

Errata to Summary of Submissions/Observations from Landowners Seeking Re-Zoning Requests and the Chief Executive's Opinion and Recommendations

Errata to Table 4.1 Submissions/Observations from Landowners Requesting an Amendments to the Land Use Zoning

| Sub. No. | Name | Summary of Submission |
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| 497 | Applegreen Service Areas Ltd | <p>Submission by David Mulcahy Planning Consultants Ltd. on behalf of Apple Green Service Areas Ltd. relates the former Cemex site, adjacent to junction 9 on the M7, Dublin Naas. A cover letter states that the following document have been submitted as part of the overall submission:</p> <ol style="list-style-type: none"> 1. A written submission prepared by this office. 2. A traffic submission prepared by Traffico Ltd 3. A design brochure prepared by Applegreen Service Areas Ltd. 4. A list of previous submissions made to the Council concerning this site (enclosed with the cover letter). <p>Written Submission (Main Document)</p> <ul style="list-style-type: none"> • The submission notes that Applegreen Service Areas Ltd. own lands measuring 6.37 hectares at one of the key gateway locations into Naas (see map below) and states that the lands contain fire damaged buildings which seriously detract from the visual amenity of the area and contain illegal encampments. • The submission incorporates a number of maps and photos to support its submission. • Notes that Applegreen Service Areas Ltd. have been waiting since 2015 to lodge a planning application for the subject lands. Further notes that an appeal to a planning application granted by the Council in 2016 (Plan Ref. 15/500) was withdrawn due to the ABP/TII view that M7 was not yet widened, junction 9A was not operational and the Naas Transport Study wasn't complete, along with no specific policy support for off-line MSA at this site. Submission notes that this final element is still missing. • States that there is a need for the Naas LAP to provide supportive policies in order to maximize the chances for success for any application, including any appeal. |

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| | | <ul style="list-style-type: none"> • Submission welcomes the mixed-use zoning applied to the lands in the draft Plan, and the Key Development Area designation. However it has serious concerns with the content of the draft Plan which could threaten the ability to deliver the regeneration of the site. • Notes that Applegreen Service Areas Ltd. want to imminently lodge an application for mixed-use development consisting of, a regional level conference and exhibition centre with ancillary hotel and motorway service area, including the largest EV charging facility in the country. Further notes that there is the potential to deliver over 350-400 jobs to Naas under this development in a fully sustainable design driving the carbon reduction objective forward with a gateway project for Naas • States that Applegreen welcomes the opportunity to continue to work closely with our neighbours and other stakeholders on masterplanning and transport assessment on a holistic basis, this submission seeks the support of the Council to: <ul style="list-style-type: none"> ○ Ensure that a wide range of land uses are permissible under the land use matrix for mixed use zoned lands and not just Open for Consideration (as would be the norm), with specific objectives for the lands to ensure robust policy support in the Plan. ○ Provide that Applegreen Service Areas Ltd have the opportunity to prepare traffic and design strategies including any necessary modelling within the supervision and approval of the Council and within a specific timeframe. Notes that this will facilitate lodging a planning application for the subject lands at an early date. ○ Ensure that Applegreen Service Areas Ltd. are not reliant on third parties in order to provide egress for traffic from any proposed development on their site, preferring to take on the responsibility and delivery of futureproofing access and egress for neighbouring lands and the first phase of the Naas Outer Orbital Route (Option 6 in the Naas Transport Strategy) on lands within its ownership. ○ Ensure that the 91m motorway setback sterilisation line or any other employment constraint does not prohibit or restrict sustainable development of the site. <p>Draft Naas LAP: Provisions for Junction 9 (Maudlins) Key Development Area</p> <ul style="list-style-type: none"> • Notes that under the draft LAP the site is zoned K (3) Mixed Use with, the objective of which is “To provide for commercial and appropriate residential mixed-use developments” and that that the ‘3’ refers to: Junction 9 (Maudlins): No residential development is permitted. Further notes that there |

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| | | <p>is a proposed 91m setback off the M7 motorway which affects the northern portion of the site (yellow line).</p> <ul style="list-style-type: none"> • Notes that contents of the draft Plan regarding the subject including the following: <ul style="list-style-type: none"> ○ Land Use Matrix does not include any Permissible in Principle land uses under the K3 zoning objective and that listed land uses are either Open for Consideration or Not Permitted. ○ The subject site and Donnelly Mirrors (c.13.1Ha) have together been identified as a Key Development Area. ○ Traffic is a major issue of concern, where there is risk that a development on the site might generate a peak traffic flow, which could result in queuing on the existing public road network, specifically southbound traffic on the M7. ○ Plan acknowledges the potential for internal vehicular queuing (up to c. 800m) – though a new internal road network to reduce or remove risks. ○ Requirement any application for development within this KDA be accompanied by a shared vision for the two sites, with a shared ingress-egress strategy and a comprehensive Traffic and Transport Assessment for the KDA in its entirety. ○ Notes that “the Council also propose to carry out preliminary modelling for the site to inform the use, quantum and intensity of development on the site (Objective URD 1.12). • In response to the above the submission states that there is no traffic engineering basis for suggesting that one particular site with employment generating zoning should be treated differently to another, purely on the grounds of its proximity to a motorway or motorway junction. • Submits that it is for landowners and/or applicants to work with transport planning professionals and the Council and/or TII to agree tried and trusted engineering solutions to mitigate any impacts of employment generation on the road network. • Submission outlines the proposed land uses for the site and the limitations of such land as stipulated in the draft Plan. Submission notes that means that the Council require a joint traffic and design strategy to be agreed with the Council for both the Cemex and Donnelly Mirrors site (to include an ingress/egress strategy and TTA). • States that the Council propose to carry out a preliminary traffic modelling of the site but it is not clear when this will occur or how it will relate to the above joint traffic and design strategy. It is |

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| | | <p>submitted that landowners are best placed to commission, fund and drive this process within the control and supervision of the Council and using an agreed set of transport professionals.</p> <ul style="list-style-type: none"> • Submission refers to the design brief vision for the site and states that its full support to realise such a vision. • Regarding the Connectivity/ Movement provisions of the design brief and the proposal to the create a one-way traffic network within the site, it is submitted that there is no foundation in tried and tested traffic engineering to justify this one-way system proposal and the further possibility of a new connection between the subject site and Naas Industrial Estate to the south. States that the mitigation of traffic impacts should be developed on the basis of sound, empirical engineering analysis and tried and tested design solutions for similarly busy transport nodes. • Notes there is also the to allow for exit onto Fishery Lane (this would have a similar effect as above) and this may also include the provision of a signalised junction at the exit point to manage traffic exiting the site and/or upgrades to neighbouring roundabouts (subject to the agreement with Kildare County Council Roads and Transportation Department and Transport Infrastructure Ireland (TII) (where appropriate). • The submission notes that Applegreen Services Areas Ltd. supports in principle the objectives in the design brief in relation to cyclist, pedestrian and car parking provision. • The submission supports in principle the provisions of the design brief relating to landscaping (including the provision of a linear park) and built form notwithstanding other constraints in the current draft Plan on legacy motorway setbacks and arbitrary employment caps contradict these objectives. <p>Land Use Matrix</p> <ul style="list-style-type: none"> • Submits that that the absence of any 'permitted in principle' land uses associated with a zoning objective is highly unusual, particularly when compared with zoning matrices (see Appendix A). • States that and there are numerous land uses listed in the land use matrix which should be Permitted in Principle (generally acceptable) in order to meet the mixed use aim of this zoning objective i.e Guesthouse/Hotel/Hostel, Hot food take-away, Industry (light), Offices, Service Station, Shop (convenience), Warehouse (wholesale), depot, store. |

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| | | <p>Recommendation: All of these uses are typical land uses under mixed-use zonings and should be Permitted in Principle in the land use matrix for K3 zoned lands.</p> <p>Additional Land Uses</p> <ul style="list-style-type: none"> • Notes that Applegreen Service Areas Ltd. wish to urgently lodge an application mixed-use development consisting of, a regional level conference and exhibition centre with ancillary hotel and motorway service area including the largest EV charging facility in the country. Requests that that the following land uses are also included in the land use matrix as Permitted in Principle: Conference Centre, Exhibition Centre, Motorway Service Area, Low Carbon Hub • States that although the land use matrix refers to a 'hotel' this submission seeks a specific reference to 'Conference Centre' and 'Exhibition Centre' to facilitate any future application in respect of same as a 'Hotel' on its own does not provide sufficient clarity as to whether these uses would be allowable or not under the zoning objective. Notes that these land uses are off-peak traffic generators. <p>Recommendation: Suggests that a footnote is included in the land use matrix which makes it clear that 'Hotel' includes 'Exhibition Centre' and 'Conference Centre' uses. We further submit that a site-specific objective be included for a hotel and regional-level conference, exhibition centre to be provided at the former Cemex site.</p> <ul style="list-style-type: none"> • It is highlighted that KCC granted permission for a Motorway Service Area under Reg. Ref. 15/500 clearly indicating that this was seen as an acceptable land use for this site. States that service area/fillings stations are the core of Applegreen Services Areas Ltd business model and this element will fund the overall development. It is envisaged that any such service area would be materially smaller than that in the withdrawn application but would also be of the same quality in terms of its design and visual appearance. Refer to the enclosed visuals document prepared by Applegreen Services Areas Ltd in this regard. • Submission refers to the follow established precedents: <ul style="list-style-type: none"> ○ States that there have been a number of recent An Bord Pleanala decisions (Dromoland, Co. Clare: PL.03.246435 and Dunshaughlin, Co. Meath: PL.17.246554) which have highlighted the absence of a specific reference to an off-line service facility in Development Plans as a key reason for refusal and this is something that urgently needs to be addressed |

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| | | <p>going forward. Notes that on foot of the An Bord Pleanala refusal in Dromoland, the current Clare CDP contains a specific policy for an off-line service station and on foot of the An Bord Pleanala refusal in Dunshaughlin, the draft Meath CDP includes a site-specific objective for an offline motorway service area in the amendment stage of the Draft Meath County Development Plan 2020-26.</p> <ul style="list-style-type: none"> ○ Refers to the Portlaoise LAP 2018-24 which states the need for a motorway service area at Junction 17 on the M7 motorway. The LAP has zoned the lands in the vicinity of the Junction 17 for Enterprise/Employment. The Togher Masterplan 2018-24 which accompanies the LAP specifically identifies two separate landholdings on the same side of Junction No.17 (both zoned Enterprise and Employment) for Motorway Service Zones. States that this clear direction within the LAP and masterplan gives the land owners clarity in terms in terms of the intended land use, including clarity for Transport Infrastructure Ireland. <p>Recommendation: Include a specific reference to a 'motorway service area' in the land use matrix as a permitted use or, include a site-specific objective in s. 10.6.2., or map-based objective, as follows: "Provide for a motorway service area at the former Cemex site (as part of an integrated development of the site)".</p> <p>Low Carbon Hub</p> <ul style="list-style-type: none"> • The proposed Low Carbon Hub this would comprise of an on-line Compressed Natural Gas facility (in conjunction with Gas Networks Ireland) and Electric Vehicle fast charging hub with other possible national level pilot projects for other alternative and sustainable fuels e.g. Hydrogen facilities for the larger HGV's etc. • Submission refers to NPO 55 of the NPF regarding the promotion of renewable energy use and generation at appropriate locations to meet national objectives towards achieving a low carbon economy by 2050. • Refers to National Policy Framework Alternative Fuels Infrastructure for Transport in Ireland 2017 to 2030 which aims to support a transition away from fossil fuels, moving predominantly to electricity for passenger cars, commuter rail and taxis by 2030. Notes the support in the Framework for a minimum initial network of fast-fill CNG stations is critical to the development of a |

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| | | <p>'network effect' for potential CNG vehicle operators. Notes that it recommends, inter alia that existing sites (where appropriate) and brownfield sites should be considered in the first instance for any infrastructural development or expansions.</p> <p>Recommendation: Include a specific reference to low carbon hub in the land use matrix and/or include a site-specific reference in s.10.6.2. as follows: "Provide for a low carbon hub at the former Cemex site".</p> <ul style="list-style-type: none"> Notes that Applegreen Services Areas Ltd have no issue with the principle of having to agree an overall design strategy with the owner of the Donnelly Mirror's site and for this to be agreed with the Planning Authority prior to lodging an application. <p>Traffic Studies</p> <ul style="list-style-type: none"> Submits that it is critical to have a supporting policy environment where they can lodge an application with confidence. States the Plan as currently drafted will require the Applegreen Services Areas Ltd to agree an overall traffic strategy with Donnelly Mirrors, and subsequently with the Council, before they can then lodge an application. The Plan also states that KCC will undertake separate preliminary traffic modelling for the site to inform the use, quantum and intensity of development on the site (Objective URD 1.12). Submits that the need to wait for preliminary modelling by the Council, which is likely dependent on the necessary funding, could delay matters indefinitely. It is not clear from the wording of the draft NLAP when this modelling is to be carried out and the statement that it will "inform the use, quantum and intensity of development on the site" is a serious concern as it appears to undermine the purpose of the NLAP which is to inform the use, quantum and intensity of development on the site. <p>Recommendation: Submits that only one comprehensive traffic study should be undertaken. This should be funded and undertaken by Applegreen Services Areas Ltd using a traffic expert agreeable in advance with the Council, the neighbouring owner zoned K3 and TII. This study to include modelling with the scope to be agreed with the Council in advance and carried out under the general control and supervision of the Council.</p> <p>Egress</p> |

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| | | <ul style="list-style-type: none"> Notes that provisions in the plan that any egress of traffic entering the Cemex site be via the Donnelly Mirrors site. States Applegreen Services Areas Ltd have a serious issue with this requirement but wish to be in a position to be in full control of the development of their own site in order to lodge an imminent planning application and not be reliant on third parties which is unreasonable given the delays to date. However it states that they are happy to liaise with the owner of the Donnelly Mirror's site to ensure that the overall traffic/design strategy aligns and that this is agreed with the Council. <p>Recommendation: Recommends that the issue of access and egress from KDA is agreed post the traffic study and modelling undertaken by Applegreen Services Areas Ltd when there is clear empirical evidence available upon which to base a decision.</p> <p>91m Setback</p> <ul style="list-style-type: none"> The 91m building line provided for in t potentially affects a significant portion of the site north of same. Submits that it would appear to directly conflict with the design brief to provide buildings at the edge of the site. Note the wording of Objective MTO5 3.7 allows for some degree of flexibility but only refers to "ancillary development" and therefore could have serious implications for the delivery of the urban design concept outlined in Fig. 10.29. <p>Recommendation: Submits that the specific reference to "ancillary" should be omitted. We further submit that following wording should be included "particularly Junction 9 Maudlins KDA to avoid conflict with the urban design concept" in order to avoid any ambiguity at application stage or on appeal.</p> <p>Public Transportation</p> <ul style="list-style-type: none"> There is no objective in the plan to service the K3 lands with public transport. <p>Recommendation: A site-specific objective be included to provide a public transport node as part of any development on the site, ideally with a strong emphasis on carbon neutral proposals.</p> <p>Conclusion</p> <p>The submission includes a conclusion which reiterates the points outlined above and summarises its main recommendations.</p> <p>Appendix A</p> |

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| | | <p>Submission includes in Appendix A examples of land uses permitted in principle under mix use zonings in other statutory plans including Ferrybank-Belview LAP 2017 and Dublin City Development Plan 2016-2022.</p> <p>Traffic Statement prepared by Mr. Martin Deegan of Traffico Ltd</p> <ul style="list-style-type: none"> • The Traffic Statement (dated April 2021) has been prepared to support the main submission. • Statement notes the following amendments to the LAP that are required to support Applegreen in developing the Cemex Site: <ul style="list-style-type: none"> ○ Removal of the proposed cap on employment numbers ○ Specific measures which could support travel to the site using non car modes ○ Removal of the need for Council to undertake their own preliminary traffic ○ modelling study before the site can be developed (Applegreen will fund and deliver this in full consultation with all stakeholders) ○ Removal of undeliverable aspiration that Applegreen could share an egress to the public road network with the adjacent Donnelly Mirrors site • The Statement includes details on the site context and background, its previous use as a significant AM and PM traffic generator noting that the previous traffic modelling and road alignment design associated with the original N7 route (including Maudlins Interchange) made direct provision for the Cemex site, as did the subsequent Naas Road Widening scheme (opened circa 2007). • The following methodology and tasks were completed for this submission: <ol style="list-style-type: none"> 1. A desktop examination of the Draft Naas LAP 2021-2027 and the Naas/Sallins Transport Strategy, open-source satellite mapping and collision records, as detailed in the statement. 2. A targeted inspection was undertaken of the site and the surrounding road network. 3. A suite of practical interventions were developed to remove or reduce all transport related risks identified (see below) • On foot of the above the statement outlines 6 proposed areas in which the LAP and Transport Strategy should be amended, as follows: <ol style="list-style-type: none"> 1. Draft Naas LAP 2021-2027: Amend the Draft Naas LAP and its supporting study to the Naas/Sallins Transport Strategy to support the development of the Cemex site. Key areas |

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| | | <p>for improvement include removal of the proposed cap on employment numbers, inclusion of measures to support travel to the site using non car modes and removal of the need for KCC to undertake their own preliminary modelling study before the site can be developed.</p> <ol style="list-style-type: none"> <li data-bbox="689 395 2033 608">2. Shared Access with Donnelly Mirrors Site: Removal of the need for Applegreen to share direct access to the public road network with the adjacent Donnelly Mirrors site. Instead, an access optioneering process will be undertaken in consultation with Kildare County Council, with all options subjected to a rigorous traffic modelling exercise with the aim of protecting the operation of Maudlins Roundabout. The requirement for a joint Masterplan for both sites is accepted. <li data-bbox="689 612 2033 975">3. Protection of Maudlins Roundabout: Applegreen will use the traffic modelling data undertaken as part of the Naas/Sallins Transport Strategy to develop a linked microsimulation model of Maudlins Roundabout and M7 Junction 9. Access options for both adjoining sites will be developed and tested with a view to protecting the safety and capacity of the junction. The optimum access layout will be used to guide the development of a joint Masterplan for both sites. To further reduce potential traffic impact, a mobility management plan, a construction traffic management plan and a suite of road safety audits will be commissioned by Applegreen. Studies to be developed following thorough consultation with the Council's Transportation Dept. to ensure all risks raised are either remove at source or mitigated. <li data-bbox="689 979 2033 1198">4. Limited alternatives to encourage non-car travel: Amend the Draft Naas LAP to include measures to improve permeability and walking connections to the site, to improve cycling connectivity from Naas Town, to provide a bus corridor which serves the site and a bus link to the train station. Consider the site as an option for locating a bus interchange to serve Naas. Applegreen will support, design and deliver the section of the Naas – Kill Cycle Scheme which passes in front of the land under their ownership. <li data-bbox="689 1203 2033 1348">5. Potential Traffic impacts on M7. Refer to mitigation measures set out within item '3. Protection of Maudlins Roundabout' above. The final site layout will include an active street frontage and Applegreen will incorporate a set-back strip along the road frontage for land to be sterilised for possible future road widening by KCC. Applegreen propose to enlist the |

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| | | <p>support of KCC's Council's Transportation Dept. to assist them in entering into an early stage consultation process with TII with a view to managing this risk.</p> <p>6. High Level of Car Dependency: Refer to mitigation measures set out within item '3. Protection of Maudlins Roundabout' and item '4. Limited alternatives to encourage non-car travel' above.</p> <p>Design brochure prepared by Applegreen Service Areas Ltd.</p> <ul style="list-style-type: none"> • Brochure depicts a number of 3-D renderings illustrating the layout and design proposed uses on a regenerated site.  <p>fig No.1 Existing building layout on the site. Red line is indicative only. (source: Myplan.ie)</p> <p>Chief Executive's Opinion The contents of the submission received from Applegreen Service Areas Ltd are noted.</p> <p><i>Land uses under mixed-use zonings</i></p> |

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| | | <p>The Spatial Planning and National Roads Guidelines (2012) under Section 2.4 emphasise that there must be an evidence base to developments that are proposed in the vicinity of motorway interchanges and a traffic assessment to ensure the avoidance any adverse impact on the national road infrastructure must be provided to this end. The draft Naas Local Area Plan has been informed by a comprehensive evidence base, which included the Naas/Sallins Transport Strategy (2020). The Transport Strategy highlighted the lands at Junction 9 with a forecasted jobs number of 388 were a cause for concern, showing significant queuing at the M7 interchanges. The result from the study were that lower density development would be favourable.</p> <p>In this context, the land use zoning matrix as detailed in Table 11.3 has been carefully considered to ensure the development of the subject lands can continue to occur without a negative impact on the carrying capacity of the national road network, in the absence of detailed modelling which will be provided for under Objective URD 1.12. It is envisaged that this modelling will be a priority once the Plan for Naas is adopted.</p> <p>In the context of the recommendations to provide for a Conference Centre or Exhibition Centre, Motorways Service area and a Carbon Hub on the subject lands. It is important to note that the Land Use Zoning Matrix is not an exhaustive list of uses but rather seen as a guide. The development of particular land uses which are referred to, will be required to be assessed on thier merits. It is considered premature, having regard to the Spatial Planning and National Roads Guidelines (2012), the results from the Transport Strategy and in the absence of further modelling for the subject land to specifically refer to any of the proposed uses as there is no evidence base that the development of the subject lands for such uses would not impact on the carrying capacity of the national road network.</p> <p><i>Traffic Study</i></p> <p>The recommendation for one comprehensive traffic study is noted. It is considered that the objectives put forward in the draft Plan are acceptable given the outcome of the modelling undertaken in the Transport Strategy. In the absence of URD 1.12 it would not be considered appropriate to zone the subject lands for a mix of uses. Should the modelling to be undertaken by the Council allow for an</p> |

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| | | <p>increase in job numbers, they will be provided to inform any development application and associated traffic assessment for any development application on the subject lands.</p> <p><i>Access and Egress</i></p> <p>It is considered that the overall development of the subject lands will benefit Naas as a whole given the prominence of the site as a Gateway to Naas. The measures put forward in the Urban Design Concept as provided for under Figure 10.29 in terms of access and egress are to provide a possible solution to the concerns raised in the Transport Strategy regarding the impact on the national road network. It does not preclude the possibility of other tried and tested engineering solutions as stated in the submission. These issues need to be considered as part of the further modelling on the site. Without a solution to access and egress the site in a sustainable manner there may be queuing at the M7 interchanges as shown in the Transport Strategy.</p> <p><i>91-metre Setback</i></p> <p>The Urban Design Concept as provided for under Figure 10.29 is indicative only and is not a scaled illustration. During the preparation of the draft Plan this issue of the 91-metre was discussed with Transport Infrastructure Ireland (TII) who are responsible for the protection and maintenance of the motorways. It was considered that the setback of 91-metres was adequate to protect the national road network and associated junctions. While no further upgrades are envisaged in the near future, it is the role of the Council to protect national investment in infrastructure beyond the lifetime of many land use plans. Therefore, the reference to 'ancillary' is considered warranted in this context.</p> <p><i>Various</i></p> <p>In relation to the comments to remove the cap on employment numbers, this is not considered acceptable, as it would completely undermine the evidence base provided to support the draft Plan.</p> <p>The comments in relation to the provision of a bus corridor to the subject lands, a bus link to the train station and a location for the bus interchange are noted. The Naas / Sallins Transport Strategy which informed the Plan provides for the delivery of sustainable transport structure over the coming years.</p> |

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| | | <p>The strategy is an evolving document and any identified gaps will be examined and considered for inclusion in future iterations of the Strategy. The draft Plan proposes three local bus routes to improve services across the Plan area in the short and medium terms.</p> <p>As part of the Naas Sallins Transport Strategy a number of sites were assessed for a potential location for a Bus Interchange. Generally, a bus interchange should be sited in a central location where there is a large volume of passengers, good accessibility for active modes and sufficient parking. In this context, the subject lands were not assessed.</p> <p>Chief Executive's Recommendation No change recommended.</p> |
| 498 | Venturis Investment Group | <p>Zoning Request – Lands at Jigginstown</p> <ul style="list-style-type: none"> • Submission by RPS Consultants on behalf of Venturis Investment Group relates to lands comprising c. 88 hectares to the southwest of Naas in the Jigginstown area (see map showing extent of lands at end of Submission). • Submission notes the strategic location of Naas on a national motorway and rail transport corridor, close to Dublin city and is the county town of Kildare. • Notes the significant population growth of the town and the fact that uniquely Naas had more jobs (10,999) than resident workers (9,806). States this is a unique position for a town of its size in Dublin's hinterland. • The submission states the lands are approximately 1.5km west of the town centre, south of the R445 (Newbridge Road) and the Grand Canal (Corbally Line) and west of the Naas Inner Relief Road. • Notes that the lands are currently in agricultural use but they adjoin the built up area of Naas, including existing residential development along Primrose Lane and Primrose Avenue, new residential development immediately to adjacent the north east corner. Nearby developments are stated as the Southern Link Business Park, Newhall Retail Park and Enable Ireland's Children's Services |

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| | | <ul style="list-style-type: none"> • States that the site is strategically located in the context of the surrounding road network including road frontage onto the Naas Southern Ring Road with links further afield to the M7 motorway and town centre. • Submission notes that the lands have access onto Jigginstown Green which can provide pedestrian and cyclist access to the services at Newhall Retail Park, bus stops, and the Grand Canal (Corbally Line). • States that the lands are not subject to flooding, and there are no known sites, monuments or buildings on the Record of Monuments and Places (RMP) or Record of Protected Structures (RPS) and all necessary services including watermains, sewage mains, telecoms, electricity and gas are readily available. • Notes that planning permission has recently been granted for the development of a turning circle and two bus bays on Venturis Investment Group's land off the South Ring Road with a bus stop adjacent to the site. States that the site's owners submitted the application and plan to facilitate the development of this bus stop. States that this underpins the subject land's location with high quality public transport access to Sallins Railway Station. <p>Planning Policy Background</p> <ul style="list-style-type: none"> • Notes the provisions of the Project Ireland and the NPF regarding population growth for the Eastern and Midland Region and additional housing requirements (National Planning Objective (NPO) 32) to 2040 and that the NPF provides a sustainable land use strategy to cater for such growth. • Notes the provisions of the NPF in relation to the creation of strong urban communities (NPO 4), housing, employment growth and the development of towns of sufficient scale that will be the drivers of growth and investment (NPO 5). States that this sustainable and flexible approach is stated explicitly in NPO 9. • States that the NPF acknowledges the strategic location of Co. Kildare in the Mid-East and its proximity to Dublin and that Appendix 2 of the NPF notes that the population of Naas in the 2016 census was 21,393 and the town had a jobs ratio 1.122. |

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| | | <ul style="list-style-type: none"> • Refers to the NPF Implementation Roadmap and how its provisions were applied to Co. Kildare through the Variation No. 1 of the Kildare County Development Plan. Notes that this has a proposed population target of 39,370 to 2026 for the County. • Notes the provisions of the Regional Spatial and Economic Strategy 2019-2031 (RSES) for the Eastern and Midland Regional with respect to Naas and the fact that the settlement is designated a Key Town. Further notes the specific policy responses required for such Key Towns and that the following Regional Policy Objectives (RPOs) relate directly to Naas: RPO 4.48, RPO 4.49, RPO 4.50, RPO 4.51, RPO 4.52 and RPO 4.53. <p>Request to increase in the size of the data centre zoning</p> <ul style="list-style-type: none"> • States that the draft LAP Land Use Zoning Map includes for an area of the subject lands to be included for a data centre zoning (zoned P: “To provide for Data Centre development and their associated infrastructure only). The area zoned P(2), comprises c.15.8 ha of land owned by Venturis Investment Group and c. 28.5ha of land owned by an adjacent landowner giving a total of c. 44.3ha of P zoned land. • States that since the draft LAP was issued, Venturis Investment Group have engaged with data centre developers and their indication is that there are two distinct markets for data centres. Firstly, there is a market for smaller sites in close proximity to Dublin. Secondly, there is a market for larger sites for single user, larger footprint, data centres. Notes that these larger occupiers are prepared to look beyond Dublin to find a suitable site. • In terms of site size, the submission states that that the optimal site size for such occupiers is between 61 ha and 81 ha (150ac and 200ac). To ensure that the proposed zoning can adequately meet the market requirement, it is requested that the P zoning is amended as follows: <ul style="list-style-type: none"> ○ Extended to the east into Venturis Investment Group’s land. ○ Extended to the south (including an amendment to the LAP boundary. ○ Reduced to the north to provide additional F zoned land. • Submission states that this revised zoning would provide a total of c. 73.7ha of land zoned P. This would ensure that the quantum of land zoned would meet future occupiers’ stated requirements. • Further states that through engagement with data centre providers, and examination of current data centres, it is considered that the reduction of the buffer between the land zoned P: Data |

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| | | <p>Centre and residential development to the east is appropriate as data centres can operate close to existing residential development provided noise generating elements are sensitive located and adequately screened.</p> <p>Request for Residential and Neighbourhood Centre Zoning</p> <ul style="list-style-type: none"> • Notes the provisions of the LAP to accommodate 14.9% of Kildare’s housing target in Naas. • Notes the provisions of national and regional spatial documents regarding settlement growth, as reflected in the Kildare CDP core strategy. States that it has severely constrained housing figures for Naas. • States that the existing capacity of zoned land and extant permissions as shown in the draft LAP is a maximum of 1,626 , which equates to a maximum of 271 units per year. • Notes the work done by the four Dublin Local Authorities to implement the NPF, RSES and MASP including the rezoning of land for residential purposes. However, states many of these newly zoned lands within the four Dublin authorities are currently in use for industrial uses and it will be many years before the level of housing delivery will compensate for the restrictions imposed on the surrounding counties. States that this will result in housing shortages in Naas, an increase in housing prices, further pressure on KCC’s rural housing polices and increased commuting for residents who cannot find a home in Dublin • Therefore, requests that KCC seek to ensure that the fullest quotient of residential lands are zoned to provide sufficient residential development. In this regard, it is submitted that that a portion of Venturis Investment Group’s land adjacent to the ring road and existing residential development is zoned C: Residential in the LAP. • States that the proposed zoning which includes provision for a Neighbourhood Centre zoning which would provide sustainable residential development in close proximity to the town centre and adjacent to the newly permitted bus stop and be a logical extension of the residential area of Castle Farm. <p>Roads Objective Request</p> <ul style="list-style-type: none"> • Notes that Map 5.1 and 5.4 with the draft LAP shows a “Possible Future Route: - Jigginstown (Indicative only)” which traverses the site and would provide access from the South Ring Road to the zoned P: Data Centre lands. |

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| | | <ul style="list-style-type: none"> • Notes that Table 5.3 of the LAP shows Roads Measures and Delivery Timeframe. This indicates a “Road from South Ring Road serving Educational and Data Centre Lands” planned for the “Medium Term”. • Notes the provisions of Objective MTO 3.2 states that this objective includes all road objectives from Table 5.3 of the LAP except the road to serve the data centre land. <p>It is requested that this Objective is amended to add reference to the proposed road to serve the data centre as follows:</p> <p><i>‘(vii) Road from South Ring Road serving Educational and Data Centre lands’</i></p> <p>Realignment of F zoned land (Open Space and Amenity) to provide a linear amenity space through the lands</p> <ul style="list-style-type: none"> • Notes that the expansion of the data centre zoning as per the submission request creates a natural area running north to south and therefore it is proposed that this area is zoned F: Open Space and Amenity. • States that this area would provide a greenway which would include cycling and walking paths with intensive landscaping providing excellent links between Kilashee to the south with the sports ground to the north over a 2.5km route. Notes that there is further scope to integrate this link with the Corbally Canal. • States that this amenity link would also provide a buffer between the data centre zoning and the town. <p>Retention of Agriculture lands to the North</p> <ul style="list-style-type: none"> • Submission requests that the lands to the north (see Appendix 1 below) be retained as Agricultural <p>Conclusion</p> <ul style="list-style-type: none"> • Submission includes a conclusion section which summarises the submission document and reiterates requests outlined above. • Considers that the amendments proposed would generally accord with the aims and objectives of the National Development Plan and RSES and would ensure the LAP assists in delivering good planning and sustainable development. <p>Appendix A</p> |

| Sub. No. | Name | Summary of Submission |
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| | | <ul style="list-style-type: none"> <li data-bbox="593 287 1993 359">Submission includes Appendix A illustrating proposed alternative zoning as per requested in the submission (see map immediately below). <div data-bbox="958 354 1659 778" data-label="Figure"> <p>This is a zoning map of the subject lands. The map shows several distinct zones: a large purple zone labeled 'P' and 'P(2)', a green zone labeled 'F' and 'F(2)', a blue zone labeled 'E' and 'E(2)', a brown zone labeled 'C' and 'C(2)', a light blue zone labeled 'L' and 'L(1)', a yellow zone labeled 'R', and several other zones labeled 'B', 'K', 'H', 'I', and 'N'. A red boundary outlines the specific subject lands, which include parts of the purple, green, and blue zones. The 'Grand Canal' is visible on the left side of the map.</p> </div> <div data-bbox="949 842 1671 1315" data-label="Figure"> <p>This is an aerial photograph of the area. A red outline highlights the subject lands, which are located south of the M7 motorway. Key landmarks labeled on the map include 'Eastwall M7 Business Park', 'Newhall Retail Park', 'Naas', 'Naas Racecourse', and 'Cradcockstown Golf Club'. The surrounding area consists of a mix of green fields, residential areas, and commercial buildings.</p> </div> <p data-bbox="949 1321 1120 1343">Figure 1: Subject Lands</p> |

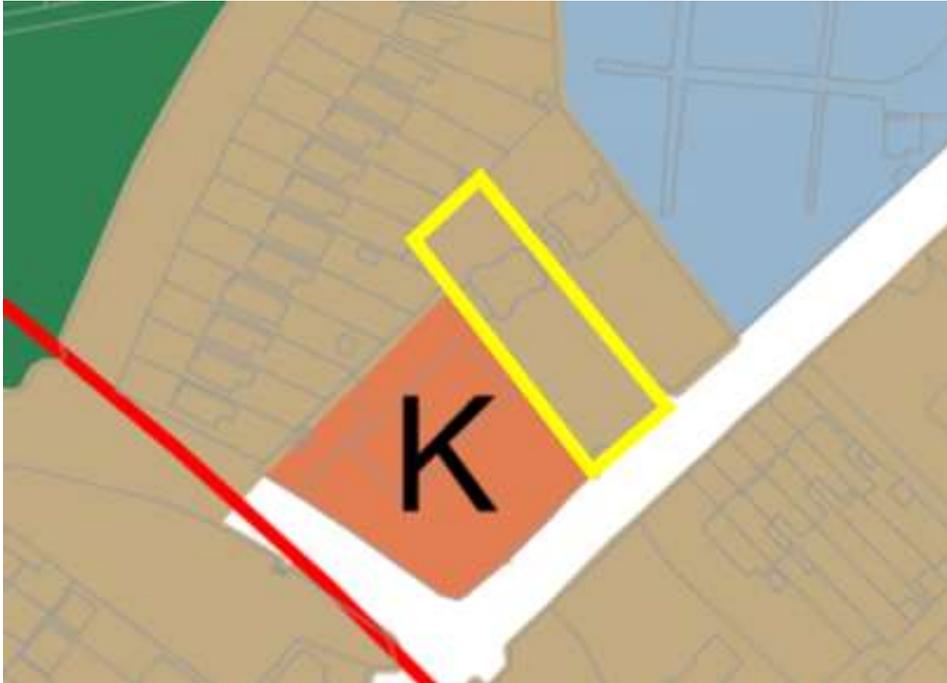
| Sub. No. | Name | Summary of Submission |
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| | | <p data-bbox="589 316 987 347">Chief Executive's Opinion</p> <p data-bbox="589 352 1778 384">The contents of the submission received from Venturis Investment Group are noted.</p> <p data-bbox="589 427 2029 1086">The Plan has been informed by a series of comprehensive evidence-based assessments, which included the Naas/Sallins Transport Strategy (2020). Additional Transport Modelling has also been carried out and is included under Appendix 2 of this report. This report has provided detailed modelling, providing a justification of the amount of lands zoned for Data Centre development at Jigginstown. Having regard to subject lands proximity to the national road network it is considered that the lands zoned for Data Centre uses is sufficient to prevent any impact on the national road network. The request for New Residential land zoning and the provision of a neighbourhood centre are noted. The draft Plan was supported by a Social Infrastructure Audit which highlighted that the schools in Naas, at both primary and post-primary level were operating at capacity. A new primary and post-primary school are required for the Plan area. The subject lands were selected given the proximity to the existing recent residential developments and are currently under construction in the area. The provision of educational facilities at this location would also be complemented by the provision of the linear park and associated playing pitches as provided for under Table 4.3. The reconfiguration of the Open Space and Amenity lands are noted however, it has not been demonstrated that the proposed changes will still facilitate the proposed linear park and associated pitches as detailed in the draft Plan. Similarly, the inclusion of agriculture lands to the north of the subject lands as illustrated in the submission would be considered out of character with the remaining of the proposed zoning in the submission.</p> <p data-bbox="589 1129 2002 1342">The subject lands are located outside the defined settlement boundary and are not required to meet the requirements of the CDP Core Strategy (as varied) in accordance with the requirements of the NPF and RSES as sufficient lands have been identified for development which are considered more appropriate having regard to policy context. Lands have also been designated for a neighbourhood centre on the opposite side of the road at Elsmore where an application for planning permission has been granted for same.</p> |

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| | | <p>The absence of the route traversing the lands at Jigginstown from Objective MTO 3.2 are noted and accepted, provision will be made in MTO 3.3 to include the route through Jigginstown.</p> <p>Chief Executive's Recommendation</p> <p>Proposed Material Alteration</p> <p>Insert additional text under Objective MTO 3.2 (and any consequential amendments) as follows:</p> <p>MTO 3.2 Support the implementation of the following road schemes/projects (as detailed on Map 5.4), subject to the availability of funding, the relevant legislative process and appropriate environmental assessment and where necessary to preserve the identified routes free from development:</p> <ul style="list-style-type: none"> (i) The Gallops Avenue. (ii) Upgrade of Murtagh's Corner junction. (iii) Millbridge Street. (iv) Roadway linking Aldi Distribution Centre to Millennium Link Road. (v) Town centre HGV restrictions. (vi) Upgrade signalised junctions to MOVA or SCOOT as appropriate. <i>(vii) Possible future route through the lands at Jigginstown.</i> |

Clarification of images

In Section 4 of the Chief Executive's Report, the yellow shapefiles referring to 4 sites (submissions 92, 349, 355 and 456) had moved from the correct position. The correct position is shown in Appendix 3. For clarification purposes, the following images show the correct location of sites in the Chief Executive's Recommendation for each submission.

Page 250: The yellow box should be as follows (in response to Submission 92).



Page 275: The yellow box should be as follows (in response to submission 349).



Page 277: The yellow area should be as follows (in response to submission 355).



Page 307: The yellow box should be as follows (in response to submission 456).



End.