouncil/media/Naas%20Inner%20Relief%20Road%20A5%20Size%20B.pdf States that proposed "alterations" speak of footpaths, cycle lanes, a bus stop, "greenway" and some trees and that it is common knowledge that all such roads around Naas, and elsewhere, include designated footpaths, cycle paths, and some trees and does not assuage concerns.
		• Further states that if the reference to including a bus stop is in response to strong and legitimate calls for much enhanced public transport in Naas, it is clearly disingenuous.
		• Submits that the Council's attempts to now say the ring road will have the "appearance of a street, avenue or boulevard", are frankly insulting, are greenwash and will not be accepted by the residents of Woodlands or neighbouring estates.
		 Outlines extremely concerns about the negative environmental, safety and quality of life impact that this road would have on the Tipper Road area and also notes that it would be particularly damaging for Woodlands residents creating, inter alia; light, air, dust and noise pollution, dangerous junctions for children walking to school, decreased security and property devaluation.
		 States that they are still not aware of any adequate and independent environmental impact assessment – but it if it has, they would like to receive a copy.
		Submits the proposed road would create serious congestion in other parts of Naas and simply move the problem to another area, including in the context of new housing developments in those areas.

Sub. No.	Name	Summary of Submission
		 States that such repeated attempts to force through the ring road in a clearly inappropriate place also raise fundamental questions about democracy, transparency and governance. Notes that this was an extremely strong democratic mandate on the part of all the people of Naas. Notes that they were assured just a few months ago by our local TD and the Minister for Housing that "convoluted procedures" involving the Land Development Agency (LDA) to force through the democratically-rejected road would not be used in an attempt to force this road through. States that they have requested clarity on this from our local TD and will do so via the Minister too. Notes that other local TDs have also written very strongly in opposition to this road and in support of the local community and we can share this with you. Submits that Kildare County Council works for the people of Kildare, in this case the people of Naas, not the other way round and that it is about time the Council listened. Reiterates opposition to this and states that they are consider contacting the media and a legal challenge if continued attempts are made to force through this democratically rejected proposal. The submission attaches a letter from Minister for Housing, Local Government and Heritage, Darragh O'Brien, TD confirming that LDA will not be involved in any aspect of the Gallops Avenue proposal.
KCC- C37- 74	Karen McCarthy	 MTO 3.3: Objects to the fact that The Gallops Avenue continues to be included in the area after this route was comprehensively rejected by the NMD council in 2019. States that it will not provide relief in the short-term nor any lasting benefit in the long term and proposes to channel significant traffic through established residential areas (with all the attendant environmental and safety concerns) and restrict the development of Naas Racecourse, a valuable commercial and community enterprise. Notes that The Gallops Avenue is a 30 year old idea and any further time and money spent debating is better invested in creating the vision and infrastructure need to serve the community for years ahead. MTO 3.9: Submits that this section of the MTO is welcomed as addresses the provision of a future-proofed road infrastructure for Naas. States route would take traffic away from residential areas, provide better access to essential services and enable the growth of the town in a sustainable

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		manner. Request that this be reframed as an stated objective of the plan as opposed to a feasibility study.
KCC-	Colm Byrne	Modal Shift
C37- 75		 States that the modal shifts of cycling to 6.7% of work trips and 4.4% of school trips is incredibly unambitious and inadequate in the context of our national climate targets and the switch required to active travel. Notes that most of Naas, including Sallins train station, is within 15 minutes cycle of the town centre, especially with an e-bike. States that this target feeds into the transport plan in the LAP with a focus on road building and car priority rather than active travel. Submits that public transport is good and important for connections outside the town but it will not be as quick as cycling for transport within Naas. States that our children should be able to cycle to school on their own on safe infrastructure and this plan does not provide this. Submission proposes an increase of the targets to 30% by 2030 for cycling, the abandonment of the Millbridge/Finlay Park Road and Gallops roads and the construction of a cycling network on all our roads and lanes.
KCC- C37- 76	Zachary McCann	 Objects strongly to the proposed "Gallops Avenue" route and states that proposal has been rejected by the vast majority of Naas Councillors, on behalf of Naas Residents. Submits that to continue with the proposal is an insult to democracy and is to ignore the voice of the people who know what is best for the community. States that the residents along this proposed route are the people who are already most affected by the traffic congestion on the Blessington and Dublin Roads. Submits that they would welcome a suitable relief road to link the Blessington Road to the N7/M7. States that re-routing this traffic through a residential area is a short cut and will cause other problems costing the taxpayer money, and in the end, the correct solution will still need to be carried out and paid for by taxpayers. Notes that the only logical solution is a properly planned orbital route that would address the traffic bottlenecks. States that alternative routes to the "Naas Inner Relief Road" were much more logical and need to be properly reconsidered.

Name	Summary of Submission
	 MTO 3.3: States any version of the proposed "Gallops Avenue" should be rejected. Re-examining this route again is a continued waste of tax-payers money. MTO 3.3: Submits An alternative route to the east of the racecourse should be the only route given consideration. MTO 3.9: Requests that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility. Submission outlines opposition the proposed route is based on the following grounds: States that "Gallops Avenue" route, will move the problem to another area and not work and that it is an outdated proposal and is contradictory. Submits that this route was first proposed 30 years ago and that since then the population of Naas has almost doubled in the shadow of consistent poor planning decisions by Naas / Kildare Councils. Notes that KCC state that this route will take traffic away from the "town centre" while also stating that Naas has "no through traffic". States that these statements make no sense. Submits that the traffic congestion is caused by the lack of an alternative link from Blessington to the N7/M7 and a lack of public transport and school busses and cycle routes. States that quality of life and future proofing for the environment, health and safety have not been considered. States that this route proposes that congestion, including high volumes of HGVs, be rerouted through residential areas. Contends that this will have a devastating impact on the health and well-being of the families living along this route and that heavy pollution and noise will be moved to a route that impacts a greater number of people than it currently does. Submits that the traffic including high volumes of HGVs and complex junctions that are proposed for greener transport is well illustrated in Table 5.1B (of the Naas /Sallins Transport Strategy), where a target reduction in private car usage for education trips has b
	Name

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		 around the town. Notes this is unacceptable in 2021 and this type of planning in Naas has already been publicly criticized by the Office of the Planning Regulator noting that the Deputy Regulator reflected on how poor planning has "created a disproportionate reliance on car transport in the area" and that Ms O'Connor stated that the long-term plan for Naas must be to "promote a pattern of development that was more conducive to public transport as well as pedestrians and cyclists." 4. Reiterates that a Proper Outer Ring Road is required to link the Blessington Road to the N7/M7 and that investing in a 30-year-old road is an unacceptable waste of taxpayers' money. Further states that it is an insult to the people of Naas to continue to maintain that this road is proposed to take traffic away from the town centre when the objective is to prioritise traffic movement between Blessington and the N7 at the expense of residents. Notes that in the past there have been concerts in Punchestown and getting traffic in and out of this area has been a problem. Submits that a proper Outer Ring Road could be used to address this problem and increase necessary revenue for town centre.
KCC- C37-	Edmund Murphy	 MTO 3.3: States that the proposed Gallops Avenue is not a solution and has already been investigated and rejected.
77		 MTO 3.3: Submits that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9: Requests that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC-	lan d'Alton	Permeability Link 36 - Map 5
C37- 78		 Objects to this link for the following reasons: Lack of prior consultation and engagement with stakeholders: States that the 'permeability' strategy in the draft plan appears to be based upon the NTA's Permeability Best Practice Guide (2015). Notes that this document states (p. 11) that "Consensus must be sought, insofar as is possible, between local residents and the relevant authorities as to the objective of any proposal to maintain an existing link or create a new one." Asserts that this has not been done by Kildare County Council. The proposed link goes against the guidelines for 'Scheme Design' in the NTA Guide: States that there is a steep incline from the Rathasker Road to the Rathasker Heights green area, necessitating the creation of either a steep and possibly dangerous slope especially for children and

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	 cyclists exiting onto the Rathasker Road. States that additional lighting that will doubtless be necessary beside the properties which will cause light pollution. It is noted that the location of the main sewer from Rathasker Heights runs somewhere in the vicinity of the proposed link. The proposed link has the potential to recreate the anti-social problems that the residents successfully stopped in 1999: States that the NTA Guide (p. 45) notes that "Residents often perceive that opening up new pedestrian routes can affect their personal security" States that in the case of Rathasker Heights, this is not a 'perception'; this was the reality here until 1999 as the estate was plagued with anti-social behaviour before 1999, when, at their own expense, residents installed a fence along the boundary with Rathasker Road and landscaped it (it is now greened up, and barely visible). Submits that the proposed link will, undo this, by providing direct access again to the green area from the Rathasker Road. States that some hundreds of new houses are being constructed to the west of the road; eventually and inevitably the anti-social problem will re-emerge if this link is constructed. The Rathasker Heights green area is an extensive end-space and opening it up will only make it more attractive to gangs and groups: Notes that the estate already has a quiet, well-maintained green, safe area, which should remain so for sake of our children and residents generally, especially our vulnerable community. Submits that opening up a link will confer no tangible benefit on our residents, and can, by definition, only lead to a worse outcome for them in terms of the formalisation of short cuts which can cause a decrease in anti-social behaviour as the increased usage and passive surveillance dispersed anti-social gatherings. States that this may be the case where there are existing rat-runs and informal through-routes – but the Rathasker Heights green area is already an end-space and the link will simply pro

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		 relatively lightly-trafficked and bringing pedestrians and cyclists through Rathasker Heights to the busy Kilcullen Road where there is a multiple junction gives them no additional safety or accessibility that they could not have by going along the Rathasker Road and using the pedestrian access through SuperValu's overflow carpark; or St Michael's Terrace. 8. States that the proposed link is planned to run alongside our boundary wall which will seriously impact on the privacy and the enjoyment of private open space. Notes that before the green area was closed off in 1999, residents suffered from persistent incursions over our wall, with bottles, cans and worse being thrown into our garden. Contends that the concept of 'permeability' is open to considerable argument as to whether it is appropriate or viable in every circumstance. The NTA Guide treats design as solving any problems. The difficulty with that is that human nature cannot so easily be 'designed'. Refers to case study of an Australian town of Dubbo [2019 – Dubbo, NSW – population 38,000 (Naas, c. 21,000)]. Notes that public consultation in the town was undertaken with an overwhelming majority of submissions in favour of closure. Support for closure was between 78.3 per cent and 86.3 per cent for individual walkways. Crime and anti-social behaviour was the main reason cited in many submissions in favour of closures, with concerns for safety a common focus. (Source: https://www.dubbo.nsw.gov.au/news-and-media/news-and-resources/mayoral-mediareleases/2019/council-to-close-10-walkways-in-bid-to-reduce-crime-and-anti-social-behaviour (accessed 16 April 2021))
KCC- C37- 79	Irish Water	This is a submission from a Prescribed Authority refer to Section 4 of the Chief Executive's Report.
KCC- C37- 80	Teresa Behan	 Strongly objects to the proposed "Gallops Avenue" route. Notes that proposal has already been rejected democratically by the vast majority of Naas Councillors, on behalf of Naas Residents. States that this resubmission is an insult to local democracy and that the only logical solution is a properly planned orbital route that would properly address the traffic bottlenecks. Submits that alternative routes to the "Naas Inner Relief Road" were much more logical and need to be properly reconsidered.

Sub. No.	Name	Summary of Submission
		 MTO 3.3: States that the proposed Gallops Avenue is not a solution and has already been investigated and rejected. MTO 3.3: Submits that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9: Requests that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC- C37- 81	An Post	 Proposed Material Alteration Nos. 49, 22, 54 and 71. The submission has been prepared by Avison Young on behalf of An Post, GPO, O'Connell Street, Dublin 1 in response to the publication of the proposed Material Alterations to the Draft Naas Local Area Plan 2021-2027 Notes that An Post operates a number of post offices and delivery service units across the County and throughout the State and that due to the age of some of these facilities as well as the requirement to efficiently modernise postal facilities the Company will seek to enhance facilities at existing and new locations to provide for their current and future operational requirements. States that this submission is being made in respect of Proposed Material Alteration (PMA) No. 49, PMA No. 22, PMA No. 54 and PMA No. 71. Submission requests that KCC carefully consider this submission in the finalisation of the Plan and accommodate future engagement with An Post. Outlines that An Post, operates two distinctive businesses in an increasingly digital environment: An Post Mail & Parcels and An Post Retail which provides an array of financial services and has a retail network of 950 Post Offices. Notes the central role that the company plays in Irish life and society and outlines its activities including the delivery of over 3,000 vehicles and its ownership of a significant number of properties throughout the State. The submission notes that the efficient operation of these facilities is central to the successful provision of the postal service for business and personal customers. Further notes changes in postal market over last decade and that the Covid-19 crisis has expedited this change with a greater number of people shopping online. Submission details changing postal trends and also notes the high level of population growth in Ireland along with the development of new urban settlements which have resulted in a requirement for An Post to assess its estate to

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		 ensure that its facilities continue to meet operational needs. In this regard the company undertaking detailed assessments of its existing facilities nationwide and considering a programme of works to ensure these facilities are best in class while also seeking new sites capable of accommodating modern delivery operations to serve new/expanding catchment areas. Submission notes the provisions of the draft Plan in which Naas is a designated Key Town under the RSES and further notes its housing and population allocation under the core strategy of the Kildare County Development Plan 2017-2023 (as varied). States that in light of the above and the proposed Material Alterations to the Draft LAP, it is important that a supportive policy framework for the future provision of postal infrastructure is provided for in the new LAP, in line with An Post's operational requirements. Further states that the enhancement of An Post's facilities and the future provision of new facilities could generate employment in Naas, increasing economic development; reinvigorate redundant and underutilised lands; and support climate change mitigation with the transition to e-vehicles in An Post's fleet.
		Proposed Material Alterations
		 Notes that An Post own and/or operate a number of postal services in the Town, including An Post Retail (Main Street) and An Post Mail and Parcel Distribution facilities (Blessington Road), as well as a Regional Office (Monread Avenue). In this regard, An Post are seeking to engage with Local Authorities to ensure this future development can be undertaken in a sustainable manner that benefits local areas and accords with local and national planning policy. Refers to An Post's submission on the Draft Naas Local Area Plan (Submission No. 489) which set
		 out An Post's current and future requirements to adequately serve expanding catchment areas and to request that KCC provide a supportive policy framework for the existing and future provision of postal infrastructure in Naas (attached to this submission as Appendix 1). States that having reviewed the Chief Executive's Report, it is not apparent that An Post's initial submission on the Draft LAP was assessed or considered by KCC. Asserts that this submission seeks to highlight additional comments from An Post in relation to the
		Proposed Material Alterations to the draft Plan as published and requests that KCC consider the comments made in respect of the Proposed Material Alterations as outlined further below.

Sub. No.	Name	Summary of Submission
		 Notes An Post has an important presence in Naas and is continually aiming to enhance its capability of providing a robust and reliable public service. In this regard, it trusts that the matters outlined below will be taken into consideration as part of the finalisation of the Naas Local Area Plan. Proposed Material Alteration No. 49 Notes that the Draft LAP has been informed by an Urban Regeneration and Development Strategy for the town and that The Draft LAP has identified a number of Core Regeneration Areas (CRAs), Key Development Areas (KDAs) and the Northwest Quadrant (NWQ) lands for the purposes of regeneration, consolidation, infill and urban expansion. The Draft LAP identifies Main Street within Core Regeneration Area No. 1 (CRA 1: Main Street) and envisages that it will strengthen its position as an established centre in which to live, work, shop, and socialise. Notes that Proposed Material Alteration (PMA) No. 49 seeks to amend the Urban Regeneration Areas of the Town Centre and will also examine other areas of potential within Naas. Notes that PMA No. 49 includes the following Action into the Urban Regeneration and Development Strategy Chapter of the Local Area Plan - Action: <i>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.</i> An Post states that, as a key property owner on Naas Main Street, it supports the undertaking of a TRP for the Town Centre. The submission notes that the TRP will likely contain a number of elements that relate to privately owned land and which may impact on current operational requirements of established businesses. As such, the submission considers that direct and detailed engagement with landowners is considered essential throughout the preparation of the TRP. It is therefore requested that Kildare County Council engage with An Post throughout the entire process
		 for the Naas TRP. Submission highlights the operational requirements of existing postal facilities in the Town to ensure these requirements are considered as part of the implementation of any redevelopment proposals under the TRP for Naas. States that it is imperative that An Post's services in Naas can continue undisrupted a result of the redevelopment of this area through the TRP. Submits that An Post's retail

Sub. No.	Name	Summary of Submission
		 offices and mail sorting offices are central to the operation of a reliable public postal service and their long-term viability should be protected. Car Parking Reiterates that An Post requires the use of c. 3,000 vehicles on a daily basis and that due to the increasing number of larger parcels being processed, it is considered likely that this requirement will increase over time and as such, An Post facilities may require greater levels of parking spaces including electrical vehicle charging points, as a steady transition is made to the use of environmentally sustainable vehicles. States that it is important to note, however, that car parking spaces are not only required for An Post delivery vehicles but also for vehicles used by staff that travel to An Post by private car and customers collecting mail items. Notes that older postal facilities have been adapting to the increased volumes of mails and parcels and changing operational requirements. States that older town centre facilities face challenges regarding additional space and car parking requirements relating to An Post's operations. Submission requests that Kildare County Council consider the requirements for postal facilities in the preparation of any future local plans or masterplans for the Town, require sufficient car parking spaces to operate in an efficient manner. Further notes that Postal facilities may require a greater quantum of car parking spaces going forward as postal trends continue to evolve thus it is imperative that facilities are future proofed to ensure the long-term viability of An Post's operations. Deliveries and Access Submits that postal facilities which are located in town centres have specific requirements, primarily with regards access and deliveries. Notes that access is typically required to premises on a 24-hour basis, with early morning late evening also being of importance. States that any restrictions on the times of deliveries/collections

Sub. No.	Name	Summary of Submission
		 Further states that it is important that a sufficient level of vehicular access is maintained and that sufficient loading bay space is provided to accommodate the collection and delivery of mail and to accommodate customers who require use of a vehicle to visit an An Post facility. Requests that KCC recognise this requirement as part of the finalisation of the LAP and in the future assessment and preparation of planning policy and masterplans for the Town. It is further requested that the Local Authority consult and engage constructively with An Post to ensure that solutions, in respect of their delivery/access requirements, are incorporated prior to the introduction of any restrictions or new masterplans. Proposed Material Alteration No. 22 Notes the provisions of PMA No. 22. States that Objective MTO 3.3 seeks to comprehensively reexamine the design of the Gallops Avenue and states that the redesign shall be carried out after consultation with local residents, stakeholders and other interested parties. Notes that The Gallops Avenue will connect the Dublin Road to Blessington Road at the existing junction to Time House (AIB), located approx. 150m from An Post's existing Depot entrance. In this regard, the submission requests that the design and location of this junction is fully assessed to ensure that there will be no further knock-on impact in terms of additional traffic hazards such as congestion or restrictions on accessibility into An Post's site. Submits that it is imperative that vehicles, including HGV's, can continue to access An Post facilities in a safe and efficient manner and that any restrictions to An Post's operational requirements and engage constructively with the company. Proposed Material Alteration No. 54 Notes the provisions of PMA No. 54 and states that the new land use group is considered as 'Open for the proposed material Alteration No. 54
		for Consideration' under the Q: Enterprise and Employment land use zoning objective, with the

Sub. No.	Name	Summary of Submission
		 restriction that it is only 'Open for Consideration' in the area between the Western Relief Road and the M7 (footnote No. 27). States that the inclusion of an identified "Logistics" land use is welcomed by An Post for Naas. Notes that in relation to An Post's facilities and operational requirements, it is considered important that flexibility is provided within land use zonings and objectives. Submits that both An Post Retail (retail) and An Post Mails & Parcels (distribution/logistics) operations are a necessity in urban locations in order to effectively provide an essential public service. Submits that it should be specifically noted that the Draft LAP has not identified any permissible uses under the 'Q-Enterprise and Employment' land use zoning objective. Therefore, requests the inclusion of appropriate land uses as permissible or open for consideration under 'Q-Enterprise and Employment' context of the established Enterprise and Employment centre on Blessington Road. Considers it inappropriate to limit the inclusion of the 'Warehouse (wholesale)/Logistics /Store/Depot' land use as 'Open for Consideration' only in the Enterprise and Employment zoned land between the Western Relief Road and the M7. Therefore, requests that the restriction on this land use (footnote No. 27) is removed from Proposed Material Alteration No. 54, and the 'Warehouse (wholesale)/Logistics/Store/Depot' land use be altered to 'Permissible' under this zoning objective. Alternatively, it is requested that the restrictive footnote is amended to include the existing Enterprise and Employment area on Blessington Road. Proposed Material Alteration No. 71 Notes that PMA No. 71 seeks to amend the Land Use Zoning Map 11.1 to change the site north of An Post's Depot on Blessington Road from 'Q: Enterprise and Employment' to 'C: New Residential C (12)' and 'F: Open Space and Amenity' and all other consequential amendments. Outlines concerns that this PMA would result in the creation
		 uses, including An Post's operations at this location. States that the development of open space and new residential development adjacent to An Post's established facility may result in unintended conflicts in respect of An Post's continued operation from this location and that any conflicts arising could have serious knock-on impacts on the ability of An Post to meet the postal needs of the public and agreed service legal agreements with the State.
Sub. No.	Name	Summary of Submission
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		 Therefore, the submission requests that we request PMA No. 71 not be adopted on economic grounds, as the zoning change has the potential to; a) impact on the current and future operational requirements of the existing businesses within the Enterprise and Employment Centre on Blessington Road and; b) restrict the potential enhancement/expansion of existing businesses in the future, including An Post. Submit that the zoning objective for this site as per the Draft LAP of 'Q: Enterprise and Employment' should remain in place. Conclusion Reiterates that this was made in respect of PMA No. 49, PMA No. 22, PMA No. 54 and PMA No. 71. Trusts that the matters outlined above will be taken into consideration as part of the finalisation of the Naas LAP and states that they are available for discussion on any of the matters referred to in the submission. Appendix 1: The submission has attached a copy of its initial submission (dated April 2021) to the Draft Naas Local Area Plan 2021-2027. This submission was summarised and responded to in the <i>Chief Executive's Report on Submissions/Observations Received to the Draft Naas Local Area Plan 2021-2027</i> (dated May 2021).
KCC- C37- 82	Mary Taaffe	 Proposed Gallops Avenue MTO 3.3: Strongly objects yet again to any version of a proposed Gallops Avenue. States that this proposed route was rejected by NMD councillors in 2019 on behalf of Naas Residents. It's an outdated plan and is not fit for purpose MTO 3.3: Believes that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9: Requests that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC- C37- 83	Ricardo Paco	 Proposed road through Finlay Park and proposed social housing Objects to the construction of a through-road through Finlay Park as it does not bring any benefits to the estate, specifically when an alternative could be built outside the estate. States that even now we have often motorbikes and cars speeding on the estate and that his daughter was almost run over a food delivery car this weekend.

Sub. No.	Name	Summary of Submission
		 Asserts that increasing the circulation of motorised vehicles exponentially increases the risk for children and vulnerable adults that currently use the estate. Also objects to the social housing proposed for the Finlay Park area. States that 100+ social housing will have a negative impact on the area and increase the risks usually associated with social housing areas not carefully planned in the past. Supports inclusion but states that measures need to be planned and approved in advance and that a mix of private and social housing is more inclusive.
KCC- C37- 84	Gerard Byrne	 Submitter attended the consultation with the Combined Residents Group representing 10+ estates in opposition to the Inner Relief Road plan (states now in it is fourth naming following previous rejections). States that he wasn't going to write a submission as he doesn't believe that this is a sincere process. States that KCC are going to push ahead regardless. Despises KCC for the mess that they have made of the town and for the patchwork development which has put all the retail on the boundary and sucked the air from the Main St. States that there is zero parking in the town, a derelict town centre development and a Main Street which is a retail desert. Submits that this isn't about the inner relief road but about 2,000-5,000 houses that KCC hopes to see built over the coming decades. Most of which will uses the 'local' relief road which will become a highway. States that he would like to see development too but requests that the right thing is done and get the developers to pay for the right solution which would be a proper outer ring/relief road which would mark the outer limit of the town's boundary. States that the suggestion that this won't be a big deal for the estates affected is disingenuous and states that if KCC bully their way into such an abomination of a cheap solution the solution that Naas deserves (the outer ring road) will never be built. Refers to zoom conference (on Proposed Gallops Avenue) and states that such a proposal will be always opposed by locals. States that KCC is relying on a sham process to push this on the people again and again. States that the Council should be damned in its efforts should it frustrate the democratic and consistent wishes of the people of Naas.

Sub. No.	Name	Summary of Submission
KCC- C37- 85	Cormac O'Donovan	 MTO3.3: Submits that this should be rejected. States that this is a divide and conquer approach to the same thrice rejected route. MTO3.3: Requests route to go east and around and that such a route is the right solution for not and for the future. MTO3.9: States that the LAP should have an objective for an outer orbital route and when this is built then let's have a conversation about an inner relief road. Submits that traffic calming/mitigation offers are a fig leaf and if built the inner relief road will become a principal highway for as much as 1/3-1/2 of the town traffic heading towards the big ball roundabout and will include heavy vehicles. Concludes by stating that this is simply not appropriate. The Gallops Avenue Strongly objects to the proposed "Gallops Avenue" route. Notes that this proposal has already been rejected democratically by the vast majority of Naas Councillors, on behalf of Naas Residents. States that alternative routes to the "Naas Inner Relief Road" were much more logical solution is a properly planned orbital route that would properly address the traffic bottlenecks. Submits that alternative routes to the "Naas Inner Relief Road" were much more logical and need to be properly reconsidered. MTO 3.3: States that an alternative route to the east of the racecourse should be rejected. MTO 3.3: Submits that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected MTO 3.9: Requests that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC- C37- 86	OPW	This is a submission from a Prescribed Authority refer to Section 4 of the Chief Executive's Report.
KCC- C37-	Gavin McDermott	Proposed Material Alteration No. 22, Movement and Transport Objective 3.3
87	MCDermott	 States that the proposed road scheme "The Gallops Avenue", previously referred to as the "Naas Inner Relief Road", has already been rejected by the democratically elected Naas Municipal District through a statutory Part 8 process.

Sub. No.	Name	Summary of Submission
		 Objects to the proposal to revisit the design of "The Gallops Avenue" and notes that the proposed material alteration states that "the redesign will take account of best practice design guidance for sustainable infrastructure, such as DMURS". States that given the level of vehicular traffic, and in particular HGV traffic, projected to use the route corridor the feasibility of the proposed road is questionable as best practice design in accordance with DMURS may not be achievable. Submits that design/delivery of an alternative route to the east of Naas Racecourse should be a stated objective of the Draft Plan 2021-2027 as this route will protect the existing settled communities from traffic, noise, and air pollution and will, in the long term, provide better traffic relief along the Blessington and Dublin Roads, Naas town centre, and at all associated junctions.
KCC-	Gavin	Proposed Material Alteration No. 23, Movement and Transport Objective 3.9
C37- 88	McDermott	 Submits that Naas Town and its environs is a key town situated within a core region in the context of both regional and national planning frameworks and economic strategy and that projected population growth and economic activity will bring added pressure on existing transport and movement infrastructure. Submits that the provision of an "Outer Relief Road" to the east of Naas should therefore be a stated objective of the Plan rather than an investigation of feasibility.
KCC-	Aisling	The Gallops Avenue
C37- 89	Twomey	 Objects to proposed Gallops avenue, previously rejected when called the Naas Inner Relief road. MTO 3.3: Rejects any version of a proposed Gallops Avenue a it was not suitable when called the Naas Inner Relief road and is still not fit for purpose. MTO 3.3: Submits that that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9: States that an outer orbital route should be a stated objective of the LAP rather than an investigation of feasibility.
KCC-	Ballymore	Proposed Material Alteration No. 22 - The submission supports the PMA to the Draft Plan in
C37-	Group	particular PMA No. 22 in relation to the Gallops Avenue Road.
90		 Proposed Material Alteration No. 1 – works have now commenced on planning permission 15/1060, which has been extended under planning reference 21/777. Ballymore intend to complete the build

Sub. No.	Name	Summary of Submission
		out of the 385 houses permitted over the next five years. Therefore, it would be more appropriate to zone the subject lands B: Existing /Infill residential.
KCC- C37-	Aisling McCormack	The submission proposes an amendment to Objective EDO 1.12 (PMA 29).
91		a) Facilitate the location of Data Centre development on land designated P: Data Centre at Caragh Road South and Jigginstown for the identified land use only subject to appropriate environmental assessments, heat mapping, transport impact assessments and consideration of the cumulative impact on the electricity network supply capacity and targeted reductions in greenhouse gas emissions. All of the above-mentioned assessments should include a focused and detailed report of the impacts on residential properties within close proximity to the proposed sites.
KCC- C37- 92	Stephen O'Brien	 Proposed Material Alteration 11 Targets not sufficiently ambitious. 17% reduction in car transport and a 12% increase in public transport over 20 years is half-hearted, disappointing objective. New cycle routes may appeal to leisure cyclists but not commuters or school children who want direct routes. Cycling infrastructure need to prioritise bicycles over cars and trucks. Proposed Material Alteration 17 Concerned over the cycle routes would impact on the community garden and biodiversity habitat at Jigginstown Green. Support exploring the feasibility of greenways from Naas to Forenaughts and at Leinster Mills.
KCC- C37- 93	Edelvale Property Ltd	 Composition of the site as follows: 1) Zoning name T- Mixed Use, misleading as limited number of uses permitted in principle. 2) Residential should be permitted to be a true Mixed-use zoning. 3) Undefined timeline for traffic modelling of Junction 9. 4) Constrained by an indefinite process of Masterplanning with the adjoining landowner.

Sub. No.	Name	Summary of Submission
		Site Context The subject lands (6.3 ha) are the previous Magna Donnelly Site as outlined in red below.
		 Zoning Proposed Material Alteration No. 53 changes zoning from K (3) Commercial/Residential to T: Mixed-Use. PMA no 46, 47 and 48 also relate to the site in terms of the traffic modelling and masterplan required. Points of Submission Misleading Heading for Proposed Zoning T: Mixed-Use (PMA 53) K: Commercial /Residential is misleading as residential is not permitted, neither is the T: Mixed-Use zoning. No strategic direction in terms of what uses is generally acceptable for what is repeatedly identified as a key development area. Limited opportunities for a definitive land use. The submission suggests then following should be 'Permitted in Principle' as a minimum: Industry (Light) Guest House/Hotel/Hostel

Sub. No.	Name	Summary of Submission
	Name	 3) Motor Sales 4) Warehouse/Store/Depot 5) Offices Requirement for an Element of Residential at the Subject Site Edelvale's intention to conceive a high-quality proposal with a focus on a quality and landmark design concept. Viability of the scheme is a key consideration. A mixed-use development, with active streetscapes, 24-hour activity, and a component of live-work units, alongside office and other appropriate uses, should be unconditionally supported by the Council in the final LAP. Subject lands are within walking distance of Tesco, Odeon Cinema and the future Public Park at Kerdiffstown, with direct access to employment opportunities. The submission notes the concerns about the impact on the national road network made in the Draft Plan. Reference is made to an extract from a report prepared by Transport Insights which stated that <i>"residential component in the land use mix in the former Donnelly Mirrors site could contribute to mitigating the overall traffic impact of the full buildout of the site. This would be aligned with the recommendation of the Naas/ Sallins Transport Strategy that "either a reduction in the Scale of development or a change in land use purpose with a lower trip generation" in the Maudlins KDA lands be pursued."</i> Draft LAP is a barrier to the development of the site. Premature to restrict residential use.
		 The Plan should be flexible and allow for details to be analyses based on the development proposed at the time. Live-work units would allow it to become truly mixed-use.
		 Traffic Modelling Requirement PMA No 46. which amends Objective URD 1.12 requires greater clarity.

Sub. No.	Name	Summary of Submission			
110.		 Significant traffic modelling was undertaken for the Transport Strategy and query whether significant modelling has already been completed and can be included as part of the final Draft LAP. URD 1.12 has the potential to hinder the development timeline for the site. Request a more definite timeframe for the modelling – suggest wording "within 2 years from the adoption of the Naas LAP 2021-2027". 			
		Masterplan Requirement PMA 48 which amends URD 1.13 with regards a joint/agreed vision for ethe KDA has the potential to delay development of the subject lands. objective is not clear and concise, it does not give a definitive outline of who the relevant parties are in reaching a shared/agreed vision, nor for a timeline for same. Require certainty around the masterplan. Suggested wording – <i>"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 to be agreed between the two principle landowners and by a comprehensive Traffic and Transport Assessment to be submitted by the applicant."</i>			
		 Direction on the LAP Add key Mixed Uses as "Permitted in Principle" in the T zoning. Remove the restriction on residential development on the subject site. Re-wording of the objectives that relate traffic modelling or Masterplanning exercises. Consider the Transport Insight report that was submitted as part of the previous submission. 			
KCC- C37- 94	Westar Group	Submission is made in respect of PMAs 1, 24, 59 and 61. There are a number of additional reports accompanying this submission.			
		The subject lands extend to 11.95 ha to the west of Naas Town Centre.			



The basis of the submission is to seek reinstatement of the 'draft' zoning for the subject lands and the majority of the landholding be zoned for residential purposes with an area set aside for a canal side linear park.

The submission requests that regard be had for the Draft Development Plan Guidelines which came out after the Draft Plan and the Proposed Material Alterations were on display. It considered the Core Strategy of the CDP be updated to reflect the Draft Guidelines.

Summary of Key Points and Recommendations

- Sequential Development sequential to town centre and existing areas of development. Submission questions the apparent leap frogging of zoning.
- No Flood Risk Relating to the Lands JBA determine lands are within Flood Zone C.
- Lands are Tier 1 not Tier 2 the SPIA underscored the subject lands.
- Lands should not be subject to KCC Flood Risk Assessment or Northwest Quadrant Masterplan SSFRA confirmed no flood risk and masterplans discussion for site already underway with KCC.

Sub. No.	Name	Summary of Submission						
			-	d will Facilitate Transpor easibility from Irish Wate	-			
		Under the Gu reference is r settlement ba 7) of which th deliver a com the Draft Gui	uidelines ac made to the asis. The G ne subject la npact, cons delines stat which the su iled in the ir	e 'Additional Provision' of uidelines require the sec ands are considered to p olidated and connected te that it should be a pric ubject lands will do havin mage below.	f lands quentia presen patteri prity to	s o al o nt s n c fa arc	over and above the projected housin of 20-25%, which should be impleme development approach to developme some of the best located lands, whic of development. The submission hig avour development that supports sus d to the transport objectives containe	nted on a ent (SPPR h can hlights that tainable
			Mode	Naas Sallins Transport Strategy Measure	Phasing	Ac	commodation in Finlay Park Masterplan	
			Public Transport	PT2: Bus Interchange at Harbour, incorporating Bus only bridge link to Town Centre PT11: Bus Only Link to Sallins Bypass	Long Term Long		Sufficient lands reserved to south of site to accommodate Bus Interchange and bus only bridge Bus Link to be facilitated through site connecting Bypass to	
			Cycling & Walking	C1: Naas to Sallins Greenway	Term Medium Term	~	proposed Bus Interchange Proposed Greenway to be accommodated along southern boundary of the site	
				C16: Northwest Quadrant Link Road Cycle Route +Perm 35	Long Term	*	Proposed cycle lanes to be provided connecting the Northwest Quadrant Link Road to the site and onto Abbey Bridge	
				C36: Abbey Street Shared Street Improvement	Medium Term	1	Development support upgrade of Abbey Street to Shared Space	
				C37: Basin Street Shared Street Improvement	Medium Term	*		
				Perm 38: Two footbridges connecting The Harbour, Abbey Bridge & Pacelli Rd	Long Term	1	Footbridges to be accommodated within Masterplan lands	
	1	1	Roads	RD3: Millbridge Street Road Link	Long		North-South road running adjacent to the western	

Sub. No.	Name	Summary of Submission
		The submission points out in the context of the subject lands and sustainable transport that despite then identification of new transportation routes on Westar's lands it is not reflected in the proposed land use zonings. There is a mismatch between the two. Also, the lands in close proximity to Naas Town Centre have been identified as a park amenity and Strategic Reserve the rational for the SR appears wholly unwarranted.
		PMA No. 1 and 61 Westar are disappointed with the revised and reduced allocation of 2.8 ha in Tale 3.5. The delivery of the lands will deliver a walkable sustainable area in the heart of Naas and facilitate the bus only route.
		Recommendation on PMA no. 61: Westar's Proposed Amendment to Material Alteration no. 61 Proposed expansion of Material Alteration no. 61 from From C Phase 2 to C - New Residential Autorial Material Alteration no. 61 from From C Phase 2 to C - New Residential Store C - New Residential Autorial Material Alteration no. 61 from From C Phase 2 to C - New Residential Store C - New Residential No.59 Store C - New Residential Zoning Objective is extended to the east of the remainder of Area 3 and that the 'Phase 2' residential designation is omitted.

Sub. No.	Name	Summary of Submission
		The development of the subject lands would be in accordance with NPO 33 a sustainable location, RPO 4.48 improvement of transport network in Naas, RPO 4.49 support the Grand Canal for an amenity and RPO 4.52 delivery of enhances public transport infrastructure in Naas and Sallins.
		These lands should be reprioritised having regard to strategic location. Strategic Reserve zoning should be reviewed. Allocate zoning in the Draft 2019 LAP. Westar question the de-zoning of their lands where the industrial and retail zoning around the periphery of Naas to the west and north-west is considered. The issue of the flooding information of not being up to date is also raised.
		PMA no. 61 is predicated on the recommendation of the OPR which is based on incomplete CFRAM information.
		Recommendations Area 1: Change from K zoning to Town Centre zoning and extend the footprint as shown in the image provided below.
		Proposed expansion of Material Alteration no. 61
		The submission provides for a number of set objectives relating to Area no. 1 as follows:

Sub. No.	Name	Summary of Submission
		 Provide for the alignment of the boulevard from the Northwest Quadrant to the Canal with bus priority and a bus terminus/mobility hub at the Canal Bank as part of an undercroft element of hotel/office development. Amend CQ 1.4 - Ensure as part of any future development proposal for the Canal Bank that there is provision for a mixed use residential and commercial development that focusses on creation of public plazas, with ground floor retail, restaurant uses with residential above along its east, south and western sides. Amend CQ 1.8 – Provide for linear linkages through the site and along the canal with land to the north, west and within the town centre. Rezone Open Space and Amenity and Strategic Reserve Zoning of Area 1 to being Town Centre. Provide for public park area at the 'toe' of the Canal Harbour Area. Town Centre zoning will facilitate mixed use facilities in conjunction with amenity areas. It would enhance user and visitor experience by providing a vibrant canal side destination which is connected to the town centre.
		The submission notes that a masterplan for the Canal Quarter is required but as there is no specific zoning applied to the lands it could not be completed within the LAP plan period, which will further delay the development of the area. Reference is made to previous plans in 2005 and 2011 which indicated a masterplan for the lands which still has not been completed.
		The masterplan and the flood risk study will postpone the delivery of housing on the site which is ready to go. Therefore, they seek that the requirement for the masterplan and flood risk study is omitted from Westar landholding.
		Additional Text to PMA no. 61 (Section 3.5.2) is recommended by Westar as follows: To support the sequential development of Naas delivery of housing, proposed school site and the public transport route, lands in Finlay Park can be brought forward in advance of the preparation of the Northwest Quadrant Masterplan, and the detailed Flood Risk Assessment including Integrated Catchment Model.

Sub. No.	Name	Summary of Submission
		The submission highlights that there is inconsistency where the lands identified on the old Wastewater Treatment Plant for Phase 2 residential development and include a future as yet underdetermined compensatory are of flood risk management without evidence to support. These lands are further from the town centre and are identified as being at Flood Risk and despite this have been zoned for residential. The subject lands are not at risk of flooding and sequentially better located.
		 <u>PMA no. 24 – Suggested Footnote</u> Westar recommend the proposed footnote be added to PMA no. 24 as follows: To support the sequential development of Naas delivery of housing and the public transport route, lands in Finlay Park can be brought forward in advance of the preparation of the Northwest Quadrant Masterplan, and detailed review by the OPW of the flood areas in Naas, subject to the preparation of a Site-Specific Flood Risk Assessment including Integrated Catchment Model.
		The lands should not be part of a masterplan and can be planned as part of a development proposal which can deliver the key structuring elements of the Naas Transport Study. The delays will result in delay of much need housing the short term.
		<u>PMA no. 59 – Area 2 and 3</u> Having regard to the JBA Consulting report, it is considered that the previously indicated New Residential Zoning should be reinstated within areas 2 and 3 from the proposed F zoning and to reflect the JBA Report Flood extents.



Sub. No.	Name	Summary of Submission
		JBA Consulting Report (May 2021) and Addendum The submission states that there is sufficient information in the JBA Report to reinstate the residential zoned owned by Westar. It is stated that the report outlines that following a review of the CFRAM Hydraulics report, it appears that the Grand Canal has only been modelled in the 2D only with limited extents. This results in an inaccurate representation of the Grand Canal in the model especially when modelling the hydraulics of the system.
		It is stated that the CFRAM is an overestimating flood risk and are not an accurate representation. The flow path through the site is an overland flow and does not represent a watercourse. The stream runs in a westerly direction through the centre of the site and has not been specifically modelled in the CFRAM study. The flood mapping has only been represented by low resolution LIDAR data only hence the need to undertake a detailed site-specific flood model.
		 The JBA Flood Risk Assessment shows that: No out of bank flooding on the site during the scenario. Overtopping of the Grand Canal does not occur. Floodwater that enters the Grand Canal from the Bluebell River largely remain within the canal system, with the flood water continuing to flow over the lock gate east of the site and the spillways to the west.
		The report states that once the canal system is incorporated into the model there is no inundation with the site and the site is located in Flood Zone C.
		Integrated Catchment Model An Integrated Catchment Model has also been prepared by JBA. The results confirm that there is "no overtopping of the canal north of the harbour area during the 1% AEP event, but very minor overtopping does occur during the 0.1% AEP event. The resulting floodwaters are subsequently captured by the Oldtown stream and do not present a flood risk to the site. There is no inundation onsite during any flood event."

Sub. No.	Name	Summary of Submission
		 Conclusion Interest of sustainable development that land in proximity to the town centre are appropriately zoned. Request that the Council re-examine the zoning. The zonings will impede the development of the subject and which is undeveloped at a strategic location. Zonings have been altered which is contrary to the recommendation by the OPR in respect of the Draft LAP 2019 and contrary to national and regional policy. Zoning does not make optimal use of lands. Disconnect between land use and the Transport Strategy. Zone lands as per the Draft Plan in 2019. Appendix 1 JBA Flood Risk Report and Catchment Analysis A Draft Flood Risk Assessment Dated August 2021 was submitted as part of the submission. The objectives of the report were to: Identify potential flood risk. Confirm the level of flood risk and identify key hydraulic features. Assess the impact that the proposed development has on flood risk. Develop appropriate flood risk mitigation and management measures which will allow for the long-term development of the subject site. The initial flood risk assessment has found the site to be at risk to fluvial flooding. The study then assessed the likelihood of flooding to the site in more detail using a site-specific hydraulic model of the Bluebell Stream and the Grand Canal and wider flood plain. It is considered that this will provide clarification of the anticipated flood zone extents, updating the information provided by the Eastern CFRAM study. The Report states that the information will then be used to configure the site layout and propose mitingtion more meaning the development of the sub extend to configure the site layout and propose mitingtion more meaning the development of the development of the optimal will then be used to configure the site layout and propose mitingtion more meaning the direction will then be use
		mitigation measures that ensure flood risk is effectively managed. These mitigation measures and development scenarios will be assessed in the hydraulic model.

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		 Pre-development i.e. the flood risk to the existing site; Residual Risk/ Climate Change analysis.
		The results of the study from the Flood Risk /Mitigation Measures states that from reviewing the available sources of flooding outlined in Section 3 there is predicted fluvial flooding at the site. This is based on the CFRAM flood mapping of the area. However, it has been noted during the review process that the Grand Canal has not accurately represented in the CFRAM model.
		Therefore, a site-specific hydraulic model has been developed comprising the main hydraulic features in the area. The mitigating measures contained in the site design has been based on the JBA flood maps. Once the canal system is incorporated into the model there is no inundation within the site. The JBA hydraulic model therefore confirms that the majority of the site is located in Flood Zone C, and at a low risk of inundation. All of the residential dwellings are located in Flood Zone C.
		The report states that a partial breach of the canal bank presents the greatest flood risk to the development, as the site level is lower than the water level within the canal. To manage this flood risk it is recommended that additional structural measures i.e. sheet piling be installed along narrow sections of the canal. This will ensure that structural integrity of the canal banks during a flood event. It is noted that in certain areas that land elevations are below the water level within the canal. It is recommended that the above works be undertaken to minimise flood risk to the surrounding area, however it is acknowledged that this may not be achievable on lands outside of the control of the client.
		The report with regards the stormwater design/pluvial flood risk states that the "increase in the hardstanding area onsite could potentially increase the surface water runoff from the site, if not mitigated. A stormwater water system is included within the proposed development which will capture and manage surface water flow from hardstanding areas. The stormwaters need to comply with the overarching Fingal County development policy and the GDSDS guidance document".
		In relation to an Irish Water Foul line the report states that "an existing foul line crosses the stream just upstream of the site boundary. A culvert is in place to enable flows underneath the pipe. The system

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		currently has the capacity to convey the estimated flows. It does present a risk of blockage; however, plans are in place to move this pipeline which will remove blockage risk at this location".
		Climate Change The report examined the potential impact of climate change on flood risk. The climate change assessment has been based on the Mid-Range Forecast Scenario (MRFS). A scenario was run to estimate an increase of 20% (MRFS) on the peak flood flows. Review of the results confirms that there is some overtopping of the canal during the 1% AEP MRFS flood event with no impact upon the site. JBA recommend that low lying sections of the canal be raised to prevent overtopping elsewhere along the system. This could increase the flood risk to the site especially following the impact of climate change. The design scenario for the site incorporates the potential raising of the canal while also including climate change.
		Conclusion The report states that the JBA hydraulic model differs significantly from the CFRAM mapping in how the Grand Canal system is represented. The Grand Canal has been fully represented in the JBA model and extended appropriately to the east and west. Within the CFRAM model, it has only been partially represented in the 2d domain. This has a significant impact on the subsequent flood extents.
		The report also in the conclusion states that the JBA flood maps confirm that the proposed development is not impacted by the 1% AEP or 0.1% AEP flood events. The hydraulic model confirms that the floodwaters that overflow into the Grand Canal predominantly remains within the system with no inundation within the site predicted. Some overtopping of the Grand Canal does occur to the west but this does not impact on the site.
		There are a number of Appendices including in the JBA Report. Appendix A – Understanding Flood Risk – overview of probability and the types of Flood Zones. Appendix B – Finlay Park Integrated Catchment Model (ICM) – tis part of the report examined and modelled the stormwater system and associated catchment areas that discharge into the canal. The

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		results show that the inclusion of the stormwater system has a minimal impact on the peak water levels during both the 1% and 0.1% AEP flood events.
		Engineering Services Report in Response to Draft Naas LAP 2021-2027 and Sustainable Planning and Infrastructural Assessment (April, 2021)
		This report was prepared by Donnachadh O'Brien & Associates Consulting Engineers in response to the SPIA.
		The report states that the scoring/weighting applied to C3 and A1 are incorrect. Drainage, SuDs and Flooding – the additional modelling as provided show that there is no issue with flooding.
		Water Supply – Confirmation of feasibility letter form Irish water. Feasible subject to upgrades. Wastewater - Confirmation of feasibility letter form Irish water. Feasible without infrastructure upgrade by Irish Water.
		Roads – modest extension to the Old Caragh Road, serviceable form the existing Finlay Park development. Future measures from the Naas/Sallins Transport Strategy. Agreed improvement works to the Old Caragh Road extending from the existing roundabout junction with the R409, currently ongoing.
		It is stated that both sites should be classified as Tier 1 lands.
		Accompanying the submission also are the following:
		 Letter form KCC which consents to Westar Group/Pat Fadden to making a planning application respect of Phase2 development at Finlay Park, under Article 22(2)(g) of the Planning and Development Regulations 2001 (as amended). Irish Water Web Maps illustrated the network.
KCC-	Bridget	MTO 3.9 – Investigation of Outer Orbital Route
C37-	Armstrong	Welcome addition.
95		 The route would take traffic away from residential areas minimises impact on residents Improving links to town, motorway and train station.

Summary of Submission
 It should replace RD3 and RD3A as these road measures will impact on the environment at Finlay Park. Proposed Material Alteration No. 61 Welcome the F: Open Space and Amenity zoning within Finlay Park. Object to the New Residential Phase 2 at Finlay Park due to environmental impact, particularly the flood risk. As per the OPR any plan for further residential development at Finlay Park and the Northwest Quadrant should be removed from the Plan until the detailed flood risk assessment has been completed and a flood management plan put in place. Categorically object to the bus only route/road due to impact on the canal from fumes, noise and traffic. Unacceptable through a residential area, use the Outer Orbital Route. Walking and cycling should be encouraged at Finlay Park and canal areas. Proposed Material Alteration No. 62 Object to inclusion in the Plan that there is significant unmet social housing demand and that proposals will be considered on Phase 2 lands. Object to social housing scheme at Finlay Park labelled as Phase 2 in the absence of prior provision of the necessary infrastructure, amenities and resources for such a social housing development to be considered at Finlay Park/Northwest Quadrant. A linear park is not sufficient as it would not promote team sports that would be beneficial not only for physical activity but for social support. Concern for 'social housing schemes' that a mix of private and social should be provided to prevent social exclusion which could result in antisocial behaviour. MTO 2.3 Bus-only/Priority Route link to Sallins Bypass through the Northwest Quadrant should be removed. Replace with the development of bus routes outside residential areas and using an outer orbital route. RD3/RDA Remove any mention in the Plan as roads through residential are

Sub. No.	Name	Summary of Submission
		 Data Centre at Jigginstown Object to the inclusion. Lack of information on the impact of a centre so close to the town centre and apparent lack of resources to support the development at this time/location. Lack of information on the site selection at Jigginstown. Gallops Avenue All reference should be removed from the Plan as it has been rejected previously.
KCC- C37- 96	James Lawless TD	 Proposed Material Alteration No. 53 and 54 The submission submits that the following changes to the Zoning Matrix should be made in relation to the T: Mixed Use zoning: Guest House/Hotel/Hostel – from "O" to "Y" Industry (Light) – from "O" to "Y" Motor Sales – from "O" to "Y" Offices – from "O" to "Y" Warehouse (wholesale)/Store/depot– from "O" to "Y" Warehouse (wholesale)/Logistics/Store/Depot– from "O" to "Y" Maudlins is a strategic site and represents an eye-sore that has been idle for 15 years. Need to give the chance of a viable industry, enterprise to ensue on the site. The proposed zoning matrix uses are too limited and restrictive. Proposed Material Alteration No. 46 A timeline for the completion of the traffic modelling is crucial, as it is required to proceed with the masterplan. The specifics as to the capacity, parameters and details of the traffic survey should be clearly set out in the Plan.
		Proposed Material Alteration No. 14

Name	Summary of Submission
	Supports the greenway/cycleway link between Naas and Naas Rugby Club, as it is beneficial in terms of a positive environmental policy and also for health and well-being.
	Proposed Material Alteration No. 15 and 16
	• Supports the proposed alterations as per the reasons set out for PMA no. 14.
Pádraig McEvoy	Proposed Material Alteration No. 53 Given EU and national priorities to reduce climate change the Zoning Matrix under Mixed Use to preclude new service stations from selling fossil fuels.
	 Proposed Material Alteration No. 76 Restore land to the previous zoning of F: Open Space and Amenity instead of B: Existing /Infill Residential for the reasons as follows: Strategic shortage of Open Space in Naas and Kildare. Expanding 'needs' based on the growing population. The decision to materially alter the zoning was preceded by councillors citing purported benefits for a third-party organisation and included the development of separate lands for use by the third-party organisation. The basis of the decision appears to be a consideration for zoning, as issue that concerned Hardiman, in McHugh v. Kildare County Council.
John Collins	Gallops Avenue • Not have the desired effect • Move the problem. • The amenity of the racecourse difficult to access. • Noise and pollution during construction have a negative effect. • Illegal parking and dumping. • Inner Relief Road got rejected. • Outer Orbital Roue to link up with Millennium Road is a better alternative.
	Pádraig McEvoy John

Sub. No.	Name	Summary of Submission
KCC- C37- 99	Kings Court Resident's Association	 MTO 3.3 Frustrating the route continues to be included despite being antiquated and democratically rejected. Persistence to retain a rejected route is an example of a lack of democracy. Welcomes 'to consider an alternative route located on a corridor on the east of the racecourse'. Requires a blank state review and not a rehash of old consultant's reports. This should be the only route receiving consideration. Merit at a minimum to widening Fishery Lane and through the racecourse where adequate space already exists. MTO 3.9 This objective is welcome. It should eb a stated objective. Wonder would there be an attempt to blow the dust and cobwebs off previous AECOM and Clifton
KCC- C37- 100	Maureen Boylan	 Scannell reports and rehash these, then reject, rather than a full and proper blank slate review. Objects to the road that was democratically defeated. LAP must not overlap with other areas. The Plan should be voted on my Naas MD Councillors only. Unacceptable that any decision regarding Naas LAP be made by full council.
КСС- С37- 101	Patrick Solon	 Completion of the outer ring road should be a priority. MTO 3.3: Gallops Avenue has been rejected and we are in a democracy. An alternative route to the east of the racecourse is the only route to be considered. MTO 3.9: An Outer Orbital Route should be a stated objective rather than an investigation of its feasibility.
KCC- C37- 102	Derek Leahy	 Objection to the Gallops Avenue. MTO 3.3: Rejects any version of Gallops Avenue – not suitable or fit for purpose. Alternative route to the east of the recourse should be the only route. MTO 3.9: Submits outer Orbital Route should be a stated objective rather than an investigation of feasibility.

Sub. No.	Name	Summary of Submission
KCC- C37- 103	Abbey Bridge and Canal Residents Group	 Submission Title: Impact on Abbey Bridge and environs of Grand Canal The submission forms two parts. A letter and details completed on Consult. Movement and Transport Map – Proposed Road with Footpath No. 35 Where does the road begin? This 'planned route' featured originally in the 2020 Vision for Naas but lacks details since that time. This road has been referred to as a Bus Corridor but lacks specificity. Construction over the Grand Canal would impact on both the visual and actual environs of the Canal. A new bridge over the Grand Canal between Abbey Bridge and Tandy's Bridge linking Naas West with Sallins Road, as a "future thought process" should not be included in the current plan. Not clear if this bridge is on or off the current plan following the recent consultation phase. It should be removed if the Bridge is included. Requests clarify on what is Strategic Reserve. Lack of details so impossible for residents and members of the public to make meaningful submissions. Commercial Zoning K in McCormack's Field Naas West Appears to be a new addendum, no clarity on how it came about. It should be a centre piece for the further development of the linear park concept/Green way and the enhancement of the Grand Canal for amenity purposes. KCC to review town park in Carlow to see what can be done. Commercial re-zoning of part of McCormack's Field, albeit subject to flood plain review, is of concern as to possible additional traffic over Abbey Bridge and the private road and cul de sac. Proposed Cycle Path and cycle/pedestrian crossings over the Grand Canal before such a rezoning be contemplated. Proposed Cycle Path and cycle

Sub. No.	Name	Summary of Submission
KCC- C37- 104	Les Kelly	 What is actually proposed? What is the visual impact? What is impact on boating traffic? More details are required. Attached Letter The attached letter signed Frank O'Leary can be summarised as follows: Significant concerns over some proposals set out in the Draft Plan and subsequent material alterations. The issue of a new bridge is unclear even following direct engagement with the Planning Office as to its current status. A reference to a 'future thought process' leave matters very unsatisfactory. Preservation of Abbey Bridge and the need for traffic, cyclist and pedestrian safety. Enhancement of the Grand Canal. Concerns about water issues in Naas West and welcome the OPR observations of the matter. Reject any version of the Gallops Avenue. Alternative route to the east of the Racecourse should be the only route considered. This route would build for the future growth and development of Naas and not a rat run through established housing estates. Outdated and defeated. Correct decision is an outer orbital route to be a stated objective rather than an investigation of feasibility.
KCC- C37- 105	Noel Geary	 Oppose Gallops Avenue. Merely transfer traffic. Interfere with green lung of the racecourse. Support the Outer Orbital Route Connecting the 'Ball' to Blessington Road east of the Naas Racecourse. Alleviate both internal and through traffic through Naas. Join up with the Monread Road.

Sub. No.	Name	Summary of Submission
KCC- C37- 106	Gail Mooney Collins	 Gallops Avenue Not right for Naas or the housing development at Tipper Rad and Blessington Road. Increase in congestion. Environmental and pollution cost to families. Health impact. Freedom of children curtailed. Loss of amenity. Crossings are not safe enough. A full circular ring road is needed. Ring road will facilitate all the retail parks and new developments planned for the Tipper and Blessington Roads.
KCC- C37- 107	Majella O'Keefe	 Glad regarding the promotion of universal design MTO 3.3 Pleased that the relief road is being examined. Purchased their home on the Dublin Road knowing that the relief road was planned in the future. The residences of the Gallop Avenue area purchased their properties in the full knowledge that the relief road was ion the plans and would be constructed in the future The road must be constructed New layout is excellent and will provide the people of Naas with safe, inclusive designated spaces where cyclists, pedestrians and all vehicles (including HGV'S), will all have their own "space" to use and will disperse traffic coming into Naas. Dublin and Blessington Road will have less traffic Look forward to the completion of the Dublin Road Hub Project The completion of the shopping centre and new library will require a more pedestrian friendly town with less congestion and no HGV's passing through it.
KCC- C37- 108	Clare Prasad	Objection to PMA in respect of Gallops Avenue Two letters are attached to this submission for a local TD and from the Minister.

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bu • • • • • • • • • • • • •	e submission notes that if they had more time a more comprehensive objection would be submitted t notes that the consultation has taken place in the middle of the August holiday period. Concerned at the attempt to push through the Gallops Avenue. Superficial, cosmetic tweaks to a fundamentally flawed proposal. A link has been provided in the submission which relates to Kildare County Councill website and the Inner Relief Road ¹ . The alteration proposed do not assuage the serious concerns. If including a bus stop is part of the solution to the calls for more public transport in Naas it is clearly disingenuous. To say a ring road will have the appearance of a street, avenue or boulevard is insulting. Attempts to dress up and greenwash and unfit and rejected proposal will not be accepted. Negative impact on the environment, safety and quality of life. Damage a quiet, peaceful residential area. Damage a natural area. Property devaluation. Not aware of any adequate and independent environmental impact assessment. Move congestion. Raises questions over democracy, transparency and governance in the country. Road rejected after the election. Assured just a few months ago by our local TD and the Minister for Housing that "convoluted procedures" involving the Land Development Agency to force through the democratically rejected road would not be used in an attempt to force this road through. Local TDs from parties from Sinn Fein to Fianna Fail have also written very strongly in opposition to this road. KCC will not wear us down with repeated attempts to force this road through. We will also consider contacting the media and legal challenge if continued attempts are made to force through this democratically rejected proposal.

¹ The link provided when clicked on state the website cannot be found.

Sub. No.	Name	Summary of Submission
		 Letter from James Lawless TD The letter makes reference to Naas Inner Relief Road that was voted down during the last council terms via a Part 8 planning process. An indicative route is included in a draft version of the Naas Plan. The letter states that he has been made aware of some confusion and misinformation which suggest that the LDA, through some convoluted procedure, could usurp the wishes of the local population and bypass locally elected representatives to try force through the road. The LDA have no such powers and has written to the Minister for clarity on this issue. Letter from Darragh O'Brien, TD – Minster for Housing, Local Government and Heritage The letter is in response to Deputy James Lawless highlighting to the Minster that potentially misleading and inaccurate information around the Land Development Agency and the possible development of the Naas Inner Relief Road. The LDA will have no role in local road developments or land zonings which remain the remit of the local Council. The Minster is bringing forward changes to legislation to help fully clarify that issues like the Naas Inner Relief Road will remain a local matter. LDA have no plans to develop any site in Naas with the exception of the Devoy Barracks. The LDA build, primarily affordable housing on state land. It will work in conjunction with Local Authorities by adding expertise and finance to complete housing projects and can also work with private developers when deemed necessary. It is disappointing that public representatives may have sought to mischaracterise the important new bill which is designed to help tackle our housing crisis.
KCC- C37- 109	lan Baker	 MTO 3.3 Reject any version of the Gallops Avenue. Not fit for purpose. Alternative route to the east of the racecourse should be the only route. MTO 3.9 Outer Relief Road should be a stated objective rather than investigate the feasibility.

Sub. No.	Name	Summary of Submission
KCC- C37- 110	Mark Hendrick	 MTO 3.3 Reject any version of the Gallops Avenue Rejected by a vote by Naas Councillors Nothing has changed only the name. Air pollution, noise pollution, safety, speed issues, proximity if HGVs and public transport to residential areas. Will not solve traffic bypassing the town. Alternative route to east of racecourse should be the only route.
KCC- C37- 111	Bob Quinn	 MTO 3.9: Outer Orbital route should be a stated objective rather than investigate the feasibility. Proposed Material Alterations 11, 17, 29, 41, 74 and 49. PMA 11 and 17 Targets do little to address carbon emission reduction targets and appear to be based on the GDA Transportation Strategy. If adopted, we are sleepwalking into a greater climate catastrophe. We must play role in reducing carbon emissions. Greater update in active travel reduces car dependency, health benefits of traveling by foot and bike. A number of permeability measures do not take the most direct route and are likely to remain unused, or not used to their full potential. PMA 74, 41 and 29 Do not agree with the rezoning of agricultural land in No. 74 to land for a data centre. Data centres are nowhere close to a carbon neutral basis. Acutely aware of the environmental damage associated with the construction and operation of data centres. With the exception of development levies and commercial rates there are very few benefits to the locality. Risk of water shortage and electricity blackouts. PMA 49 Commitment to high quality retail is a hugely important aspect to the renewal of Naas Town. Retail offering is lacking.

Sub. No.	Name	Summary of Submission
KCC-	Padraig	 The Town Renewal Plan must find a way to have meaningful engagement with ratepayers, many of which are not members of the Chamber, and the process which is adopted should be based on an internationally tried and tested, best practice mythology. Any groups facilitated by KCC must be established with clear cut Terms of Reference. Legacy groups that do not fulfil this requirement should be disbanded.
C37- 112	O'Brien	 Object to the increased density threshold. Overdevelopment of the area of town. Lack of open space in the area is overwhelming Instead of making provision for open space the Council is increasing densities. Lack of frequent transport in this immediate and increasingly urban district is appalling. New bus routes should be provided along the John Devoy Link Road. At least further improvements to the Naas town bus networks. The train station being out in Sallins is another huge disadvantage. The heights/density proposed for Devoy Barracks is out if proportion with the low-density developments in the area. Area better suited as a park.
KCC- C37- 113	Venturis Investments	Venturis own lands which extend to c. 88 ha in Naas and welcome the amendments to the Plan.



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		 requiring proposals for a data centre to generate energy on site from gas when more sustainably generated electricity could be available from the grid. The following amendment is suggested: <i>"(b) Any data centre project will be required to examine include measures to generate energy on site as part of the overall development proposal".</i> PMA 74 Alteration strongly welcomed.
		PMA 75
		Alteration strongly welcomed.
KCC- C37- 114	Queally Group	 PMA 58 – Monread Road Business Park Strongly disagrees with the amendment to the zoning to reflect flood zones. The Business Park has been zoned for employment uses over a number of Naas plans and has been subject to a number of grants of planning permission. Healy Tyres/Haven Hire and Dawn Farm Foods are in close proximity to the site which is proposed to partially re-zone and neither have encountered issues with flooding. Park is a strategic sustainable employment location and is fully serviced. Convenient for active travel to work from neighbouring residential areas. Future planning applications would lodge site-specific flood risk assessment and incorporate mitigation measures.
		 <u>Recommendation:</u> Retain zoning of lands at Monread Business Park as H: Industry and Warehousing. <u>PMA 70, 73, 74 and 75 and Queally Lands at Bluebell/Whitewell</u> The submission refers to the previous submission on the Draft Plan requested lands at Bluebell be zoned for New Residential. It is stated that the subject lands are Tier 1 and can deliver housing in the lifetime of the Plan. It is stated the lands are well serviced, represent infill urban consolidation, efficient use of existing infrastructure, consolidate district at Piper's Hill, can accommodate a range of residential

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		tenures, adjoin Rathasker Road which has the potential for a walking and jogging circuit, not in a flood zone and represent the second phase to a SHD development.
		The submission states that the Council did not accede to the Queally's previous request for zoning, but in the same area the material alterations included the following:
		 a) Changed C (11) from New Residential Phase 2 to Agriculture' (PMA 70). b) Changed C (5) from New Residential Phase 2 to New Residential for up to 260 units (PMA 73) c) Changing 'Agriculture' to 'P' Data Centre (12 hectares) and 'F' Open Space (12 hectares) (PMA 74)
		 d) Reduced Community and Education lands to New Residential Phase 2 and a Neighbourhood Centre (PMA 75).
		In relation to PMA 75 it is unclear what size the site is, how many units could be accommodated, and they are not in Table 3.5. It is also stated that it is unclear why the lands are proposed for re-zoning. The
		 submission states that it is disconcerting and appears inequitable. Bluebell lands are ready to go. <u>Recommendation</u> – Re-zone Bluebell / Whitewell from Agriculture to New Residential.
KCC-	Una and	Increase in Density Threshold at Devoy Barracks SHD Planning Zone
C37-	Seamus	Object to increased densities.
115	O'Brien	Area does not need further residential development.
		Area ideal for a park/recreational area.
		 Low density units for the elderly or medical centre.
		 Area has potential to provide amenities and infrastructure for the existing population and not further overdevelopment of this part of town.
KCC-	Seamus	Proposed Material Alteration No. 62
C37-	and Linda	• Refers to the provisions of PMA No. 62 which states that "In the event that there is a significant
116	Dolan	unmet social housing demand in the Naas area, proposals for social housing schemes on Phase 2
		may be considered during the plan period subject to all other assessments." In this regard the
		submission outlines concerns have previously been raised in relation to the land in this area -
		including at national level – owing to this location's proximity to a flood plain adjacent to Finlay Park.

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		 States that there are obvious potential environment issues arising from same issue which remain, and which must be considered. Further states that they have pointed out in previous submissions on related matters that there are significant environmental concerns in overdeveloping an area that is rich in biodiversity, natural habitats which is in close proximity to the Grand Canal. Submits that in relation to the development of social housing, we appreciate that a significant housing issue exists presently in Ireland. However, the submission contends that a strategy whereby houses are effectively built as a matter of convenience or to "ensure compliance with the County Development Plan Core Strategy allocation" makes little sense and represents poor planning. Submits that the development of any housing schemes or estates need to be supported by proper planning and infrastructure/services. States that any housing development in the area indicated would be completely unsuitable for the lands adjoining Finlay Park for all of the reasons outlined.
KCC- C37- 117	Charlton and Leeson families (via Corcom)	 Submission by Corcom is behalf of the Charlton and Leeson families who, through separate ownership, control the lands and properties thereon detailed in Image 1 below.

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		Image 1: Charlton and Leeson Sallins Landholdings
		Charlton Lands 14.45 Ha Leeson Lands 5.16 Ha
		 Notes the provision in the Draft Naas Local Area Plan 2021 - 2027 for a Dedicated Bus and Active Modes Transport Link is proposed to bisect these landholdings. Notes that the Dedicated Bus and Active Modes Transport Link is the subject of Proposed Material Alternative Modes Transport Link is the subject of Proposed Material
		 Alterations No.18 and No.19 and outlines provisions of proposed amendments. Refers to its initial submission its initial submission (KCC ref. 490) to the Draft Naas Local Area Plan 2021-2027. This submission was summarised and responded to in the <i>Chief Executive's Report on Submissions/Observations Received to the Draft Naas Local Area Plan 2021-2027</i> (dated May 2021).
		 Submits that in order to support the achievement of the delivery of the Sustainable Travel Bridge over the M7 linking Sallins and Naas and meet the objectives of Proposed Material Alterations No.18
Sub. No.	Name	Summary of Submission
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		 & No.19 that our client's lands located of the west of the indicative route of the Sustainable Travel Bridge be zoned for residential / mixed use development. Notes that that in relation to their initial submission to the Draft Naas LAP 2021 - 2027 that the Chief Executive's Opinion Public Transport Measure No. 7 (PT7) noted that: "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". States that given the Chief Executive's previous opinion outlined above it is requested that KCC consider the zoning of the submitters' landholdings west of the indicative route of the Sustainable Travel Bridge for residential / mixed use development when drafting the forthcoming Kildare County Development Plan 2023 – 2029.
KCC- C37- 118	Phoebe Dillane	 RD3 and RD3A (Millbridge Street) Outlines concerns as a resident with the proposed RD3/RD3A road/bridge over the Grand Canal which is still present in the Plan. States that the proposed bridge over the canal would be a severe blow to the peaceful environment the canal walk brings to hundreds of people every day. Notes the present biodiversity and wetlands of the canal and Knocks areas which would be severely impacted upon. States the need to preserve areas such as the canal as there is so much development happening elsewhere around the town. Notes that indicative route RD3 is also passing extremely close to existing houses along the canal. Outlines the effects of the COVID-19 pandemic and the greater appreciation the community has of the natural beauty and value of the canal area of our town and that events like Car Free Sundays have reinforced this. Refers to plans for a cycle/walking greenway and potential linkages into a Town Park at the DeBurgh lands, the area should be protected in the development plan and should not be compromised by traffic noise and pollution. States that after conducting research into the amount of traffic on the Sallins Road it will be clearly
		 Refers to plans for a cycle/walking greenway and potential linkages into a Town Park at the Deflands, the area should be protected in the development plan and should not be compromised by traffic noise and pollution.

Sub. No.	Name	Summary of Submission
		 Outlines effects that 1000's of vehicles will have on existing quiet, mature residential areas, States that effectively, KCC intends to complete a ring road of the town by pouring thousands of vehicles (including HGV's) right beside existing estates. Reiterates opinion that the canal area should be preserved for recreation and amenity purposes and be a haven for walking and cycling in Naas and implores the council to remove this plan for a new bridge on the canal and new road through Mill Lane, Any mention of roads RD3/RDA should be removed as the development of roads through residential areas and promotion of car usage is not in keeping with KCC's objectives of increasing alternative modes of transport such as cycling. Also states that investment in a greenway and safe cycle lanes for school children to travel to and from Finlay Park and the Northwest quadrant would be welcomed. Proposed Material Alteration No. 61 Welcomed the change in designation of the NWQ to Strategic Reserve (SR) (Ref. Map 11.1 Land Use Zoning Map) in the Draft LAP as they hoped that this would protect the integrity of the lands within the Northwest Quadrant to provide for the future strategic expansion of the town. Notes the intention of the to prepare a Masterplan for the NWQ following the outcoming of a detailed Flood Relief Plan by the OPW and welcomed the Council's new vision for the NWQ which includes the retention of open space and amenity with important landscape and environmental features be retained and incorporated into masterplan scheme. Further that large housing development would be pushed away from the canal greenway. However, is perplexed to see Proposed Material Alteration No. 61 which rezones areas of the previously designated Strategic Reserve to a number of different used (C, F, K & E) before the OPW have carried out a detailed Asks who in the Council is taking responsibility for this rezoning without a
KCC- C37- 119	Etienne duPlessis	 Proposed Gallops Avenue Objects to the inclusion in the Naas LAP the proposed Gallops Avenue which was rejected by the majority of democratically elected NMD councillors when still called the Naas Inner Relief road.

Sub. No.	Name	Summary of Submission
		 MTO 3.3: Rejects any version of a proposed Gallops Avenue - it was not suitable when called the Naas Inner Relief Road and is still not fit for purpose. MTO 3.3: States that an alternative route to the east of the racecourse should be the only route possible given that the proposed Gallops Avenue has been rejected. MTO 3.9: Requests that an outer orbital route should be a clearly stated objective of the LAP rather than only an investigation of feasibility. States that the alternative (Gallops Avenue) has been removed from consideration by the rejection of the Naas Inner Relief Road Part 8 process by the NMD Councillors.
KCC-	Audrey	Proposed Gallops Avenue
C37- 120	Barlow	 Outlines dissatisfaction in regard to the Proposed Naas LAP regarding the proposed Gallops Avenue. Refers to page 62 of draft Plan which states "The option referred to as the Gallops Avenue which follows the route of what was formally referred to as the Inner Relief Road, scores positively in terms of economy, integration and physical activity by providing relief of congestion on Main Street and the Dublin Road, thereby achieving the overall objective compared to the number of options proposed." Outlines the planning history of the Naas Inner Relief Road (IRR) which originally underwent the Part 8 process in 2006 and the 2019 process. Notes that as part of the route selection, eight route options were proposed, and Route 2 (IRR) was the preferred option. Objects to MTO's on Page 64-65 of Draft plan, as follows: MTO 3.2 (i) The Gallops Avenue: States any version of development of this option is not acceptable and request the Council to listen to the listen to the people who have consistently objected to this! MTO 3.3: Improvements/extensions to the transport network within Naas: Submits that an alternative route to the East of Naas Racecourse is the only acceptable route as the Gallops Avenue route has been repeatedly rejected by the public. Submits that an Outer Orbital Route should be a stated objective of the Naas LAP rather than an investigation of feasibility of existing out dated routes.
KCC-	Ivan Codd	Gallops Avenue
C37- 121		 MTO 3.3 – Notes that in spite of the democratic decision of the sitting Naas MD not to proceed with the development of a road and in spite of hundreds of submissions, observations and objections from

Sub. No.	Name	Summary of Submission
		 residents against this proposed route when input was sought (e.g. Public Consultations for the Naas Sallins Transport Strategy, Naas Draft LAP) that KCC continues to include and promote the 'Gallops Avenue' route as the viable means to deal with traffic issues in Naas. Submits that it is beyond credible that a route envisaged 30 years ago is still seen by KCC as the optimal solution, given the scale of development and expansion of the town since then, and now increasing further in this Naas LAP / under the proposed MAs. Notes that as the development of a road on the proposed Gallops Avenue route has already been rejected PMA No. 22 (MTO 3.3) should state that the only route under consideration is one to the east of Naas Racecourse. MTO 3.9: Submits that the development of an Outer Ring Road routed to the east of Naas Racecourse. MTO 3.9: Submits that the development of an Outer Ring Road routed to the east of Naas Racecourse to take traffic and HGVs to/from the south and eastern sides of Naas to/from the N/M7 corridor is a necessity and investigating the feasibility of an Outer Relief Road is inadequate. States that therefore PMA No. 23 (MTO 3.9) should be reworded to state the Outer Relief Road shall be development of Naas Racecourse, within the lifetime of this LAP, to facilitate the expansion and development of Naas town in a futureproofed and well-ordered manner. Land Use Zonings Notes that a number of MAs seek to alter previously proposed zonings of sites from the initial Draft LAP to either; New Residential, New Residential Phase 2, or Existing/Infill Residential. States that with residential densities now being increased considerably across many existing sites with a promosed zoning of MW Pocidential in generating gene
		 with a proposed zoning of New Residential, it seems quite illogical to add further New Residential / New Residential Phase 2 zonings to this LAP at Material Alteration stage while the same time, lose the previous zonings on these sites for such important requirements as Enterprise and Employment (PMA 71) Community and Education (PMA 75) Open Space and Amenity (PMA 76) and a Strategic Reserve zoning (PMA61). Submits that the construction of large numbers of residential units without adequate provision (i.e. zoning of land) for the required essential associated services, employment opportunities and amenities such as those permitted under the previously proposed zonings in the initial draft LAP is surely suboptimal longer term planning.

Sub. No.	Name	Summary of Submission
		 PMA No. 1: Notes that the location of the 'C (13) Dublin Road' site (as set out in Table 3.5), with a proposed zoning of New Residential does not appear to be shown on the accompanying map (11.1), although it is now proposed to be zoned for up to 55 residential units. Rejuvenation of Naas Town Centre (Proposed Material Alteration 50.) States that the development of large scale out-of-town retail parks and shopping centres (in particular the Monread Centre) has led to a massive loss of footfall/business from Naas Town Centre. Contends that a thriving commercial town Centre is essential for Naas and its residents, and all efforts should be promoted to ensure this is facilitated. States that this LAP seeks to address issue of town centre regeneration, however leaving the possibility of further large scale out-of-town developments still open to the further detriment of the town centre. For example, a Mixed Use zoning is proposed to be applied to the former Concrete Pipes and Donnelly Mirrors sites and could allow such developments, based on the proposed change under PMA No. 50 (permitting of certain developments to change from 'Not Permitted' to 'Not Normally Permitted' (but then states may be permitted under 'very exceptional circumstances'). Submits that a policy to prioritise town centre developments is necessary.
KCC-	John Walsh	Proposed Gallops Avenue
C37- 122		 Strongly objects to the proposed development of the Gallops Avenue as the inner relief road for Naas. States that the proposal represents a plan that was drawn up in excess of 20 years ago and is out of date, short sighted, does not represent good and proper planning. Further states that it does not adequately provide for the high volumes of additional traffic being created by the new housing developments within Naas and that it would only serve to push traffic congestion from one part of the town to another. Submits that pushing HGVs through this narrow route alongside densely populated housing estates poses a risk to health and safety and to that of the residents and children and its negligent of the Council to allow it to proceed. Contends that an outer relief road taking the traffic to outside of the town is the only viable option. It is an afront to the duly elected Council Members to re-present this proposal in circumstances where the proposal has already been defeated by the elected members.

Sub. No.	Name	Summary of Submission
		 MTO 3.3: States that a redesign of the proposed route does not address the fundamental issue which is the inner relief road is not a viable solution in terms of relieving traffic congestion. An outer relief road is the only viable option to relieving the high traffic volumes. MTO 3.9: Requests that an Outer Orbital Route should be the stated objective of the Naas LAP rather than the investigation its feasibility.
KCC- C37- 123	Letitia Foley	 Submitting dissatisfaction regarding the Proposed Material Alteration No. 17. However, it is noted that submission mainly relates to specific pedestrian cycling measures proposed in the draft Plan. Notes proposal for a slip cycling route from the New Caragh Bridge to the canal cycle lane into the Jigginstown Estate. I object to this on the grounds that this area has been developed by the residents as a biodiversity area and one which also to helps with the drainage of surface water from the estate's open space. Measure 63/64 (Jigginstown Green) as per draft plan Strongly objects to the proposed new cycle route at this place. States it's directly outside houses 31/32 Jigginstown Green but only 50 meters down the road is another entrance for cycling to the Leisure Centre and the canal. Contends that it would be a duplication of a cycling route to the canal and a waste of money.
KCC- C37- 124	Brendan Colivet	 Proposed Material Alteration 73 The submission is from the owner of the site C (5) and they welcome the changes from Phase 2 to New Residential under the alterations to the plan. The submission states that the OPR that the "findings of the SPIA should inform the approach that 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. The submission states that the PMA 73 is appropriate due to: SPIA report shows that the site is 6th best from 23 residential sites. RPO 4.2 of the RSES dictates that high-level Tier 1 sites should take precedent over Tier 2 sites. Tier 1 New Residential sites can deliver far earlier that Tier 2 New Residential sites. Compliance with planning policy objectives. Tier 1 status of site.

Sub. No.	Name	Summary of Submission
		Close proximity to the town core.
		Within CSO boundary.
		Quickly deliver much needed housing.
KCC-	Dermot	The submission is on behalf of the Burke Family who own extensive lands at The Knocks.
C37-	Burke	 Welcomes the designation of the Northwest Quadrant as strategic development zone.
125		 Note the Flood Relief Plan, however the lands owned by the Burkes are well drained and not subject to flooding.
		 Wish to be consulted as part of the preparation of the Flood Relief Plan.
		 Support the policy of the Councill to develop the Northwest Quadrant are developed in a sustainable manner and the unique opportunity for development the lands present.
		 The Burkes would like to be consulted during the planning process to prepare the development strategy for the lands.
		Support the Strategic Reserve zoning.
		PMA 61
		 PMA 61 includes changes to the zoning of the subject lands.
		Support the Educational zoning.
		 Notes the change of zoning to New Residential Phase 2 on the adjoining lands in the ownership of the Westar Group.
		 Requests a similar zoning for the lands to the west for the proposed educational zone, as appropriate and logical development within the Northwest Quadrant.
		Note the intention to prepare a masterplan and anxious to be fully consulted.
KCC-	Christine	Submission outlines systemic issues with transport in Naas. Refers to numerous private bus
C37-	Murray	operators, fare systems, bus liveries, types of services, pricing and no integrated fares.
126		• States that KCC have the power to change this and should lobby the NTA for a bus fare system the same as other commuter towns such as Maynooth or Celbridge.
		Submits that Naas commuters are paying up to 300% more than those in Maynooth and Celbridge for the bus.

Sub. No.	Name	Summary of Submission
No.		 Notes that KCC stated that fares are determined by private operators and it's not within KCC's scope to influence fare changes, but this is simply not true as the NTA determines fares on all PSO bus routes. Provides example of traveling on R126 in within Naas compared to a trip from Maynooth to Dublin City Centre. Refers again to Celbridge and Maynooth, where unlike Naas, Dublin bus and commuter train services all seamlessly integrate with one another. States that people do not want to use a bus that does not connect with other modes of public transport. Asks why isn't KCC lobbying to include Naas in BusConnects? States that Naas should have frequent local bus routes going to/from Blessington, Tallaght, Clane, Kill, and Johnstown. Submits that a small village called Newtownmountkennedy in Co. Wicklow has more frequent Dublin bus service than the primary bus route in Naas (Route 126). Reiterates that KCC should be doing everything in their power to provide more local and Dublin bound bus routes with integrated ticketing and the standard fare like every other commuter town within 30km of Dublin. States that Routes 126 and 139 are too expensive to sustain any sort of travel and has caused college students to move out of Naas to Dublin and has convinced the submitter to buy a car. and Further states that KCC has used private operated bus routes. Notes that there are no plans to provide local transport between Newhall retail park and Naas/Naas suburbs and that the 126 is a commuter coach which serves Rathangan, Kildare, and Newbridge, and is not suitable for local travel. Further states that, it does not provide room for a mobility scooter or wheelchair. Those who are disabled cannot use the buses in Naas Cites examples of bus/rail services in towns such as Wicklow, Greystones and Drogheda which have
		 more comprehensive and accessible services. Notes that the DART will be extended to Drogheda, in County Louth and Meath County Council have
		been successful in lobbying DART to Navan and it seems like the Naas Area is being extremely

Sub. No.	Name	Summary of Submission
		 overlooked when it comes to public transport improvements. States that demand justifies extension of the DART to Naas, and as far as Newbridge and Kildare. States that it is baffling that Naas is not included in the extension of the DART to Celbridge and requests that KCC should intervene with those plans as a matter of urgency if we are to meet any of our modal shift targets and increase quality of life. States that building the DART to Celbridge will mean that those commuting from Sallins/Naas will no longer be able to avail of a direct train to Dublin City Centre and will have to make a connection in Celbridge. Submits that such a situation will lead to even more reliance on the car. States that KCC should ensure Naas takes advantage of its proximity to Dublin. Asks why would MNC's invest in the Millennium Park if there is no direct and frequent DART service from Sallins to Dublin City Centre? States that on the issue of roads and road design, upgrading roads with segregated cycle lanes, bus lanes, pedestrian crossings, and bus shelters should be made a matter of priority. States that the Dublin and Sallins Roads are currently in a state of decay and disrepair and not fit for purpose. Recognises that that Naas is far too car dominant across the board. States that as the county town and largest metropolitan area of County Kildare, Naas should be a modal town for the others but isn't. Submits that we need a complete change in attitude with regards to cycling infrastructure and public transport infrastructure to make this modal shift from cars a reality. Notes that the Dublin Road is wide enough to accommodate bus lanes, cycling lanes, and wide footpaths but it is instead taken up by car space and submits that any road that is to be resurfaced/redesigned should have pedestrians, cycling, and public transport in mind before any cars. Suggests that when redesigning a road, KCC should ensure the following: Wide, sepa

Sub. No.	Name	Summary of Submission
		 4. Bus shelter islands should be built around cycle lane infrastructure. This would be most beneficial when redesigning cycle lanes and bus shelters on the Dublin Road. Submits that plastic bollards should be erected to protect cyclists and pedestrians as a temporary measure. States that Sallins road is a hazardous and hostile environment for everyone but road users and refers to issues with narrow payment. States that KCC could take one or two metres from private front gardens as this road should have not only segregated cycle lanes but also bus lanes where possible. Submits that to make the town attractive, it should be pedestrianised, or even simply made a one way system with a bus only street that not only attract people to use the town but also attract tourism. Asserts that people in Naas want to use public transport but the supply just isn't there and there aren't sufficient bus stops, bus shelters, or bus routes and a fragmented service. To summarise, reiterates that Naas should be a model town for the county. Notes that we don't have pedestrianised streets, large plazas, lack cycling infrastructure, zero bus lanes etc. States that instead, there is Maynooth, Ballymore Eustace, and Celbridge which have Dublin bus which make public transport affordable, integrated, and accessible. States that it is sad to see that this plan is not very ambitious, especially considering Naas is one of the fastest growing towns in the country with housing being built at an astonishing rate.
KCC-	Graham	MTO 3.9 Investigation of Outer Orbital route:
C37- 127	Armstrong	 Welcomes this addition as a solution for traffic and road movement issues in Naas. States that an Outer Orbital route would take traffic away from residential areas minimising the impact of road users on residents and providing improved links to various parts of the town/motorway/train station. Submits that This Outer Orbital route should be included in the Naas LAP as an alternative objective to replace the RD3 and RD3A road plans, the latter having potential for significant detrimental effects on the environment of Finlay Park, its residents, and the surrounding canal habitat. Proposed Material Alteration No.61: Welcomes the inclusion of zone F for open space and amenity within Finlay Park which would be very well suited for developing a playground to benefit young families. Objects to the development of

Sub. No.	Name	Summary of Submission
		 lands labelled C: New Residential Phase 2 at Finlay Park due to the environmental impact, particularly given the potential flood risk. States that as per the Office of the Planning Regulator direction, any plan for further residential development at Finlay Park and NWQ should be removed from the Naas LAP 2021-27 until a detailed flood risk assessment has been completed and a flood management plan put in place. Proposed Material Alteration No.61, new 2nd paragraph Section 3.5.2: Objects to a bus only route/road from canal harbour to junction 9a. States that the impact of fumes, noise and traffic on the canal is unacceptable given that the canal is such a cherished amenity. States that equally a bus route through Finlay Park is totally unacceptable due to the environmental, safety and privacy issues that would result. Submits that bus and any other traffic should use the planned Outer Orbital route for connectivity and safe walking and cycling options should be encouraged and facilitated at Finlay Park and canal areas. Proposed Material Alteration No. 62:
		 Objects to the inclusion of plan in relation to the event that there is a significant unmet social housing demand in the Naas area, that proposals for social housing schemes on Phase 2 may be considered during the plan period subject to all other assessments. Strongly objects to the development of social housing schemes on land at Finlay Park, labelled as "Phase 2" in the absence of prior provision of the necessary infrastructure, amenities and resources for such a social housing development to be considered at Finlay Park/Northwest Quadrant. States that even the mention of providing a "linear park" as part of this development would be contrary to what would be assumed as a basic requirement of residents of a social housing scheme, where a linear park does not cater for nor promote team sports that would be beneficial, not only for physical activity, but for social support. Outlines concerns for plans of social housing "schemes" as opposed to providing a mix of private and social housing units in all residential areas, as it would seem to be a retrograde step in social development that could possibly result in social exclusion of those residents.

Sub. No.	Name	Summary of Submission
		 States that the development of such a scheme could be perceived negatively in the absence of housing mix, with such exclusion possibly resulting in antisocial behaviour and lack of investment in the area. MTO 2.3: States that the Bus-only/Priority Route link to Sallins Bypass through the Northwest Quadrant should be removed and replaced with the development of bus routes outside residential areas and using an outer orbital route. Further submits that any mention of roads RD3/RDA such as those in the movement and transport plans should be removed as the development of roads through residential areas and promotion of car usage is not in keeping with KCC's objectives of increasing alternative modes of transport such as cycling. States that investment in a greenway and safe cycle lanes for school children to travel to and from Finlay Park and the Northwest quadrant would be welcome instead. Proposed Material Alteration No. 29 Objects to the inclusion of the development of a data centre at Jigginstown given the lack of information available on the impact of such a centre so close to the town and apparent lack of resources to support such a development at this time/at this location. There is a lack of information of site-selection, why Jigginstown was identified as being suitable for a data centre. More information is required. Submits that any mention of The Gallops road development should be removed given that the Inner Relief Road plans were categorically rejected previously. States that the Outer Orbital route is a welcome alternative to such plans.
KCC- C37- 128	Carraig Oscair Residents' Association	 Submission on behalf of the residents of Carraig Oscair estate notes the development comprises of an estate of 41 single storey bungalows with vehicular access from the Kilcullen Road through Rathasker Heights. Notes the location of the estate being bound by Rathasker Road/ Lane (west), and the Ring road and lands zoned 'B: Existing Residential/Infill' to the south. States that the estate is a settled one and a safe place to live. States that there are many aspects of the Proposed Material Alterations to Draft Local Area Plan (LAP) that are positive with the emphasis on regeneration of the Main Street on climate change being particularly welcome.

Sub. No.	Name	Summary of Submission
		 However, states that there are other aspects of Proposed Material Alterations to the Plan that are a source of serious concern to our Association. These concerns arise from The recently published Material Alterations to the Draft Local Area Plan 2021-2027 indicates that the Council envisages even more housing in this area e.g., re-zoning lands beside Enable Ireland for approx. 300 units (Proposed Material Alteration No. 75), redesignating lands on the Kilcullen Road (site C5) opposite Esmondale housing estate for housing development (Proposed Material Alteration No. 73), and increasing the possible units on the Devoy Barracks lands from 152 indicated in the Draft LAP to up to 218 units in the proposed Material Alterations to the Draft LAP (Proposed Material Alteration No. 1). Also refers to Proposed Material Alteration No 33. to amend Map 7.1 to remove the hedgerow line along the western section of Rathasker Lane/Road. Recent and Proposed Residential Development in the vicinity of Carraig Oscair Notes that the Plan and Proposed Material Alterations indicates that there has been a significant increase in housing construction in Naas since the Census in 2016 and states that the projected population in the Plan of 28,000 persons by 2027 (page 73) could be reached years ahead of time. Submits that much of the current and recent house building is in close proximity to Carraig Oscair with consequent direct and indirect effects on the residents. Notes that in addition, planning permission records indicate that an additional 750 units have been permitted or are planned for sites in the immediate vicinity of the estate. Further notes that the recently published Material Alterations to the Draft Local Area Plan 2021-2027 indicates that the Council envisages even more housing in this (as outlined above). Submits that this pattern is rep
		 services, and impact of traffic and pedestrian safety. Notes that by comparison, the Council is insisting on the masterplanning of the area the northwest quadrant, including a phasing infrastructure programme for physical, social, transport and economic infrastructure, flood and transport studies etc before additional new housing is permitted or built.

that it would appear to the Association that none of these requirements for the future planning designed sustainable communities apply to the Kilcullen Road/Rathasker Road/Ring Road ind the area is being left to being planned and developed on the basis of the land ownership of
locks of land or by the major developers operating in the area. Is that Measures and requirements similar to the ones outlined for the North-West Quadrant to necessary for the Kilcullen Road/Rathasker Road area and the adjacent ring road that runs e Newbridge Road (Jigginstown Castle/ Chadwicks) to the Kilcullen Road. hat the Draft Plan is fairly explicit that services have not kept pace with new housing oment in the town and that this is before permitted major new residential developments have ommenced/completed and prior to significant further residential development provided for in endments to the Draft Plan being granted planning permission by the Council or by An Bord la. Indations: Carraig Oscair Residents Association requests that – uncil re-balances its development strategy for Naas to ensure that all areas of the town are beed in a more balanced and sustainable manner and that no one area and particularly the ound Carraig Oscair – has to accommodate a substantial number of new houses and ents built in a very short timeframe and where there is a urgent and specific need to provide ropriate levels of social/community infrastructure. st that Proposed Material Alterations No. 73 and No. 75 be amended to their previous in the Draft Plan in order to achieve a more balanced development strategy for Naas. Juests that the Council both councillors and officials engage proactively with ernment and public and private sector bodies to ensure that the components of munity infrastructure are funded and developed in a timely Material Alteration No. 33 he provisions of PMA No. 33 to remove the hedgerow line along the western side of ker Road. This hedgerow has been severely damaged recently due to housing construction is recommended that the remaining elements of the hedgerow are preserved. Consequently, nends that the map is not altered in order to encourage the preservation of the remaining ts of the hedgerow. n Measure No. 37

Name	Summary of Submission
	 As noted by the Association in its submission on the Draft LAP the hedgerow on the eastern side of Rathasker Road will be compromised by the proposed pedestrian entrance, measure number 37 ("Pedestrian link between housing estate Carraig Oscair - Rathasker Road), when there has been an adequate link for many years between the estate and Rathasker Road. This link – a former farm gate - was temporarily blocked off. However, it has recently been reopened by the KCC Parks Department. The submission notes that the Council will be aware of this entrance as there are photographs of the traditional hinged farm gate and supporting piers in both the Kildare County Development Plans of 2011-2017 (figure 16.43) and of 2017-2023 (Figure 16.42). Further notes that the gateway facilitates pedestrian and cycling access to the town centre area to the north and to the south and that all of this is supported in the Draft LAP. States that Developing the proposed permeability link number 37 will only duplicate the existing pedestrian entrance some 50 metres to the north and will also involve severing the single public open space area that serves Carraig Oscair and Rathasker Heights. States that this space is where our children and young people play and events are held and which has been developed and maintained by the Residents Association. Submits that the Council's proposal will involve significant, unsightly and expensive civil engineering works through the open space due to the differing ground levels with the open space being at a higher level (by some 1.5 metres) than the adjoining Rathasker Lane. It will also involve the removal of a mature and historic hedgerow on the eastern side of the Rathasker Lane, adding to the further serious loss of Green Infrastructure in the area. Further states that the breaking open of a new gap in the hedgerow would be contrary to the provisions of the Draft Naas LAP (objective MTO 1.10, p 56). Driving Instruction/Testing N
	ame

Sub. No.	Name	Summary of Submission
		 In summary the Residents Association reiterates that an existing established pedestrian access exists approximately 50m due north from the proposed new pedestrian measure No 37 and as such there is no need for this new access as indicated in the Draft LAP and proposed material alterations. Recommendations: Carraig Oscair Residents Association requests that the Council – Delete Proposed Material Alteration No 33 to preserve the remaining elements of the severely depleted hedgerow on the Western side of Rathasker Lane/ Road and require the replanting of the sections of hedgerow which have been removed. Delete Pedestrian Measure Number 37 "Pedestrian link between housing estate Carraig Oscair and Rathasker Road" from the Plan Ensure that the pedestrian gate opposite the former Naas Men's Shed (old farmhouse) on Rathasker Road/Lane remains open and in use and reinstate the area around the gateway.
KCC-	Gerard	Proposed Gallops Avenue
C37- 129	Madden	 Objects to the development plan, on the basis that it was voted down on previous occasions by our elected representatives. States An alternative route should be considered on this basis alone.
KCC- C37- 130	Pierce Greaney	 This submission is in relation to the lands that will be zoned F (2) in the Naas LAP and which are located south of the southern ring road (see map below) and are also referred to as the Naas Hospital Stream Green Infrastructure Corridor. Submission states that this is a general observation and is not linked to a specific Proposed Material Alteration. The stated purpose of the submission is to acknowledge and indeed commend the CEO and Kildare County Council for continuing to recognize the importance of, and ensuring that these lands are zoned as F(2) Open Space and Amenity. Notes the land has been identified as appropriate for its intended use and this green space will be an essential part of the overall Greening Strategy for Naas. Recommends that these lands are monitored and further protected by KCC to ensure that the Treelines, Woodlands and Hedgerows within these designated lands are protected until the Open Space and Amenity development of this location occurs. States that this area F(2) already has significant habitats and biodiversity in situ and that these will add to the overall finished amenity once the Open Space is developed.

Sub. No.	Name	Summary of Submission
		 Submits that any attempt to damage, remove or destroy any of the habitats should be resisted by the Council. Notes however that unfortunately, it may be the case that the damage and destruction of these habitats has already commenced.
KCC- C37- 131	Christine Murray	 Issues relating to Roads and Transport and a University for Naas Submits that the plan should be altered to make Dublin Road upgrade project a priority for completion regardless if the Gallops Inner Relief road is completed or not. Cannot stress enough how hostile and anti-pedestrian, anti-public transport, and anti-cyclist this road is in its current form. Bus shelters need upgrading, the road needs narrowing, cycle lanes need to be built, lighting needs upgrading, pedestrian lights need to be installed, etc. States that this upgrade should not be conditional on other projects being complete. Submits that any proposed bridges or development over the canal should not be built for the public good as it is one of Naas' best and most attractive amenities. States that if a road is to be built across the canal, it should be built underground. States that there is a severe lack of bus stops in the area and there should be more bus stops on the Dublin Road and on the Newbridge Road.
		 Requests that while Naas awaits KCC and the NTA to implement local bus routes, KCC could request that the NTA alter the Route 126 to go through Monread and Elsmore.

Sub. No.	Name	Summary of Submission
		 Submits that the Monread area North the M7 is a great area to examine the feasibility of building a through road to Kerdiffstown park or perhaps and pedestrian and cycle lane. States that there is great development potential in this area as it ties Sallins, Naas, Monread, and Johnstown together. States that with the high volumes of students commuting to Dublin, a university should be considered for the area.
KCC- C37- 132	OPR	This is a submission from the Office of the Planning Regulator, refer to Section 3 of the Chief Executive's Report.
КСС- С37- 133	Michael O'Brien	 Proposed Gallops Avenue Rejects to any proposed version of the Gallops Avenue (MTO 3.3) as this is still taking traffic through a residential area. Submits that the restrictions in the past year have highlighted the need for a peaceful area close to peoples' homes for exercise and to sustain positive mental health and not traffic congestion and road noise. States that the route has no benefit to help traffic congestion and it has already been democratically rejected and that the only beneficial route is an outer orbital route. States that this should be the stated objection for this project, not a feasibility study (MTO 3.9).
KCC- C37- 134	Declan McCormack	 Proposed Material Alteration No. 1 The proposal that in all cases lands zoned residential which are in private ownership be increased to a density of 50 (in one case 60) units per hectare leads one to believe that the Planning Authority has not properly the considered the impacts of such high density development on (i) the local environment (ii) the amenities of local residents and (iii) the future character and ambiance of the area. Refers to the site at Tipper Road/Blessington Road (C12) is to be zoned residential and states that this is an acceptable change from light industrial/commercial use but contends what is not acceptable is the proposal to erect 160 dwelling units on a brownfield/infill site with many mature and semimature specimen trees. Submits what such development would have environmental impacts. States it is unclear how 160 units could be accommodated alongside the open public space provision expected for any site of 100+ units in line with objective HCO 1.8

Sub. No.	Name	Summary of Submission
		 States that the only option to facilitate such density would appear to be the construction of high rise apartment blocks which would be completely incongruous to the nature and character of the area and would certainly be at variance with the PMA. Proposed Material Alteration No. 14 Refers to the provisions of PMA No. 14. States that the Tipper Road is the current conduit between these two locations and is a very suitable candidate for a greenway route but the proposed construction of 475 (315 (C16) + 160(C12)) additional dwelling units along with the 397 under construction to the east of the Paddocks will have a very serious and detrimental impact of the traffic volumes and consequent safety of cyclists/pedestrians along the Tipper Road. Notes that the density of that construction is commencing on the site to the east of The Paddocks. is 18 units/hectare (397 units across 22 hectares) yet what is being proposed here is almost 3 times that density. Submits that it beggar's belief that densities as high as 50 units per hectare are being considered for sites such as C12 Tipper Road/Blessington Road. Submits that the construction of almost 900 additional dwelling units between C16 Racecourse (315), C12 Tipper Road (160) and the lands to the east of the Paddocks (397) will result in possibly 1,800 additional cars using that short section of the road on a daily basis which will make it hazardous for current residents. Notes that there are at least 3 separate locations along the Tipper Road (from our residence) to the Blessington Road where the width of the roadway is well below that approved for a single carriageway and there is no possibility for clear circulation in both directions at these points thereby increasing the potential for accidents should be quite apparent to any road design engineer. Notes that the National Roads Authority and the Department of Transport, Tourism & Sport have clear guidelines as to the minimum width of roads and f

Sub.	Name	Summary of Submission
No.		
		 landowners and the developers without any thought of the long term impact of the area and its residents. States that recently the Planning Authority has acted sympathetically when granting permission for brownfield/infill sites. Notes example of Oldtown Walk where the public open retained mature trees and the original Oldtown Estate wall to maintain the character and ambiance of the area. Hopes that that such sensible and sympathetic approaches would be adopted to the development on future brownfield sites would continue. Proposed Material Alteration No. 21 States that the implementation of the Gallops Avenue, in particular its intersection with the Tipper Road, will have a major impact on their property. Submits that there is no doubt that this proposed route will have a detrimental impact on our current standard of living due to noise, wind, dust, vibration, traffic fumes, light pollution and reduction in general amenity value of our residence. States that the quietness of the road will be lost by the imposition of a busy traffic-lighted junction with cars and tracks accelerating and braking and will greatly add to the noise of the locality. Refers to the example of the Blessington Road to envisage how a busy, noisy thoroughfare can substantially damage the quality of the immediate environment. Notes that HGV carrying quarry material will now be routed onto this new road. Also refers to the removal of tress along a portion of the route.
		• States that The Gallops Avenue is not the solution to traffic volumes, current or future, in Naas and
		the development of an Outer Ring Road is one which is long overdue.
KCC- C37- 135	Munoo Prasad	 Outlines concerns as a resident with the proposed RD3/RD3A road/bridge over the Grand Canal which is still present in the Plan. States that the proposed bridge over the canal would be a severe blow to the peaceful environment the canal walk brings to hundreds of people every day.

would have provided more comprehensive objections.

• States that the submission is only a brief summary of their objections and that given more time, they

• Notes that that this consultation is taking place in the middle of the summer holiday period and that

other consultations (including the current speed limit review) had their deadlines extended

ry of Submission
into September for this reason. Submits that it is unclear why the same has not been done for consultation. Further that the resident's associations were only informed about the consultation 10pm on Monday, 16 August, (therefore leaving less than a week for residents to make nissions) despite the fact that the consultation opened on 23 July. nes extreme concern at yet another attempt to push through a so-called "Gallops Avenue" as of the Naas Development Plan and nothing in the proposed "alterations" to the proposal ges their opposition. It is a fundamentally flawed proposal are unacceptable. Notes that these elements were already ded in April 2019 in following link: :://kildare.ie/CountyCouncil/media/Naas%20Inner%20Relief%20Road%20A5%20Size%20B.pdf). es that the proposed "alterations" speak of footpaths, cycle lanes, a bus stop, "greenway" and e trees and states It is common knowledge that all such roads around Naas, include designated avaths, cycle paths, and some trees. mits that if the reference to including a bus stop is in response to legitimate calls for much nucle public transport in Naas as part of the solution to the town's traffic problems, it is clearly genuous. The submits that attempts to now say the ring road will have the "appearance of a street, avenue pulevard", are frankly insulting and are attempts to greenwash an entirely unfit and rejected osal. Is that as previously stated, they remain extremely concerned about the negative environmental, ty and quality of life impact that this road would have on the Tipper Road area and would also regative recreational and environmental impacts for all residents of the town. as it would be particularly damaging for Woodlands residents, whose bedrooms would back onto oad, creating, inter alia; light, air, dust and noise pollution, dangerous junctions, decreased rity and property devaluation. as that they are still not aware of any adequate and independent environmental impact ssment – but it if thas, they would like to receive a copy.

Sub. No.	Name	Summary of Submission
		 Submits the proposed road would create serious congestion in other parts of Naas and simply move the problem to another area, including in the context of new housing developments in those areas. States that such repeated attempts to force through the ring road in a clearly inappropriate place also raise fundamental questions about democracy, transparency and governance and requires examination. Notes that this was an extremely strong democratic mandate on the part of all the people of Naas. Notes that they were assured just a few months ago by our local TD and the Minister for Housing that "convoluted procedures" involving the Land Development Agency (LDA) to force through the democratically-rejected road would not be used in an attempt to force this road through. States that they have requested clarity on this from our local TD and will do so via the Minister too. Notes that other local TDs have also written very strongly in opposition to this road and in support of the local community and we can share this with you. Submits that Kildare County Council works for the people of Kildare, in this case the people of Naas, not the other way round and that it is about time the Council listened. Reiterates opposition to this and states that they are consider contacting the media and a legal challenge if continued attempts are made to force through this democratically rejected proposal. The submission attaches a letter from Minister for Housing, Local Government and Heritage, Darragh O'Brien, TD confirming that LDA will not be involved in any aspect of the Gallops Avenue proposal.
KCC- C37- 136	Dept of Education	This is a submission from a Prescribed Authority refer to Section 4 of the Chief Executive's Report.
KCC-	Fiona	Gallops Avenue
C37-	Duigan	• Changing the name does not matter it will be still the route that was democratically rejected in 2019.
137		Do not want this road.
		Totally reject at the proposed location.
		Only intelligent long-term objective is an outer orbital route.
		Inner relief road waste of public funds and utter disaster for residents.

Sub. No.	Name	Summary of Submission
		Outer Ring Road should be a stated objective rather than an investigation of feasibility.
KCC- C37- 138	Kate O'Riordan	 Concerned over the increased housing in Devoy Quarter Questions why the Council not providing open space on this side of the town. Instead allowing more housing to be poured in. Rapid increase in population but no notable amenities or green areas to serve the increased population. Irresponsible to the people of the area and future generations. Wealth of wildlife in the area proposed for housing and heart-breaking to think so many native animals and trees being eradicated unnecessarily.
KCC- C37- 139	Aonghus Dillane	 Proposed Material Alteration 61 Welcomed the Strategic Reserve zoning in the Draft Plan, to provide for strategic expansion and ensure inappropriate forms of development did not occur. The intention of a masterplan for the NWQ was also noted and the vision in the plan was welcomed in particular retention of open space and amenity with important landscape and environmental features (including significant tree groups and hedgerows, stream corridors and wetland areas) be retained and incorporated into the open space and amenity network. Perplexed over PMA which now zones land previously that were Strategic Reserve, before the OPW Flood Relief Plan and masterplan for the full area is complete. Who in the Council is taking responsibility for the rezoning with a Flood Risk Assessment by the OPW? Guarantee the local residents will not be subject to flooding in the future as flood waters will be displaced.
KCC- C37- 140	Adrian Geissel	 MTO 3.3 KCC continue to include and promote the Gallops Avenue route despite, a democratic decision and hundreds of submissions. Beyond belief a route envisaged 30 years ago is an optimal solution. Naas needs an orbital route.

Sub. No.	Name	Summary of Submission
KCC- C37- 141	Adrian Geissel	 MTO 3.9 Outer Ring Road to take traffic and HGVs to/from the south and eastern side d of Naas to/from the N/M7 is a necessity over the lifetime of the Plan. Key that is does not add traffic volumes at Junction 9. Strategic infrastructure preparing Naas for the next 20 years, rather than catching up on the past 20. To investigate the feasibility is inadequate. Time is now.
KCC- C37- 142	Diarmuid Parker	 Proposed Material Alteration 76 Object to the PMA. Lands is zoned Open Space and Amenity and should remain. The land is next to a school and high-density housing. There are a few places left for the number of people expected to use. Monread Park and the GAA are overextended due to population density. C(19) Zoned Land Object to the New Residential zoning on C (19). The amenity that the site provides will be lost. The Draft Plan has increased the proposed number of houses and consequently the density. This will further pressure on a high pressurised area of the town where housing dominates the surroundings.
KCC- C37- 143	Aaron McHale	 RD3 and RD3A Millbridge Street Object to the roads proposal and to construct a bridge over the canal to link Sallins Road via the residential area of Mill Lane. The area of canal unique natural beauty. Used by all residents in Naas, especially on Sundays. Forms integral part of the greenway. Howe anyone with common sense would think reasonable to construct a bridge over it is beyond comprehension. Remove PMA.

Sub. No.	Name	Summary of Submission
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KCC-	Aine	Proposed Material Alteration 22
C37-	McDermott	 MTO 3.3 – Gallop Road was democratically rejected through a Part 8 process.
144		Insult to the elected members to persevere.
		Relocate traffic and congestion to a settled community.
		 Road to the east of the racecourse should be a stated objective.
		Protect community from traffic, noise, and air pollution.
		 Ridiculous to jump from one design proposals to another.
		Incurring unnecessary costs when better to identify and deliver a more acceptable relief road.
		Proposed Material Alteration 23
		• MTO 3.9 - Outer Relief Road should be a stating objective rather than to investigate the feasibility.
		Naas will experience significant population growth and need to plan in the short terms rather than
		delaying the process.
KCC-	Ciara Breen	Proposed Material Alteration 22
C37-		There should be alternative route that the Gallops Avenue.
145		Located to the east of the racecourse
		Similar to Route 6 in a previous plan.
		Road to the east will avoid all the problems with the Gallops Avenue and serve better as an effective
		proper relief road.
KCC-	Anne Breen	Proposed Material Alteration 22
C37-		Alternative route to the east of the racecourse is required.
146		Similar to route 6 on a previous plan.
		This should be the only route considered.
		 Issues with traffic congestion, pollution and adverse effects on the environment.
		• Alternative route to the east will avoid all problems associated with the Gallops Avenue and serve as
		a proper relief road.
		Proposed Material Alteration 23
		An Outer Relief Road to be provided to eliminate traffic congestion and improve traffic flows around the
		town.

Sub. No.	Name	Summary of Submission
KCC- C37- 147	Cllr. Seamie Moore	 It has been formally agreed by Full Council (and Naas MD members) that Permeability Links and Transport Route proposals for change should be retained for later discussion and decision by Naas Municipal District Committee Members. Ask that any such proposals still existing on the LAP be removed. To retain those presently listed would create an unfairness on the inability of the public to avail of a Part 8 process and the facility of submissions. Already general published information that such proposals were removed from the '40 Member Plan' by agreement. The submission outlines the following: Site to be considered as 'designated' or 'suitable of consideration' as a Halting site facility during the Plan period. Question raised on PMA 76 as follows: Has the site been previously determined in zoning and planning approvals, as 'Amenity & Open Space' for nearby residential and local junior primary school developments? Is the Primary School, without an Open Space/Green Amenity? If this site is zoned 'Residential' will it mean that the site will have been used twice to satisfy residential developments? Will the compensatory offer of a much smaller site satisfy a) the requirements for the previous development b) the school requirement and c) local sport's needs?
		 Change text to read 'Site Zoning to include a Sallins Road cycling and walking facility on the site side of the boundary wall'. 4. Requests the following changes to be made to the Zoning Matrix: Community/Recreational/Sports Buildings to be Open to Consideration in the Greenbelt
		zoning.

Sub. No.	Name	Summary of Submission
		 Park/Playground to be Open to Consideration in the Greenbelt zoning. Playing Fields to be Open to Consideration in the Greenbelt zoning Allowing 'Dwellings' on Green Belt Zoning to 'Not Allowed'.
		5. Proposed Material Alteration 25-55
		 Conference Centre, Exhibition Centre and Off-Line Motorway Service Area be' Permitted in Principle' at the derelict, interchange and Naas Gateway site.
		6. Proposed Material Alteration 44-46-47-48
		 Insert a clause on a 'Taking in Charge Consideration' of an 800-metre access/egress road, following an agreed Traffic & Transport Assessment of the site, to remove any priority claims on ownership of the road.
KCC-	Cormac &	Proposed Material Alteration 22
C37- 148	Orla Breen	 Alternative route to the reast of the racecourse stated in the Objective be the accepted route in place of the Gallops Avenue.
		Can be similar to Route 6 in a previous plan.
		 A road to the east will avoid problems and issues associated with Gallops Avenue and serve better as an effective and proper relief road.
KCC- C37- 149	Geological Society of Ireland	This is a submission from a Prescribed Authority refer to Section 4 of the Chief Executive's Report.
KCC-	Helena	Proposed Material Alteration No. 22 and No. 23
C37-	Hearne	Objects to the proposed Gallops Avenue
150		 MTO 3.3: strongly opposes any version of the Gallops Avenue, an alternative route to the east of the racecourse should be the only route proposed. The Naas Inner Relief Road was rejected in 2019.MTO 3.9: An outer orbital route should be a stated objective rather than an investigation of feasibility.

Sub. No.	Name	Summary of Submission
KCC- C37- 151	Hester McAllister	 Gallops Avenue MTO 3.3: States that the proposal is being made despite it previously having been rejected by Kildare County Council and that it is also based on a 26 year old plan drafted when Naas was just a small dornitory town and not a major commuter town. Contends that the original concept which might have been reasonable has become outpaced by the extensive development of the town. Refers to existing levels of traffic congestion in the area and states that the primary objection appears to route traffic to the town centre and asks how it can be rational to divert this traffic so close to the town centre at its proposed exit point on the Blessington Road. States that the delivery time of the road in the next 7 years will coincide with extensive housing development in the area and exacerbate the level of traffic that will be using the route. States the Gallops estate would be end up being cut-off from one of the major amenities of Naas; the racecourse and the splitting of amenity lands would be to the detriment of the racecourse also. Refers to the consideration of an alternative route to the east of the racecourse. States that this is a more constructive proposal and provides a long term view on the future of the town's development. States that Gallops Avenue would inevitably increase traffic (including HGVs) on the already congested Blessington Road which is extensively used by joggers, pedestrians and cyclists who would be affected by the further increase in traffic. MTO 3.9: Welcomes the proposal but strongly suggests that this should be a stated intention. Outlines continued astonishment that the Gallops Avenue keeps being proposed and questions if it is envisaged that the residents will be worn down by such repetitious proposals in order to get the 'right' result? Concludes by stating that it is time KCC should take a wider and long term perspective and decide that an outer relief route east of the racecourse woul
KCC- C37- 152	James Dowling	 Permeability issue – Morell Close States that the cul-de-sac on Morell Close has been sealed for the last 26 years and the estate has a green that the children play on because it is safe to do so. Notes that some years ago a Spanish student was killed on Monread Road after walking out of an entrance on Monread Court. States that this has to be brought to the Council's attention as a health and safety issue.

Sub. No.	Name	Summary of Submission
		Concludes by stating that there is no way an opening can be put into Morell Close.
KCC- C37- 153	Larry Breen	 Gallops Avenue Proposed Material Alteration No. 23 (MTO 3.9, Outer Relief Road) Submits that as part of a long term Movement and Transport Strategy there should be an Outer Relief Road to eliminate traffic congestion and improve the overall traffic flow.
KCC- C37- 154	Mae Leonard	 Gallops Avenue Strongly objects to the persistent determination to construct the proposed Gallops Avenue and states that it has been out voted by the people of all the surrounding areas and yet it is presented again. States that this in not democratic. States that they were lied to by the Department at a meeting in the Osprey Hotel when people were told that funding for the road would only be available until a certain date but now the funding has been somehow found. Submission attached a previous submission sent to the Council opposing the Gallops Avenue for reasons relating to desecrating biodiversity, air and noise pollution and the fact that road was previously voted down.
KCC- C37- 155	Michaela Piare	 Gallops Avenue States that there should be an alternative route to the Gallops Avenue located to the east of the racecourse. States that such a route would avoid all the problems associated with the Gallops Avenue i.e. traffic congestion, noise, air pollution and adverse effects on residents' quality of life. States that an alternative route to the east of the racecourse will avoid these problems and serve better as an effective and proper relief road.
KCC- C37- 156	Springwood Limited	Proposed Material Alteration 76 The proposal to change the zoning from Open Space to Existing Residential/ Infill is acceptable to Springwood Limited site.

Sub. No.	Name	Summary of Submission
KCC- C37- 157	St Mary's College	Proposed Material Alteration 50

Chief Executive's Report on Submissions/Observations on the Proposed Material Alterations to the Draft Naas Local Area Plan 2021-2027

Sub. No.	Name	Summary of Submission
		 The redevelopment of the school is currently at early stages of the design process. Under the 2011 Plan the subject lands were covered by two zonings – Community and Education for the school buildings and the land adjoining the canal comprising sport pitches and green areas was zoned Future Park/Greenbelt. School buildings were not permitted in the Future Park/Greenbelt, but the objective did state that 'existing uses in open space areas will continue to be permitted and reasonable development proposals in relation to theses uses will be considered on their merits'. Therefore, in principle allowing some scope if the school encroached on the open space lands. In the Draft Plan the site is zoned Strategic Open Space where school buildings again are not permitted in principle. However, the submission states the objective is more restrictive as there is no reference allowing for exceptional circumstances. In this regard PMA 50 is very welcomed. This will provide a more flexible approach to consideration of new development proposals.
KCC-	The	Proposed Material Alteration 50
C37-	Educena	 Concern over impact of Draft Plan on school on Sallins Road.
158	Foundation	

Sub. No.	Name	Summary of Submission
		 Redevelopment project for the school at early design stage. Under the 2011 Plan the subject lands were covered by two zonings – Community and Education for the school buildings and the land adjoining the canal comprising sport pitches and green areas was zoned Future Park/Greenbelt. School buildings were not permitted in the Future Park/Greenbelt, but the objective did state that for integrating upon in open energy will certify to be permitted and recompliant development.
		 'existing uses in open space areas will continue to be permitted and reasonable development proposals in relation to theses uses will be considered on their merits'. Therefore, in principle allowing some scope if the school encroached on the open space lands. In the Draft Plan the site is zoned Strategic Open Space where school buildings again are not permitted in principle.
		 However, the submission states the objective is more restrictive as there is no reference allowing for exceptional circumstances. In this regard PMA 50 is very welcomed. This will provide a more flexible approach to consideration of new development proposals.

Sub. No.	Name	Summary of Submission
		Welcome and support this objective on the basis that it will facilitate in principle, the consideration of buildings encroaching within the open space zoned area at the school, if it can be demonstrated to be an exceptional circumstance.
KCC-	Tom	The submission concerns land at Jigginstown which extend to 78 ha.
C37- 159	McParland	 28 ha of these lands are now proposed to be zoned P: Data Centre and 13 ha Open Space and Amenity.
		 Welcomes the zoning but highlights that the zoning does not automatically mean planning consent will be given, or moreover a Data Centre may not be economically viable on the lands.
		 Concerned over the restrictive nature of the Data Centre zoning which does not allow any other form of development and further restricted with the removal of 'Warehouse'.
		Agriculture will become a non-conforming use.
		 Request the Zoning Matrix to be amended to allow uses Permitted in Principle and Open to Consideration under Agriculture to be inserted into the table to continue to use as an agricultural holding in the event a data centre isn't developed.
		 Also request that the data centre zoning allow for a range of uses Open to Consideration such as Research and Development, Science and Technology based industry, Software Development and associated Office use allowing the data centre to be part of a larger business/technology campus.
		 Notes EDO 1.12 (b) and the requirement to include measures to generate energy on site and therefore requests the land uses for the zone relating to energy generation and storage such as solar farms, battery storage and CHP be Open to Consideration.
		Extending the P: Data Centre Zoning
		 37 ha of the landholding remaining as agriculture and is unviable as a modern agricultural landholding.
		 Increasing the P zoning with a complementary high technology campus style development and on site energy generation would be viable and more attractive to large multi-national corporation.
		Request that an additional land be zoned as per image below.
		The amenity lands would provide a buffer around the campus and provide attractive looped amenity to connect to the wider networks of greenways.

Sub. No.	Name	Summary of Submission
		requests and Open Store 2
KCC-	Patricia	Gallops Avenue
C37-	Gammell	States outrage that The Gallops Avenue proposal was included in the Naas-Sallins Transport
160		Strategy given that it was comprehensively defeated by the democratic members of Naas MD in 2019. States that to disregard this democratic decision and continue to include it in local area plans is completely unacceptable and insulting to our elected members.
		 Submits that such a proposal must not be considered for any future County Development Plan. Notes that the relief road concept was first conceived 29 years ago and has been recognised by the
		members of Naas MD as completely outdated.
		 States that it is imperative the development of a proper outer relief road to deal with traffic issues is given as a clear priority objective in this County Development Plan.
		 Strongly objects to any suggestion or inclusion of an inner relief road in the County Development
		Plan.
		 MTO 3.3: Rejects any version of a proposal Gallops Avenue

Sub. No.	Name	Summary of Submission
		 Submits that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9: Requests that an outer orbital route should be a state objective of the LAP rather than an investigation of feasibility.
KCC-	Kieron	Gallops Ävenue
C37- 161	Gammell	 States outrage that The Gallops Avenue proposal was included in the Naas-Sallins Transport Strategy given that it was comprehensively defeated by the democratic members of Naas MD in 2019. States that to disregard this democratic decision and continue to include it in local area plans is completely unacceptable and insulting to our elected members. Submits that such a proposal must not be considered for any future County Development Plan. Notes that the relief road concept was first conceived 29 years ago and has been recognised by the members of Naas MD as completely outdated. States that it is imperative the development of a proper outer relief road to deal with traffic issues is given as a clear priority objective in this County Development Plan. Strongly objects to any suggestion or inclusion of an inner relief road in the County Development Plan. MTO 3.3: Rejects any version of a proposal Gallops Avenue MTO 3.3: Submits that an alternative route to the east of the racecourse should be the only route given that the proposed Gallops Avenue has been rejected. MTO 3.9: Requests that an outer orbital route should be a state objective of the LAP rather than an investigation of feasibility.