

Planning Statement and Statement of Consistency with Planning Policy

In respect of

**Proposed Largescale Residential Development at Finlay Park,
Naas, Co. Kildare**

Prepared for

Westar Homes Limited

Prepared by

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1.0 INTRODUCTION

On behalf of the applicant, Westar Homes Limited, this Planning Statement and Statement of Consistency with Planning Policy sets out the planning and development context for proposed development in respect of lands within the townland of Naas West, Finlay Park, Naas, Co. Kildare.

In summary, the proposal will comprise 134 no. dwellings comprising a mixture of 2 storey apartments and apartments consisting of 22 no. 1 bedroom apartments, 77 no. 2-bedroom units, and 35 no. 3 bedroom units, commercial/ health/medical unit floorspace of c. 247.6 sq. m, communal open space, public open space, all on a site of c. 2.9 hectares (Figure 1.1).

This Planning Report and Statement of Consistency, prepared by John Spain Associates, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and provides a statement of consistency with local planning policy.

This Planning Report and Statement of Consistency should be read in conjunction with the accompanying detailed documentation prepared by C+W O'Brien Architects, DOB Consulting Engineers, JBA Consulting Engineers, Landmark Design Landscape Architects, Systra Consulting Engineers, Openfield Ecological Services, Redkite Ecology, Martin Byrne Archaeology, Chris Shackleton Sunlight/Daylight, The Tree File, Brian Keeley, Rexel, Waterman Moylan, Gnet and Mullin Landscape.

For details of consistency with the quantitative standards for residential units as outlined in the Apartment Guidelines 2020 & the Kildare County Development Plan 2017-2023 please refer to the Schedules Document brochure prepared by C+W O'Brien Architecture.

This Large-Scale Residential Development (LRD) application report is accompanied by a comprehensive range of documentation which specifically seeks to address the items raised by the Planning Authority LRD Opinion and the relevant sections of the Kildare County Development Plan 2017-2023 as well as the Naas Town Development Plan 2021-2027.

It is noted the LRD Opinion from Kildare County Council (KCC) was received on the 23rd of August 2022 which noted that

“Following consideration of the issues raised in the LRD meeting, the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act would constitute a reasonable basis for an application for Large-Scale Residential Development”.

Appendix 2 outlines list of previous pre application meetings held with KCC regarding Finlay Park lands.

2.0 SITE LOCATION AND DESCRIPTION

The subject site is located to the east of Finlay Park, Old Caragh Road, Naas (within the townland of Naas West), County Kildare. These lands are within close proximity to the town centre (which is located to the southeast). The location of the site in the context of its surroundings is shown below in Figure 2.1 outlined in red, with the applicant's wider land ownership is shown in blue.

The subject lands are bound to the north and east by greenfield lands, to the west by the existing residential development known as Finlay Park and to the south by the grand canal.

Our client's overall landholding extends to c.11.6 ha of greenfield lands (blue line boundary) and is fully serviced by foul, sewer and water connections. This application relates to c.2.9 ha of greenfield lands as highlighted in red. The site is currently accessed via the Old Caragh Road and cycle/pedestrian link via the Ploopluck Bridge over the Canal, which connects the site to Naas Town Centre.

These lands which are serviced and located c. 1.3km from the town centre via the Ploopluck bridge and c. 500-650m to the main street to the southeast (via Abbey Bridge) and are well placed to provide for the future confirmed residential needs of the town of Naas.

Figure 2.1 – Site Location



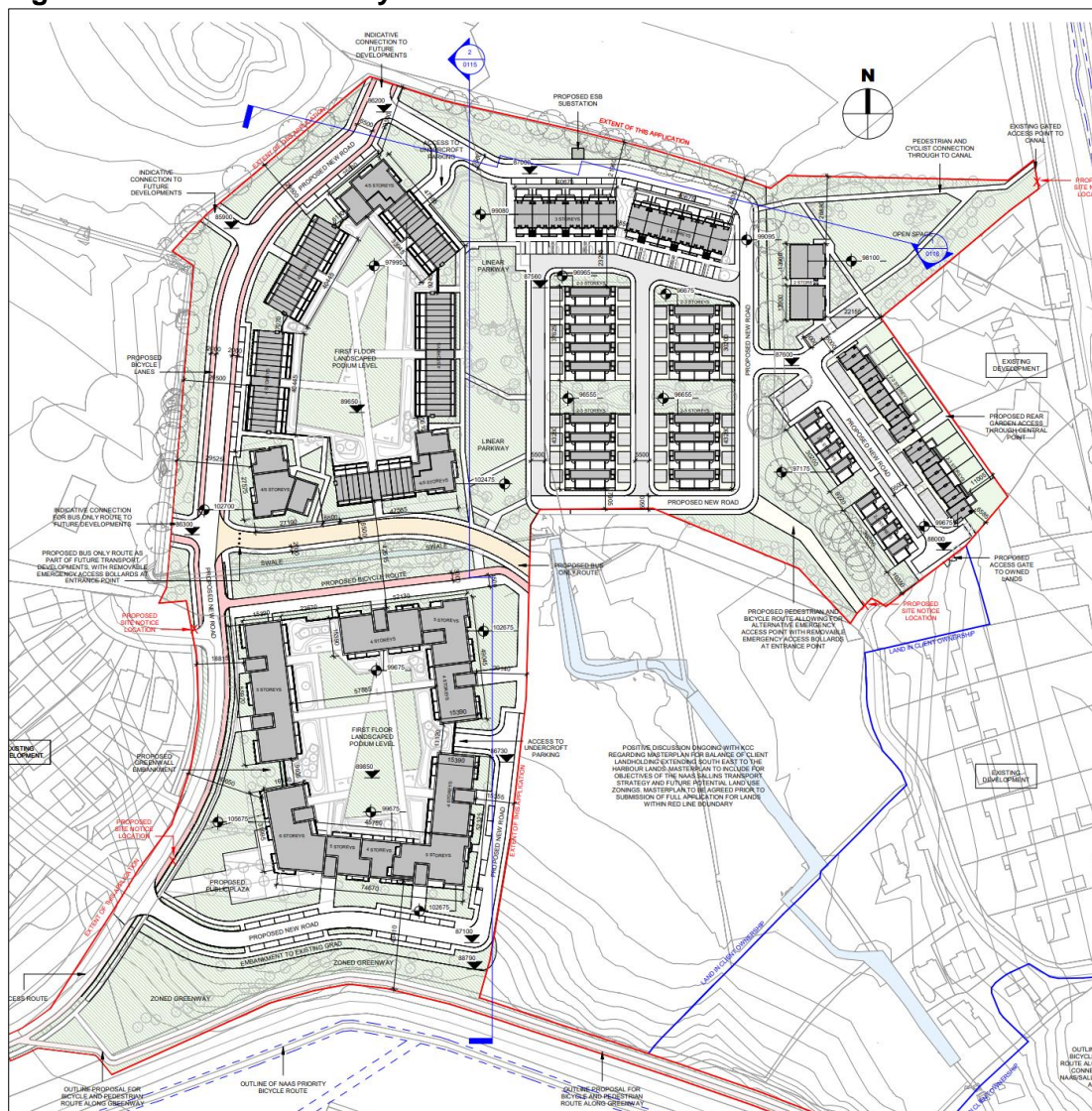
3.0 PLANNING HISTORY

3.1 Subject Site

3.1.1 ABP-310244-21 ABP Pre-application Consultation Opinion

An Bord Pleanála issued an opinion on the 26th of November 2021 in respect of the development of 359 no. dwellings (13 no. houses, 346 apartments) and associated site works on a site of c. 8 hectares.

Figure 3.1 – Overall Site Layout



The LRD proposal comprises the southern portion of the overall previously proposed SHD application.

The opinion of An Bord Pleanála stated:

“An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.”

The site is divided up into 4 no. zones which relate to existing features/wayleaves located on the subject lands. It should be noted that this development did not proceed on the basis of land use zoning changes made under the 2021-2017 Naas Local Area Plan (LAP).

3.2 Adjoining Lands to the West

3.2.1 Planning Reg. Ref. 13500055 (ABP Ref. PL 73.242895)

On the 31st of December 2014, An Bord Pleanála upheld the decision of Naas Town Council to grant permission to Le Monde Holdings for:

“development comprising of 60 dwellings comprising of 18 no. 3 bed 2 storey semi-detached dwellings, 30 no. 4 bed 2 storey with roof space accommodation semi-detached dwellings, 11 no. 4 bed 2 storey detached dwellings and 1 no. detached bungalow, relocation of previously proposed footpath/cycle track on canal bank off the canal bank and all ancillary site works.”

3.2.2 Planning Reg. Ref. 17592

Kildare County Council granted permission to Le Monde Holdings on the 8th of December 2017 for the construction of:

“14 no. four bed two-storey semi-detached houses with roof space accommodation and a four bedroom detached house in lieu of 10 no. detached four bed two-storey houses previously granted and all ancillary site works. On sites 51-60 as granted under planning permission 13/500055 (An Bord Pleanála Reference PL73.242895). Revised by Significant Further Information which consists of revised Site Layout Plan 12 no. four bed two-storey semi-detached houses with roof space accommodation and two four bedroom detached house.”

3.2.3 Planning Reg. Ref. 22160

Kildare County Council granted permission to Westar Homes Limited for the construction of:

“4 No. 2 storey houses comprising 2 No. 3 bedroom dwellings, 2 No. 4 bedroom dwellings, along with open space (c. 0.2 hectares), 8 No. car parking spaces with access from existing Finlay Park residential development, as well as all associated layout and site development and landscape works”

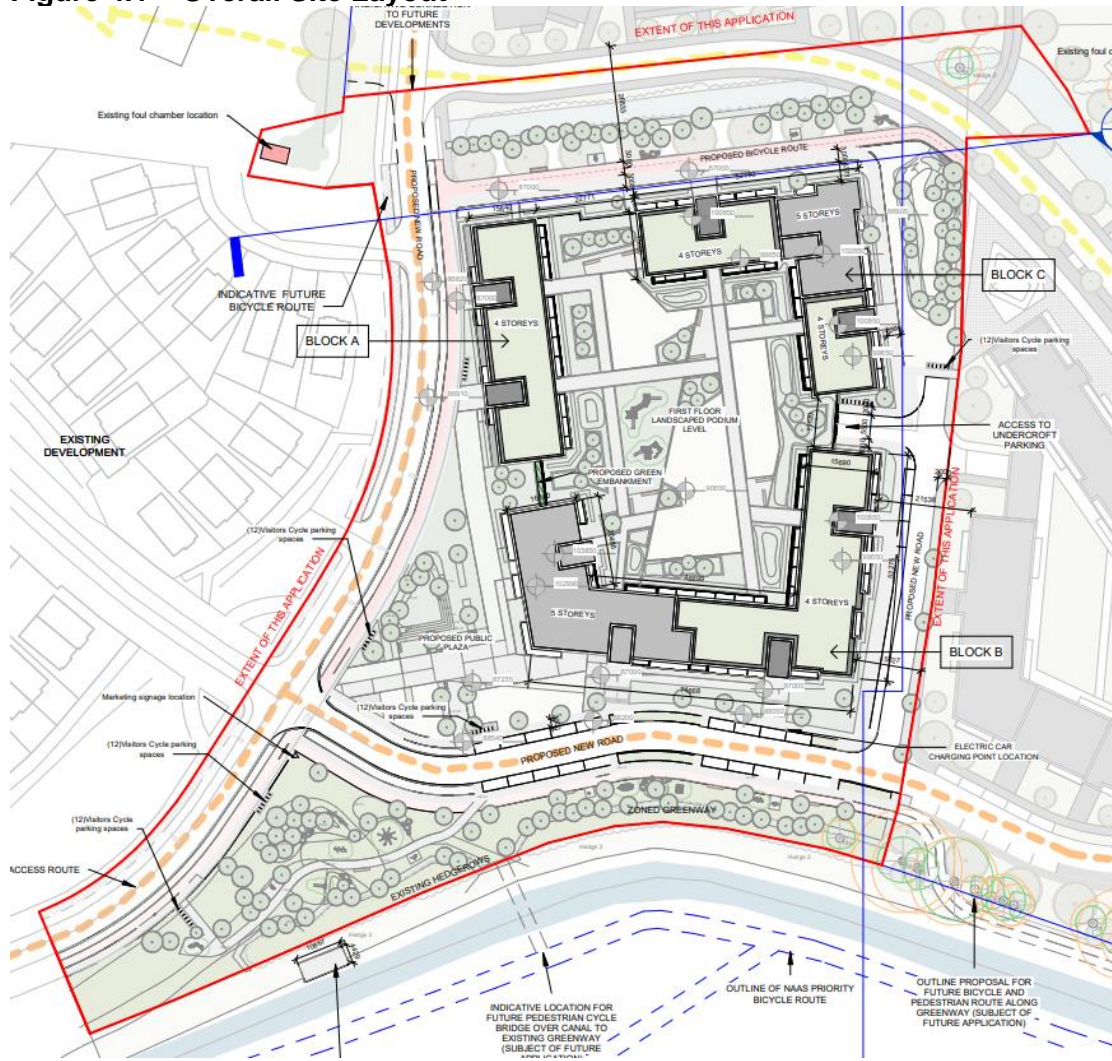
4.0 DEVELOPMENT DESCRIPTION

The Site Layout Plan (figure 4.1) prepared by C+W O'Brien Architects shows the site layout in context. Figure 4.2 illustrates the undercroft car parking layout at ground floor level. The proposal will provide a mix of apartments, 2 storey apartments and open space all on a site of c. 2.9 hectares.

The proposed development will consist of the construction of 134 no. apartments (comprising a mixture of 70 no. 2 storey apartments and 64 no. apartments - 22 no. 1 bedroom apartments, 77 no. 2 bedroom apartments, and 35 no. 3 bedroom apartments) with private open space provided in the form of balconies/terraces as follows:

- A) *Block A (4 storey apartment block) comprising 26 no. apartments (6 no. 1 bed units, 16 no. 2 bed units & 4 no. 3 bed units); Block B (part 4 part 5 storey apartment block) comprising 66 no. apartments (10 no. 1 bed units, 33 no. 2 bed units and 23 no. 3 bed units), with a commercial/ health/medical unit (c. 247.6 sq. m) at ground floor; Block C (part 4 part 5 storey apartment block) comprising 42 no. apartments (6 no. 1 bed, 28 no. 2 bed units and 8 no. 3 bed units);*
- B) *Vehicular/pedestrian and cyclist access from the Old Caragh Road (in new arrangement) along with the provision of 201 no. undercroft and surface car parking spaces as well as 388 no. undercroft and surface cycle parking spaces; internal road and shared surface networks including pedestrian and cycle paths;*
- C) *Public Open space including central communal (courtyard) open space including outdoor playground area;*
- D) *Provision of foul and surface water drainage, including relocation of existing foul main in northern part of site as well as green roofs; linear greenway path, bin stores; plant rooms; public lighting and all associated landscaping and boundary treatment works, site development and infrastructural works, ESB substations, and all ancillary works necessary to facilitate the development.*

Figure 4.1 – Overall Site Layout



Source: C+W O'Brien Architects

Figure 4.2: Ground floor site layout showing undercroft car parking



Source: C+W O'Brien Architects

4.1 Residential Development

The proposal comprises 134 no. dwellings comprising a mixture of 2 storey apartments and apartments consisting of 22 no. 1 bedroom apartments, 77 no. 2 bedroom units, and 35 no. 3 bedroom units (Table 4.1), commercial/ health/medical unit floorspace of c. 247.6 sq. m, communal open space, public open space, all on a site of c. 2.9 hectares.

Table 4.1 – Overall Dwelling Mix

	1 bedroom	2 bedroom	3 bedroom	Overall	%
Duplex		56	14	70	52%
Apartments	22	21	21	64	48%
Total	22	77	35	134	100%
Overall Mix %	16%	58%	26%	100%	100%

Source: C+W O'Brien Architecture Schedule of Areas

The site has a net density of c. 59 uph and 112 no. units (84%) achieve dual aspect. 22 no. units are single aspect. No single aspect unit is north facing.

The proposal includes 70 no. 2 storey apartments and 64 no. apartments along with 201 no. car parking spaces. (179 no. undercroft car parking spaces and 22 no. surface car parking spaces). This equates to 1.3 spaces per unit.

338 no. cycle spaces are provided at surface and undercroft levels (300 no. undercroft cycle parking spaces and 88 no. surface car parking spaces) (2 per residential unit, 0.5 for visitors and 0.05 for commercial space).

The proposed layout is configured in an enclosed block arrangement (As shown on Figure 4.1) comprising 3 no. apartment blocks as follows:

- Block A fronting onto the existing road is 4 storeys (Figure 4.3),
- Block B is a 'horseshoe' block of 4 and 5 storeys,
- Block C is an 'L' shaped block of 4 storeys rising to 5 storeys at the corner fronting onto the area to the north.

Figure 4.3: Elevation of Proposed Block A



(Source C+W O'Brien Architects)

The blocks will include a first-floor landscaped podium and undercroft parking will be accessed from the east of the site.

The design achieves a high level of open space with 46% of the total site area designated for open space, well in excess of the minimum standards as set out by the plan. Overall, there is 10,437 sq. m. of open space.

4.2 Access

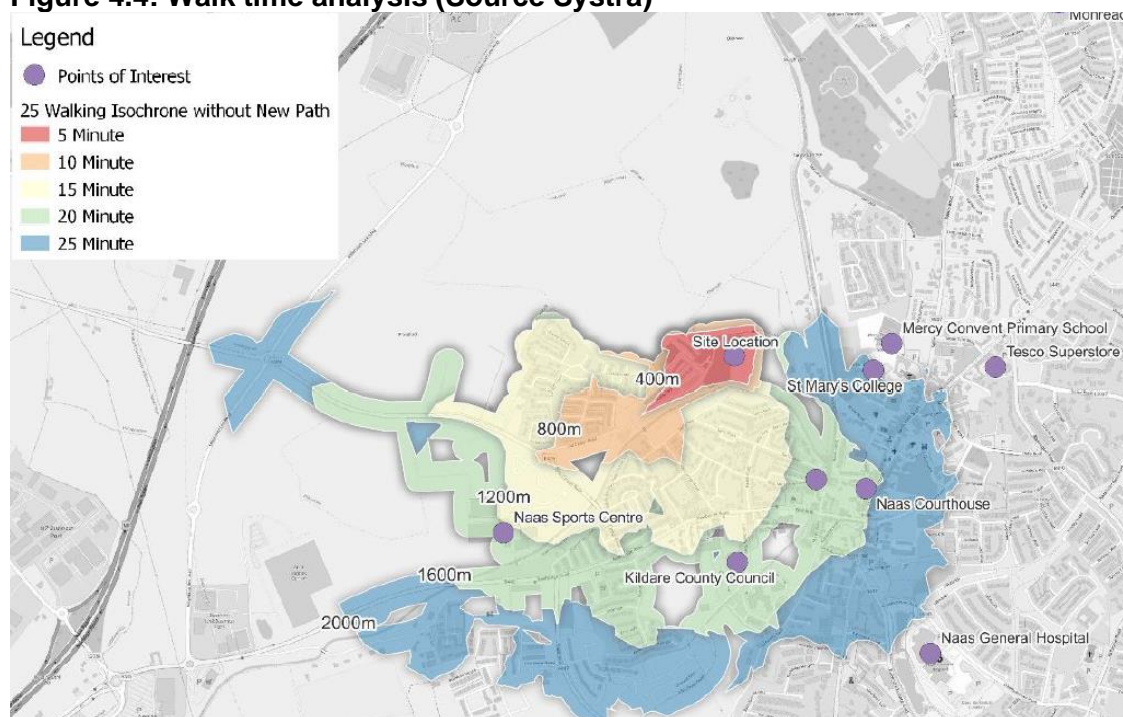
4.2.1 Pedestrian Facilities

The proposed site design provides excellent access to, from, and within the development for pedestrians. Within the site, footpaths will be provided alongside all of the internal roads. In addition, footpaths will be provided through greenspaces providing direct pedestrian access to building entrances and short cuts between roads.

A walk time analysis of between 5-25 minutes has been undertaken by Systra. Figure 4.4 illustrates the walking distance timeframe from the from the subject site. The town centre of Naas is within a 15-minute walking distance.

Later future separate phases of development will provide a bridge to be built over the Grand Canal near the town centre. This bridge will provide the opportunity for linkage as part of a linear park space running south-east from the development site to the town centre.

Figure 4.4: Walk time analysis (Source Systra)



4.2.2 Cycle Facilities

In total the proposed development provides for 338 no. cycle parking spaces. 300 no. undercroft cycle parking spaces and 88 no. surface car parking spaces.

The previously completed cycle tracks along Old Caragh Road provide segregated cycle tracks on either side of the road. This provides a continuous off-road route to the south between the development site and the Ploopluck canal bridge (and the western spur of the proposed Naas Sallins Greenway along the south bank of the canal), and on to the R409 and Naas Sports Centre.

The proposed pedestrian/cycle route along the north bank of the Grand Canal (within the site boundary) is designed to facilitate future link southwards over the canal to the greenway. The greenway route will link to Sallins (which has a rail station).

An east-west cycle track will also be provided along the north side of the development, which will provide cycle access into the north of the site, as well as access to a future cycle route to the harbour. This spur could also connect into the planned Naas-Sallins Greenway alongside the canal, providing recreational routes in both directions between the two settlements.

4.2.3 Vehicle Access

The development will be accessed from an extension of Old Caragh Road. The road is as follows;

- Old Caragh Road has a 6.5m wide, two-way carriageway, and in addition incorporates a 2m-wide shared footpath and cycle facility on its northern side.

- To the east of the Ploopluck Bridge, the road continues as a 6.5m-wide carriageway, with separate 1.5m-wide footpaths and cycle tracks on either side
- A speed limit of 30km/h.

Vehicle access into the residential area will be provided via a new priority junction on Old Caragh Road, Should Old Caragh Road become a through route for the Northwest Quadrant, there is the potential to upgrade the priority junction to a signalised junction (with bus priority) if required.

The access road will run east from the junction, loop around the south of the development, and then enter a parking undercroft on its eastern site.

The internal roads within the development will be 6m wide and have 2m footways on either side. Corner radii will be reduced as far as possible to help reduce vehicle speeds.

Further traffic calming measures will be incorporated at the detailed design stage. These are likely to take the form of measures such as differentiated surfacing, localised narrowing and horizontal deflections.

4.3 Landscaping Strategy

The landscape strategy aims to integrate the new built development with the existing landscape and create a network of attractive and useable open spaces while contributing to the local biodiversity. The landscape plan provides for an amenity space in the open space located in the southwest of the site which consists of outdoor gym equipment and children's playground facilities as illustrated on Figure 4-5.

The strategy incorporates a range of natural features into the overall design. Some of these features include natural boulders with rounded edges, grassy mounds and limestones seat with stainless steel frame.

The landscape design strategy is as follows:

- The retention and integration of the existing green infrastructure which is key to the development of the landscaped open spaces.
- Utilising the existing Green Infrastructure to create a positive receiving environment, establishing a strong sense of place and an aesthetically pleasing landscape.
- The landscape design aims to create a distinct landscape character drawing inspiration from the design and layout of canal locks ensuring appropriate screening, visual and aesthetic interest, pedestrian and cycle links and access, recreation and movement across the development.
- The landscape design aims to provide flexibility in recreation activity, allows for social interaction and active play as well as spaces that are quiet and calming and spaces that are accessible and inclusive for all ages and abilities.
- The landscape design aims to manage and enhance the habitat protection and biodiversity of the site and augment same with native and pollinating plant species ensuring the establishment of riparian corridors along existing and proposed watercourse design.
- The use of a range of native and pollinating plant species within the open spaces to support local biodiversity and continue development of ecological corridors.

Figure 4.5 – Overall Landscape Masterplan Source: Landmark Landscape Design



It is proposed to provide c. 1.04 hectares of open space, which comprises c. 46% of the site. Communal open space is provided internally within the blocks of c. 4,265 sq. m. as shown on Figure 4.6.

Figure 4.6 – Open Space Breakdown



Source: C+W O'Brien Architects

5.0 STATEMENT OF CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

The key provisions of national and regional planning policy as it relates to the proposed development is set out in the following sections.

5.1 National Planning Framework

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

As a strategic development framework, '*Project Ireland 2040*' sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.

5.1.1 National Strategic Outcomes

The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. Section 2.6 of the NPF seeks to provide compact and sustainable growth.

Chapter 4 of the NPF seeks to make urban places stronger "*to enhance people's experience of living and working in and visiting urban places in Ireland.*"

The following is outlined:

National Policy Objective 3a: "*deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements*".

National Policy Objective 3c: "*Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints*"

National Policy Objective 4: '*ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being*'.

National Policy Objective 6: "*Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area*".

National Planning Objective 13: "*In urban areas, planning and related standards, including, in particular, height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*"

National Policy Objective 27: "*Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.*"

National Policy Objective 33: *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location”.*

National Policy Objective 34: *“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time”.*

National Policy Objective 35: *“Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights”.*

5.1.2 Evaluation of Consistency

The subject lands at Finlay Park accord with the National Planning Framework (2018) (NPF), in particular with its principles of compact growth and the reinforcement of the country’s existing urban structure at all levels. Where housing policy is concerned, the proposed development accords with the NPF’s core principles for housing delivery – in particular that the location of new housing be prioritised in existing settlements, in this case within the built-up area of Naas.

The development of our clients’ residentially zoned lands will deliver a good housing mix within the development footprint of Naas and utilise a sequentially located site to provide housing and a sustainable neighbourhood, in compliance with NPF objectives 3a, 3c, and 6 listed above.

In accordance with National Policy Objective 33, the development of our clients’ landholding will be provided at a sustainable location, with access to existing services and facilities being within a 10-15 minute walk to Naas town centre. In accordance with National Policy Objective 35, the development of our clients’ lands will increase residential density within an existing settlement. Current proposals for the subject lands comprise a net density of c. 59 uph, which is considered appropriate.

The emerging design of our client’s lands incorporates accessibility to existing and proposed neighbouring developments. The proposal also prioritises walking and cycling through design interventions such as shared surfaces and pedestrian and cycle links throughout the site.

5.2 Regional Spatial and Economic Strategy 2019-2031

The Regional Spatial and Economic Strategy (RSES), which was published on the 5th of November 2018, notes that the preferred spatial strategy for the Eastern and Midlands is the consolidation of Dublin plus the Regional Growth Centres of Athlone, Dundalk and Drogheda, supported by planned focussed growth of a limited number of self-sustaining settlements.

In the RSES, Naas is identified as a key town in the core region. Key towns are identified as “large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.”

The RSES supports enhanced links to Naas/Sallins train station to provide for more sustainable transport choices by those living and working in Naas and Policy RPO 4.33 supports the improvement of links through the Northwest quadrant of Naas.

Specifically, relevant to Naas the RSES recognises the settlement’s role as the county town of Kildare and a strong employment base with a jobs-to-resident workers ratio of 1.122. The RSES supports the enhanced links to Naas/Sallins train station to provide for more sustainable transport choices for those living in Naas.

The Regional Policy Objectives for Naas are noted as follows:

“RPO 4.48: *Promote the improvement of the transport network within and serving Naas town, including delivery of a robust and efficient walking, cycling and bus network with strong links to Sallins Railway Station, key destinations within the town and to the North West Quadrant and town centre area.*

RPO 4.49: *Support the development of the Grand Canal for amenity, recreation and sustainable transport purposes including the Naas to Sallins and Naas to Corbally harbour greenways and linking these to the national Grand Canal Greenway.*

RPO 4.50: *Regeneration and consolidation of the historic centre to improve the retail and commercial functions of the town core, with enhanced permeability and sustainable mobility within the town centre and improve links between the core and surrounding residential and employment areas through the further development of walking and cycling routes and improved public transport.*

RPO 4.51: *Strengthen the local employment base including through the development of MERITS, Millennium Park in the North West Quadrant and the regeneration of underutilised lands including industrial lands in the north east of the town.*

RPO 4.52: *Support the delivery of new and enhanced public transport infrastructure in Naas and Sallins, including Park and Ride and interchange facilities as identified by the NTA and Kildare County Council. RPO 4.53: Support an enhanced role and function of Naas as the County town of Kildare, particularly as a hub for high quality employment, residential and amenities.”*

It is clear that the new RPO's for Naas recognises and supports the enhanced role and function of Naas as the County town of Kildare. The Naas LAP provides for appropriately zoned residential land which ensure that the town fulfils its role and function as a “Key Town” in the EMRA.

With reference to residential development, the RSES states that:

“The sustainable growth of Naas should be carefully managed to promote the concept of a compact town by encouraging appropriate densities in suitable locations and by resisting sporadic isolated developments which do not integrate with the surrounding urban fabric. Promoting placemaking and more mixed tenure and the delivery of lifetime adaptable homes that can accommodate the changing needs of a household over time should be encouraged thereby helping to create integrated communities.”

5.2.1 Evaluation of Consistency

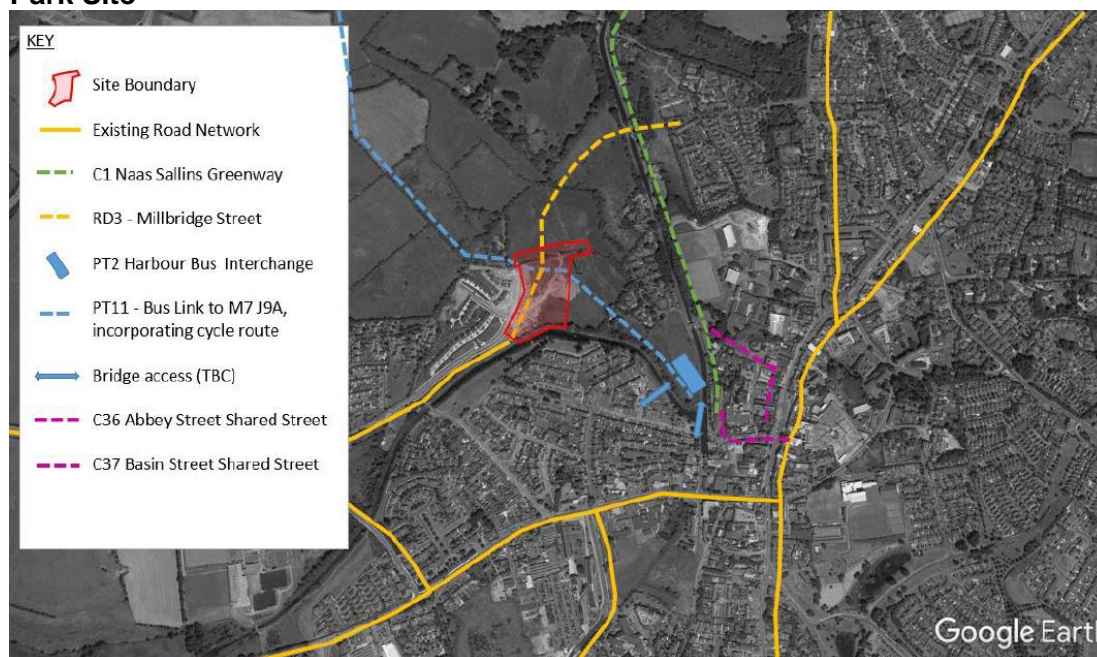
Naas is identified as a key town in the RSES. Naas is a key town for growth as it is a self-sustaining town within Dublin's hinterland. The proposed development will consolidate the town of Naas within a greenfield site, located immediately to the north west of the town centre.

Naas has strong links to both Newbridge and Sallins in terms of employment, services and education, in part due to strong transport links. This allows Naas to develop as a hub and key growth town for these surrounding areas.

Systra has prepared a Mobility Management Plan which identifies multiple transport measures which will interact with the Finlay Park lands and are earmarked to be delivered in the short,

medium and longer term over the next ten years. Figure 5.2 below identifies the different measures. An indicative bus only route connects the lands to the town centre and Sallins.

Figure 5.1: Naas Sallins Transport Strategy Preferred Options affecting Finlay Park Site



Source: Systra

The proposal promotes a progressive and sustainable density of c. 59 uph on sequentially located lands within close proximity to the town centre of Naas. The mix of 1, 2 & 3 bed units provide tenure for a wide demographic.

Policy Objective RPO 4.33 emphasises the need for a robust transport network both within the town and with links to the surrounding area. This is supported by the consolidation of development within the town, to both improve walkability and to provide more appropriate densities for the provision of public transport. The site is located within 1.3km of the town centre via Poopluck Bridge and c. 500-650m to the town centre via Abbey Bridge and will allow for connections through the site which can facilitate public transport from the town centre to the south to Sallins train station to the north, in the future.

It is submitted that Naas, as a designed Key town in the RSES, and which has had significant investment in infrastructure, comprising the upgrade of the Osberstown WWTP, along with the ring roads, including the Devoy Link Road, and the M7 upgrades including the Millennium Park Interchange (improving connectivity to Sallins train station) is strategically placed to cater for the growth envisaged by National Policy Objective 9. It is important to ensure that the significant investment in public infrastructure is used to facilitate housing, particularly when there is a shortage of suitable housing.

A greenway is proposed to enhance walking and cycling connectivity throughout the southern open spaces. This greenway will be extended within future phases of development along the north of the Grand Canal. The construction of a bridge in future phases of development will connect this proposed greenway route to the town centre of Naas and the existing Naas/Sallins Greenway.

5.3 The Climate Action Plan – Securing Our Future

The Climate Action Plan 2021 was published by the Government of Ireland in November 2021. The Action Plan provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

The Plan lists the actions needed to deliver on our climate targets and sets indicative ranges of emissions reductions for each sector of the economy. The proposed development has had due regard to The Climate Action Plan in developing the subject site.

5.4 Housing For All

Housing for All - a New Housing Plan for Ireland (hereinafter '*Housing for All*') is the government's housing plan to 2030. Launched in September 2021, it is a multi-annual, multi-billion euro plan which will improve Ireland's housing system and deliver more homes of all types for people with different housing needs.¹ The government's overall objective is that every citizen in the State should have access to good quality homes:

- to purchase or rent at an affordable price;
- built to a high standard and in the right place;
- offering a high quality of life.

The government's vision for the housing system over the longer term is to achieve a steady supply of housing in the right locations with economic, social and environmental sustainability built into the system. It is estimated that Ireland will need an average of 33,000 new homes to be provided each year from 2021 to 2030.

The policy has four pathways to achieving housing for all:

- supporting home ownership and increasing affordability;
- eradicating homelessness, increasing social housing delivery and supporting social inclusion;
- increasing new housing supply;
- addressing vacancy and efficient use of existing stock.

5.4.1 Evaluation of Consistency

The proposed development is consistent with the overall aim of Housing for All to accelerate social housing and build more an average of 33,000 homes per annum in the State between and 2030.

The proposed development provides for 134 no. new apartments which will substantially add to the residential accommodation availability of the area and cater to the increasing housing demand. The proposed development will contribute to the quantum of new of social housing units available to the Council through the Part V agreement which is consistent with the objectives of Housing for All.

¹ <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

5.5 Transport Strategy for the Greater Dublin Area 2016 – 2035

The current Transport Strategy for the Greater Dublin Area 2016 – 2035 is a strategic framework plan that guides the delivery of transport and infrastructure up until 2035. The plan sought the upgraded development of the N7 to Naas (completed) and increase bus frequency in Naas at peak times.

‘Reconfiguration of the N7 from its junction with the M50 to Naas, to rationalise junctions and accesses in order to provide a higher level of service for strategic traffic travelling on the mainline’

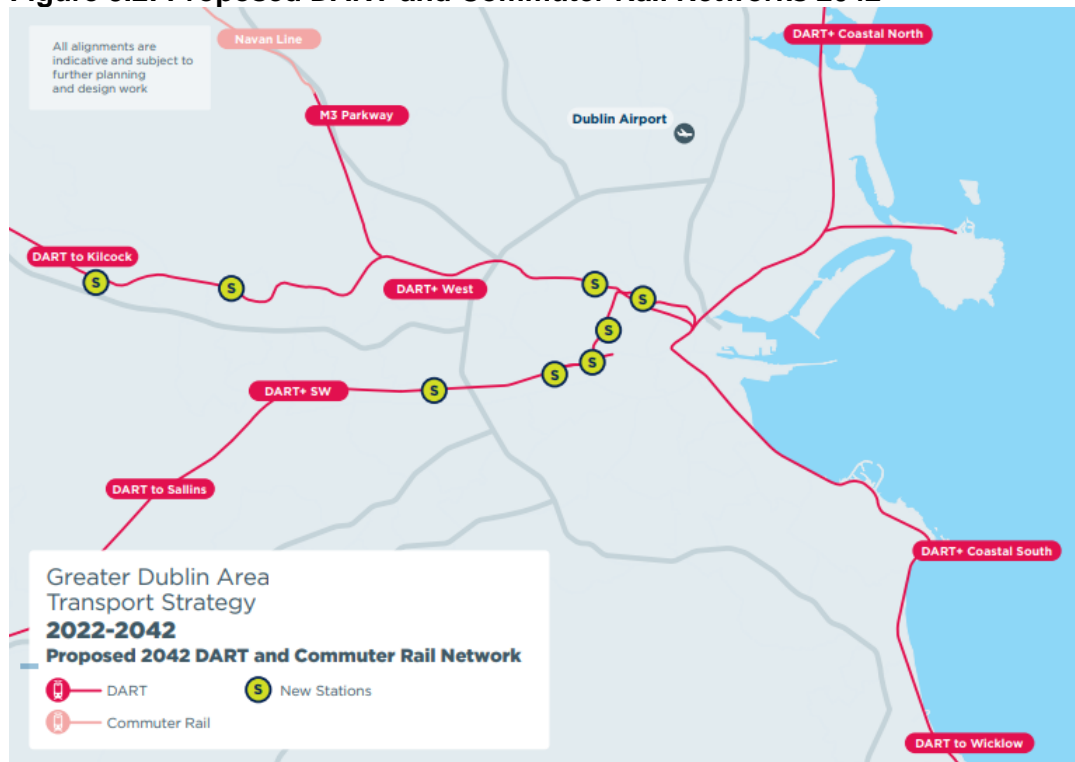
‘Express services will be provided from the major towns in the GDA hinterland to Dublin City Centre at a frequency which meets demand, including a bus every 30 minutes during peak travel periods from the RPG Growth Towns of Navan, Naas and Wicklow’

5.6 Draft Transport Strategy for the Greater Dublin Area 2022-2042

The Draft Transport Strategy for the Greater Dublin Area 2022-2042 replaces the previous 2016-2035 Transport Strategy. This strategy aims to ensure the Greater Dublin Area has high quality public transport to serve existing and future residents. This Strategy outlines plans to bring the Dart to Naas. The objectives of the Strategy are:

- An Enhanced Natural and Built Environment;
- Connected Communities and Better Quality of Life;
- A Strong Sustainable Economy;
- An Inclusive Transport System.

Figure 5.2: Proposed DART and Commuter Rail Networks 2042



With regard to Naas the strategy acknowledges the RSES which has the following RPO's,

“RPO 4.48: Promote the improvement of the transport network within and serving Naas town, including delivery of a robust and efficient walking, cycling and bus network with strong links to Sallins Railway Station, key destinations within the town and to the North West Quadrant and town centre area;

RPO 4.52: Support the delivery of new and enhanced public transport infrastructure in Naas and Sallins, including Park and Ride and interchange facilities as identified by the NTA and Kildare County Council;”

Furthermore, the strategy notes that there will be a DART extension to the settlements of Naas/Sallins,

‘An extension of the DART service on the Kildare Line to Naas / Sallins will provide additional capacity to this area, including to the planned regional Park & Ride site in this vicinity’

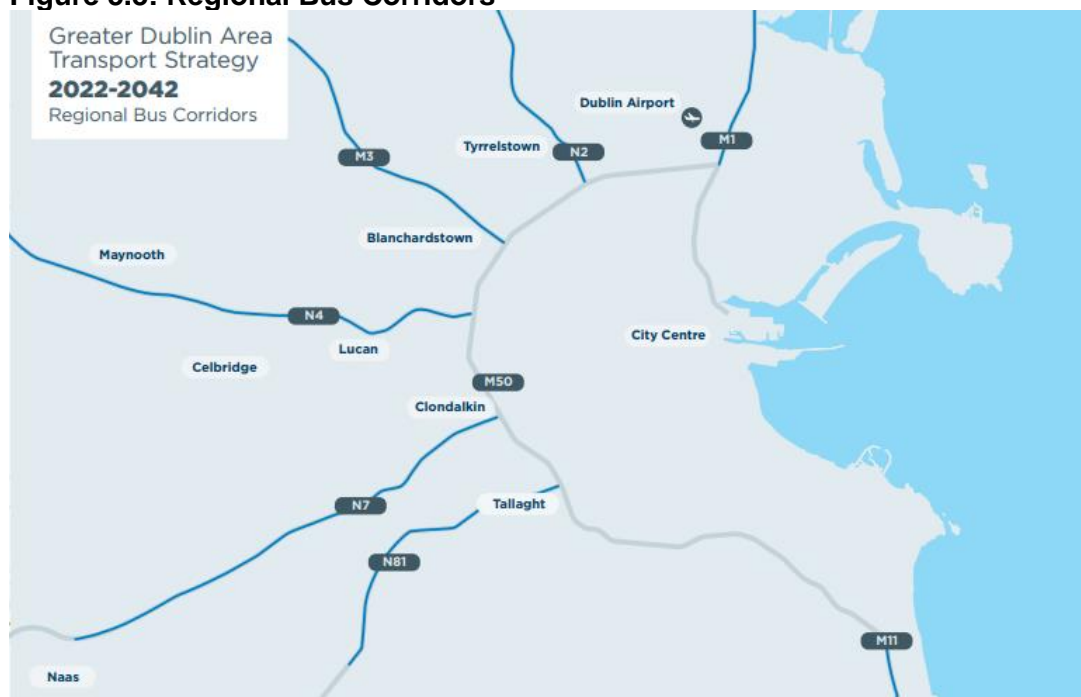
This Dart expansion proposal to Naas/Sallins is shown below on Figure 5-2.

This is supported by Measure Rail 3,

‘Measure RAIL3 – DART Extension The NTA and Irish Rail will, over the lifetime of the Strategy, extend the DART to deliver electrified rail services to the following towns: Sallins / Naas; Kilcock; and Wicklow’

This Strategy will aim to provide enhanced levels of bus priority on the Regional Core Bus Corridors. Naas sits along the N7 which is identified as a regional bus corridor as shown on Figure 5-3 below. This regional bus enhancement is envisaged under Measure BUS11 – Regional Core Bus Corridors *“It is the intention of the NTA, in collaboration with TII and the relevant local authorities, to continue to provide enhanced levels of bus priority on the Regional Core Bus Corridors, in particular addressing sections where bus delays are caused, or will be caused in the future, by traffic congestion”*.

Figure 5.3: Regional Bus Corridors



6.0 STATEMENT OF CONSISTENCY WITH SECTION 28 GUIDELINES

The key section 28 guidance documents of relevance to the proposed development are as follows:

- Urban Development and Building Height Guidelines (December 2018);
- Sustainable Urban Housing: Design Standards for New Apartments (2020);
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Draft Water Service Guidelines for Planning Authorities (2018);
- The Planning System and Flood Risk Management (2009);
- Appropriate Assessment of Plans and Projects – Guidance for Planning Authorities (2009);

6.1 The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (“*SRD Guidelines*”) provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The SRD Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. To assist with this, the SRD Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

The role of the SRD Guidelines is to ensure the ‘*plan led*’ delivery of new development throughout the country.

The SRD Guidelines reinforce that planning authorities ‘should promote increased residential densities in appropriate locations, including city and larger town centres’ and that ‘firm emphasis must be placed by planning authorities on the importance of qualitative standards in relation to design and layout in order to ensure that the highest quality of residential environment is achieved’.

Chapter 5 of the SRD Guidelines set out guidance in respect to density. It is submitted that the location of the proposed development allows the classification of the site as “*Inner-suburban*”.

The SRD Guidelines note that for such sites, “The provision of additional dwellings within inner suburban areas of towns or cities, proximate to existing or due to be improved public transport corridors, has the revitalising areas by utilising the capacity of existing social and physical infrastructure.”

Section 5.9 of the SRD Guidelines does not stipulate maximum densities on sites defined as Inner Suburban/ infill, but instead recommends that the local area plan (LAP) should set out the planning authority’s views with regard to the range of densities acceptable within the area.

6.1.1 Evaluation of Consistency

The net density of c.59 units per hectare is within the recommended LAP guidance, as detailed further below, and is considered appropriate for the inner suburban lands. The delivery of

higher density residential development on the subject lands will underpin the delivery of a compact urban form for the key town of Naas required to confirm consistency with national and regional policies.

The proximity of the site to the town centre of Naas (to the south east) within easy walking distance and the public transport provision (and future provision) would support higher density development at this location and the density as proposed at c.59 units per ha net is considered appropriate.

The proposed development conforms to the more detailed guidance within the SRD Guidelines on layout, design and density – by making effective use of the site; making a positive contribution to its surroundings; having a sense of identity and place; providing for effective connectivity. The proposed development meets the 12 criteria for sustainable residential development contained within the Urban Design Manual (2009), a companion document to the SRD Guidelines, examined below and also set out in the C+W O'Brien Architecture design statement.

6.2 Urban Design Manual – A Best Practice Guide (2009)

Figure 6.1 – Urban Design Manual 12 criteria



Source: Urban Design Manual DoEHLG 2009

The Urban Design Manual is based around 12 criteria that have been drawn up to encapsulate the range of design considerations for residential development based on “a *distillation of current policy and guidance and tried and tested principles of good urban design.*”

The 12 no. criteria are assessed as follows:

6.2.1 Context: How does the development respond to its surroundings?

Manual further notes that the quality and sustainability of a neighbourhood can be measured by *'how well it is connected to important amenities, and how pleasant, convenient and safe those links are to use.'* Positive indicators include attractive routes for pedestrians and cyclists; proximity to a mixed-use centre, layout facilitating a bus service, easy links to adjoining areas, and appropriate densities aiding the efficient provision of public transport.

The proposed development provides for enhanced levels of connectivity and accessibility. The development includes the provision of new linkages for pedestrians and cyclists through the development and also along the Canal via a greenway and provides for well-designed access arrangements. Pedestrian links to the town centre are illustrated below on Figure 6.3.

Figure 6.3: Pedestrian Links



Source: Systra

The proposed development seeks to promote cycling through the provision of cycling facilities. Quality cycle facilities are provided within the development and cyclists will be able to access the surrounding networks using safe and attractive links which will provide connectivity within the site but also to the town centre. Cycle links are shown below on Figure 6.4.

Figure 6.4: Cycle Links

Source: Systra

The proposed development will benefit from strong connectivity and permeability, thereby encouraging active transit and incentivising more sustainable modal choices.

6.2.3 Inclusivity: How easily can people use and access the development?

According to the Urban Design Manual, inclusive design is defined as ‘that which meets the needs of all users, regardless of age, gender, race or sensory and mobility abilities. In its broadest sense, it also means creating places that can be enjoyed by people from all cultural and socio-economic backgrounds.’

The proposed development includes apartments and 2 storey apartments which are suitable for mobility impaired persons. Landscape design and detailing of roads and footpaths provide for movement throughout the development by mobility impaired persons, in compliance with Building Regulations Part M.

The overall development will include 11% of total units as social housing which will be provided within the scheme.

The proposed development will provide a variety of vehicle, pedestrian and cycle routes throughout the site. The internal road network provides for a clear navigable route throughout the development with a series of cycle paths and footpaths to increase the overall level of connectivity and permeability for future residents.

The development will provide for disabled car parking spaces and all communal areas and apartment types are designed to be accessible to all. With regard to the provision of access for all, it is confirmed that the design of the proposed development complies with the requirements of Part M of the Building Regulations– Access for People with Disabilities.

6.2.4 Variety: How does the development promote a good mix of activities?

The Urban Design Manual states that ‘most successful and sustainable communities are ones that contain a good variety of things to do, see and enjoy. For large scale developments, this

means providing a good mix of uses, housing facilities and amenities to engender a successful community.'

The proposed development provides for a mixture of uses within the overall scheme with commercial/ health/medical unit provided at ground floor level of Block B. The primarily residential nature of the scheme is complemented by the inclusion of these uses.

The development also includes provision for a range of high quality public open spaces, communal open spaces, a greenway and new pedestrian and cycle routes as shown below on Figure 6.5. A high standard of residential amenity is ensured through these aspects of the scheme.

Figure 6.5: Layout showing open spaces



Source: C+W O'Brien Architects

The proposed development provides for a good mix of dwelling types including a mix of apartments and 2 storey apartments of varying sizes which include 1, 2 and 3 bedroom units. This will ensure a mix of tenures is provided for within the scheme which will cater for a wide demographic.

It is considered that the proposed development provides for the necessary ancillary land uses required for this residential development, whilst having regard to the significant range of community, commercial and social infrastructure in the town centre located c. 500-650m to the south east of the subject site via Abbey Bridge (and c. 1.3km via Ploopluck Bridge).

6.2.5 Efficiency: How does the development make appropriate use of resources, including land?

The proposed development proposes 134 no. dwellings on a site of c. 2.9 hectares (c. 2.3 ha net) resulting in a gross density of 47 units per hectare and a net density of c.59 units per hectare. This density makes efficient use of the residential zoned land, located in close proximity to Naas town centre and its amenities.

6.2.6 Distinctiveness: How do the proposals create a sense of place?

The Urban Design Manual recognises that successful communities often have a distinct and special character, which is derived from elements contained within the other 11 questions. The Urban Design Manual notes that *'interesting urban design and architecture will also have a role in helping an area to form a strong identity.'*

Figure 6.6: CGI of Proposed development



Source: Gnet

As set out in the accompanying design statement, and the plans and drawings prepared by C+W O'Brien Architects, the layout of the proposed scheme has been devised to provide a legible, permeable layout with a range of building heights which, together with a varied use of materials and finishes, engender a definitive sense of place in a new residential area within the centre of Naas. There is a variety and mix of dwelling types, heights and design, with a mix of apartment buildings, proposed throughout the scheme, thereby providing a distinctive sense of place on site.

The sense of place will be strengthened by the inclusion of areas of active and passive green space for the enjoyment of residents and others, all of which will benefit from enhanced passive surveillance from surrounding residential units to encourage a safe sense of place, discourage anti-social behaviour and facilitate effective community policing. Strong visual and physical connections are prioritised between the proposed residential units and the proposed recreational areas, open spaces and other uses, while secondary connections will link the scheme with the surrounding areas.

The Landscape report prepared by Landmark Design Landscape Architects sets out in detail the landscaping– all of which will form a strong and positive identity for the proposed development.

6.2.7 Layout: How does the proposal create people-friendly streets and spaces?

The Urban Design Manual states that ‘how the site is laid out is one of the key determinants of successful places’, and that ‘the layout of a neighbourhood can help to determine an area’s character and sense of place.’ Positive indicators include a permeable interconnected series of routes that are easy and logical to navigate around, active street frontages with front doors directly serving the street, traffic speeds controlled by design and careful location of public and communal open spaces.

The layout of the proposed development recognises the need to provide for a permeable, easily navigable network of streets and spaces which will provide for ease of access and make for comfortable spaces to use for pedestrians and cyclists.

The priority for the design team is to propose a pedestrian friendly series of streets and spaces whereby the proposed site layout plan provides for a legible, permeable and distinctive layout. The design of the Site Layout Plan is based on the principles of best practice urban design including permeability, connectivity and legibility as set out above. We refer the council to the DMURS compliance report prepared by DOB Consulting Engineers, which sets out how the proposed development provides people-friendly streets.

Figure 6.7: CGI of Proposed development



Source: Gnet

The internal layout has been designed with pedestrian and cyclists to the forefront and with traffic safety in mind. Reduction of vehicle speed is a fundamental principle behind the layout. In general, all roads are designed for maximum vehicle speeds of 30 km/h. Traffic calming features have also been designed into the development – all in accordance with best practice (DMURS).

Shared surfaces are proposed at all junctions and on parts of the road network through, and all buildings have frontage to the streets. The courtyards between the buildings are designed for pedestrian priority and active use as public open space as illustrated below in Figure 6.7.

6.2.8 Public Realm: How safe, secure and enjoyable are the public areas?

The Urban Design Manual notes the importance of high quality open spaces within new developments and that “the most successful neighbourhoods contain streets, squares, parks and public gardens that are as good quality – if not better, than the private buildings and spaces within the neighbourhood.” The Guidelines recommend that open spaces are suitably proportioned and overlooked by surrounding homes so that amenities are safe to use; and that roads and car parking areas should be considered as an integral landscaped element in the design of the public realm.

The layout and design of the proposed development has been influenced by the level of security and overlooking to be provided by the future residents. The design of the development has been carefully considered so as to provide a high level of passive surveillance on both the area of open space and public access areas (Figure 6.8). The design of the dwellings provides for a direct frontage onto all public areas ensuring the provision of a safe, secure and enjoyable residential development.

Figure 6.8: CGI of Proposed development



Source: Gnet

The proposed open spaces and public realm will be safe, secure and comfortable for the use of future residents.

The location layout and usability of the proposed public open space areas are of a very high quality and will contribute positively to the residential amenity of future residents. The proposed development will also provide for a connected series of public open spaces and amenity.

It is proposed to provide c. 1.04 hectares of open space, which comprises c. 46% of the site. Communal amenity space is provided internally within the blocks of c. 4,265 sq. m. This is in compliance with the apartment guidelines standards which require 964 sq. m. of communal

open space based on the 134 no. units proposed (22 no. 1 bedroom apartments, 77 no. 2 bedroom units, and 35 no. 3 bedroom units).

The proposed open space for the development at 46% therefore meets and exceeds the open space requirements as set out in the Development Plan (15%).

6.2.9 Adaptability: How will the buildings cope with change?

The Guidelines recommend that new homes are energy efficient and equipped for challenges anticipated from a changing climate; homes should be capable of subdivision and adaptation with space available in the roof or garage for easy conversion into living accommodation.

Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size. The development provides a mix of 1, 2, and 3-bedroom apartments.

The overall architectural style is contemporary and reflects the modern requirements to balance lighter, airier elevations with the need to satisfy energy reducing objectives.

Privacy / Amenity: How do the buildings provide a high-quality amenity?

The core objective set out in the Urban Design Manual is to create homes “that people are proud to call home and which encourage people to continue living in the development and contributing towards a strong, sustainable community”. The Urban Design Manual highlights the increasing importance which the level of storage available in homes plays in making a liveable home.

Each dwelling is provided with an area of useable private open space which meets or exceeds the Development Plan standards. All of the apartments meet or exceed the Section 28 Guidelines unit size requirements. The design of dwellings has also had due regard to the siting and orientation of the development in order to maximise the solar gain and natural light aspect of each dwelling.

The development provides for appropriate separate distances between dwellings at 22m. This maintains a high level of privacy and amenity obtained by residents and reduced the level of overlooking and overshadowing.

In this regard, reference should be made to Housing Quality Assessment prepared by C+W O'Brien Architects, which contains a detailed appraisal of the standards achieved in the proposed development in meeting the space and amenity needs of future residents.

In summary, it is confirmed that each proposed residential unit has an area of useable private outdoor space as well as being in accordance with storage requirements.

6.2.10 Parking: How will the parking be secure and attractive?

The Guidelines seek to ensure that appropriate car parking is on-street, and within easy reach of front doors; that parking is provided communally to maximise efficiency and accommodate visitors; and that materials used for parking areas are of similar quality to the rest of the development. Adequate, secure facilities are required for bicycle storage.

The parking within the development is located at surface and undercroft levels. It is proposed to provide 201 no. car parking spaces and 338 no. cycle spaces within the scheme. Figure 6.9 below illustrates under croft car parking and cycle parking layout.

Figure 6.9: Undercroft car parking at ground floor level

Source C+W O'Brien Architects

Car parking provision equates to 1.3 spaces per apartment unit. The car parking provision is in line with the 'Design Standards for New Apartments – Guidance for Planning Authorities 2020' which states that,

"The quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria".

The subject lands lie between an 'Intermediate Urban Location' and a 'Peripheral' location. Intermediate areas described as those areas served by public transport or close to town centres or employment areas. Here planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard. For peripheral locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.

The proposed parking provision is in line with that suggested for the less favourably situated 'Peripheral' areas. Based on this guidance the parking provision is deemed to be adequate for the proposed development.

There are no spaces proposed for the commercial/ health/medical unit as it is not envisaged as a destination facility that will generate car usage. The purpose is to cater for the day to day needs of the future and local residents within walking distance.

6.2.11 Detailed Design: How well thought through is the building and landscape design?

The Urban Design Manual notes that the finished quality of a scheme can have a significant effect on a development's character sense of place and legibility and that the quality in the detail of the architecture and landscape design *'will help all of the previous eleven questions to meet their full potential.'*

The design rationale from an urban design and architectural perspective is explained in the Design Statement prepared by C+W O'Brien Architects. The landscape design rationale is set out in the drawings and material included by Landmark Design Landscape Architects (in consultation with Kildare County Council).

The proposed buildings and landscape are of extremely high-quality design and material quality and would elevate the townscape value of the locality (Figure 6.10).

Figure 6.10: CGI of proposed development



Source: Gnet

The proposed landscaping aims to enhance the overall biodiversity and ecology of the area and to take advantage of the significant riparian strip, which provides a key structuring element to the scheme along the western boundary.

The proposed landscaping aims to enhance the overall biodiversity and ecology of the area and to take advantage of the significant riparian strip, which provides a key structuring element to the scheme along the western boundary.

6.3 Urban Development and Building Height Guidelines (December 2018)

The Urban Development and Building Height Guidelines were published on the 7th of December 2018 under Section 28 of the Planning and Development Act 2000, as amended. We note that the proposed height of 4 to 5 storeys is supported in this location under the Development Plan and LAP which permits up to 5 storeys and or 15m. While the proposal is only 5 storeys, its maximum height is 17.8m. The Naas LAP notes “*this Plan does not propose to place any height limitations on new development in Naas*”.

Section 3 of the Building Height Guidelines states there is a presumption in favour of building of increased height in appropriate urban locations with good public transport accessibility. Planning authorities are therefore encouraged to apply the following broad principles in considering development proposals for buildings taller than the prevailing building heights in urban areas. While the proposed development is not considered to provide any significantly tall buildings (max. 5 no. storeys), the scheme has been assessed against development management criteria set out in paragraph 3.2 of the Building Height Guidelines.

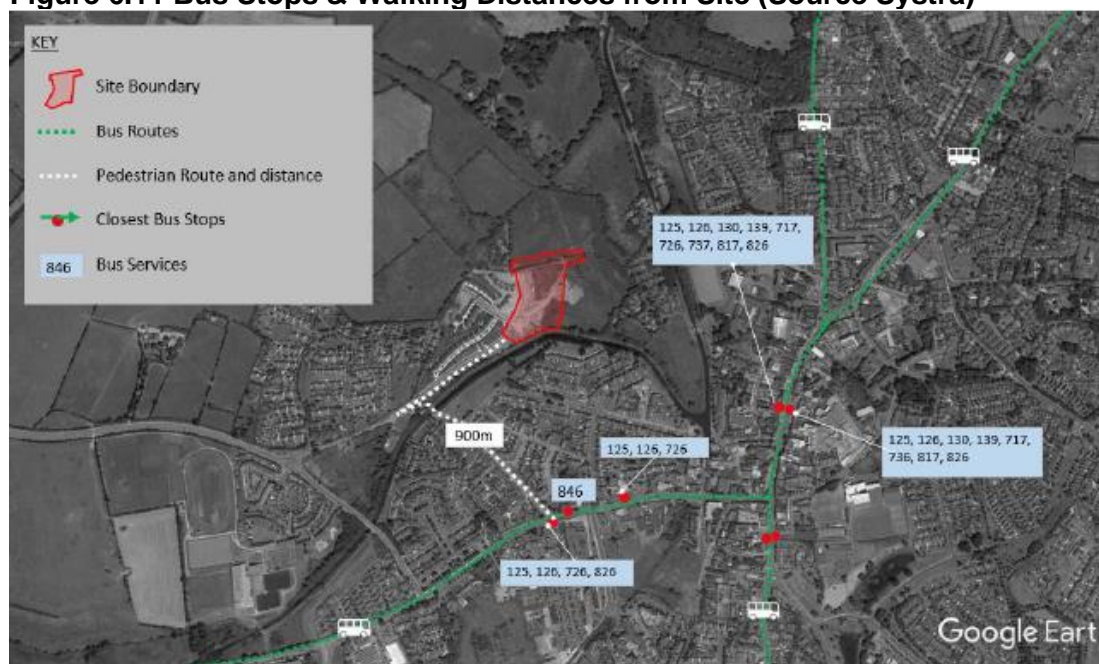
Assessment with the criteria set out in the Building Height Guidelines is demonstrated below.

6.3.1 At the scale of the relevant city/town

The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.

The subject site is located within c. 1.2km (c. 600m as the crow flies) of Naas town centre via Abbey Bridge and c. 900m to bus services to the south. As such, the site will be served by multiple bus routes are within reasonable proximity to the subject site as illustrated on Figure 6.11. As set out in the Traffic and Transport Assessment prepared by Systra, Figure 6.12 outlines the extensive range of bus services and notes the frequency which serve the site.

Figure 6.11 Bus Stops & Walking Distances from Site (Source Systra)



Source: Systra

Figure 6.12: Bus Routes & Frequencies in Naas

Route	Weekday			Weekend	
	AM Peak	Interpeak	PM Peak	Sat	Sun
125 Newbridge to Naas and Dublin	Two services between 7am and 8am	No service	Two services between 6pm and 7pm	-	-
126 Rathangan - Kildare - Newbridge - Naas - Dublin	30 mins	30 mins	30 mins	30 mins	30 mins
130 Athy - Naas - Dublin	Two services between 6am and 8am	120 mins	One service	4 services per day	3 services per day
139 Naas to Blanchardstown	1 Service	120 mins	120 mins	120 mins	120 mins
717 Dublin Airport - Dublin City - Kilkenny - Clonmel	One service at 07:25	No service	One service at 18:55	As weekday	
726 Dublin Airport- Portlaoise-via Kildare, Naas, Newbridge and Red Cow Luas	60 mins	60 mins	60 mins	60 mins	60 mins
736 Dublin Airport - City - Carlow - Kilkenny - Waterford	No service	3 services per day	No service	-	-
817 Kilkenny - Dublin	No service	1 service	1 service	-	-
821 Newbridge to Sallins Rail Station	1 service	2 services	1 service	As weekday	3 services per day
880 Dublin - Cork Route	3 services	60 mins	3 services	As weekday	No Service
885 Ballymore Eastace to Sallins Rail Station	1 service	1 service	1 service	-	-

Source: Systra

The TTA states that the existing rail services are located c. 3 km north of Naas and is served by high-capacity commuter trains connecting Naas to Dublin City and beyond. The journey time between Naas and Heuston Station is 22 minutes and for trains which stop at intervening stations it is typically around 31 minutes. The following is noted from the TTA rail assessment,

“Cycle times to Sallins Rail Station from the centre of Naas, travelling alongside the canal, are approximately 12 minutes.

Bus Service 139, operated by JJ Kavanagh and Sons runs between the centre of Naas and the Sallins Rail station (and onwards to Maynooth, Leixlip, Ongar and Blanchardstown). It runs at two-hourly intervals Monday to Sunday, taking 15 minutes to travel between Naas and the Station. A return fare from Naas costs 3 Euro.

The rail station is approximately a 10-minute drive from the Finlay Park site, and there are 390 pay and display car parking spaces available for commuters.

Travelling to the station (Either by bike, bus or car), and then commuting onwards by train to Dublin is therefore a relatively convenient option for future residents of Finlay Park”.

The proposed development will connect to the existing pedestrian/cyclist pathway. It is therefore considered that the proposed development is suitably located within close proximity to existing public transport connections to serve the scheme.

Development proposals incorporating increased building height ... should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment by a suitably qualified practitioner such as a chartered landscape architect.

A Landscape and Visual Impact Assessment has been prepared by Mullin Landscape. The assessment states the following in relation to the potential landscape and visual impacts of the proposed development:

“In addition to the consideration of the layout, the implementation of landscape proposals as illustrated in the submitted landscape planning drawings will greatly assist with the appropriate integration of this development into its setting. However it is expected that residual glimpsed and partial views of the development would continue to be achieved from a number of locations surrounding the site.

The intention is to transform the existing landuse typology to one which continues to deliver positive placemaking attributes. This would include public access and connectivity through the site and notably, significant open spaces and pedestrian walkways, cycleways and play areas. The development proposals would not involve the introduction of new and uncharacteristic features into the local or wider landscape character area.

Whilst the proposals would result in some disruption to visual amenity (notably during the construction phase) it is considered that there are opportunities for beneficial amenity and biodiversity outcomes during the post construction phase of development.”

Importantly, the assessment found that there would be minor visual effects on existing residential properties adjacent to the site, e.g. Sarto Park to the south.

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

The proposed development site has a gross site area of 2.9 ha and would therefore be considered a ‘larger urban development site.’ It is considered that the proposed development makes a positive contribution to the place-making by providing for new streets and pedestrian/cyclist facilities which will connect to Naas town centre.

The proposed development will include for a commercial/ health/medical unit as well as extensive areas of public and communal open space. These areas of open space provide include the pedestrian/cyclist facilities. The development includes for attractive walking routes for residents along the Grand Canal. This will provide safe routes for pedestrians and cyclists to navigate through the site. Please refer to the Architectural Design Statement prepared by C+W O’Brien Architects and the Landscape Design Report prepared by Landmark Design.

6.3.2 At the scale of district / neighbourhood / street

The proposal responds to its overall natural built environment and makes a positive contribution to the urban neighbourhood and streetscape

The proposed development will significantly enhance the surrounding site which is currently greenfield in nature. It will provide for high-quality contemporary design at an appropriate location and make a significant positive contribution to the existing urban neighbourhood. The LVIA prepared by Mullin Landscape states the following in relation to the potential visual impacts of the proposed development from different viewpoints:

*“Predicted visual effects arising from the proposals at the selected key visual receptors during the construction / establishment phase would range from **Moderate** to **Negligible** with impact*

type being considered **Neutral** (N). Of these receptors, **None** are considered within the 'Significant' category – i.e. Predicted visual effects Moderate – Major or greater.”

It is considered that the proposed development introduces a high-quality development on a greenfield site. The proposal will provide for extensive areas of public open space which can be enjoyed by Naas residents. The site's location is suitable for the proposed development due to its location to Naas town centre.

The proposal avoids long, uninterrupted walls of building in the form of perimeter blocks or slab blocks with materials / building fabric well considered.

The proposed development includes 3 no. apartment building blocks which will be constructed with high-quality materials which relate to the site's location within Naas and the style and palette of neighbouring properties. It strikes a balance both between uniqueness and remaining sympathetic to neighbouring structures, both permitted and existing.

The apartment blocks break along the western, northern and eastern facades to allow pedestrian entrance into the communal open space. This, therefore, avoids any long, uninterrupted building wall.

Please refer to the Architectural Design Statement for greater detail on overall design, materials and finishes.

The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).

The proposed development provides for 1.04 ha of public open space through the entire site. This is predominantly located to the south of the site which includes a greenway path. Pedestrian/cycle routes around provided through the public open space which connects the proposed development to the town centre.

A Site-Specific Flood Risk Assessment has been prepared by JBA Consulting and is submitted with this application. The site is located within Flood Zone C and the report concludes the following:

“The Flood Risk Assessment was undertaken in accordance with 'The Planning System and Flood Risk Management' guidelines and confirms that the proposed development is appropriate from a flood risk perspective and is in agreement with the core principles of the planning guidelines”.

The provision of extensive pedestrian/cycle route through the site significantly improve the site's legibility and the legibility. The proposed routes will connect to the town centre. Full completion of greenway route in future phases of development will provide enhanced connectivity and leisure amenity within the settlement of Naas.

It is considered that the proposed development will be a positive contribution to the wider area by completing the Finlay Park development and through the provision of extensive areas of public open space which can be enjoyed by the wider Naas community.

The proposal positively contributes to the mix of uses and/or building/dwelling typologies in the neighbourhood.

The surrounding area comprises of predominantly two-storey semi-detached housing units within Finlay Park development to the west. The proposed development will provide for a variety of housing typologies including apartments and duplex units. The development also provides for a mix of one, two and three bed units throughout the scheme. A commercial/health / medical unit is proposed at ground floor of Block B. The development also includes outdoor exercise gym equipment which adds to the variety of uses on the subject site.

The subject site is considered an appropriate location for the proposed mix of uses and dwelling typology given its location in close proximity to Naas town centre.

6.3.3 At the scale of the site/building

The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd Edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

The proposed scale, massing and height of the development has been informed by the existing and emerging built environment in the surrounding area. The development introduces a slightly higher built element to the surrounding urban frame which seeks to optimise the site's location and position. The scale and height of the proposed residential blocks take cognisance of the surrounding urban form, which is within close proximity to Naas town centre and proposed to be on a high-quality future public transport corridor.

The proposal consists of three blocks which range in height from 4 to 5 no. storeys. This height effectively responds to the site's prominent location, whilst minimising any potential negative effects to the surrounding context.

A Daylight and Sunlight Report has been prepared by Chris Shackleton. The report concludes the following:

"This report is in compliance with: "Site layout planning for daylight and sunlight a guide to good practice" - BR209". It also references EN 17037 and Annex NA (BS/EN 17037) as and where called for in the above BRE guidance document".

The application generally complies with the recommendations and guidelines of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice – BR209.."

Please refer to this report for further details on the results. This study includes compensatory measures in Appendix 3. Furthermore, the report complies with the LRD Opinion and notes the following,

“The initial design, testing and opinion was used to inform the architects’ design and the floor layouts were substantially adjusted to ensure a high standard light in the development. This report addresses these concerns and analyses all rooms, on all floors at the full current target standards. The results show very high level of compliance, and the architect has outlined compensatory factors in their Design Statement. Relevant pages from the Architect’s Design Statement concerning compensatory measures and design strategy are reproduced in Appendix 3”.

The overall design has been designed successfully to maximise the occupant’s access to light and reduce the impact on existing buildings, while achieving a progressive density of 59 uph on sequentially located residential lands. As previously noted, the subject lands are located within close proximity to the town centre with existing public transport links nearby to serve the residents. Achieving a progressive density at this location will help meet the housing demand target of 1,362 units in Naas as set out in the core strategy.

6.3.4 Specific Assessments

Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

Given the height of the proposed development only reaches a maximum of 5 no. storeys, it is not considered that the development will have significant effects on the micro-climate. For this reason, micro-climate assessment has not been carried out for the proposed development.

In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.

A lighting plan has been prepared by Rexel and omits lighting along the footpath running close to canal and existing hedgerows so as not to disturb wildlife such as bats. A bat report has been prepared by Brian Keely and notes the following,

‘There will be no appreciable impact on the local bat fauna following the implementation of all mitigation measures proposed. There will be no long-term loss to the conservation status of the bat species present. There will be a long-term to permanent slight negative impact from the introduction of housing and lighting while the waterways will provide access for bats and feeding once lighting can be controlled close to the Canal’.

The EclA prepared by Openfield outlines a range of mitigation measures. During the construction phase the report notes the following with regard to the disturbance of birds nests,

“Deliberate disturbance of a bird’s nest is prohibited unless under licence from the National Parks and Wildlife Service. The removal of vegetation and demolition of buildings should be undertaken outside the nesting period (March to August inclusive). Where this is not possible, vegetation must be inspected for the presence of nests. If no nest is found, vegetation can be removed within 48 hours. Where a nest is found, vegetation can only be removed after young birds have fledged, or under licence”.

With regard to lighting the following is noted,

Lighting shall be controlled to avoid light pollution of green areas and should be targeted to areas of human activity and for priority security areas. Motion-activated sensor lighting is

preferable to reduce light pollution. None of the remaining mature trees or trees proposed for planting shall be illuminated.

- DARK SKIES areas shall be designated where no lighting shall be permitted to provide bat movement through, within and around the site*
- Dark corridor for movement of bats along the grounds of the site. Lighting should be directed downwards away from the treetops.*
- All luminaires shall lack UV elements when manufactured and shall be LED*
- A warm white spectrum (ideally <2700 Kelvin) shall be adopted to reduce blue light component*
- Luminaires shall feature peak wavelengths higher than 550 nm*
- Tree crowns shall remain unilluminated*

An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.

Waterman Moylan has undertaken a telecommunications assessment within their Energy Statement. The report notes the following with regard to telecommunications,

'We have reviewed the proposed development at Finley Park and consider that the height and scale being sought for this new development will not have an impact on any current microwave telecommunication channels.

If however, a microwave link is found to be effected by this new development, during the construction stage of this project, mitigation will be employed by engaging with the telecommunication company and organising the re-alignment of their microwave links to a new hop site'.

An assessment that the proposal maintains safe air navigation.

Given the height of the proposed development only reaches a maximum of 5 no. storeys, it is not considered that the development will have significant effects on air navigation. For this reason, an air navigation assessment has not been carried out for the proposed development.

An urban design statement including, as appropriate, impact on the historic built environment.

An Archaeological Heritage Report has been prepared by Byrne Mullins and Associates. Please refer to this document for further details regarding the proposals impact on the historic built environment.

Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.

An Environment Impact Assessment screening has been prepared by Redkite and included with this application. In addition, an AA Screening and ECIA have been prepared by Openfield and included with this application. The AA Screening report concludes as follows:

'This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects to the Natura 2000 network. No mitigation measures are relied upon to arrive at this assessment. This assessment is based upon the best available scientific evidence'.

The ECIA report concludes as follows:

'With mitigation, the majority of the impacts can be reduced so that no moderate negative impact remains.

Monitoring is required where the success of mitigation measures is uncertain or where residual impacts may in themselves be significant. After mitigation, no significant effects are likely to arise as a result of this development to biodiversity and so monitoring is not required'.

The EIA Screening report concludes as follows:

'No significant negative effects on any of the environmental factors to be considered under the EIA Directive are anticipated as a result of the Project either cumulatively or individually'.

From the above analysis, it is considered that the proposal meets the criteria for higher buildings as set out within the Building Height Guidelines. The site is well placed to absorb a medium-density development which is appropriately scaled and designed in the context of its urban surroundings, whilst introducing an element of increased building height. A key aspect of the proposal is to provide for a variety of building typology on the subject site from what is currently in place, to maximise its development potential both to the benefit of Naas and the housing demand for Kildare as a whole.

The Urban Development and Building Height Guidelines contain SPPR 4 which states:

"It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2009)" or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more."*

With reference to point 1, the proposed development provides an appropriate density in compliance with the Sustainable Residential Development in Urban Areas (2009) and the LAP at c.59 units per hectare (net), which is considered appropriate for an inner suburban site, located close to the town centre and to future improved public transport link (bus transport corridor).

In relation to item no. 2, The proposal includes for a mix of building heights which range from 4-5 storeys. The proposal provides for 16% 1-bedroom units, 58% 2-bedroom units and 26% 3-bedroom units.

Furthermore, in relation to item no.3, the proposal comprises of part 4 and part 5 storey blocks which avoids mono-type building typologies.

6.4 Sustainable Urban Housing: Design Standards for New Apartments 2020

Updated Sustainable Urban Housing Design Standards for New Apartments were published in December 2020. The guidelines provide for revised guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.

6.4.1 Evaluation of Consistency

This application is accompanied by a Housing Quality Assessment, prepared by C+W O'Brien Architects, which demonstrates that the proposed apartments and associated communal spaces will conform to and exceed the standards set out within Sustainable Urban Housing: Design Standards for New Apartments.

The following is noted with reference to the Specific Planning Policy Requirements (SPPRs):

6.4.1.1 Specific Planning Policy Requirement 1 (Mix)

Specific Planning Policy Requirement 1 (SPPR1) states that 'Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)'.

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios).

Table 6.1 – Overall Apartments Mix

	1 bedroom	2 bedroom	3 bedroom	Overall	%
Duplex		56	14	70	52%
Apartments	22	21	21	64	48%
Total	22	77	35	134	100%
Overall Mix %	16%	58%	26%	100%	100%

Source: C+W O'Brien Architects Schedules

The Proposed development complies with SPPR 1 as it includes 22 no. 1 bed apartments (16%), 77 no. 2 bed units (58% 2 storey apartments / apartments) and 35 no. 3 bed units (26% 2 storey apartments / apartments).

Section 8 of this report provides a Statement of Housing Mix.

6.4.1.2 Specific Planning Policy Requirement 2 (Small Urban Infill Sites of up to 0.25ha)

Does not apply to the subject site.

6.4.1.3 Specific Planning Policy Requirement 3 (Minimum Areas)

Figure 6.13 outlines the breakdown by unit type and shows that each unit type is in excess of the minimum floor area required. SPPR3 of the Apartment Guidelines 2020 state that the following minimum floor areas for apartments apply:

- 1 bedroom apartment Minimum 45 sq.m;
- 2 bedroom apartment Minimum 73 sq.m;
- 3 bedroom apartment Minimum; 90 sq. m

The proposed development complies with the minimum apartment floor area requirements set out in SPPR3. The schedule of accommodation / HQA and drawings prepared by C+W

O’Brien Architects demonstrates that the proposed development complies and exceeds the standards outlined in the Sustainable Urban Housing: Design Standards for New Apartments 2020.

Figure 6.13: Extract from Housing Quality Assessment

	Apartment Type	Bed No.	Net Internal Floor Area	Min. Area		Apartment Type	Bed No.	Net Internal Floor Area	Min. Area
DUPLEXES	Type A	2 Bed	96	73	APARTMENTS	Apt. Type H.1	2 Bed	99	73
	Type A.1	2 Bed	86	73		Apt. Type I	1 Bed	46	45
	Type B	2 Bed	91	73		Apt. Type J	1 Bed	49	45
	Type B.1	2 Bed	83	73		Apt. Type K	2 Bed	70	63
	Type C	3 Bed	113	90		Apt. Type K.1	2 Bed	70	63
	Type C.1	3 Bed	106	90		Apt. Type L	2 Bed	73	63
	Type D	2 Bed	99	73		Apt. Type M	1 Bed	65	45
						Apt. Type N	2 Bed	73	63
				Apt. Type O		2 Bed	85	73	
				Apt. Type P		3 Bed	98	90	
				Apt. Type Q		2 Bed	91	73	
				Apt. Type Q.1		2 Bed	91	73	
				Apt. Type R		3 Bed	122	90	
				Apt. Type S		1 Bed	47	45	
				Apt. Type T		1 Bed	58	45	
				Apt. Type U		2 Bed	83	73	
				Apt. Type V		1 Bed	67	45	
				Apt. Type W		1 Bed	49	45	
	Apt. Type A	3 Bed	97	90					
	Apt. Type A.1	3 Bed	102	90					
	Apt. Type B	2 Bed	87	73					
	Apt. Type C	2 Bed	80	73					
	Apt. Type D	3 Bed	99	90					
	Apt. Type E	3 Bed	101	90					
	Apt. Type F	3 Bed	100	90					
	Apt. Type G	1 Bed	57	45					
	Apt. Type H	2 Bed	88	73					

In addition, the Guidelines state that ‘the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total but are not calculable as units that exceed the minimum by at least 10%).’

The proposed development complies with the above.

6.4.1.4 Specific Planning Policy Requirement 4 (Aspect)

SPPR4 of the Guidelines relates to the provision of dual aspect units and states the following:

“Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.” (Emphasis added)

SPPR4 recommends that ‘a minimum of 33% of dual aspect units will be required in more central and accessible locations’, and 50% for suburban or intermediate locations. As set out in the C+W O’Brien material, overall, the proposal has c. 84% dual aspect.

6.4.1.5 Specific Planning Policy Requirement 5 (floor to ceiling heights)

The apartment blocks comply with the requirement for floor to ceiling heights of 2.7m at ground floor level. Please refer to the material prepared by C+W O’Brien Architects in relation to floor to ceiling heights.

6.4.1.6 Specific Planning Policy Requirement 6 (Max units per core)

SPPR 6 notes that a maximum of 12 apartments per core may be provided within apartment schemes. As set out in the CWOB HQA, the proposal complies with this requirement.

6.4.1.7 Communal Amenity Space

The HQA, prepared by C+W O’Brien Architects demonstrates how the proposed apartments comply with appendix 1 of the Apartment Guidelines 2018 in respect of sizes of apartments, minimum aggregate floor areas, widths, storage, minimum private open space.

With reference to communal open space the proposed development would require an overall communal open space provision of some 964 sq. m, calculated as follows:

22 x 5 sq. m	110 sq. m
77 x 7 sq. m	539 sq. m
35 x 9 sq. m	315 sq. m
	964 sq. m

The proposed development provides c. 4,265 sq. m of communal open space which is in excess of the standards.

6.4.1.8 Car Parking

The Apartment Guidelines generally encourage reduced standards of car parking. The document defines accessible locations as falling into 3 categories:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

The subject lands lies between an ‘Intermediate Urban Location’ and a ‘Peripheral’ location. Intermediate areas described as those areas served by public transport or close to town centres or employment areas. Here planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard. For peripheral locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.

The proposed parking provision of 201 no. spaces is in line with that suggested for the less favourably situated ‘Peripheral’ areas. Based on this guidance the parking provision is deemed to be adequate for the proposed development. This equates to 1.3 car parking spaces per unit.

There are no spaces proposed for the commercial/ health/medical unit as it is not envisaged as a destination facility that will generate car usage. The purpose is to cater for the day to day needs of the future and local residents within walking distance.

6.4.1.9 SPPR 7, 8 and 9- Build to Rent and Shared Accommodation

The above SPPRs do not apply to the proposed development.

6.5 Design Manual for Urban Roads and Streets (DMURS) (2019)

The Design Manual for Urban Roads and Streets (DMURS), 2019, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

6.5.1 Evaluation of Consistency

The Engineering Services Report, prepared by DOB Consulting Engineers provides further detail in respect of the consistency of the proposed development with DMURS. The internal carriageway hierarchy within the proposed development has been designed in accordance with Section 4.4.1 in DMURS as follows:

- *Arterial Streets: The main arterial road through the development has been designed with a width of 6.5m to serve the proposed future bus interchange as part of the Naas Sallins Transport Strategy;*
- *Local Streets: The local streets in the development have been generally designed with a width of 5.5m;*
- *Psychological and physical measures have been adopted in the proposed site layout to balance the functional needs of different carriageway users. The following measures have been included:*
- *Footpaths (minimum 2m wide) are provided throughout the development with frequent crossing points and connections to external pedestrian routes;*
- *With the objective of encouraging low vehicle speeds, regular changes of direction have been included across the local street network;*
- *Reduced corner radii have been included at junctions to encourage lower speeds*

6.6 Guidelines for Planning Authorities on Childcare Facilities (2001)

Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions. The Guidelines for Planning Authorities on Childcare Facilities, the Apartment Guidelines 2020, and Sustainable Residential Development in Urban Areas (2009), acknowledge that the standards are recommendations only and do not represent minimum mandatory requirements. These guidelines note that studio and one-bedroom units should not be considered. This can also apply in part to two-bedroom units.

'One bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms'.

6.6.1 Evaluation of Consistency

The proposal includes for 112 no. dwellings (2-3 bedroom units, excluding 1 bedroom units) which would equate for a potential requirement of c.35 children using the 2001 Guidelines.

The most recently published and publicly available creche attendances are recorded in the Quarterly National Household Survey (QNHS) carried out by the Central Statistics Office includes a Special Module on Childcare. The most recent report on this module was published for Quarter 4 2016 (released July 2017). The QNHS states that the percentage of pre-school children that are minded by a parent is 62%, while the corresponding figure for primary school children is 74%. The most commonly used non-parental childcare type for pre-school children is a creche/Montessori/group/ aftercare school facility. This type of care is used by 19%² of pre-school children, with the highest rate of use in Dublin at 25%, while the remainder of children are minded by other relatives, au pairs etc.

The QNHS information confirms that, the proportion of children using childcare is not as high as may be realised. While some chose to use childcare facilities, the majority of pre-school childcare is provided outside the formal childcare provision sector.

The overall number of 2 bedroom plus 3-bedroom dwellings relating to the proposed development is 112. The overall potential pro-rata population equates to c. 334 persons (based on 2.98 persons per household based on Census household size for Naas in 2016)³. According to the 2016 Census, the proportion of 0-6 age cohort was 10.4% which if applied to the 334 figures (for the 112 no. dwellings) would equate to potentially 35 children within the scheme requiring childcare services.

In this regard, it is noted that the QNHS 2016 outlines that c. 19% of the 0-6 age group use creches, while the remainder of children are minded by other relatives, au pairs etc. Using the CSO figures, this would equate to a creche requirement of c. 7 places ($112 \times 2.98 = 334$. $334 \times 10.4\% = 35$. $35 \times 19\% = 7$). It is further noted that there are some 9 no. spaces currently provided in the wider Naas area.

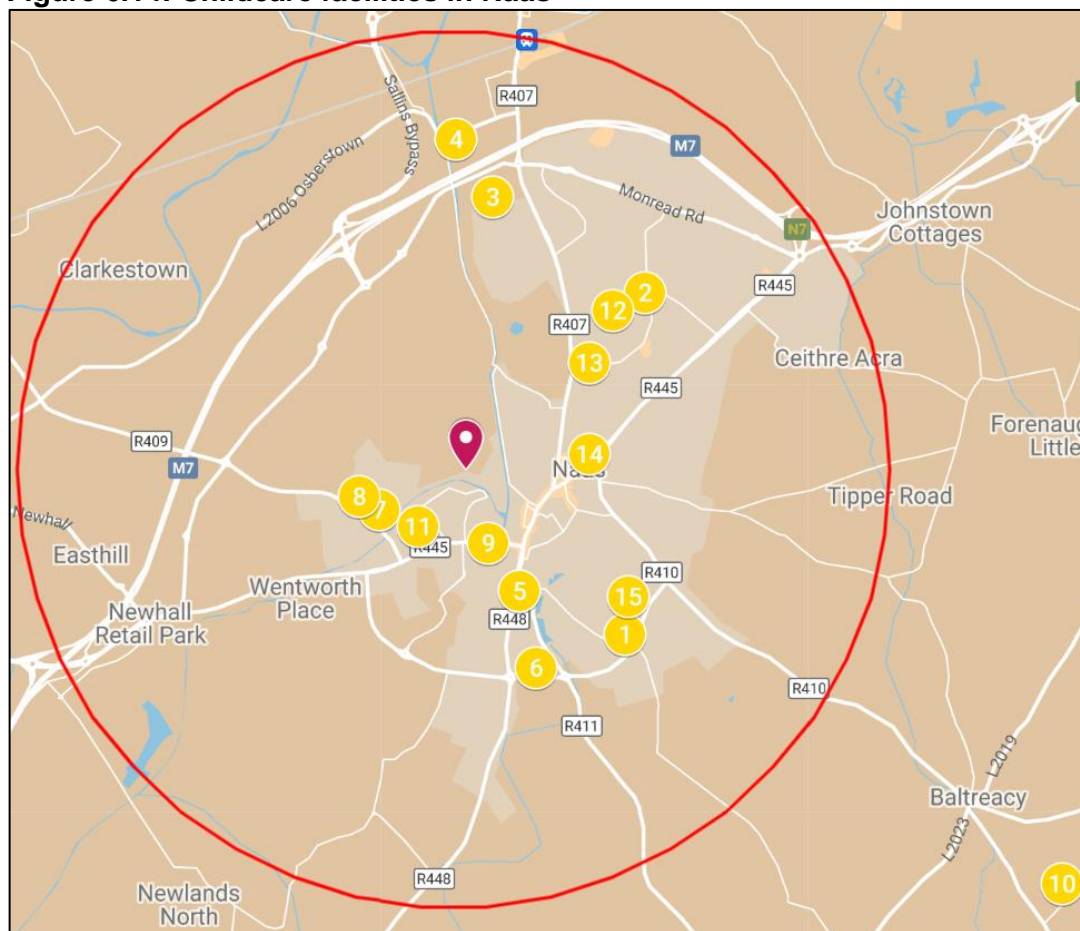
Additionally, there are proposed creche facilities to be provided within other developments within the town. An application for a 10 classroom creche was submitted to KCC on the 01/12/2022 by Little Harvard Creche (Reg. Ref. 221436). Noting the potential demand arising from the proposed development it is respectfully submitted that there is no requirement to include a creche at this point in time. Figure 6.14 below illustrates the location of existing childcare facilities in the area.

Having regard to the above it is submitted that the wider demographic profile of Naas and the anticipated demand for creche places arising from the development does not warrant the provision of a creche in the proposed development site.

A creche assessment accompanies this report and justifies the omission of a childcare facility within the proposed development. Please refer to Childcare audit contained within the Community and Social Infrastructure Audit submitted with this planning application.

² <https://www.cso.ie/en/releasesandpublications/er/q-chi/qnhschildcarequarter32016/>

³ 2022 full census results not available at the time of writing this report

Figure 6.14: Childcare facilities in Naas

It is noted that during pre-planning discussions, the Planning Authority noted they were satisfied with no creche to be provided for this LRD application and that a creche could be provided with future development phases if required.

6.7 Draft Water Services Guidelines for Planning Authorities 2018

The Draft Water Services Guidelines for Planning Authorities were published in January 2018 by the DoHPLG, which sets out a clear structure for actively managing the interface between spatial planning and development and water services planning. The Water Services Guidelines for Planning Authorities have been prepared by the Department of Housing, Planning and Local Government in consultation with Irish Water.

The Guidelines provide best practice guidance in relation to the interface between planning and development functions provided by planning authorities and the delivery of public water services by Irish Water.

The key aims of the Guidelines are to:

- Provide advice to planning authorities on the operational framework within which Irish Water must operate to deliver water services,
- Establish mechanisms for effective engagement between planning authorities and Irish Water across all the relevant functions of planning authorities, and
- Set out how the planning system, in setting out a spatial framework for growth and development, will relate to and inform the planning and delivery of water services by Irish Water at a national, regional and local level.

The Draft Guidelines state that it is a requirement for Strategic Housing Development applications to contain evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant water network or networks have the capacity to service the development.

The Draft Guidelines outline that having regard to the views of Irish Water and having satisfied itself “that there is a reasonable prospect of the constraint(s) being addressed within the lifetime of the permission, a planning authority or An Bord Pleanála (in the case of a SHD application) may approve, inter alia, this aspect of the development, subject to a condition that requires the applicant to enter into a connection agreement (s) with Irish Water to provide for a service connection to the public water supply and / or wastewater collection networks, as appropriate.”

6.7.1 Evaluation of Consistency

DOB Consulting Engineers have consulted with Irish Water on the design of the development and a confirmation of design acceptance is submitted with this planning application.

6.8 Guidelines for Planning Authorities on ‘The Planning System and Flood Risk Management (November 2009)’.

The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

6.8.1 Evaluation of Consistency

In order to comply with these Guidelines a Site-Specific Flood Risk Assessment has been prepared by JBA Consulting Engineers which concludes that:

“JBA Consulting has undertaken a detailed Flood Risk Assessment (FRA) of the proposed site at Finlay Park, Co Kildare. The assessment was carried out in order to verify and compare with the flood extents undertaken previously by the Eastern CFRAM deliverables. This FRA demonstrated that the proposed design can manage flood risk appropriately.

Review of the CFRAM, Naas FRS and JBA flood maps confirm that the proposed residential development is located in Flood Zone C. The Naas FRS have superseded the CFRAM mapping in the study area. To aid in the development of mitigation measures, a site-specific hydraulic model has been developed for the Bluebell Stream and Grand Canal system. The model incorporates the main hydrological features in the area and associated flow mechanisms. Both the JBA hydraulic model and Naas FRS differs significantly from the CFRAM mapping in how the Grand Canal system is represented, and results in significant difference in the final flood maps. Based on this, all mitigation measures are based on the Naas FRS and JBA model. It should be noted that all the residential areas are located in Flood Zone C within the CFRAM flood maps.

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. Based on the JBA and Naas FRS flood maps, access can also be maintained to the development up to the 1% AEP flood event.

The proposed FFL of 87.0mOD provides a freeboard of 1.56m above the 0.1% AEP flood level. Climate change and residual risks have been assessed for the development and the results confirm the development will not be impacted during the modelled scenarios. The Flood Risk Assessment was undertaken in accordance with 'The Planning System and Flood Risk Management' guidelines and confirms that the proposed development is appropriate from a flood risk perspective and is in agreement with the core principles of the planning guidelines."

6.9 Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)

An Appropriate Assessment Screening Report (AASR) prepared by Openfield Ecological Consultants is enclosed with this Application.

The AASR concludes as follows:

"This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects to the Natura 2000 network. No mitigation measures are relied upon to arrive at this assessment. This assessment is based upon the best available scientific evidence".

7.0 STATEMENT OF CONSISTENCY WITH LOCAL PLANNING POLICY

The key provisions of local planning policy relating to the proposed development are set out in the following sections. Reference is made to the following documents:

- The Kildare County Development Plan 2023-2029;
- The Naas Local Area Plan 2021;
- The Kildare County Development Plan 2017-2023 (including Variation no. 1);
- Naas Sallins Transportation Strategy.

An evaluation of the proposed development in terms of the relevant policy or policies is included within each section (as per proposed material amendments).

7.1 Kildare County Development Plan 2023-2029

At a special meeting of Kildare County Council on 9th December 2022, the Elected Members of Kildare County Council voted to adopt the Kildare County Development Plan 2023 - 2029. The Kildare County Development Plan 2023 - 2029 will come into effect on 28th January 2023.

7.1.1 Core Strategy & Settlement Strategy

The Core Strategy designates Naas as Key Town and sits at the top of the settlement hierarchy. The RSES designated Naas and Maynooth as Key Towns. The plan defines Key Towns as “*Large towns which are economically active that provide employment for their surrounding areas. High quality transport links and the capacity to act as regional drivers to complement the Regional Growth Centres*”.

Figure 7.1: Population and Housing Unit Targets Q1 2023 to Q2 2028

Settlement Type	Settlement Name	Census 2016 Population	Settlements percentage per total County population	2021 Population Estimate (based on % growth from 2011-2016)	Housing & Population Target %	Population Target 2023 to 2028 (end of Q4) (persons)	Housing Target 2023 to 2028 (end of Q4) (units) in accordance with HSTGs	Residential Zoned Land Requirement (ha)	Target Residential Density (UPH)
County	Kildare	222,504		235,387		260,533	9,144		
Key Town	Naas	21,393	9.60%	22,632	14.9%	3,747	1,362	40	35-50
	Maynooth (MASP)	14,585	6.60%	15,429	10.90%	2,741	997 ^a		35-50
Self-Sustaining Growth Towns	Newbridge	22,742	10.20%	24,059	11.60%	2,917	1,061	35	35-50
	Leixlip	15,504	7%	16,402	10.20%	2,565	933	31	35-50
	Kildare Town	8,634	3.90%	9,134	4.70%	1,182	430	14	35-40

With Naas positioned at the top of the settlement hierarchy, the council envisages the strategically located settlement to achieve steady population growth up to 2028. As illustrated on Figure 7-9 Naas will need a minimum of 1,362 housing units to fulfil its housing targets. Policies CSO 1.1 and CSO 1.5 seek to ensure that the development of County Kildare is in accordance with the settlement hierarchy.

Table 7.1 – Evaluation of the Proposed Development in terms of Core Strategy Policies

Policies/Objectives	Consistency
CSO 1.1 Ensure that the future growth and spatial development of County Kildare is in accordance with the population and housing allocations contained in the Core Strategy which aligns with the regional growth strategy as set out in the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midland Region and further	<p>The proposal will provide 134 no. apartments which is in accordance with the allocated 898 no. dwellings identified for the period 2020-2023.</p> <p>With reference to the dwelling targets, we would note that the following SHD developments have been permitted since early 2020 in Naas.</p>

Policies/Objectives	Consistency
specified in the 'Housing Supply Target Methodology for Development Planning.	307258-20 – 152 no. apartments – permitted 17/9/2020 313276-22 – 219 no. units – permitted 14/10/2022 Separately it is noted a 314 no. unit SHD (305701-19) was permitted prior to the adoption of variation no. 1 so does not contribute to the figures. With the development at Devoy Road recently permitted under 313276 the permissions granted (371 no.) is still well below the core strategy figure of 1,362 no. dwellings to 2028.
CSO 1.5 Promote compact growth and the renewal of towns and villages through the development of underutilised town centres and brownfield sites, maintaining a 'live' baseline dataset and to monitor the delivery of population growth on existing zoned and serviced lands to achieve the sustainable compact growth targets of 30% of all new housing within the existing urban footprint of settlements.	The proposed development provides for 134 no. housing units and will support the Council's vision to promote the development of key towns. The subject lands are located within the settlement boundary and achieved a progressive density of 59 uph thus complying with CSO 1.1 & 1.5 which seeks compact growth. The subject lands are residentially zoned and sequentially located on a greenfield site located within close proximity to Naas town centre.
CSO 1.12 Require that the design of future developments occurs in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creates a safe, attractive, universally accessible environment for pedestrians and cyclists, where measurably adequate transport links are in place, or will be situated, close to new developments and, insofar as possible, to existing developments which would benefit from them	The proposed development and its design will promote sustainable modes of transport through the provision of generous numbers of cycle spaces all within a safe, attractive, universally accessible environment for pedestrians and cyclists.

7.1.2 Consistency with Housing Policies and Objectives

Chapter 3 of the 2023-2029 County Plan relates to housing which has the aim to,

“To show how the Plan intends to accommodate the full range of current and future housing needs of all members of society throughout the county while giving clear guidance on making provision for specialised housing requirements and providing for the needs of communities in order to deliver sustainable residential communities across the county”.

We note the following policies and objectives with a response to each showing consistency:

Table 7.2 – Evaluation of the Proposed Development in terms of Housing Policies and Objectives

Policies/Objectives	Consistency
HO P1 Have regard to the DHLGH Guidelines on: - Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustaining Communities (2007); - Sustainable Urban Housing: Design Standards for New Apartments (2020); - Sustainable Residential Development in Urban Areas (2009);	The proposed development has had regard to the relevant guidance as set out above in section 5 and 6.

Policies/Objectives	Consistency
<p>- Urban Design Manual: A Best Practice Guide (2009);</p> <p>- Urban Development and Building Heights – Guidelines for Planning Authorities (2018) - Housing Options for our Aging Population (2020) and Age Friendly Principles and Guidelines for the Planning Authority (2021);</p> <p>Design Manual for Urban Roads and Streets (DMURS) (2019)</p>	
<p>HO P5 Promote residential densities appropriate to its location and surrounding context.</p>	<p>The proposed development achieves a progressive density of c. 59 uph. This density is considered appropriate given the location of the site. Within a 15-minute walk from the subject lands future residents have access to a wide range of retail, services and is served by public transport.</p>
<p>HO O4 Ensure appropriate densities are achieved in accordance with the Core Strategy in Chapter 2 of this Plan, and in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Urban Development (Cities, Towns and Villages), DEHLG, 2009, Urban Design Manual: A Best Practice Guide, DEHLG, 2009; Urban Development and Building Height Guidelines for Planning Authorities (2018); and with reference to Circular Letter NRUP 02/2021 (April 2021)</p>	<p>Response as per HO P5 above.</p>
<p>HO O5 Ensure a strategic approach to building height in urban settlements that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, Specific Planning Policy Requirements (SPPR) 1 to 4.</p>	<p>The proposed heights of 4 storeys with some 5 storey elements are in compliance with the Building Height Guidelines 2018 as set out above in section 6.3.</p>
<p>HO O7 Ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable residential development is achieved in all new developments.</p>	<p>The proposed development has been carefully designed in order to respect the surrounding context. The density proposed is deemed to be appropriate and progressive as means to secure sustainable residential density at respectful increase relative to the existing residential areas.</p>
<p>HO O8 Promote, where appropriate and sensitive to the characteristics of the receiving environment, increased residential density as part of the Council's development management function and in accordance with the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities and the accompanying Urban Design Manual, DEHLG, May 2009.</p>	<p>The proposed development has a density of c. 59 units per hectare which is considered appropriate for an inner suburban site (as defined by the SRD 2009) in the key town of Naas.</p>
<p>HO O9 Support new housing provision over the Plan period to deliver compact and sustainable growth in the towns and villages in the County, and supporting urban renewal, infill and brownfield site development and regeneration, to strengthen the roles and viability of the towns and villages, including the requirement that at least 30% of all new homes in settlements be delivered within the existing built up footprint.</p>	<p>The proposed development achieves a progressive density of c.59 uph and lies on underutilised residentially zoned development sequential to the town centre of Naas. The Core Strategy of the County Development Plan provides a housing allocation of 1,362 units to Naas up to 2028 period and the subject proposal will deliver 134 no. of the units. The subject lands are located within the LAP boundary.</p>

Policies/Objectives	Consistency
HO O14 Promote the design and delivery of environmentally sustainable and energy efficient housing, including through the refurbishment and upgrading of existing stock	We refer the Planning Authority to the Energy Statement and Utilities Report prepared by Waterman Moylan which sets out how the proposed development will provide energy sustainable buildings in accordance with relevant building regulations.
HO P7 Encourage the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the county.	The proposal includes a range of amenity spaces, home sizes and typologies to meet the needs of a wide range of residents. These include a mixture of 2 storey apartments and apartment units. The variety of units will accommodate a diverse mix of inhabitants varying in age, life stage, mobility and family unit size. The proposed development offers a variety of units across the site to encourage an inclusive and varied community. It consists of 22 no. 1 bedroom apartments, 77 no. 2 bedroom units, and 35 no. 3 bedroom units.
HO O16 a) Require that new residential developments provide for a wide variety of housing types, sizes and tenures. b) Specify target housing mixes, as appropriate, for certain sites and settlements as part of the Local Area Plan process. c) Require the submission of a 'Statement of Housing Mix' with all applications for 10 or more residential units. d) Require that all new residential developments in excess of 5 residential units provide for a minimum of 20% universally designed units in accordance with the requirements of 'Building for Everyone: A Universal Design Approach' published by the National Disability Centre for Excellence in Universal Design. Further detail in respect of unit mix is set out in Chapter 16: Development Management Standards.	<p>The proposal includes a range of amenity spaces, home sizes and typologies to meet the needs of a wide range of residents. These include a mixture of houses, 2 storey apartments and apartment units. The variety of units will accommodate a diverse mix of inhabitants varying in age, life stage, mobility and family unit size. The proposed development offers a variety of units across the site to encourage an inclusive and varied community. It consists of 22 no. 1 bedroom apartments, 77 no. 2 bedroom units, and 35 no. 3 bedroom units.</p> <p>A statement of mix can be found within section 8 of this planning report.</p> <p>A minimum of 20% of the dwellings across the site have been designed to comply with the Universal Design Guidelines.</p>
HO O17 Promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood. Apartment development must be designed in accordance with the provisions of Sections 15.2, 15.3 and 15.4 (Chapter 15), where relevant, to ensure a high standard of amenity for future residents.	<p>The proposed LRD seeks to create an innovative development of new homes on lands within close proximity to the town centre of Naas. The scheme will provide a vibrant new neighbourhood based on the principles of sustainability, permeability, walkability and shared public spaces. The proposal meets the relevant development management standards as set out within this report.</p> <p>A Community and Social Infrastructure Audit (including schools and childcare) has been prepared and is included with this planning application.</p>
HO O18 Require new apartment developments to comply with the Specific Planning Policy Requirements and standards set out in the Apartment Guidelines for Planning Authorities (Department of Housing, Environment and Local Government, 2020), where relevant particularly	A detailed Housing Quality Assessment has been provided by C+W O'Brien Architects. This assessment is included in the architectural package accompanying this pre-application, illustrating in tabular format how the proposed apartments comply with and exceed

Policies/Objectives	Consistency
in relation to paragraph 3.8(a) of same which requires that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).	requirements of the Guidelines. All apartment units proposed within the development meet or exceed the requirements of the Guidelines.
HO O19 Support high-quality design in new housing and to promote housing that is attractive, safe, and adaptable to the needs of existing and future households. Kildare County Council will support innovative construction methods to deliver sustainable and adaptable housing.	The subject proposal provides high quality design which will contribute positively to the built environment and local streetscape in Naas. All public areas proposed are clearly defined by facades, providing clarity between public and private realm, ensuring full passive surveillance and a safe environment for residents.
HO O20 Support housing design that contributes to climate resilience and climate mitigation, including innovative low carbon construction methods and the reduction of embodied energy in newly built homes, in line with Goal 3 of the Kildare County Council Climate Change Adaptation Strategy 2019 – 2024.	The site layout considers orientation and structural flexibility to optimise performance. Each unit has been designed to create positive aspects. The apartment units achieve a high BER rating and will reduce reliance on energy costs. The Dwellings constructed will deliver a minimum A2 energy rating.
HO O21 Support the delivery of housing options to meet the needs of older people and support older people to live independently in active retirement, where possible	The Proposed Development provides for an acknowledged need for apartments in national strategic guidance such as the National Planning Framework as well as a mix of apartments and two storey apartments (across 1-bed, 2-bed, and 3-bed configurations). Apartments are well suited as a housing option for older persons.
HO O27 Support access for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated, timely and sustainable manner, which promotes equality of opportunity, individual choice and independent living	Response as per HO O21 above.
HO A3 Ensure that all Kildare County Council new build housing stock is in compliance with Part M of the Building Regulations.	As set out in the CWOB Design Statement, the proposed development includes apartments and 2 storey apartments which are suitable for mobility impaired persons. Landscape design and detailing of roads and footpaths provide for movement throughout the development by mobility impaired persons, in compliance with Building Regulations Part M. The development will provide for disabled car parking spaces and all communal areas and apartment types are designed to be accessible to all. With regard to the provision of access for all, it is confirmed that the design of the proposed development complies with the requirements of Part M of the Building Regulations– Access for People with Disabilities.
HO A4 In line with the Objectives and Actions in respect of Accessible Housing contained in the 'County Kildare Access Strategy – A Universal Access Approach 2020-2022', to ensure,	The proposal includes a range of amenity spaces, home sizes and typologies to meet the needs of a wide range of residents. These include a mixture of houses, 2 storey apartments

Policies/Objectives	Consistency
measure and monitor that 10% of acquired housing stock meets the needs of those with a disability and 12% of Kildare County Council new builds are universally designed, and have regard to any revised actions in updated versions of the Access Strategy	and apartment units. The variety of units will accommodate a diverse mix of inhabitants varying in age, life stage, mobility and family unit size. The proposed development offers a variety of units across the site to encourage an inclusive and varied community
<p>HO P9 Promote the provision of social and affordable housing in accordance with the Council's Housing Strategy, Housing Need Demand Assessment and Government policy as outlined in the DHPLG Social Housing Strategy 2020 and to ensure, where applicable: (a) That 20% of (i) lands zoned for residential use, or for a mixture of residential and other uses, in respect of which permission for the development of 5 or more houses is granted, and (ii) any land which is not zoned for residential use, or for a mixture of residential and other uses, but in respect of which permission for the development of 5 or more houses is granted, shall be reserved for the provision of social housing, affordable housing and cost rental housing; with at least half the 20% to be used for social housing support, and the remainder to be used for affordable housing, which can be affordable purchase, cost rental or both, social housing, or a combination of affordable and social housing, in accordance with the Affordable Housing Act 2021 and Part V of the Planning and Development Act 2000 (as amended) Or (b) Where (i) planning permission was granted before 1 August 2021, or (ii) where land was purchased between 1 September 2015 and 31 July 2021 in respect of which new planning permission was granted between 3 September 2021 and 31 July 2026, Kildare County Council will require that 10% of lands zoned for residential use, or for a mixture of residential and other uses, in respect of which permission for the development of 5 or more houses is granted, shall be reserved for the provision of social housing, in accordance with the Urban Regeneration and Housing Act 2015 and Part V of the Planning and Development Act 2000 (as amended) (c) Where Part V provision on planning applications is being accepted off site, that the units offered be located within a 5km catchment of the area.</p>	<p>The applicant has entered into initial discussions with the Housing Department of Kildare County Council in respect to Part V. The applicant agrees to accept a condition on a grant of planning permission, if the council is minded approving the proposed development, which requires the applicant to enter into a Part V agreement with Kildare County Council as per their requirements prior to the commencement of development. The applicant is proposing to provide 15 no. units (5 no. 1 bed, 8 no. 2 bed and 2 no. three bed).</p> <p>The proposal relates to an overall 11% provision in respect of Part V.</p>
<p>HO O39 Meet the county's housing need for social housing provision through a range of mechanisms, including Part V of the Planning and Development Act 2000 (as amended), a social housing building programme, acquisition, Repair and Lease Scheme, the Housing Assistance Payment (HAP) scheme, the Rental Accommodation Scheme (RAS) and the utilisation of existing housing stock.</p>	<p>The applicant has entered into initial discussions with the Housing Department of Kildare County Council in respect to Part V. The applicant agrees to accept a condition on a grant of planning permission, if the council is minded to approve the proposed development, which requires the applicant to enter into a Part V agreement with Kildare County Council as per their requirements prior to the commencement of development. The applicant is proposing to provide 15 no. units.</p>

7.1.3 Sustainable Mobility & Transport

Table 7.3 – Evaluation of the Proposed Development in terms of Sustainable Mobility & Transport

Policies Objectives	Consistency
<p>TM O5 Encourage the use of materials and engineering solutions that optimise natural surface water drainage as part of Sustainable Urban Drainage Systems (SUDS) with all new active travel, public transport, parking, road and street developments and ensure adequate replacement and additional planting of pollinator-friendly and native species.</p>	<p>The proposed development incorporates SUDS into the design of the development, including planting of pollinator-friendly and native species.</p>
<p>TM O15 Support and facilitate the provision of electric vehicles including Battery Electric Vehicles (BEV) and Plug-in Hybrid Electric Vehicles (PHEV) including electric cars, bikes and scooters as a more sustainable low carbon option to the conventional private motor vehicle. The support of e-scooters will be subject to the enactment of legislation to regulate and legalise e-scooters.</p>	<p>13 no. Electric vehicle charging points are provided throughout the proposed development. Please refer to the material prepared by C+W O'Brien Architects</p>
<p>TM P2 Prioritise and promote the development of high-quality, suitable, safe and sustainable walking and cycling pathways and facilities, both inter-county, intra-county (in consultation with all relevant stakeholders including neighbouring local authorities) and within the towns and settlements of County Kildare within a safe road/street environment that will encourage a shift to active travel that is accessible for all, regardless of age, physical mobility, or social disadvantage, subject to all relevant and cumulative environmental assessments and planning conditions. New projects (including greenways, blueways and cycleways) should first be subject to the undertaking of feasibility assessment. Where feasibility is established, a Corridor and Route Selection Process will be undertaken where appropriate, for relevant new road infrastructure in two stages", Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection</p>	<p>The proposed layout includes a pedestrian and cycle path within the southern portion of the site which will facilitate and connect into the wider greenway along the Grand Canal in due course.</p>
<p>TM O16 Ensure regular maintenance of walking and cycling routes and ensure that all roads in new developments are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets 2019, the National Cycle Manual (NTA, 2011 – or the pending update) and the Draft GDA Cycle Network Plan (NTA, 2021).</p>	<p>We refer the Planning Authority to the enclosed Engineering report prepared by DOBA which sets out compliance with DMURS. Detail is also provided above in section 6.5.</p>
<p>TM O17 Ensure new development areas are fully permeable for walking and cycling at a minimum, public transport (where appropriate) and provide for filtered permeability for private vehicle access in accordance with the NTA Permeability Best Practice Guide in order to give a competitive</p>	<p>The layout of the proposed development is fully permeable for cycling and walking to the boundaries to future lands to the east and north.</p>

Policies Objectives	Consistency
advantage to active travel modes for local trip making.	
TM O18 Ensure site layout proposals detail present and possible future connections to pedestrian/cycle links and improve permeability between existing and proposed developments including adjacent developments thereby facilitating the '10-minute settlement' concept	Response as per TMO17
TM O20 Secure the development and delivery of the cycle network identified in the Draft Greater Dublin Area Cycle Network Plan (2021) as shown in the maps attached at the end of Chapter 5 (and any subsequent revisions), subject to funding from the NTA.	The layout includes cycle and pedestrian infrastructure in the southern part of the site which will link into the greenway along the Canal.
TM O21 Implement the greenway and blueway projects that promote walking and cycling in conjunction with the relevant organisations and bodies including: <ul style="list-style-type: none"> • Naas to Sallins Greenway and Naas to Corbally Harbour greenways and linking these to the national Grand Canal Greenway network. • The development of a walking route from Palmerstown House through Kerdiffstown Amenity lands to link with the Sallins Aylmer Greenway in consultation with all relevant landowners subject to appropriate environmental assessments and considerations. • The development of a walking route between Lullymore, Killinthomas Woods and Rathangan in consultation with all relevant landowners. The delivery of the Barrow Blueway with Waterways Ireland and associated works to enhance the amenity use of the river and canal area. • The development of further Sli na Sláinte routes in the county. Investigate the feasibility of further connections from existing and proposed greenways in County Kildare. Investigate the feasibility of re-opening/upgrading and re-developing the historic Barrow Drainage Scheme access routes and trail along the eastern bank of the river Barrow between Monasterevin and Athy.	The layout includes cycle and pedestrian infrastructure in the southern part of the site which will link into the greenway along the Canal.
TM O24 Ensure the delivery of robust and efficient cycle and walking infrastructure in Naas by enhancing permeability and improving linkages between Naas Town Centre, surrounding residential and employment areas, Sallins Railway Station and the Northwest Quadrant	The layout includes cycle and pedestrian infrastructure in the southern part of the site which will link into the greenway along the Canal. The future development of the applicant's landholding will further enhance cycling and walking infrastructure and links to the town centre and to the Northwest Quadrant. Please refer to Systra Transportation report for further detail.
TM O34 Generate additional demand for public transport services by strengthening development around existing and planned high-capacity transport routes and interchanges and by reducing walking and cycling distances through the implementation of local permeability improvements and improving access to public transport as part of road improvement projects where possible.	The proposed development and 134 no. apartments will underpin the demand for public transport and the high capacity bus interchange which will be located on the applicant's lands in the Harbour area.

Policies Objectives	Consistency
TM O35 Seek to address urban congestion with particular emphasis on facilitating the development of town bus services for the Key Towns within the County ensuring connectivity to and from residential areas, key employers, and public transport hubs such as train stations, along with retail and amenity sites	The applicant's lands will facilitate the future bus connection between the town centre and Sallins train station. The layout of the proposed development has had regard to this future link and connections are included to integrate into this link in the future. Please refer to Systra Transportation report for further detail.
TM O38 Work with statutory agencies and stakeholders to promote and facilitate the development of a public transport hub in proximity to Naas and Sallins which will connect road, rail and public bus transport, including Park and Ride and interchange facilities.	The applicant's lands will facilitate the future bus connection between the town centre and Sallins train station. The layout of the proposed development has had regard to this future link and connections are included to integrate into this link in the future. Please refer to Systra Transportation report for further detail.
TM O39 Support the delivery of a bus - only link to the Sallins bypass through the Northwest Quadrant in Naas which will provide a direct bus service to the Sallins Railway Station from the town centre of Naas.	As per response to TM038.
TM O55 Ensure that the planning, design and implementation of all road and street networks within urban areas across the county accord with the principles set out in the Design Manual for Urban Roads and Streets (2019), the National Cycle Manual (2011 – or the pending update) and all other standards where relevant	We refer the Planning Authority to the enclosed Engineering report prepared by DOBA which sets out compliance with DMURS. Detail is also provided above in section 6.5.
TM O97 Ensure that all streets and street networks are designed considering the hierarchy of users in Figure 5.8 above and includes the provision of high-quality walking and cycling infrastructure and traffic calming measures which may include speed ramps	We refer the Planning Authority to the enclosed Engineering report prepared by DOBA which sets out compliance with DMURS. Detail is also provided above in section 6.5.
TM A21 Require all multi-unit developments and schools to submit mobility management plans and travel plans, including an assessment of the public transport capacity in a manner consistent with existing NTA guidance and to implement mobility management initiatives to minimise the impact of new developments on the road and street network of the County	We refer the Planning Authority to the Mobility Management Plan prepared by Systra included with the planning application.
TM A22 Require the preparation of a Road Safety Audit as part of any proposed development/project of a significant scale which may have potential implications on major transport infrastructure. Such assessments shall be in accordance with the Transport Infrastructure Ireland publications 'Road Safety Audit, GE-STY-01024, (Dec 2017) and Road Safety Audit Guidelines, GE-STY-01027, (Dec 2017).	We refer the Planning Authority to the Road Safety Audit prepared by RoadPlan included with the planning application.
TM O103 Design car parking layouts in accordance with the Design Manual for Urban Roads and Streets (2019) and ensure that car parking, including the provision of fully accessible EV charging facilities, do not detract from the comfort and safety of pedestrians and cyclists or the attractiveness of the landscape.	The layout has been prepared in accordance with DMURS. EV points are provided.
TM O106 The quantum of car parking or the requirements for any such provision for	The car parking provision has been carefully considered having regard to the Sustainable

Policies Objectives	Consistency
apartment developments will have regard to the proximity and accessibility to urban locations, public transport and employment locations as outlined in the Sustainable Urban Housing: Design Standards for New Apartments (2020).	Urban Housing: Design Standards for New Apartments (2020). The proposed parking provision of 201 no. spaces is in line with that suggested for the less favourably situated 'Peripheral' areas. Based on this guidance the parking provision is deemed to be adequate for the proposed development. This equates to 1.3 car parking spaces per unit.
<p>TM O109 To facilitate, along with the NTA and TII, the conversion of the private car fleet to electric in the following ways:</p> <ul style="list-style-type: none"> • Providing public charging points at key destinations such as public car parks, Park and Ride facilities, on-street in town centres, and public parks; • Ensuring that where car parking is proposed as part of all new developments either public or private, provision is made for all spaces to be dedicated over time to electric cars with provision for charging infrastructure built-in from the outset; • Providing significantly expanded electric car charging facilities at service stations on the national road network; • Ensuring provision is made for fast charging points at service stations and public car parks in order to make provision for a shorter charging time than domestic charging; • Ensuring that charging infrastructure does not encroach on footpaths or otherwise compromise the free movement of pedestrians, cyclists and public transport. 	13 no. Electric vehicle charging points are provided throughout the proposed development. Please refer to the material prepared by C+W O'Brien Architects
<p>TM O110 Support the Government's targets for electric vehicles on roads by prioritising parking for Electric Vehicles (EVs) in central locations, by supporting the provision of charging facilities on public and private land. Ensure a future proofed approach to the rollout of EV charging infrastructure by means of planning decisions by applying the following requirements of the EU (Energy Performance of Buildings) Regulations 2021 (S.I. 393 2021) for Electric Vehicle recharging infrastructure:</p> <ul style="list-style-type: none"> • New buildings or buildings undergoing major renovations (other than a dwelling) shall install at least one recharging point and ducting infrastructure for at least one in every 5 car parking spaces to enable the subsequent installation of recharging points for electric vehicles. • New buildings or buildings undergoing major renovations (containing one or more than one dwelling), which has more than 10 car parking spaces, shall install ducting infrastructure for each car parking space to enable the subsequent installation of recharging points for electric vehicles 	13 no. Electric vehicle charging points are provided throughout the proposed development. Please refer to the material prepared by C+W O'Brien Architects

Policies Objectives	Consistency
<p>TM O115 Support car sharing initiatives as part of new housing developments and workplaces. Facilitate the provision of appropriately sized bus parking facilities at appropriate locations in all towns (Key Towns, Self-Sustaining Growth Towns and SelfSustaining Towns)</p>	<p>The Mobility Management Plan prepared by Systra provides car sharing detail measures which form part of the MMP.</p>
<p>M P11 Ensure street lighting is provided in accordance with Kildare County Councils 'Street Lighting and Planning Guidance' policy document in either draft or adopted form. The document outlines the general principles and requirements for street lighting in the county</p>	<p>We refer the Planning Authority to the Rexel lighting design included with the application.</p>
<p>M O116 Expand the existing public lighting network and ensure that all new developments are provided with adequate public lighting for the safety of all pedestrians, cyclists and minority groups. Such lighting networks shall have regard for protected species such as bats which can potentially be affected by lighting systems. The Lux, wavelength and TTC2 (Total Transfer Capability) will be considered in the selection of appropriate lighting.</p>	<p>We refer the Planning Authority to the Rexel lighting design included with the application.</p>
<p>M O117 Ensure that landscape proposals detail public lighting locations and that proposed street lighting is not compromised by tree planting. The landscape proposals should ensure that the trees are planted a sufficient distance from public lighting so that when the canopy matures it does not cover the light standard</p>	<p>We refer the Planning Authority to the Rexel lighting design included with the application. The layout was co-ordinated with Landmark Landscape Design so as to ensure conflicts are avoided.</p>
<p>TM O119 Ensure that all new street lighting is provided in accordance with best practice guidelines and standards in terms of the type of lighting columns, lantern types, lighting class, lux levels and LEDs being provided. The 'white light' delivered by LED lights will provide greater colour rendering and provide sharper contrast and improved safety for road users</p>	<p>We refer the Planning Authority to the Rexel lighting design included with the application.</p>
<p>TM A24 Require that any lighting design strategies to be developed to minimise impacts on biodiversity. The chosen luminaires should have an optimum light control and a tightly controlled distribution to minimise light spillage or pollution outside of the immediate site area and potential impact on biodiversity in particular navigation routes and natural habitats. Cowls/shields should be utilised to provide directional lighting. In general lighting luminaires should be positioned to avoid up-lighting where possible. Consideration should be taken regarding lux level, wavelength and (Total Transfer Capability (TTC) so as to avoid any potential harmful impacts on protected species such as bats.</p>	<p>We refer the Planning Authority to the Rexel lighting design included with the application. The layout was co-ordinated with Landmark Landscape Design and Brian Keeley (Bat expert) so as to ensure conflicts are avoided.</p>

7.1.4 Infrastructure and Environmental Services

Table 7.4 – Evaluation of the Proposed Development in terms of Infrastructure and Environmental Services

Policies Objectives	Consistency
IN O4 Ensure that adequate water services will be available to service development prior to the granting of planning permission and to require developers to provide evidence of consultation with Irish Water regarding capacity in the network prior to applying for planning permission	We refer the Planning Authority to the Confirmation of Feasibility and Design Acceptance included in the particulars and DOB Engineering Services Report which confirms capacity for the proposed development.
IN O6 Require an undisturbed edge or buffer zone to be maintained, where appropriate, between new developments and riparian zones of water bodies to maintain the natural function of existing ecosystems associated with water courses and their riparian zones, and to enable sustainable public access. The width of the edge or buffer zone shall be determined during the appropriate environmental assessment such as EclA or AA.	Appropriate set backs have been provided in the layout in consultation with Inland Fisheries Ireland.
IN O13 Ensure that adequate wastewater services will be available to service development prior to the granting of planning permission and to require developers to provide evidence of consultation with Irish Water regarding capacity in the network prior to applying for planning permission.	We refer the Planning Authority to the Confirmation of Feasibility and Design Acceptance included in the particulars and DOB Engineering Services Report which confirms capacity for the proposed development.
IN O15 Ensure all new developments connect to public wastewater infrastructure where available.	The proposed development will be connected to the public wastewater infrastructure.
IN O16 Prohibit the discharge of additional surface water to combined (foul and surface water) sewers to maximise the capacity of existing collection systems for foul water	The proposed development will be connected to a separate foul and surface water network.
IN O22 Require the implementation of Sustainable Urban Drainage Systems (SuDS) and other nature-based surface water drainage as an integral part of all new development proposals.	We refer the Planning Authority to the DOB Engineering Services Report which sets out the range of SUDs measures included in the design of the proposed development.
IN O23 Require new developments to reduce the generation of storm water run-off and ensure all storm water generated is disposed of on-site OR attenuated and treated prior to discharge to an approved water system, with consideration for the following: <ul style="list-style-type: none"> • The infiltration into the ground through the provision of porous pavement such as permeable paving, swales, and detention basins. • The holding of water in storage areas through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands. • The slow-down in the movement of water. 	We refer the Planning Authority to the DOB Engineering Services Report which sets out the range of SUDs measures included in the design of the proposed development.
IN O24 Only consider underground retention solutions when all other options have been exhausted. Underground tanks and storage systems will not be accepted under public open space, as part of a SuDS solution.	SuDS measures have been incorporated into the design of the Proposed Development as required. Please refer to the Refer to DOB Engineering Services Report that is submitted with this application.

Policies Objectives	Consistency
IN O25 Promote the use of green infrastructure (e.g., green roofs, green walls, planting, and green spaces) as natural water retention measures.	SUDS measures have been incorporated into the design of the Proposed Development as required. Please refer to the Refer to DOB Engineering Services Report that is submitted with this application.
IN O31 Manage flood risk in the county in accordance with the sequential approach and requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and circular PL02/2014 (August 2014), when preparing plans, programmes, and assessing development proposals. To require, for lands identified in the Strategic Flood Risk Assessment, a site-specific Flood Risk Assessment to an appropriate level of detail, addressing all potential sources of flood risk, demonstrating compliance with the Guidelines or any updated version of these guidelines, paying particular attention to avoidance of known flood risk, residual flood risks and any proposed site-specific flood management measures.	The subject lands are (residential footprint) are located in Flood Risk Zone C, and appropriate for development. Please refer to the Site-Specific Flood Risk Assessment that has been prepared by JBA Consulting Engineers and is submitted with this application under separate cover.
IN O33 Require development proposals which may affect canals and their associated infrastructure to prepare a Flood Risk Assessment in accordance with the relevant guidance.	The subject lands are (residential footprint) are located in Flood Risk Zone C, and appropriate for development. Please refer to the Site-Specific Flood Risk Assessment that has been prepared by JBA Consulting Engineers and is submitted with this application under separate cover.
IN O34 Require that development along urban watercourses comply with the Inland Fisheries Ireland Guidance: Planning for Watercourses in the Urban Environment (2020), including the maintenance of a minimum riparian zone of 35 metres for river channels greater than 10 meters in width, and 20 meters for river channels less than 10 metres in width. Development within this zone will only be considered for water compatible developments as defined in the OPW Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).	Appropriate set backs have been provided in the layout in consultation with Inland Fisheries Ireland.
IN O39 Require the appropriate provision for the sustainable management of waste within developments (particularly apartment buildings), including the provision of facilities for storage, separation, and collection of waste	Communal bin stores are provided in the scheme as required. Please refer to the Operational Waste Management Plan prepared by Redkite Environmental that is submitted with this application.
IN O43 Ensure the provision of waste management facilities in the county (both public and private) are subject to the specific requirements of the Eastern-Midlands Region Waste Management Plan 2015-2021 (or as amended / updated).	Communal bin stores are provided in the scheme as required. Please refer to the Operational Waste Management Plan prepared by Redkite Environmental that is submitted with this application.
N O44 Support and facilitate the separation of waste at source into organic and non-organic streams or other waste management systems that divert waste from landfill and maximise the potential for each waste type to be re-used, recycled or composted.	Communal bin stores are provided in the scheme as required. Please refer to the Operational Waste Management Plan prepared by Redkite Environmental that is submitted with this application.

Policies Objectives	Consistency
IN O63 Ensure noise sensitive development in proximity to national and other roads provides a noise impact assessment / Acoustic Design Statement to the requirements set out in the Noise Action Plan and Local Planning Advice Notes as may issue and includes appropriate spatial consideration in the design phase and, where necessary physical mitigation measures, such as noise barriers, set back landscaping and /or buffer zones between areas of land where development is proposed and existing / proposed national or other roads.	We refer the Planning Authority to the Noise and Vibration Assessment Report prepared by Redkite submitted with the planning application.
IN O64 Require the design of external lighting schemes to minimise the incidence of light spillage or pollution into the surrounding environment having regard to the residential amenity of surrounding areas and the need to mitigate adverse impacts on sensitive fauna and protected species.	The design of the lighting has taken into account the surrounding natural environment and also the local residential areas.

7.1.5 Community Infrastructure

The following community policies are relevant to the proposed development.

Table 7.5 – Evaluation of the Proposed Development in terms of Community Infrastructure

Policies Objectives	Consistency
SC O11 Facilitate the provision of appropriately scaled children’s play facilities and teen space facilities at suitable locations within existing and new residential development	Play areas are provided in the layout. Please refer to Landmark Design Landscape layout for further detail.
SC O14 Require that community facilities are provided in new communities on a phased basis in tandem with the provision of new housing or other large-scale developments. In cases where there is a deficiency of a certain type of infrastructure as part of the development proposal, the frontloading of such infrastructure will be required as part of the first phase of development and must be fully operational prior to the occupation of any residential unit on the subject site. Such deficiencies should be identified in the Social Infrastructure Audit prepared to accompany the planning application. Where the Planning Authority is not satisfied with the information supplied as part of the Social Infrastructure Audit or where inadequate measures are proposed to address any identified shortfalls in social infrastructure as part of a proposed development scheme, a planning application for new housing developments or large-scale developments may not be favourably considered.	The proposal can be readily absorbed into the local community infrastructure (as outlined above and in the JSA Community and Social Infrastructure Audit (including schools and childcare)
SC O15 Require residential schemes of 20 units or greater to submit a Social Infrastructure Audit which shall determine how the capacity of the assessed infrastructure will be affected by the	A Community and Social Infrastructure Audit (including schools and childcare) has been prepared and outlines the high level of social

<p>proposed increase in population. Where a deficit is identified, the developer will be required to make provisions/submit proposals to address such deficits</p>	<p>infrastructure with Naas and is submitted with this planning application. It is considered that the proposed development provides for the necessary ancillary land uses required for this residential development, whilst having regard to the significant range of community, commercial and social infrastructure in the town centre located c. 500-650m to the south east of the subject site via Abbey Bridge (and c. 1.3km via Ploopluck Bridge).</p>
<p>SC O16 (a) Require social infrastructure audits submitted in accordance with SC O15 of this Plan to include a map of educational, community, childcare, healthcare, sporting, and open space/play facilities within a 10-15 minute² (800-1200 metre radius) walk/cycle of the proposed development. The audit should identify public / non-fee paying and private/fee paying facilities. Such audits may consider, where appropriate, services which are accessed by car. Capacities must be confirmed with supporting documentation submitted from service providers in order to verify the assessment as set out in the audit. (b) To include an assessment of the availability of or the provision of a new neighbourhood centre.</p>	<p>A Community and Social Infrastructure Audit (including schools and childcare) has been prepared and outlines the high level of social infrastructure with Naas and is submitted with this planning application. The proposed development is located close to the town centre with its range of shops and amenities (Dunnes Stores and SuperValu as well as Tesco). Additional convenience shopping is provided c. 2.4km (Lidl). Given the proximity to the town centre, a new neighbourhood centre would have the potential to detract from the town centre retail core. As such as new neighbourhood centre was not considered appropriate or that there was a requirement.</p>
<p>SC P4 Ensure the needs of children and young people, including those with disabilities and additional needs, in the provision of indoor and outdoor recreational facilities are provided for in the community in which they live.</p>	<p>Play areas are provided in the layout. Please refer to Landmark Design Landscape layout for further detail.</p>
<p>SC O23 Increase the quantity and improve the quality of children's play facilities across the county particularly in areas where a lack of provision has been identified (e.g. play areas should be within a 10-minute walk of new and existing residential areas) subject to AA screening and where applicable, Stage 2 AA</p>	<p>Play areas are provided in the layout. Please refer to Landmark Design Landscape layout for further detail.</p>
<p>SC O33 Cater for the diversity of older people's needs by promoting adaptability and flexibility in the design of homes and the promotion of appropriate commercial and community facilities in population centres with higher proportions of older people</p>	<p>The proposal includes a range of amenity spaces, home sizes and typologies to meet the needs of a wide range of residents. These include a mixture of 2 storey apartments and apartment units. The variety of units will accommodate a diverse mix of inhabitants varying in age, life stage, mobility and family unit size. The proposed development offers a variety of units across the site to encourage an inclusive and varied community</p>
<p>SC O68 Require social infrastructure audits to be submitted with development proposals to outline up to date capacity and enrolment figures of schools within the catchment (10–20 minute walk/cycle) of the proposed development noting that Second Level Schools serve a wider catchment and as such, the assessment of these should include schools within a 5km radius or otherwise agreed by the Planning Authority. The data should be verified in writing by individual schools.</p>	<p>A Community and Social Infrastructure Audit (including schools and childcare) has been prepared and outlines the high level of social infrastructure with Naas and is submitted with this planning application. The proposed development will not generate much demand for additional primary or secondary school places. The Community and Social Infrastructure Audit demonstrated that there is sufficient capacity in any case.</p>

SC O76 Have regard to the criteria specified in the Childcare Facilities for Planning Authorities, DEHLG (2001) and any updated policy guidance, regarding the provision of childcare and early years education facilities.	The proposed development does not provide for a childcare facility. A creche assessment has been undertaken within the Community and Social Infrastructure Audit and provides the justification on the omission of a creche within the proposed development.
SC O78 Ensure childcare provision is delivered in new communities prior to or in tandem with phase 1 of any residential or commercial development and is fully operational prior to the occupation of any residential units within the subject site	A full Community and Social Infrastructure Audit (including schools and childcare) has been undertaken and is included in this planning pack. The proposed development is not anticipated to generate much demand for childcare spaces and the anticipated demand can be catered for in existing creche operators in the locality.
SC O85 Require development proposals for more than 20 residential units or over 2,000sqm in the case of commercial developments (including office/industrial developments) to prepare and submit a social infrastructure audit detailing the level of childcare infrastructure in the catchment which shall outline available capacity and types of service provided in each facility which must be verified in writing by the relevant service providers.	A full Community and Social Infrastructure Audit (including schools and childcare) has been undertaken and is included in this planning pack.
SC O93 Require development proposals of greater than 20 residential units or commercial developments (including office/industrial developments) greater than 2,000sqm to submit a detailed audit of health services (including GP service hours) and facilities in the area as part of a social infrastructure audit.	A full Community and Social Infrastructure Audit (including schools and childcare) has been undertaken and is included in this planning pack.

7.1.6 Built & Cultural Heritage

Chapter 11 relates to Built Heritage and Culture. County Kildare has a rich and varied built, natural and cultural heritage resource. The county plan aims *'To protect, conserve and sensitively manage the built and cultural heritage of County Kildare and to encourage sensitive sustainable development so as to ensure its survival and maintenance for future generations'*.

Table 7.6 – Evaluation of the Proposed Development in terms of Built & Cultural Heritage

Policies Objectives	Consistency
AH O3 In co-operation with the National Monuments Service, Department of Housing, Local Government and Heritage require archaeological impact assessment, surveys, test excavation and/or monitoring and/or underwater archaeological impact assessments for planning applications in areas of archaeological importance and where a development proposal is likely to impact upon in-situ archaeological monuments, their setting and archaeological deposits, based on recommendations of a suitably qualified archaeologist and the Council will seek and have regard to the advice and	We refer the Planning Authority to the enclosed Archaeological Heritage Report by Byrne Mullins and Associates, Archaeological and Historical Heritage Consultants.

recommendations of the Department of Housing, Local Government and Heritage	
AH O40 Co-operate with Waterways Ireland in the management, maintenance and enhancement of the Royal Canal and Grand Canal and associated structures/features	The applicant has been in discussions with Waterways Ireland in respect of future proposals in relation to the Grand Canal as part of future phases of development.

7.1.7 Biodiversity & Green Infrastructure

Table 7.7 – Evaluation of the Proposed Development in terms of Biodiversity & Green Infrastructure

Policies Objectives	Consistency
BI P1 Integrate in the development management process the protection and enhancement of biodiversity and landscape features by applying the mitigation hierarchy to potential adverse impacts on important ecological features (whether designated or not), i.e. avoiding impacts where possible, minimising adverse impacts, and if significant effects are unavoidable by including mitigation and/or compensation measures, as appropriate. Opportunities for biodiversity net gain are encouraged.	Trees, hedgerows and natural features have been incorporated into the design of the proposed development. Appropriate mitigation is included where deemed necessary. We refer the Planning Authority to the enclosed ECIA prepared by Openfield.
BI O1 Require, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation and to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development. Such assessments shall be carried out in line with the CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.	We refer the Planning Authority to the enclosed ECIA prepared by Openfield. Trees, hedgerows and natural features have been incorporated into the design of the proposed development
BI O2 Require, wherever possible the retention and creation of green corridors within and between built up urban areas and industrial scale developments to protect wildlife habitat value including areas that are not subject to public access.	Trees, hedgerows and natural features have been incorporated into the design of the proposed development
BI P2 Seek to contribute to maintaining or restoring the conservation status of all sites designated for nature conservation or proposed for designation in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar Sites and Statutory Nature Reserves. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar Sites and Statutory Nature Reserves	We refer the Planning Authority to the enclosed ECIA prepared by Openfield. The Grand Canal runs adjacent to the subject site and is designated as a proposed Natural Heritage Area. An Ecological Impact Assessment has been prepared by Openfield Ecological Services. The report notes the following, <i>“With mitigation, the majority of the impacts can be reduced so that no moderate negative impact remains”</i> .
BI O5 Avoid development that would adversely affect the integrity of any Natura 2000 site and promote favourable conservation status of habitats and protected species including those	The AA screening by Openfield notes the following:

Policies Objectives	Consistency
listed under the Birds Directive, the Wildlife Acts and the Habitats Directive, to support the conservation and enhancement of Natura 2000 Sites including any additional sites that may be proposed for designation during the period of this Plan and protect the Natura 2000 network from any plans and projects that are likely to have a significant effect on the coherence or integrity of a Natura 2000 Site	<i>“This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects to the Natura 2000 network. No mitigation measures are relied upon to arrive at this assessment. This assessment is based upon the best available scientific evidence.”</i>
BI O6 Ensure an Appropriate Assessment Screening, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive Section 177A of the Planning and Development Act (2001-2022) or any superseding legislation and with DEHLG guidance (2009), is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest.	The AA screening by Openfield notes the following: <i>“This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects to the Natura 2000 network. No mitigation measures are relied upon to arrive at this assessment. This assessment is based upon the best available scientific evidence.”</i>
BI P3 Ensure that any proposal for 104 development within or adjacent to a Natural Heritage Area (NHA), Ramsar Sites and Nature Reserves is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Acts and the Habitats and Birds Directive including their habitats.	Please refer to BI P2 & BI O5 above.
BI O8 Require the preparation of an Ecological Impact Assessment (EclA) by a suitably qualified professional for proposals for development within or adjacent to a Natural Heritage Area (NHA) proposed Natural Heritage Areas (pNHA), to ensure the development is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Acts.	We refer the Planning Authority to the enclosed ECIA prepared by Openfield which states <i>“No impacts are predicted to occur to Natura 2000 sites (SACs or SPAs), principally due to the separation distance between the site and these areas. A full assessment of potential effects to these areas is contained within a separate Screening Report for Appropriate Assessment. Works will take place close to the Grand Canal pNHA however existing trees and riparian vegetation are to be retained. No direct disturbance to habitats at the canal will arise. There will be an increase in human traffic however this must be seen in the context of the existing urbanised environment. The canal in this location is already a valuable amenity for the people of Naas. No negative impacts will arise to</i>

Policies Objectives	Consistency
	<i>the biodiversity of the canal from this development.”</i>
BI P4 Ensure that any new development proposal does not have a significant adverse impact, incapable of satisfactory mitigation on plant, animal or bird species which are protected by law.	We refer the Planning Authority to the ECIA prepared by Openfield which states: <i>“Trees, hedgerows and rough vegetation (particularly with Brambles) provide suitable nesting habitat and mitigation will be required during the construction phase as all birds’ nests and eggs are protected under the Wildlife Act. Tree felling can impact upon bats which may be roosting in small spaces. The bat survey did not identify any roosts however it cautioned that felling of mature trees could result in roost loss.”</i>
BI O10 Ensure that any new development proposal does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2012, the Birds Directive 1979 the Habitats Directive 1992 and the Flora Protection Order species and any species listed under the national red lists or that could be listed on a national red list.	Response as per BI P4 above.
BI O11 Ensure appropriate species and habitat avoidance and mitigation measures are incorporated into all new development proposals.	We refer the Planning Authority to Section 6 of the ECIA prepared by Openfield which sets out appropriate mitigation.
BI O13 Require all applications for new developments to identify, protect and sensitively enhance the most important ecological features and habitats, and incorporate these into the overall open space network, keeping free from development and to provide links to the wider Green Infrastructure network as an essential part of the design process and by making provision for local biodiversity (e.g. through provision of swift boxes or towers, bat roost sites, hedgehog highways2, green roofs, etc.).	Response as per BI O11
BI O15 Prevent, in the first instance, the removal of hedgerows to facilitate development. Where their removal is unavoidable, same must be clearly and satisfactorily demonstrated to the Planning Authority. In any event, removal shall be kept to an absolute minimum and there shall be a requirement for mitigation planting comprising a hedge of similar length and species composition to the original, established as close as is practicable to the original and where possible linking to existing adjacent hedges. Native plants of a local provenance should be used for any such planting. Removal of hedgerows and trees prior to submitting a planning application will be viewed negatively by the planning authority and may result in an outright refusal	This proposal minimises any loss of green infrastructure where possible. Planting is provided throughout the development. This is detailed further in the landscape material provided by Landmark Design and in the Arborist Report prepared by The Tree File, included with the application.

Policies Objectives	Consistency
BI O16 Promote the integration of boundary hedges within and along development sites into development design so as to avoid “trapped hedges” located to the boundary of houses within the development layout. Encourage the planting of woodlands, trees and hedgerows as part of new developments and as part of the Council’s own landscaping works using native plants of local provenance.	This is detailed further in the Arborist Report prepared by The Tree File, included with the application.
BI O17 Require the undertaking of a comprehensive tree survey carried out by a suitably qualified arborist where development proposals require felling of mature trees; the tree survey shall assess the condition, ecological and amenity value of the tree stock proposed for removal as well as mitigation planting and a management scheme. It should be noted that rotting and decaying trees are an integral part of a woodland ecosystem and can host a range of fungi and invertebrates, important for biodiversity. While single or avenue trees that are decaying may be removed, others that are part of group or cluster may be subject to retention.	This is detailed further in the Arborist Report prepared by The Tree File, included with the application.
BI O18 Ensure a Tree Management Plan is provided to ensure that trees are adequately protected during development and incorporated into the design of new developments.	This is detailed further in the Arborist Report prepared by The Tree File, included with the application.
BI P7 Protect rivers, streams and other watercourses and, wherever possible, maintain them in an open state capable of providing suitable habitats for fauna and flora while discouraging culverting or realignment.	The water course to the north along the north of the site is maintained in an open state.
BI O21 Ensure the protection of rivers, streams and other watercourses and, wherever possible, maintain them in an open state capable of providing suitable habitats for fauna and flora while discouraging culverting or realignment. Endeavour to re-open previously culverted streams and watercourses through any future development/redevelopment proposals	The water course to the north along the north of the site is maintained in an open state. As set out on the Landmark Design Masterplan Additional planting is proposed to enhance biodiversity.
BI O22 Require the preparation and submission of an Ecological Impact Assessment (EclA) including but not limited to, bat and otter surveys for developments along river or canal corridors.	Dedicated bat surveys were carried out by Brian Keeley of Wildlife Surveys Ireland between June 2020 and September 2022, well within the optimal flight period. No bat roosts were recorded while five species were noted feeding or foraging.
BI O23 Consult with Inland Fisheries Ireland (IFI) and Waterways Ireland in relation to any development (greenfield development or redevelopment of brownfield sites) that could potentially impact on the aquatic ecosystems and associated riparian habitats while taking account of ‘Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites’ (IFI, 2004) and ‘Planning for	Consultation with IFI was undertaken by DOBA.

Policies Objectives	Consistency
Watercourses in the Urban Environment' (IFI, 2020).	
BI O24 Maintain riparian buffer zones and potential uses as identified in Table 12.4 when considering potential development and proposed development layouts within or adjacent to waterways.	Appropriate set backs have been incorporated into the design of the development.
BI O26 Require that expert advice is sought from a suitably qualified bat expert, in developing lighting proposals along river and stream corridors or other important locations or corridors for wildlife, to mitigate impacts of lighting on bats and other species. The use of artificial lighting shall be avoided in streamside zones (see Figure 12.2) and artificial lighting should be restricted unless absolutely necessary in the middle zone (See Table 12.4). LEDs should, where permitted, be warm white to minimise disturbance to wildlife.	Brian Keely provided advice in relation to the design of the proposed lighting scheme.
I O27 Ensure that any runoff from developed areas does not result in any deterioration of downstream watercourses or habitats and require that pollution generated by a development is treated within the development area prior to discharge to local watercourses.	The proposed design includes SUDs measures to ensure protection of surface water quality. Full details are provided in the Engineering Services Report, prepared by DOB that is submitted with this application under separate cover.
BI O30 Avoid developing walking/cycling trails through sensitive ecological habitats. A multi-disciplinary team including an ecologist and flood risk expert shall review all riverine sites to determine the appropriate zonation (ref Table 12.4) and permissible uses	The pedestrian cycle way in the southern part of the site was moved away from the Grand Canal as part of the design. The proposed development will ensure protection of green infrastructure on the subject lands. Works will take place within close proximity to the Grand Canal proposed Natural Heritage Area however existing trees and riparian vegetation are to be retained. As noted in Redkite Consulting EIA screening, there will be no negative impact on the canal from this development, <i>"No impacts on Natura 2000 sites or the Grand Canal pNHA are envisaged"</i> .

7.1.8 Landscape, Recreation and Amenity

Policies Objectives	Consistency
LR O1 Ensure that consideration of landscape sensitivity is an important factor in determining development uses. In areas of high landscape sensitivity the design, type and the choice of location of the proposed development in the landscape will be critical considerations	The design of the proposed development is set back from the Grand Canal with extensive areas of open space fronting onto same.
LR O2 Require a Landscape/Visual Impact Assessment to accompany proposals that are likely to significantly affect: • Landscape Sensitivity Factors; • A Class 4 or 5 Sensitivity Landscape (i.e. within 500m of the boundary); • A route or view identified in Map 13-2 or Map 13-3 (i.e. within 500m of the site boundary). • All	A Landscape and Visual Impact Assessment has been prepared by Mullin Landscape <i>"Whilst the proposals would result in some disruption to visual amenity (notably during the construction phase) it is considered that there are opportunities for beneficial amenity and biodiversity outcomes during the post construction phase of development."</i>

Policies Objectives	Consistency
Wind Farm development applications irrespective of location, shall be required to be accompanied by a detailed Landscape/Visual Impact Assessment including a series of photomontages at locations to be agreed with the Planning Authority, including from scenic routes and views identified in Chapter 13	
LR P2 Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place	See response to LR O2.
LR O25 Contribute towards the protection of waterbodies and watercourses, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains, from inappropriate development. This will include buffers free of development in riverine and wetland areas, as per chapter12.	The design of the proposed development is set back from the Grand Canal with extensive areas of open space fronting onto same.
LR O27 Ensure that the Streamside buffer zone (minimum of 10m plus) is kept free from development and existing vegetation is retained undisturbed to contribute to biodiversity and to ensure that bike paths and/or larger footpaths along rivers and streams are provided in the Middle buffer zone (15m-30m), in line with the Inland Fisheries Ireland's publication 'Planning for Watercourses in an Urban Environment – 2020 Update. Planting if required should be in keeping with the recommendations of the All-Ireland Pollinator Plan	The proposed development includes appropriate buffers and vegetation is to be enhanced adjacent to stream.
LR P3 Protect, sustain and enhance the established appearance and character of all important views and prospects.	A Landscape and Visual Impact Assessment has been prepared by Mullin Landscape. No particular negative impacts were identified in respect of important views and prospects.
LR O30 Avoid any development that could disrupt the vistas or have a disproportionate impact on the landscape character of the area, particularly upland views, river views, canal views, views across the Curragh, views of historical or cultural significance (including buildings and townscapes), views of natural beauty and specifically those views listed in Tables 13-5 and Table 13-6 of this plan	A Landscape and Visual Impact Assessment has been prepared by Mullin Landscape. Minor/moderate impacts were identified in respect of important views and prospects.
LR O32 Control development that will adversely affect the visual integrity of distinctive linear sections of water corridors and river valleys and open floodplains.	See LR O30, LR O27
LR O38 Ensure the biodiversity value of all sites are considered and protected in the development of outdoor recreational facilities including	An ECIA was prepared and is included with the planning application. Trees, hedgerows and natural features have been incorporated into the

Policies Objectives	Consistency
greenways through the preparation of an Ecological Impact Assessment which shall guide the location and design of such facilities.	design of the proposed development. The proposed cycle path and footpath which could form part of future greenway was moved away from the edge of the Grand Canal so as to ensure that the existing trees/biodiversity were maintained.
LR O51 Explore the feasibility of developing a greenway/cycle for amenity purposes, in cooperation with Waterways Ireland and Government Departments. (a) Naas to Corbally harbour (b) Corbally Harbour to Newbridge	The proposed footpath and cycle path could potentially link into a wider greenway along the canal.
LR O67 Ensure that new developments are compatible with the availability and size of passive and active open space and recreational facilities, i) within 10 minutes' walk from people's homes; ii) accessible to all, regardless of age, physical mobility, disability or social disadvantage, and iii) are in line with the Settlement Strategy and the 'Sustainable Development in Urban Areas: Guidelines for Planning Authorities,' (DEHLG, 2009)	The proposed development will provide open space which will be passively overlooked directly adjacent.
LR O68 Require the provision of good quality, well located and functional open space in new residential developments, including landscaping with native species and scale appropriate natural play areas to cater for all age groups	The proposed development includes a comprehensive landscape masterplan prepared by Landmark Design, which includes a series of high quality public and communal open spaces, which can cater for different age-groups. Some 46% of the site is open space.
LR O69 Ensure development proposals provide for hedgerow and woodland creation and augmentation within developments at the start of the construction phase and encourage the block planting of woodland and the joining up of hedgerows and woodlands between developments in order to support habitat creation, in so far as possible	The existing hedgerows will be augmented with additional planting as set out in the landscape masterplan prepared by Landmark Design
LR O70 Ensure that all development proposals include comprehensive landscaping schemes including trees, suitable to their environment and to require that the planting of same should either be carried out in full as part of Phase 1 for larger phased schemes or prior to the occupation of any units on the overall development site on all other schemes.	The proposed development includes a comprehensive landscape masterplan prepared by Landmark Design, which includes a series of high quality public and communal open spaces.
LR O84 Retain, where appropriate, areas adjacent to waterways as a linear park, particularly where these link into the wider open space network	The design of the proposed development is set back from the Grand Canal with extensive areas of open space fronting onto same. This area could link into lands either side to form a wider open space network.

Policies Objectives	Consistency
LR O87 Minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.	The lighting proposals were reviewed by Brian Keely (Bat expert) who recommended the lux levels etc., that were sensitive to bats.

7.1.9 Urban Design, Placemaking and Regeneration

Chapter 14 of the development plan envisages that future developments will ‘create vibrant and bustling towns and villages with a diverse mix of activities where residents benefit from inclusive, attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in’

Policy UD P1 aims to, *“Apply the principles of people-centred urban design and healthy placemaking as an effective growth management tool to ensure the realisation of more sustainable, inclusive, and well-designed settlements resilient to the effects of climate change and adapted to meet the changing needs of growing populations including aging and disabled persons”*.

Policy UD 01 Requires *“a high standard of urban design to be integrated into the design and layout of all new developments and ensure compliance with the principles of healthy placemaking by providing increased opportunities for physical activities, social interaction and active travel, through the development of compact, permeable neighbourhoods which feature high quality pedestrian and cyclist connectivity, accessible to a range of local services and amenities”*.

The proposed design achieves a high standard of design. The design incorporates public open spaces and a permeable street network, which seeks to increase accessibility and social interaction. There is a fully integrated pedestrian and cycle network with all the main landscape spaces connected to a universally accessible route. The location of the site is approximately a 10-15-minute walk to the town centre of Naas which has an abundance of local services and amenities.

“Policy UD 02 Ensure that town centres remain the focal point of their respective settlements by maintaining and enhancing their role as dynamic, attractive, resilient and inclusive environments, and as established destinations for commercial, retail, civic and recreational activities.”

The proposed development is a residential development which will not detract from the town centre. A small scale local commercial/ health/medical unit (c. 247.6 sq.m) is proposed to serve the local residents.

“UD 04 To require all proposals for multi-unit residential developments to demonstrate how the principles of ‘Crime Prevention Through Environmental Design’ have been considered and applied in the design layout of the proposed scheme.”

Full details of the open space strategy can be found in the material provided by C+W O’Brien Architects which is submitted in this planning pack.

It is noted policy UD A2 seeks to:

Prepare a series of Masterplans / Urban Design Frameworks over the lifetime of the Plan, in co-operation with relevant stakeholders, including but not limited to the following areas:

- The Northwest Quadrant, Naas
- The Canal Quarter, Naas
- Lands at Confey, Leixlip
- Dominican Lands, Athy
- Lands at St. Raphael's / Oakley Park, Celbridge
- Lands at Simmonstown, Celbridge
- Collinstown (Strategic Employment lands), Leixlip
- Collegelands (lands to west of Maynooth, adjoining Maynooth University and St. Patrick's College)

The subject lands are located within the Naas Northwest Quadrant. The Naas LAP clarifies that the Masterplan is only required for the Strategic Reserve lands and not the 'C – New Residential lands', which relate this application.

7.1.10 Residential Density and Building Heights/Contextual Approach to Building Height

Section 14.8.1 of the 2023-2029 County Plan sets out the approach to Residential Density and Building Heights. The net density of the proposed development is 59 uph. The 2023-2029 County Plan notes that:

"It is considered that the delivery of compact growth in a manner that is consistent with ministerial guidelines for both building heights and residential densities is, in the majority of instances, achievable in the county without the need to develop tall buildings. However, there are some cases where it may be appropriate to integrate taller buildings into the urban environment in order to maximise the most efficient and sustainable use of land at strategic locations or to create a certain level of interest and variety in the urban form."

In this regard *"the Council has adopted a contextual approach to building heights which integrates the specific provisions of the guidelines into the Plan whilst also directing the development of taller buildings into the most appropriate development locations within the county."*

Table 14.4 of the 2023-2029 County Plan provides an *"application of the Guidelines on Urban Development and Building Heights to a County Kildare Context."* With reference to *"Town Centres and major towns as identified in the NPF and RSES,"* Table 14.4 states:

"Sites located on key public transport corridors in urban areas,"

*In addition to above, the Guidelines require that Development Plans must actively plan for and bring about increased density and height of development within the footprint of developing sustainable mobility corridors and networks, particularly around key public transport interchanges or nodes. The Guidelines note that subject to design and planning considerations, there is scope to consider building heights in excess of 6 storeys on suitably configured sites, especially where there are particular concentrations of enabling infrastructure to cater for such development, and the architectural, urban design and public realm outcomes would be of very high quality. Such locations may include areas served by high-frequency public transport services (Dart+ and Bus Connects) and lands surrounding planned future transport nodes and transit-oriented development (TOD), including the following: • Lands at Confey, Leixlip • Lands west of Maynooth (adjacent to future train station) • **Lands in the***

Northwest Quadrant, Naas (adjacent to the bus only route from Naas Harbour to Millennium Park). (emphasis added).

The 2023-2029 County Plan notes that *“Increased building heights for developments will be required to be subject to site-specific and design quality appraisals which take into consideration the impact of taller developments on the existing urban fabric in order to ensure that such buildings integrate well with their surroundings. Accordingly, any new applications for development greater than 4 storeys shall address the development management criteria set out in paragraph 3.2 of the Urban Development and Building Heights Guidelines (2018) to enable the Planning Authority to assess the application comprehensively in relation to its local context.”*

It is an objective (UD012) of the Council to:

“Comply with the provisions of the Guidelines for Planning Authorities on Urban Development and Building Heights (2018) by providing for the following.

(a) Support increased building height and densities in appropriate locations, as outlined in Table 14.4, subject to the avoidance of undue impacts on the existing residential or visual amenities.

(b) Utilising increased building heights to support mixed use development, including downsizing opportunities and residential units that facilitate an adaptable layout to suit long term changes in homeowner requirements.

(c) In mixed use schemes, development proposals shall include details of the sequencing of uses to enable the timely activation of supporting infrastructure and services. New development greater than 4 storeys will be required to address the development management criteria set out in section 3.2 of the Urban Development and Building Heights Guidelines (2018).”

In response to the above, we refer the council to Section 6 above which addresses the development management criteria set out in section 3.2 of the Urban Development and Building Heights Guidelines 2018.

7.1.11 Development Management Standards

7.1.11.1 Apartment Development

Section 15.4.7 outlines that *“An apartment can be defined as a residential unit in a multi-unit building with grouped or common access. Planning applications for apartments shall be assessed against the Sustainable Urban Housing: Design Standards for New Apartments (2020) or any subsequent guidelines and the Urban Development and Building Height Guidelines (2018),”*

Sections 6.3 and 6.4 set out compliance with the Apartment Guidelines 2020 and the Building Height Guidelines 2018. Further detail on compliance is contained in the CWOB Housing Quality Assessment and Design Report.

7.1.11.2 Site Coverage

The proposed development has a site coverage of 29%. This is compliant with the standard as noted below.

“The maximum site coverage shall be 50% for residential development, 75% for industrial and 66% for retail and commercial development. Within town centre zones, the maximum site coverage shall be 80% for all development. Higher site coverage may be permissible in certain

limited circumstances such as: - adjacent to public transport corridors - to facilitate areas identified for regeneration purposes - areas where an appropriate mix of both residential and commercial uses are proposed'.

7.1.11.3 Plot Ratio

The subject site is in an Inner Suburban location. Inner suburban locations can have a maximum plot ratio of 1.0. The proposal has a plot ratio of 0.8 and thus complies with the plot ratio standards.

7.1.11.4 Separation Distances

A minimum separation distance of 22m between opposing above-ground floor level windows is required.

The proposed development provides for a minimum of 22 metres separation between directly opposing rear windows at first floor level. Full details can be found in the material by C+W O'Brien which is included within this planning application pack.

7.1.11.5 Daylight and Sunlight

The plan seeks high levels of daylight and sunlight within new residential developments The plan notes,

'All new developments are required to comply with the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.209, 2011) and British Standard (B.S.) 8206 Lighting for Buildings, Part 2, 2008: Code of Practice for Day Lighting or other updated relevant documents'.

The Proposed development provides for a high level of amenity. A sunlight and daylight assessment has been prepared by Chris Shackleton. Regarding the overall performance of the proposed development the report notes,

This report is in compliance with: "Site layout planning for daylight and sunlight a guide to good practice" - BR209". It also references EN 17037 and Annex NA (BS/EN 17037) as and where called for in the above BRE guidance document.

Change/Impact to neighbouring buildings in the adjoining residential areas.

Skylight- VSC

- 100% of the tested windows comply with the 27%, 0.8 ratio requirements for habitable rooms.
- The average change ratio for VSC is 0.95

Sunlight APSH & WPSH

- 100% of tested windows comply with the annual APSH and
- 100% with the winter WPSH requirements for sunlight or overall requirement.
- The average change ratio for sunlight is APSH:0.92 and WPSH: 0.90

Sunlight on the Ground SOG (Shadow)

- 100% of tested neighbouring amenity spaces pass the 2-hour test requirements for the 21st March.
- The average change ratio for shadow/sunlight is 1.00

Performance of the proposed design

Target Illuminance ET

- 91% of rooms comply with the BS/EN 17037 Annex NA room targets for 50% of the floor area tested.
- 97% if we include marginal rooms
- The average complaint areas achieving the relevant target Lx for
 - all bedrooms is 94% and
 - all Living/Kitchen spaces 65%
 - both are well in excess of the required 50%

Sunlight to rooms:

- 70% of the preferred Living rooms receive 1.5hrs of sunlight on the test day of the 21st March
- 89% of apartments, however, will receive BRE qualifying sunlight (Appendix 1).
- This is generally consistent with the BRE defined “careful layout design” 80% target.

Sunlight on the Ground SOG (Shadow)

- 100% of the Communal & Public Amenity spaces pass the relevant requirements
- These spaces are well served by sunlight with results of 87% & 90% well in excess of the 50% target.

The application generally complies with the recommendations and guidelines of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice BR209 (Version 3, 2022) and EN 17037 and Annex NA (BS/EN 17037) as and where called for in the above BRE guidance document.

Regarding the impact on skylight availability to neighbours the report notes,

“100% of the tested windows comply with the 27%, 0.8 ratio requirements for habitable rooms. The average change ratio for VSC is 0.95.”

The shared central space receives excellent daylight coverage and is well in excess of the minimum standard. The report notes that,

“100% of the Communal & Public Amenity spaces pass the relevant requirements These spaces are well served by sunlight with results of 87% & 90% well in excess of the 50% target”.

7.1.11.6 Design statements

The planning Authority requires that a design statement be provided in proposals for more than 10 no. units plus.

C+W O'Brien Architects has prepared a design statement which is submitted as part of this application pack.

7.1.11.7 Development Capacity

The 2023-2029 County Plan notes the following with regard to development capacity,

‘Applications for residential development in urban areas will be required to comply with the principles of compact growth and demonstrate that they will contribute to the overall consolidation of the settlement’.

The proposed development is situated on underutilised lands approximately 500-650m from Naas town centre via Abbey Bridge and 1.3km from Ploopluck Bridge. The design achieves a sustainable density of c.59 uph within close proximity to the town centre which achieves compact growth.

7.1.11.8 Residential Density

The development plan sets out standards on Table 3.1 within chapter 3. For Inner suburban sites the density is '*site specific*'.

The development achieves a progressive density of c.59 uph and is considered appropriate.

7.1.11.9 Housing Mix

The plan requires a '*Statement of Housing Mix*' and that all proposals comply with HO O 16.

Section 8 of this report provides a housing mix statement.

Additionally, HO O16 requires that new residential developments provide for a wide variety of housing types, sizes and tenures. The proposal includes a range of amenity spaces, home sizes and typologies to meet the needs of a wide range of residents. These include a mixture of houses, 2 storey apartments and apartment units. The variety of units will accommodate a diverse mix of inhabitants varying in age, life stage, mobility and family unit size. The proposed development offers a variety of units across the site to encourage an inclusive and varied community. It consists of 22 no. 1 bedroom apartments, 77 no. 2 bedroom units, and 35 no. 3 bedroom units.

7.1.11.10 Naming of Residential Developments

The 2023-2029 County Plan notes the following:

“All applications for residential development shall provide for the naming of residential developments in the following manner:

- *Three potential names that reflect local heritage shall be submitted as part of a planning application.*
- *The three names shall be submitted in both Irish and in English.*
- *There should be a brief description of the source and reason for the proposed name of the development having regard to the Council's Naming of New Residential Developments (2018).*
- *Avoid names already used in the county but particularly, in the local area”.*

In the event of a receipt of planning permission, the names will be put forward by the applicant to be agreed with the Planning Authority prior to marketing the development.

7.1.11.11 Taking in Charge of Residential Developments

A taking in charge plan has been prepared by C+W O'Brien Architects. The plan notes that the local authority will take in charge of 18.151.22 sq. m of land. This comprises the internal road structure and public open spaces which includes the greenway path. Please refer to drawing no. 0112.

7.1.11.12 Social Infrastructure Audit

Residential developments of more than 20 no. units are required to undertake a social infrastructure audit to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents.

A Community and Social Infrastructure Audit has been prepared by John Spain Associates and is submitted with this application. The Audit confirms that there is sufficient community infrastructure within the local area to accommodate the needs likely to be generated by the proposed development.

7.1.11.13 Childcare Facilities

The development plan notes the following in relation to childcare facilities,

“The Council will seek to facilitate the provision of high-quality childcare facilities in appropriate locations throughout the county and may require their provision in large residential, public community, commercial, and retail developments”

The proposed development does not provide for a childcare facility. A creche assessment has been undertaken within the Community and Social Infrastructure Audit and provides the justification on the omission of a creche within the proposed development.

7.1.11.14 Public Open Space for Residential Development

The plan outlines the following with regard to open space,

“Open space shall be provided within the development site as follows: • On greenfield sites, the minimum area of open space that is acceptable within the site is 15% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 8%. • On institutional sites a minimum requirement of 20% of the site area may be required. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 10%. • In all other cases, public open space should be provided at the rate of 15% of the total site area (at a minimum). This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 6%.”

The proposed development provides for 46% of public open space and thus meets and exceeds the standards as noted above.

7.1.11.15 Private Open Spaces – Gardens, Terraces, Balconies

Private open space requirements as set by the Development Plan and Apartment Guidelines are met and exceeded by the various typologies.

The minimum private open space standards for Apartments are outlined below:

Table 7.8: Private Open Space Standards

Unit Type	Private Open space
Studio	4m ²
One Bedroom	5 m ²

Two Bedrooms	6 m ²
Three Bedrooms	7 m ²
Four Bedrooms or more	9 m ²

The proposed development meets and exceeds the minimum standards as outlined on Table 7.6 above.

7.1.11.16 Cycle Parking

The Kildare County Development Plan bicycle parking requirement for apartments is 1 space per bedroom & 1 visitor space per 2 apartments. This equates to a requirement of 201 no. bicycle parking spaces.

The proposed development provides for 388 no. bicycle parking spaces and exceeds the minimum requirement.

7.1.11.17 Car Parking

Car parking standards are set out in Table 15.9 of the 2023-2029 County Plan. This notes that 1.5 spaces per unit + 1 visitor space per 4 apartments. This equates to a requirement of 235 no. car parking spaces.

The proposed development provides for 201 no. car parking spaces. Please refer to section 6 which justifies reduced car parking rate.

7.1.11.18 Surface Water

The management of surface water for the proposed development has been designed to comply with the policies and guidelines outlined in the Greater Dublin Strategic Drainage Study (GDSDS) and with the requirements of Kildare County Council.

The Sustainable Urban Drainage System (SuDS) comprises of nature-based solutions, infiltration solutions and filtration solutions. Full details of surface water can be found in the Engineering Services Report and drawings prepared by DOB which is submitted in this pack.

7.2 Naas Local Area Plan 2021-2027

The following section provides a statement setting out how the proposed LRD has had regard to the relevant objectives of the local area plan.

At a special meeting of Kildare County Council on 21st October 2021, the Elected Members adopted the Naas Local Area Plan 2021 - 2027. The Naas Local Area Plan 2021 - 2027 came into effect on 1st December 2021 and replaced the previous 2011-2017 Naas Town Development Plan.

7.2.1 Compliance with Core Strategy

The Aim of the Naas LAP core strategy is,

“To accommodate 14.9% of Kildare’s target housing in Naas, the County Town, and Key Town, in accordance with the Kildare County Development Plan’s Core Strategy”.

The core strategy of the Naas LAP seeks to create long term sustainable growth within the settlement of Naas. According to the LAP, consolidation and infill development underpin the development strategy in the Plan *“in line with achieving Strategic Objective No. 1 (Compact Growth) of the National Planning Framework (NPF). National Policy Objective (NPO 3c) of NPF requires that at least 30% of all new housing units (2,394) must be delivered within the existing built-up footprint of the town (Figure 3.2 refers). The required 30% of the housing units is 718.”*

Furthermore, the LAP states that *“Due to the nature of the settlement boundary that defines the built-up area of the town and the emphasis on delivering sequential and compact growth the additional land required to meet the remaining unit target will be achieved within the CSO defined settlement boundary (see Figure 3.2) or contiguous to the boundary, representing appropriate consolidation of the built-up area.”*

Compliance with relevant policies and objectives from the core strategy are noted below.

“Policy CS1 – Compliance with the Core Strategy It is the policy of the Council to support the sustainable long-term growth of Naas in accordance with the Core Strategy of the Kildare County Development Plan 2017-2023 (as varied), or any subsequent plan, the provisions of the National Planning Framework (2018) and the Regional Spatial and Economic Strategy 2019-2031.”

The subject lands are located sequentially with regard to the development of the town being located adjacent to the town centre and existing development, to the west and east and south. This land holding is located approximately 1.3km from the town centre via Poopluck Bridge and c.500 -650m via Abbey Bridge.

“CSO 1.1 Support and facilitate compact growth through the sustainable intensification and consolidation of the town centre and established residential areas.”

The proposed development lies on underutilised residentially zoned land and is located within close proximity to Naas town centre. The development of 134 no. units at this location will achieve a sustainable growth with a density of c.59 uph.

“CSO 1.2 Monitor the scale, type, tenure and location of constructed and permitted developments in Naas during the lifetime of the Plan and apply appropriate development

management standards to ensure compliance with the Core Strategy to achieve the delivery of strategic plan-led and coordinated balanced development within the town.”

The proposal includes a range of amenity spaces, home sizes and typologies to meet the needs of a wide range of residents. These include a mixture of houses, 2 storey apartments and apartment units. The variety of units will accommodate a diverse mix of inhabitants varying in age, life stage, mobility and family unit size. The proposed development offers a variety of units across the site to encourage an inclusive and varied community. It consists of 22 no. 1 bedroom apartments, 77 no. 2 bedroom units, and 35 no. 3 bedroom units). Furthermore 15 no. units will be provided for social housing.

The Core Strategy outlines the projected housing target for Naas up until 2027. The plan notes that 2,394 no. housing units will be required for the lifetime of the Naas LAP.

7.2.2 Residential Capacity

The LAP notes that the site at Finlay Park (C3) has an estimated capacity of 40-60 uph. The Naas LAP estimates that this site can accommodate between 112 - 168 no. units.

The proposed development of 134 no. units is appropriate given the estimated capacity. The proposed development has a net density of c. 59 uph which is within the recommended guidance as stated within the LAP.

7.2.3 Land Use Zoning

The subject site is prescribed with two land use zonings ‘C’ and ‘F’.

C New Residential – ‘To provide for new residential development’.

A dwelling is a “*permitted in principle*” use under the land use zoning matrix. A health/medical unit is an “*open to consideration*” use.

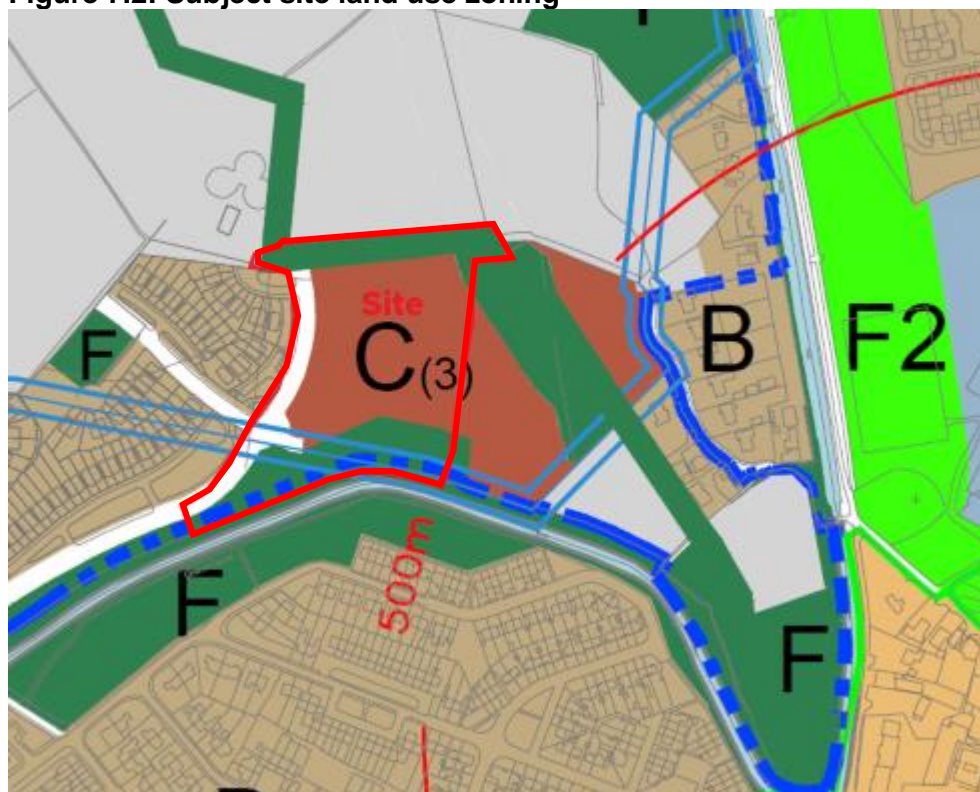
F Open Space and Amenity – ‘To protect and provide for open space, amenity and recreation provision’.

A ‘park’ is a “*permitted in principle*” use under the land use zoning matrix.

Land uses designated under each zoning objectives as ‘*Permitted in Principle*’ are generally acceptable, subject to compliance with those objectives as set out in other chapters of this Plan.

According to the LAP, Not Normally Permitted (N) Land uses which are indicated as ‘Not Normally Permitted’ in the Land Use Zoning Matrix are uses which will not be permitted by the Council / local authority, except in very exceptional circumstances and where it can be demonstrated and justified that the development does not contravene Section 28 Ministerial Guidelines. This may be due to its perceived effect on existing and permitted uses, its incompatibility with the policies and objectives contained in this Plan or that it may be inconsistent with the proper planning and sustainable development of the area.

For ‘Other Uses’ Proposed land uses not listed in the matrix will be considered on the merits of the individual planning application, with reference to the most appropriate use of a similar nature indicated in the table and in relation to the general policies and zoning objectives for the area.

Figure 7.2: Subject site land use zoning

7.2.4 Housing

The Naas LAP envisages the development of additional high-quality homes under a range of tenures to create vibrant and diverse communities. The plan has an aim,

‘To facilitate and deliver liveable, high-quality, nearly zero-energy, integrated residential development that provides for an appropriate demographic mix in tandem with the delivery of good social and physical infrastructure to support the development of vibrant and diverse communities’.

Compliance with relevant policies and objectives relating to the proposed development are noted below.

“HCO 1.1 Support new residential development and infill development that occurs in tandem with the delivery of supporting physical and social infrastructure.”

The proposed development lies on underutilised residentially zoned land and is located within close proximity to Naas town centre. The development of 134 no. units at this location will achieve a sustainable growth with a density of c.59 uph.

“HCO 1.7 Require all Strategic Housing Development applications, or applications for 100 residential units or more, to include an assessment of how the development connects to high-capacity sustainable transport services and measures proposed to improve this.”

A Transport Assessment has been prepared by Systra. This assessment is included within this application pack.

“HCO 1.8 Require all new housing developments to deliver safe areas for children to play as part of the public open space provision, in accordance with standards for new developments set out in the Kildare County Development Plan.”

The proposed development provides for a safe area of public open space. Full details of the public and communal open spaces can be found in the material by C+W O’Brien Architects which forms part of this planning pack.

“Policy HC2 - Residential Density, Mix and Design It is the policy of the Council to ensure that all new residential development provides for a sustainable mix of housing types, sizes and tenures and that new development complements the existing residential mix.”

The proposal includes a range of amenity spaces, home sizes and typologies to meet the needs of a wide range of residents. These include a mixture of houses, 2 storey apartments and apartment units. The variety of units will accommodate a diverse mix of inhabitants varying in age, life stage, mobility and family unit size. The proposed development offers a variety of units across the site to encourage an inclusive and varied community. It consists of 22 no. 1 bedroom apartments, 77 no. 2 bedroom units, and 35 no. 3 bedroom units. Furthermore 15 no. units will be provided for social housing.

“HCO 2.4 To apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use or for a mixture of residential and other uses (save where the development is exempt from the provisions of Part V).”

The applicant has entered into initial discussions with the Housing Department of Kildare County Council in respect to Part V. The applicant agrees to accept a condition on a grant of planning permission, if the council is minded to approve the proposed development, which requires the applicant to enter into a Part V agreement with Kildare County Council as per their requirements prior to the commencement of development. The applicant is proposing to provide 15 no. units.

The proposal relates to an overall 11% provision in respect of Part V.

“HCO 2.5 Promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency in traditional buildings. All new buildings will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).”

The building design and distribution of massing and footprints maximises daylight, optimising solar gain and reducing energy demands for heating. All dwellings within the proposed development are designed to provide a high level of energy efficiency by achieving a minimum BER A2 rating furthermore reducing the need for energy demands.

“HCO 2.7 To comply with the Special Policy Planning Requirements (SPPRs) for apartment standards and building heights issued under Section 28(1) of the Planning and Development Act 2000 (as amended).”

The proposed development complies with SPPRs for apartment and building heights. Refer to section 6.67 - 6.106 within this report.

Section 4.4 of the plan provides guidance on height within Naas. The plan notes that there will be no limitations on new development in Naas.

'Having regard to the requirements outlined, this Plan does not propose to place any height limitations on new development in Naas. Also, in keeping with the provisions set out in SPPR 1 the town centre has been identified for the possible location of taller buildings''.

'Taller buildings can, in circumstances where they are well-designed and sited, make a positive contribution to an urban setting, however, particular care must be taken when making such interventions in a town with such a rich historic fabric as Naas which is also an Architectural Conservation Area (ACA).'

7.2.5 Social Infrastructure

The following policy is noted:

"HCO 3.2 Require the provision of appropriately located and purpose-built early learning and childcare facilities to meet the pro-rata childcare needs of housing development during the plan period. Childcare facilities will be required, by a condition of planning permission, to be developed within the first phase of any new residential development."

A creche assessment has been undertaken as part of the Community and Social Infrastructure Audit (including schools and childcare), which is included with the application, which found that sufficient capacity exists in the area.

7.2.6 Transport & Movement

The following policies are noted:

"MTO 4.1 Apply the parking standards in the Kildare County Development Plan, and relevant Section 28 Guidelines, to all applications for planning permission in Naas. Dispensations will only be considered in exceptional circumstances and having regard to location, proximity to key public transport routes, heritage and urban design context."

MTO 4.3 Ensure that all new proposed developments make provision for the use of electric vehicles through a significant increase in the provision of clearly and exclusively designated electric car charging points on public and private land in partnership with ESB and other relevant stakeholders and landowners."

The proposal provides for 201 no. car parking spaces. 13 no. Electric vehicle charging points are provided throughout the proposed development. Please refer to the material prepared by C+W O'Brien Architects.

7.2.7 Green Infrastructure – New Developments

The LAP seeks to:

"NE 5.4 Ensure new development proposals have regard to the future function and variety of open spaces with a view to making provision for new areas of biodiversity, tree planting and / or pollinator friendly planting."

It is further noted that section 10.7.2 of the LAP outlines that "Due to the sensitivity of the area – in terms of flood risk and significant tree groups, etc.- approximately 25% (minimum) of land holdings where development is proposed will be required for public open space and amenity (including green infrastructure and nature-based solutions to flood risk management)."

The proposed development will provide 46% (1.04 ha) of open space throughout the site.

7.2.8 Flood Risk

The SFRA of the LAP has recommended that development proposals for several areas within the Plan area should be the subject of Site-Specific Flood Risk Assessment. The subject lands are located substantially outside the areas identified as potential flood risk and for a flood risk assessment. An SSFRA has been completed by JBA and notes the following,

The Flood Risk Assessment was undertaken in accordance with *'The Planning System and Flood Risk Management'* guidelines and confirms that the proposed development is appropriate from a flood risk perspective and is in agreement with the core principles of the planning guidelines.

7.2.9 Northwest Quadrant

The subject lands are located on a sequentially located site adjacent to the established Finlay Park residential development, which is within the overall Northwest Quadrant. The Vision for the Northwest Quadrant is to provide a sustainable low carbon urban district north of Naas Town. Policy NWQ1 – Northwest Quadrant states:

"It is the policy of the council to ensure that the lands located within the Northwest Quadrant (NWQ) are developed in a sustainable manner and the future development strategy should recognise the strategic location of the lands proximate to the existing town centre and the unique opportunities presented by the unique environmental and landscape features.

Objectives: It is an objective of the Council to:

NWQ 1.1 Require the preparation of a masterplan (to be developed in conjunction with relevant environmental/flood risk/transport assessments) for the NWQ giving full consideration to the type and intensity of development relative to future transport options and in particular public transport. The masterplan shall be subject to the considerations and specifications outlined in the Urban Development Strategy detailed in Chapter 10, to ensure that the future development of the Northwest Quadrant takes place in a co-ordinated and integrated manner.

(a) No development shall take place on the lands identified within the Northwest Quadrant (zoned Strategic Reserve) until such time as a masterplan is prepared and integrated into the Naas Local Area Plan by way of a statutory amendment to the Local Area Plan, pursuant to Section 20 of the Planning and Development Act 2000 (as amended)⁴.

(b) No masterplan shall be completed until the OPW Flood Study has been finalised for the lands in the Northwest Quadrant.

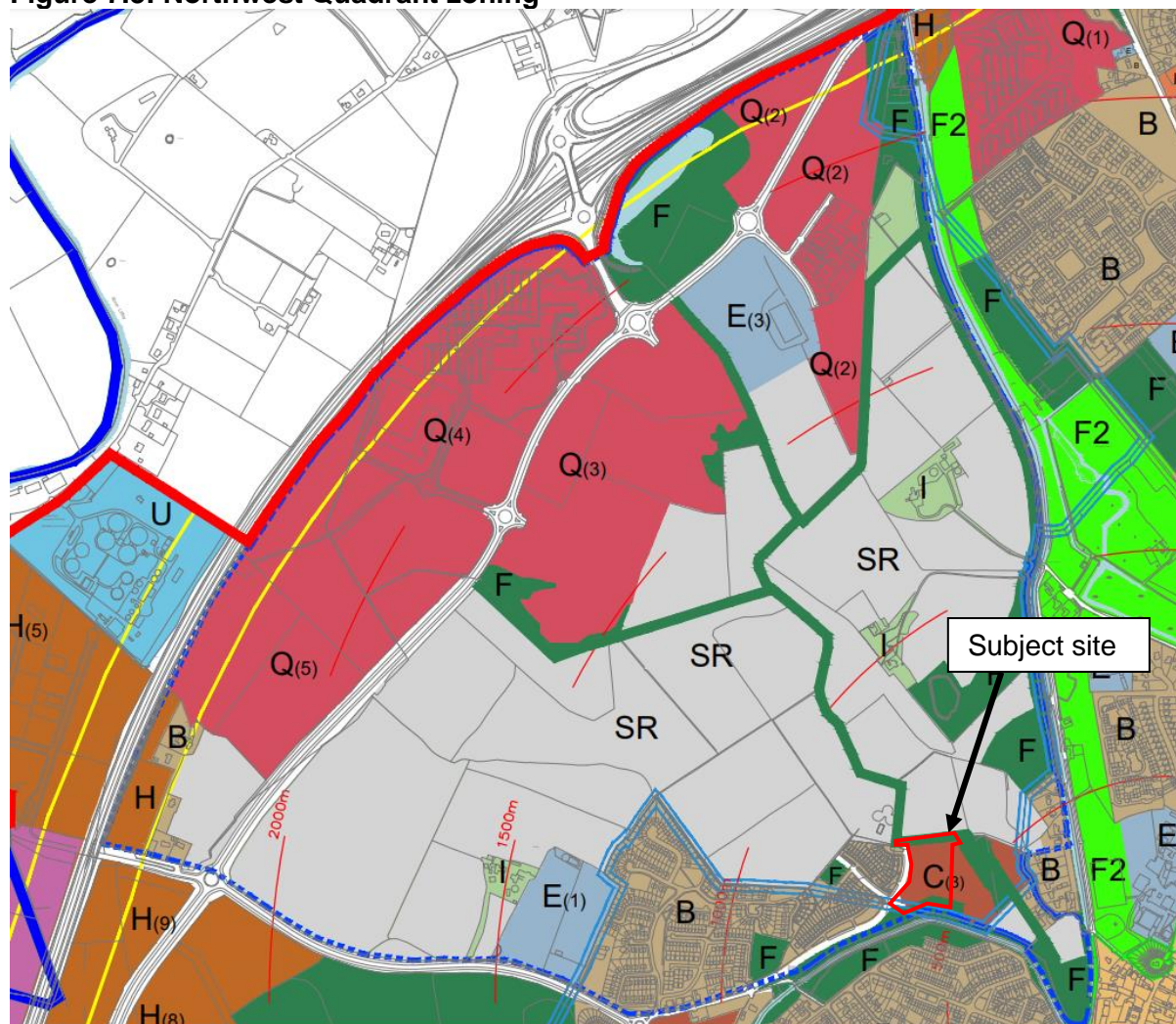
(c) The masterplan shall include (but not be restricted to):

- i. A phasing infrastructure programme including physical, social, transport and economic infrastructure.*
- ii. Site-Specific Flood Risk Assessment for the masterplan lands.*
- iii. Transport Impact Assessment.*
- iv. Water and wastewater network requirements including assessments regarding the capacity of receiving environments.*
- v. Associated Environmental Assessments and appropriate climate proofing measures.*
- vi. A surface water management plan, to review the storm water network and identify areas for SuDS solutions.*

⁴ The development of New Residential lands shall not prejudice the preparation of the Northwest Quadrant masterplan including the transport objectives.

With reference to the above, it is noted that the Masterplan is only required for the Strategic Reserve lands and not the 'C – New Residential lands', which relate this application. Figure 7.5 below illustrates the location of the subject C zoned lands in the context of the wider SR zoned lands. It is also noted that the subject lands are not dependent on the OPW Flood Study (as it relates to the wider Strategic Reserve lands and not the new residential lands).

Figure 7.3: Northwest Quadrant zoning

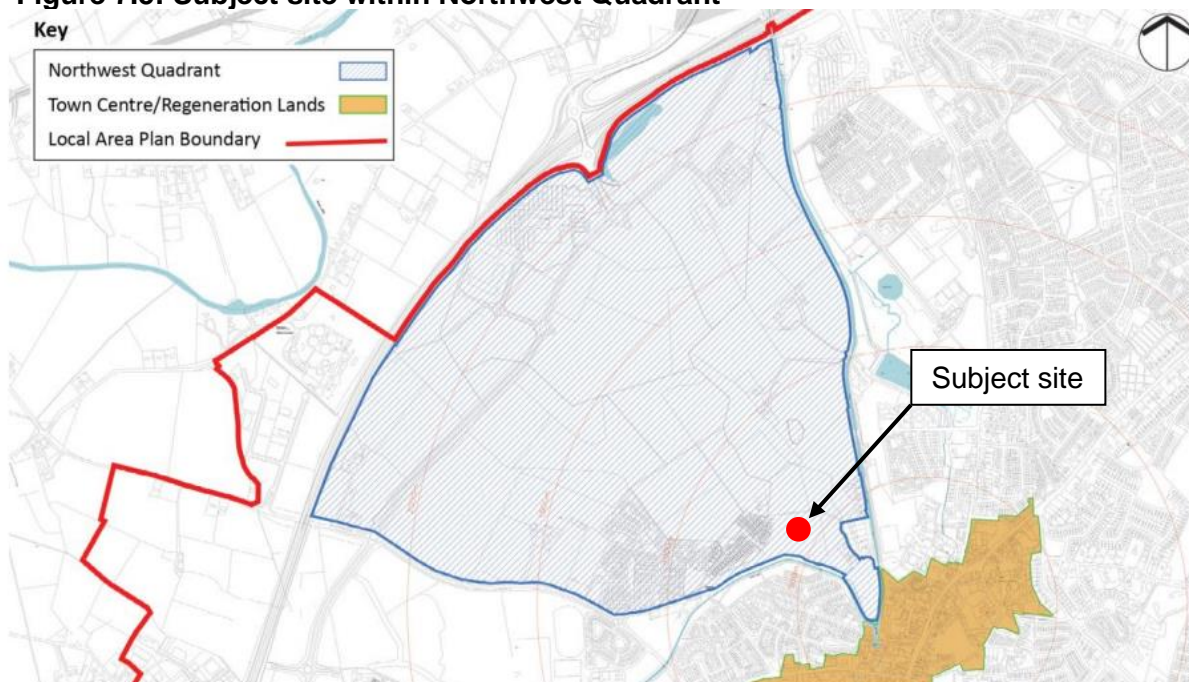


In relation to note the footnote attached to the objective, the proposed development will use the existing infrastructure roads constructed as part of the Finlay Park residential development and as such the development will not have a bearing on the overall street network structure/layout of the future masterplan. As noted above the site of the development site is also located outside any flood risk assessment.

The wider proposals on the Westar lands have been designed to cater for the future public transport link and will deliver this as part of a future development.

The subject site does not require any facilitating infrastructure such as link roads from the distributor road and the new M7 motorway Junction 9a. It will tie into the Old Caragh Road which the applicant in conjunction with KCC has upgraded.

The LAP notes that a secondary school is currently under construction at Millennium Park and the overall area, closer to the town centre, will also be expected to cater for a new primary school. In addition, within and adjoining the town centre there are two primary schools and

Figure 7.5: Subject site within Northwest Quadrant

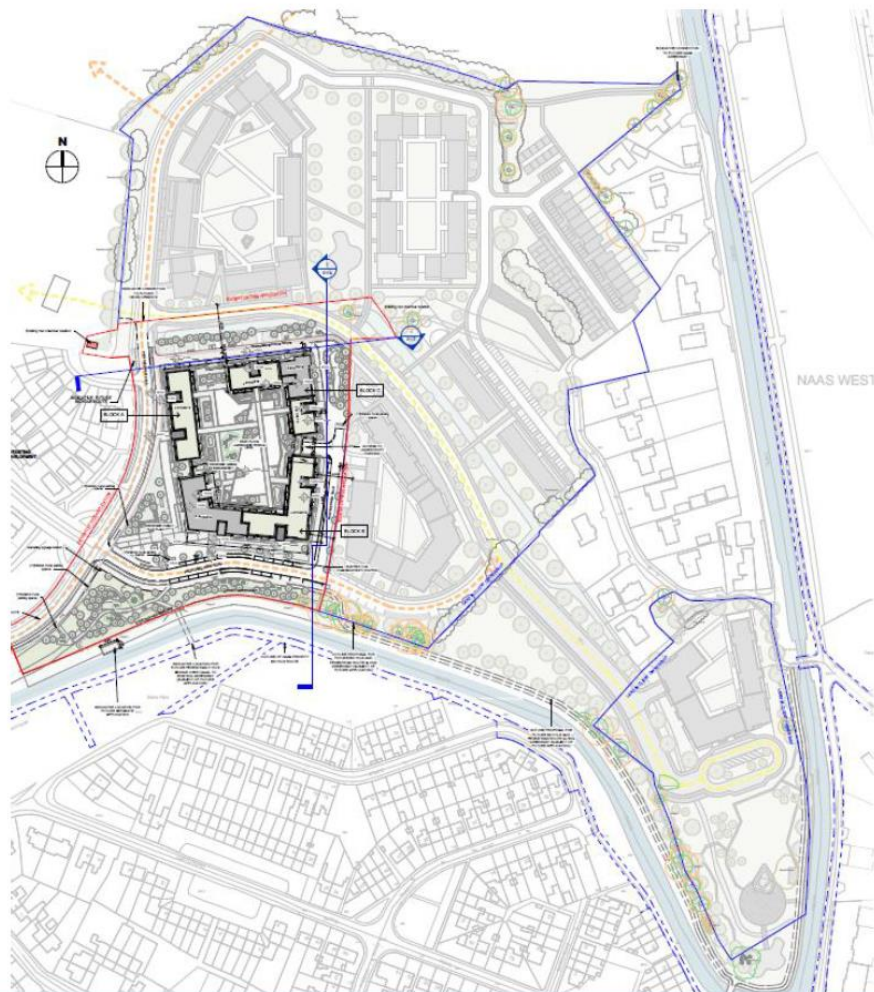
Source: Naas Local Area Plan 2021-2027

'Policy NWQ 1 – Northwest Quadrant It is the policy of the council to ensure that the lands located within the Northwest Quadrant (NWQ) are developed in a sustainable manner and the future development strategy should recognise the strategic location of the lands proximate to the existing town centre and the unique opportunities presented by the unique environmental and landscape features'.

The proposed development will provide 134 no. units on sequentially located residential lands. The town centre is within close proximity to the subject site as illustrated on Figure 7.7 which makes this location ideal for additional housing units. KCC are to soon appoint consultants for masterplan preparation of the Northwest Quadrant and this review is to include review of bus-only link to decide ultimately if it will be bus only or shared.

7.3 Appendix 1 Maps

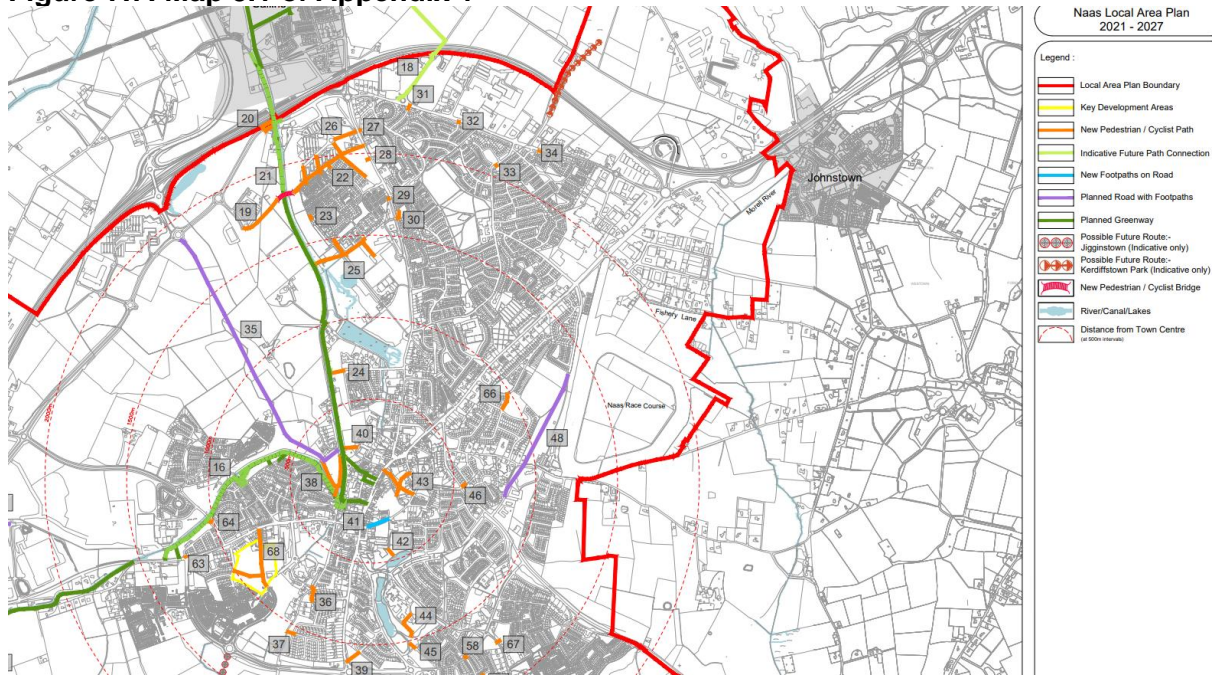
Appendix 1 of the Naas LAP provides a series of Maps which have a range of indicative objectives which relate to the subject site. Figure 7.8 below illustrates the wider masterplan for the Finlay Park lands. This masterplan shows an indicative route from the town centre to Sallins which provides for pedestrian, cycle, and road users. This indicative route provided complies with the objectives on the maps.

Figure 7.6: Finlay Park Indicative Masterplan

Source: C+W O'Brien

Map 5.1 of Appendix 1 is shown below on Figure 7.7. This Map shows the requirement for a planned road with footpaths (purple line). As shown on Figure 7.6 there is flexibility to allow for a road with footpaths through the proposed masterplan. A future bridge connection over the Grand Canal will allow Naas town centre to be connected to Sallins via the Northwest Quadrant.

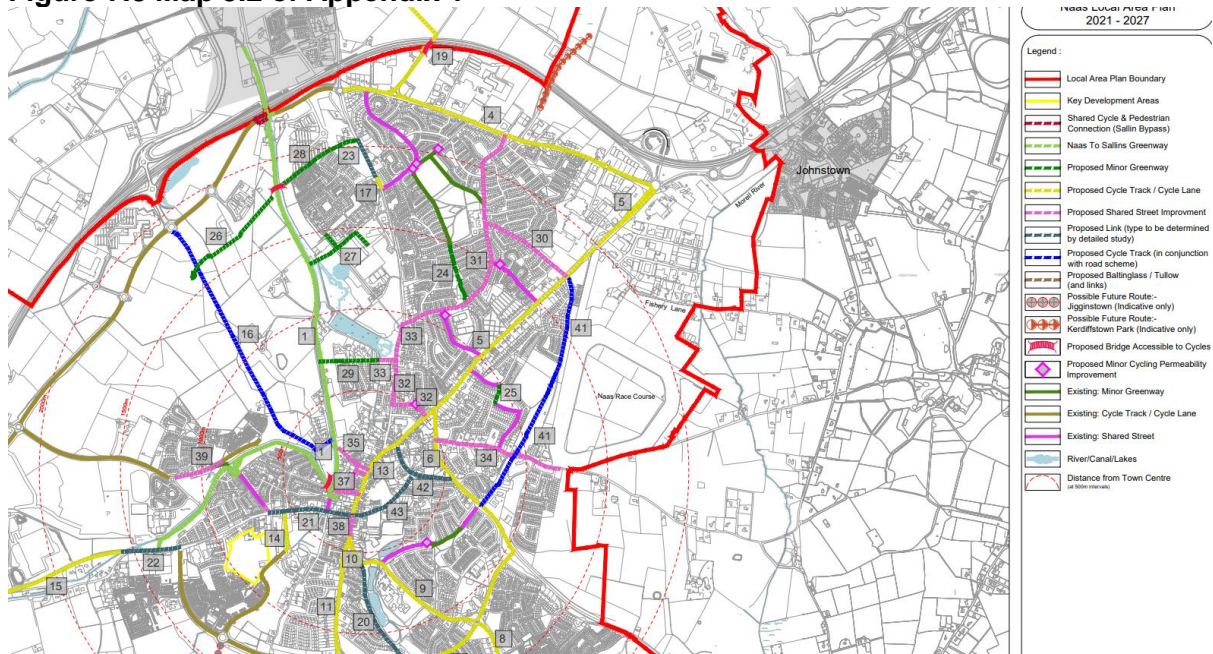
Figure 7.7: Map 5.1 of Appendix 1



Source: LAP

Regarding Figure 7.8 below the blue line through the subject lands is an indicative route for a future proposed cycle route. A Proposed cycle lane is to be provided along eastern side of Old Caragh Road, and allowance for future connection south-east to harbour area.

Figure 7.8 Map 5.2 of Appendix 1



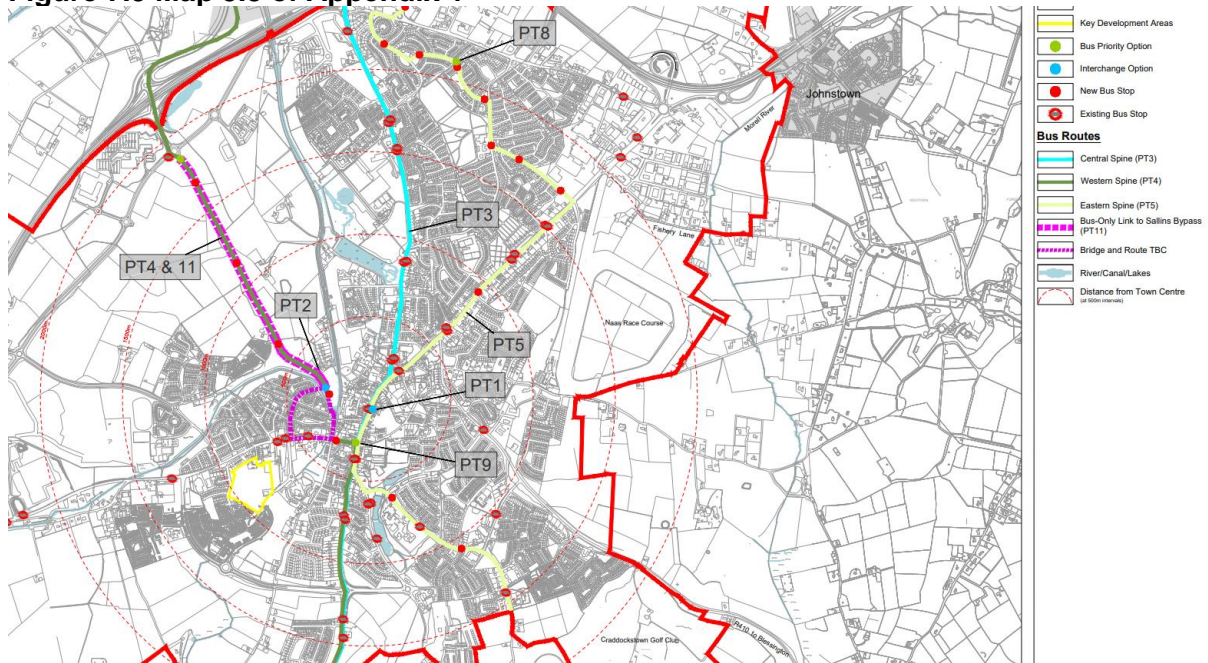
Source: LAP

Figure 7.8 contains PT2, PT4 and PT11 objectives which relate to the subject site. Systra has addressed these points within Table 8 of their Transport Assessment. This is noted below on Table 7.9.

Table 7.9: Response to Map 5.3 of Appendix 1

Action	Description	Accommodation under Finlay Park Masterplan
PT2	<p>The proposed interchange is a longer term aspiration to support the Northwest Quadrant.</p> <p>The interchange proposals would require a new 'Bus only' road bridge between the town centre and the site, over the canal, for local buses to serve the hub. The exact location of which would need to be determined by future study. The interchange would be supported by PT11, which would allow intercity and regional buses to access the M7 without being impacted by town centre congestion.</p>	<p>The proposed Masterplan layout, although not showing a bus interchange, does not preclude future bus access across the canal at the Harbour, and could accommodate a bus interchange if required.</p> <p>Provision has been made for a bus route through the north of the development site, which would link into the interchange.</p>
PT4	<p>An indicative route to serve the Northwest Quadrant. This would run from the Piper's Hill school complex to the south of Naas, through the town centre, proceed through the Finlay Park site (on PT 11, a 'Bus only' section), serve the rail station, pass through the west of Sallins, and terminate at the train station.</p> <p>Long term (6-10 years)</p>	<p>The development proposals allow for a future bus route through the site, which would loop around the north of the buildings and link the potential harbour interchange with lands to the north. This would join Old Caragh Road at a crossroads, which would likely be signalised to provide bus priority.</p>
PT11	<p>A 'bus only' link to connect the PT2 bus interchange with the Millennium Link Road and the new M7 Junction. This would form part of PT4.</p> <p>Long term (6-10 years)</p>	<p>The development allows for future connection. Further Council-led studies may be required to identify whether this link will be suitable for general traffic, as well as buses.</p> <p>SYSTRA would note that the projected frequency of four buses per hour would not typically justify the need for dedicated bus only infrastructure.</p>

Figure 7.9 Map 5.3 of Appendix 1

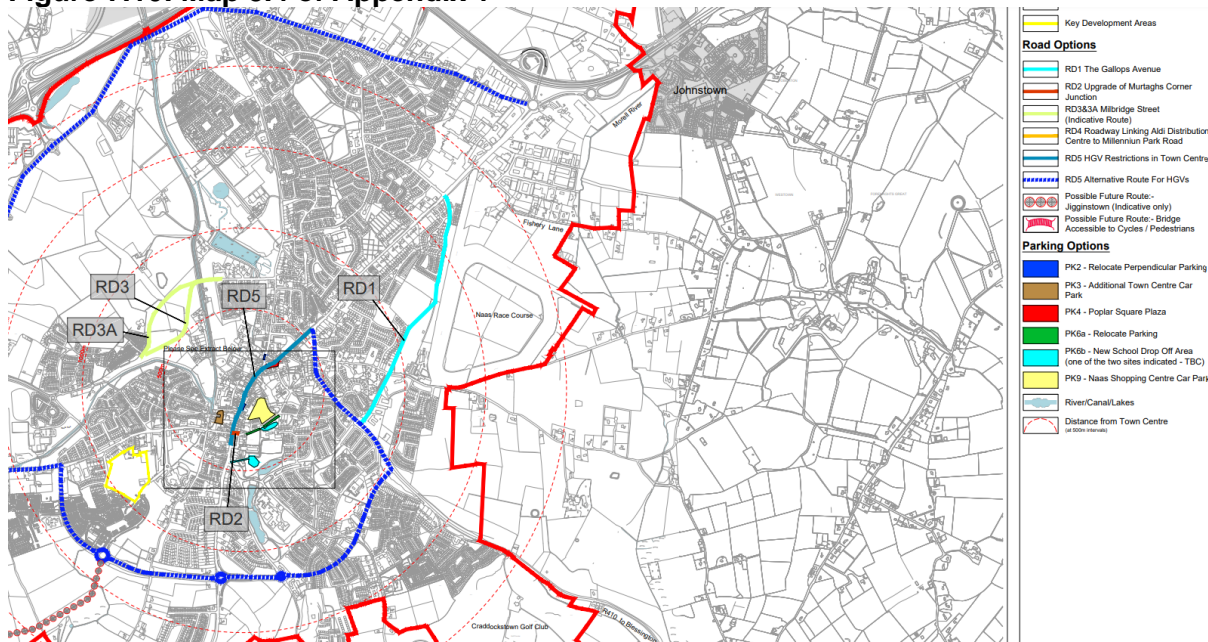


Source: LAP

Figure 7.10 below illustrates the indicative Millbridge Street objective. RD3 seeks the creation of Millbridge Street, a road connection from Old Caragh Road to Millbridge Way, providing connectivity between R409 Caragh Road and the R407. Systra notes the following with regard to RD3 Millbridge,

“The development proposals assume that Old Caragh Road, will form part of RD3, accommodating pedestrians, cyclists, and private vehicles. To the north of the site, RD3 will continue in a northeasterly direction towards Millbridge Street”.

Figure 7.10: Map 5.4 of Appendix 1



Source: LAP

7.4 Naas Sallins Transportation Strategy

Kildare County Councils 'Naas Sallins Transport Strategy' (2020) identifies several transport schemes that have a bearing on the Finlay Park site; including transport corridor proposals which utilise Finlay Park lands to provide local and regional connectivity.

As part of the Baseline Report (September 2020) of the Naas Sallins Transportation Strategy, the strategic nature of Client's lands (as KDA West) was highlighted as follows:

*"The draft LAP identifies two Key Development Areas (KDA's): Naas West (west of town centre) and KDA: Rathasker Road West (Devoy Link Road), as illustrated by Figure 2.4 and Figure 2.5 respectively. Each KDA comprises strategic greenfield lands for sequentially developed new housing. **The movement and transport connections within each development must provide linkages to the surrounding Naas network. Therefore these KDA's are core material considerations to the development of Naas' Transport Strategy.**" (JSA Emphasis Added).*

Figure 7.11: Potential bus route through clients landholding

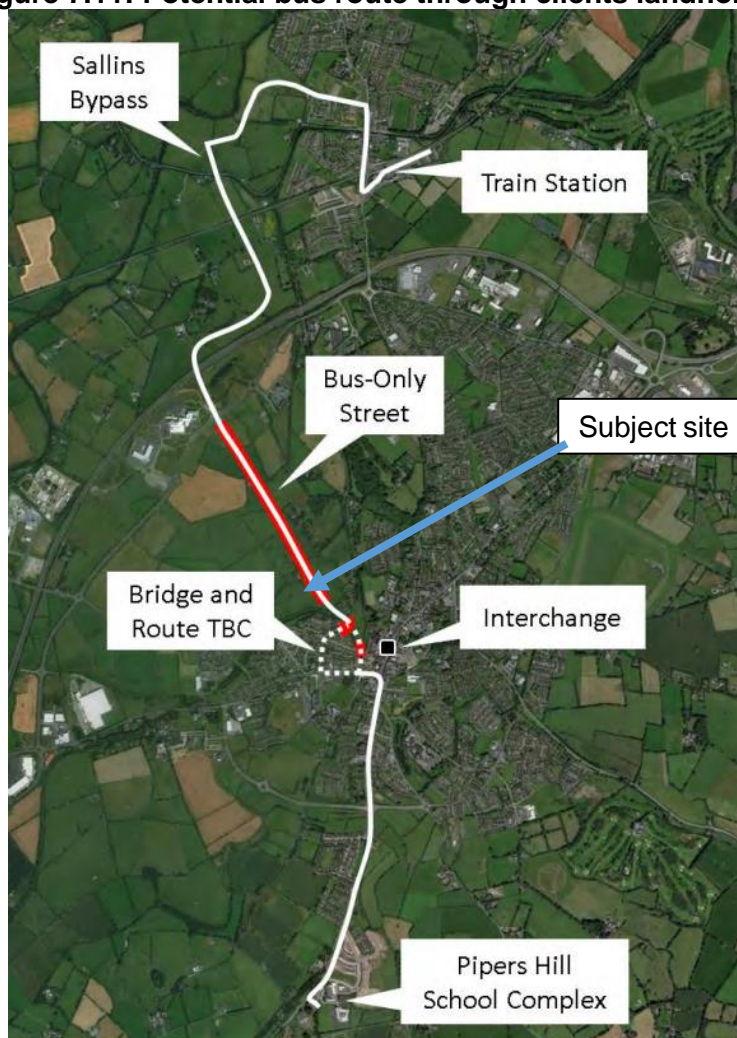


Figure 8.13 Option 2: Western Spine – Local Bus Route

The Naas Sallins Transport Strategy' (2020) identifies several transport objectives that will be channelled through our client's lands, these include:

- PT2 – A Bus Interconnection at Naas Harbour;

- PT4 – Western Spine – Local Bus Route;
- PT 11 – Bus link to Sallins Bypass;
- RD3 – Millbridge Street road link;
- C1 – Naas to Sallins Greenway;
- C16- Northwest Quadrant link road cycle route.

It is clear that the transport strategy for Naas and Sallins considered our clients lands as strategically placed to provide linkages of Naas town centre via our client lands to the lands at the Northwest Quadrant and Sallins. The development of our client's landholding will ensure that a portion of the public transport link will be provided on our client's lands as part of a development proposal. The Finlay Park access strategy has been developed to integrate with the longer-term aspirations of the Naas Sallins Transport Strategy.

The main aspects of the access strategy can be summarised as follows:

'Vehicle access to the development would be taken from a new priority junction on an extended Old Caragh Road, which would run along the western boundary of the development. Old Caragh Road would be constructed to the same standard and specifications as the upgraded section that serves Phase 1 of Finlay Park. It will form part of the NSTS RD3 proposal, and cater for vehicle, pedestrian and cycle movements.

*An **emergency access** for vehicles (if required) would be provided via Ploopluck Bridge over the Grand Canal to the west, to the south of Old Caragh Road.*

*The plans would allow for a future **Bus Route** from the identified PT2 Harbour Bus Interchange to connect into Old Caragh Road to the north of the buildings. The PT4 / PT11 Bus Route would use this link to continue onwards towards the Millennium Link Road. Subject to a future demand analysis, perhaps as a planning condition, bus stops could be incorporated into the design of the development roads.*

*The main **cycling route** will run along the east side of Old Caragh Road, and then pass east along the northern boundary of the site, with the potential to link up to future connection south-east towards the town centre. The site plan shows an outline proposal for a new pedestrian and cycle link running along the north bank of the Grand Canal, and identifies two indicative locations for future pedestrian / cycle bridges that would provide cross-canal access'.*

The proposed development allows for suitable vehicle access as noted within the MMP prepared by Systra.

The proposed development acknowledges the need for emergency access. A letter from ProFire outlines how the proposal complies with fire safety regulations to ensure fire emergency access meets the requirements.

The proposal has been designed to allow for a future bus route to connect Naas to Sallins via lands within the Northwest Quadrant.

The cycle network will link up to the existing cycle way along the Old Caragh Road. Furthermore, the completion of the greenway will allow greater connectivity to Naas town centre and the Naas/Sallins greenway.

7.5 Kildare County Development Plan (2017-2023) including Variation no. 1

The following section constitutes a statement setting out how the proposed LRD has had regard to the relevant objectives of the development plan in whose area or areas the proposed LRD would be situated.

7.5.1 Core Strategy and Settlement Strategy

On 1st February 2017 Kildare County Council, made the Kildare County Development Plan covering the period 2017-2023 for its functional area (“2017 Plan”). Variation No 1 of the Kildare County Development Plan was adopted by the elected members on the 09th of June 2020.

Naas is identified as a Key Town in the 2017 Plan. Key Towns are identified as ‘Large towns which are economically active that provide employment for their surrounding areas. High quality transport links and the capacity to act as regional drivers to complement the Regional Growth Centres’. Naas is identified as a primary economic growth town to be promoted for regional enterprise. In these key towns critical mass is a core objective for economies of scale to justify strategic infrastructure provision.

The core strategy notes that:

*“Naas and Maynooth are identified as Key Towns. They have the potential to accommodate commensurate levels of population and employment growth, facilitated by their location on public transport corridors and aligned with requisite investment in services, amenities and sustainable transport. **The growth of the Key Towns will require sustainable, compact and sequential development and urban regeneration in the town core.**” (emphasis added)*

The 2017 Plan notes that Key Towns (of Naas and Maynooth) “have the potential to accommodate commensurate levels of population and employment growth, facilitated by their location on public transport corridors and aligned with requisite investment in services, amenities and sustainable transport. The growth of the Key Towns will require sustainable, compact and sequential development and urban regeneration in the town core.”

It is the policy of the Council to: “CS 5 Support the development of the identified Key Towns of Naas and Maynooth and the Self-sustaining Growth Towns of Leixlip and Newbridge as focal points for regional critical massing and employment growth.”

The housing unit allocation for Naas, set out in the Development Plan (as varied), provides for 898 no. units over the period 2020-2023.

Figure 7.12: Dwelling Target 2020-2023

Settlement Type	Towns / Villages	2016 Census Pop	2016 Dwellings	Allocated Growth (%) 2020-2023	NPF 2026 Pop Growth in persons	NPF 2026 Pop Growth in housing units	Population Growth 2020 to 2023 (annualised from 2026 NPF Figures) ⁵	Dwellings Target 2020 to 2023
Key Town	Maynooth (MASP ²)	14,585	5,171	10.9%	4,291	1,533	1,839	657
	Naas	21,393	7,726	14.9%	5,866	2,095	2,514	898

Source: Table 3.3 Variation no. 1

With reference to the dwelling targets, we would note that the following SHD developments have been permitted since early 2020 in Naas.

- 307258-20 – 152 no. apartments – permitted 17/9/2020
- 313276-22 – 219 no. units – permitted 14/10/2022

Separately it is noted a 314 no. unit SHD (305701-19) was permitted prior to the adoption of variation no. 1 so does not contribute to the figures. With the development at Devoy Road recently permitted under 313276 the permissions granted (371 no.) is still well below the core strategy figure of 898 no. dwellings to 2023.

The core strategy (variation no. 1) outlines that:

“The RSES also requires that much closer attention is paid to actual delivery, taking the steps that may be necessary to implement strategic planning aims, housing delivery in the immediate term and above all, avoid the hoarding of land and/or planning permissions. The zoning of lands will, therefore, through site specific infrastructural assessments, take account of the likelihood of the lands being developed and their capacity to deliver population growth targets within the lifetime of the development plan.”

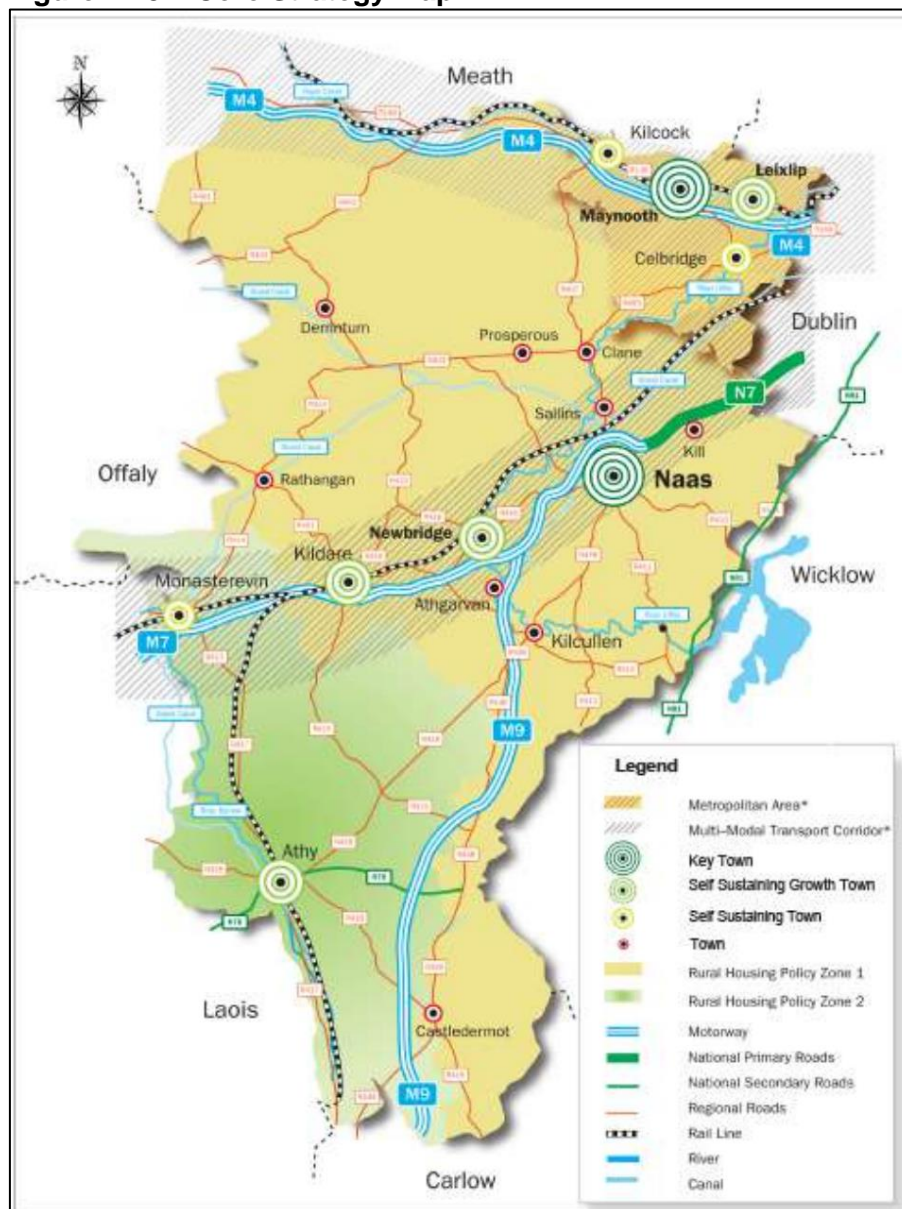
With reference to the above, it is outlined that there is no guarantee that all of the extant permissions will be delivered. This is particularly so in relation to lands to the east of the town which have an extant permission (PRR 15/1060 for c. 385 no. units) but which is dependent on the delivery of the Inner Relief Road. The subject lands are located sequentially with regard to the development of the town being located adjacent to the town centre and existing development, to the west and east and south.

7.5.2 Policies: Settlement Strategy

According to the 2017 Plan, the preferred development strategy has been informed by RSES and the environmental sensitivities of the county noting: *“It is based on building strong urban centres while protecting the rural hinterlands. The focus is on achieving: - Critical mass in the Metropolitan Area Strategic Plan (MASP) area (Maynooth, Leixlip, Celbridge, Kilcock) and in the Key Towns of Naas and Maynooth;*

In reference to Objective CS1 *“to Provide new housing provision in accordance with the County Settlement Hierarchy.”* and CS2, which seeks to *“Direct appropriate levels of growth into the designated growth centres and moderate sustainable growth towns”*, the proposed development will provide 134 no. dwelling units in a designated Key Town – in the settlement hierarchy, which is identified as an appropriate location for additional housing. In relation to Objective CS4, which seeks to *“deliver sustainable compact urban areas through a plan-led approach which requires delivery of a least 30% of all new homes that are targeted in these settlements to be within their existing built-up footprint.”* the lands are zoned for residential and open space use as part of the Naas LAP 2021-2027 and will deliver a sustainable and compact urban area.

Figure 7.13 – Core Strategy Map



Source: Kildare Development Plan

Table 7.10 – Evaluation of the Proposed Development in terms of Settlement Strategy Policies

Policies/Objectives	Consistency
<p>SS 1 Manage the county’s settlement pattern in accordance with the population and housing unit allocations set out in the RSES, the Settlement Strategy and hierarchy of settlements set out in Table 3.1.</p>	<p>The proposal will provide 134 no. apartments which is in accordance with the allocated 898 no. dwellings identified for the period 2020-2023.</p> <p>With reference to the dwelling targets, we would note that the following SHD developments have been permitted since early 2020 in Naas.</p> <p>307258-20 – 152 no. apartments – permitted 17/9/2020 313276-22 – 219 no. units – permitted 14/10/2022</p>

Policies/Objectives	Consistency
	Separately it is noted a 314 no. unit SHD (305701-19) was permitted prior to the adoption of variation no. 1 so does not contribute to the figures. With the development at Devoy Road recently permitted under 313276 the permissions granted (371 no.) is still well below the core strategy figure of 898 no. dwellings to 2023.
SS 2 Direct growth into the Key Towns, followed by the Self-Sustaining Growth Towns and the Self-Sustaining Towns, whilst also recognising the settlement requirements of rural communities.	The subject lands are located within the Key Town of Naas which is identified at the top of the settlement hierarchy and considered appropriate for a residential development of 134 no. dwellings.
SO 1 Support the sustainable long-term growth of the Key Towns (Naas and Maynooth) and the area to the north-east of the county located within the MASP and zone additional lands, where appropriate, to meet the requirements of the Core Strategy and Settlement Hierarchy of this Plan.	The subject lands are located in the Key Town of Naas with is at the top of the settlement hierarchy, appropriate for a residential development of 134 no. dwellings. This will help meet the dwellings target of 898 units to 2023.
SO 9 Sequentially develop lands within towns and villages in accordance with the Development Plan Guidelines, DEHLG (2007) including any updated guidelines and deliver at least 30% of all new homes that are targeted in settlements within their existing built-up footprint (defined by the CSO).	The subject lands are residentially zoned and sequentially located on a greenfield site located within close proximity to Naas town centre.

7.5.3 Policies: Sustainable and Integrated Communities

Policies CS9, CS10 and CS11 are relevant regarding the proposed development,

‘CS9 *Promote and facilitate the development of sustainable communities through land use planning, by providing for land uses capable of accommodating employment, community, leisure, recreational and cultural facilities having regard to the quality of the environment, including the natural environment, landscape character and the archaeological and architectural heritage*

CS10 *Ensure that developments are accessible to and meet the needs of all individuals and local community groups’.*

In relation to the above, the proposed development will provide a mix of uses with the overall subject lands which will provide employment, create new vibrant communities, as well as providing leisure and community space within a permeable ‘green sustainable transport network’ which will allow for existing and future pedestrian and cycle connections through the subject site, which is in accordance with policies CS9 CS10 of the 2017 Plan.

‘CS11 *Seek the delivery of physical and community infrastructure including strategic open space and recreational areas in conjunction with high quality residential developments to create quality living environments.’*

With reference to CS11, the proposed development will deliver significant physical infrastructure with a wider planning gain to the town by providing new pedestrian links and significant open space.

7.5.4 Consistency with Housing Policies and Objectives

Table 4.1 of the CDP identifies sites as either 'Town Centre / Brownfield, Inner Suburban, Outer Suburban In close proximity to public transport or Outer Suburban Remote from public transport'.

It is noted Inner Suburban/Infill sites as set out in the Kildare County Development Plan are described as follows:

"The existing built fabric of large towns often contains residential areas where additional dwellings can be accommodated without compromising the existing residential amenity or residential character of the area. The provision of additional dwellings within inner suburban areas of towns can be provided either by infill or by sub-division. Infill residential development may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. Sub-division of sites can be achieved where large houses on relatively extensive sites can accommodate new residential development without a dramatic alteration in the character of the area or a negative impact on existing residential amenities. Sub-division shall be considered subject to safeguards regarding residential amenity, internal space standards, private and public open space, car parking and maintenance of the public character of the area."

It is considered that the site is classified as an 'Inner Suburban' having regard to the following:

- Site's location on appropriately zoned lands proximate to Naas Town Centre (c. 500-650m to the south east)
- Site's location within the Naas Town Development Plan Boundary,
- Site's location close to existing and future transport connections;
- Proximity to town centre and its amenities and facilities;

Objective LDO 1 aims to: "Ensure that the density of residential development maximises the value of existing and planned physical and social infrastructure and makes efficient use of zoned lands in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009). LDO 3 Require higher residential densities at appropriate locations as set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)."

The proposed density and mix of units including the apartments and 2 storey apartments will assist in the delivery of a sustainable number of units within the overall 'C' zoned lands, which are located close to the town centre and its associated amenities. As such the proposed development is consistent with policies as noted on Table 7.11. The proposed development seeks to deliver an appropriate density (c. 59 units per hectare net) and form of residential development which is in accordance with the overall density provisions for residential land in respect of the Kildare CDP.

7.5.5 Consistency with Housing Policies and Objectives

Table 7.11 – Evaluation of the Proposed Development in terms of Housing Policies

Policies/Objectives	Consistency
HC 1 Support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.	The proposal will provide 134 no. dwellings with supporting infrastructure, which will provide a residential amenity area as well as areas of open space to support future residents. The proposal provides for a greenway and a commercial/health/medical unit.
HCO 2 Encourage appropriate densities for new housing development in different locations through the local area plan process while recognising the need to protect existing residential communities and the established character of the area.	The proposed development provides for a net density of 59 uph and a gross density of 47 uph, which is appropriate for this inner suburban site.
HCO 3 Ensure that all new urban development is of a high design quality and supports the achievement of successful urban spaces and sustainable communities.	The layout proposes a high-quality design and provides a series of success urban spaces and character areas, along with including sustainable pedestrian and cyclist connections to the town centre and its amenities.
HCO 4 Require the submission of a design statement with planning applications that incorporate 10 or more residential units.	We refer the Local Authority to the enclosed C+W O'Brien Architects Design Statement.
HD 1 Ensure that all new residential development within the county is of high-quality design and complies with Government guidance on the design of sustainable residential development and urban streets.	The proposal is of a very high-quality design in accordance with DMURS. We refer the Local Authority to the enclosed DMURS compliance statement prepared by DOB Consulting Engineers.
HDO 1 Ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the companion Urban Design Manual- A Best Practice Guide, DEHLG (2009).	The SRD 2009 and Urban Design Manual have been to the forefront in the design of the Proposed Development as set out in the C+W O'Brien Design Report and Section 6.1 of this report. The location of the site on an inner-suburban area, close to the town centre, will result in future residents of the development, located proximate to existing services (retail, childcare etc.). The proposal can be readily absorbed into the local community infrastructure (as outlined above and in the JSA Community and Social Infrastructure Audit (including schools and childcare)
HDO 2 Ensure that residential development provides an integrated and balanced approach to movement, place making and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DEHLG (2013).	The proposal is of a very high-quality design integrated into the existing pedestrian and cyclist infrastructure along with the cycle spaces provision and reduced car parking will encourage a sustainable and balanced approach to movement. In addition, the streetscape design will provide an appropriate urban edge, to encourage a reduction in car speeds, in accordance with DMURS. We refer the Board to the enclosed DMURS compliance statement prepared by DOB Consulting Engineers.
HDO 3 Encourage appropriate design and densities for new residential development while recognising the need to protect existing residential communities and the established character of the area. Where appropriate, local area plans may incorporate additional guidance	See HCO 2 above.

Policies/Objectives	Consistency
in the form of design briefs for important, sensitive, or larger development sites	
LD 1 Promote residential densities appropriate to its location and surrounding context.	See HCO 2 above.
LDO 1 Ensure that the density of residential development maximises the value of existing and planned physical and social infrastructure and makes efficient use of zoned lands in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)	The proposed density and mix of units including the apartments and 2 storey apartments will assist in the delivery of a sustainable number of units within the overall 'C' zoned lands, which are located close to the town centre and its associated amenities. The proposed development seeks to deliver an appropriate density (c. 59 units per hectare net) and form of residential development which is in accordance with the overall density provisions for residential land in respect of the Kildare CDP.
LDO 3 Require higher residential densities at appropriate locations as set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).	See HCO 2 above and 6.1 of this document.
MD 1 Ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the county in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual to support a variety of household types	The Proposed Development provides for an acknowledged need for apartments in national strategic guidance such as the National Planning Framework as well as a mix of apartments and two storey apartments (across 1-bed, 2-bed, and 3-bed configurations).
MDO 1 Require that new residential developments provide for a wide variety of housing types, sizes, and tenures	A mix of apartments is proposed in studio 1-bed (16%), 2-bed (58%) and 3-bed units (26%) in a range of sizes. Part V housing will also be provided.
MDO 3 Require that applications for residential or mixed-use development with a residential element are accompanied by a Statement of Housing Mix, in accordance with Table 17.3, to address the mix of dwelling types proposed. The Statement of Housing Mix should demonstrate a need for such accommodation, based on local demand and the demographic profile of the area.	See section 8 of this report – Statement of Housing Mix.
HCO 2 Apply a 10% social housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use, or for a mixture of residential and other uses.	Proposal includes for a 11% Part V provision details of which are submitted with this application. A Part V pack is submitted which includes costings and units to be transferred to the local authority.
HCO 8 Ensure that an appropriate mix of housing types and sizes is provided in each residential development.	See section 8 of this report – Statement of Housing Mix.
SNO 2 Ensure the housing mix of new residential schemes takes account of the needs of older people in terms of appropriately designed, located, and sized units.	Proposal includes ground floor units which can cater for the needs of older people. These units are appropriately designed to achieve high levels of sunlight while providing good levels of privacy.
DL 1 Promote a high quality of design and layout in new residential developments and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.	See HCO 3
DLO 1 Create high quality living environments for residents in terms of individual dwelling units and	See HDO1 as well as Section 6.1 and 6.3 of this report.

Policies/Objectives	Consistency
the overall layout, design and function of the developments through the implementation of the standards set out in Chapter 17 Development Management Standards and the principles set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the companion Urban Design Manual – A Best Practice Guide (2009) and the Design Standards for New Apartments Guidelines for Planning Authorities (2015).	
DLO 3 Support dwellings that are designed to be sufficiently adaptable to enable people to live comfortably through different stages of their lives and changing household needs.	See MDO 1 and Design Statement prepared by C+W O'Brien Architects.
DLO 4 Promote the carrying out of basic habitat assessments to inform the design of new developments in order to ensure that proposals for development integrate the protection and enhancement of green infrastructure, biodiversity and landscape features (including trees and hedgerows) where possible and minimise adverse impacts on existing habitats (whether designated or not), by including mitigation and/or compensation measures, as appropriate.	The application documents submitted include an AA Screening Report, Ecological Impact Assessment, an EIA Screening Report, Bat Assessment, and an Arboricultural Assessment all of which have informed the design of the layout proposed.
DLO 5 Develop typologies for adaptable housing types that meet the life cycle needs of communities having regard to CSO socio-demographic data.	Proposal includes ground floor units which can cater for the needs of older people. These units are appropriately designed to achieve high levels of sunlight while providing good levels of privacy. Furthermore the proposal provides for a mix of 1, 2 and 3 bedroom units which cater for a wide demographic.

The proposed development will include 2 storey apartments and apartments close to the town centre which are key to meeting policies on Table 7.12 insofar as they have the potential to cater for a broad range of dwellings to cater for different sections of society, which the above policies/objectives are seeking to achieve.

The design objectives of the design team have been to provide a scheme of high architectural merit which will respond to its immediate context – all to create an attractive and sustainable and 'walkable' living environment, through the incorporation of local facilities in the local hub adjacent to the new residential area, and which is also within walking distance of the town.

7.5.6 Objectives: Public, Private and Semi-Private Open Space

Table 7.12 – Evaluation of the Proposed Development in terms of Open Space

Policies/Objectives	Consistency
OS 1 Ensure that all dwelling units have access to high quality, functional private open space that is carefully integrated into the design of new residential developments	The Proposed Development provides private open spaces in the form of balconies for all of the apartment types within the scheme.
OSO 1 Ensure that all private open spaces for dwellings, apartments and duplexes are designed in accordance with the standards set out in the Guidelines for Planning Authorities on Design Standards for New Apartments (2015), the Guidelines for Planning Authorities on Sustainable Residential Development in Urban	All of the proposed apartments meet the requirements as set out in the Apartment Guidelines in respect of communal and private open space. See C+W O'Brien Housing Quality Assessment and Sections 6.2 and 6.12 above.

Policies/Objectives	Consistency
Areas and the companion Urban Design Manual – A Best Practice Guide (2009).	
PS 1 Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that enhances the visual character, identity, and amenity of the area.	A clear hierarchy of open spaces are provided from the enhanced landscaping. Communal open space is provided within the centre courtyard and public open space is included primary to the south and west of the proposed development. The landscape scheme is set out in the Landscape Masterplan prepared by Landmark Design Landscape Architects and included with this application.
PSO 1 Ensure that public and semi-private open space in new residential development complies with the quantitative and qualitative standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and in Chapter 17 of this Plan.	The proposal includes 39% public open space and the required communal open space for the apartments (964 sq. m. required and 4,265 sq. m. provided).
PSO 2 Ensure that there is a clear definition between public, semi-private and private open space and that all public and semiprivate open spaces benefit from passive surveillance from residential development.	The layout provides a clear delineation between the public, semi-private (communal) and private open space through careful design (e.g. planting). The apartment buildings will provide a high degree of passive surveillance and overlooking of the open space areas, including that fronting onto the Grand Canal.

With reference to policies OSO1 & PSO1, seeks that the quantitative and qualitative standards of the development comply with the SRD Guidelines. Table 17.7 of the Kildare CDP the proposed development includes for a range of open space types which are in accordance with the requirements of the Development Plan.

The proposed development will also provide for a connected series of public and communal open spaces measuring c. 10,437 sq. m. and provides easy and enjoyable access to all. It is therefore considered that the proposed design and layout of the overall development provides for a high quality safe and enjoyable area to reside. Additional open space areas are available elsewhere within the scheme.

It is proposed to provide c. 1.04 hectares of open space, which comprises c. 46% of the site. Communal open space is provided internally within the blocks of c. 4,265 sq. m.

7.5.7 Car Parking

The proposed development provides for 201 no. undercroft and surface car parking spaces. Car parking is to be in accordance with Table 17.9 of the development plan. Under this requirement the proposed development would need to provide for 235 no. spaces⁵. However, the plan provides for reduced car parking rates dependant on a range of factors. The plan notes the following,

‘Additionally, the maximum provision of parking should not be viewed as a target. Lower rates of parking may be appropriate at certain sites. In determining this, the Council will have regard to the proximity of the site to public transport.

– The proximity of the site to the town centre and services that fulfil day-to-day needs;

⁵ 1.5 spaces per unit + 1 visitor space per 4 apartments (134 X 1.5 = 201. 134/4 = 33.5 Total =235)

The subject site is located c. 500-650m from the town centre of Naas via Abbey Bridge and c. 1.3km to the town centre via Poopluck Bridge. The location of the proposed development is within walking distance of services, retail services and community facilities. This reduces the need for car usage within the proposed development.

- The potential for linked trips (where multiple needs are fulfilled in one journey);

The subject lands are located within close proximity to multiple bus routes and the Naas / Sallins train station. The subject lands are located c. 1.3km from the town centre of Naas via Ploopluck Bridge and c. 500-650m from the town centre of Naas (via Abbey Bridge) which allows for walking and cycling usage.

- The nature of the uses of the site and likely durations of stays;

The proposed development is primarily a residential development which includes a non-residential component of c. 247.6 sq. m. The development provides for visitor spaces for the residential units. The duration of stays are envisaged to be short term.

- The nature of surrounding uses and potential for dual use of parking spaces depending on peak hours of demand;

The north, east and south of the subject lands are greenfield in nature and do provide for car parking. The west of the site is existing residential. There is no peak demand envisaged as this is a residential development. The provision of 1.3 spaces per apartment unit is sufficient to support the development.

- Proximity to public car-parking areas;

The subject site is within close proximity to multiple public car parks within the town centre. Public car parks in the town include Fairgreen car park (c. 850m), Friary Road Car Park (c.760m) and Hedermans car park (c. 1km).

- The need to protect the vibrancy of town centres and regenerate vacant / underused buildings;

This development is being proposed on greenfield lands and will not detract from the vibrancy of the town centre. A small commercial/ health/medical unit is proposed however this will not have a negative impact on the town centre.

- Any modal shift demonstrated through a Traffic and Mobility Assessment;

A TTA and MMP have been prepared by Systra and outline the modal share. Figure 7.3 below illustrates the modal share preoccupation baseline and long-term modal share targets. This target seeks to reduce car usage from 75% to 65% and increase sustainable modes of travel to 30%.

Figure 7.14: Proposed Residential Mobility Management Plan Targets

	SINGLE-OCCUPANCY CAR USE	SUSTAINABLE TRAVEL MODES	WORK FROM HOME
Estimated Pre-Occupation Baseline Mode Share	75%	23%	2%
Longer-term Mode Share Target	65%	30%	5%

(Source: Systra)

- The suitability of a contribution in lieu of parking in accordance with the Development Contribution Scheme, as part of a grant of planning permission.'

The client accepts the car parking provision while justified under national policy does not meet the Kildare development plan car parking standards. The applicant will provide a financial contribution if requested under condition by KCC.

As stated above, lower rates of car parking are appropriate depending on the location of certain sites. The proposed development is located near the town centre of Naas with good public transport links.

This application is accompanied by a Transport Assessment, Mobility Management Plan and Capacity Assessment, all prepared by Systra. These documents justify the reduced parking requirement for the site.

7.5.8 Cycling Parking

It is the policy of the Council to:

“RS 1 Ensure ongoing competitiveness and the efficient movement of people and goods in the county through the improvement and expansion of the road and street network within the county to support economic development and provide access to existing communities, new communities, employment areas and development.”

The proposed development provides for 388 no. bicycle spaces to serve the apartments and 2 storey apartments. This is well in excess of the minimum requirement of 201 no. cycle spaces⁶.

7.5.9 Consistency with Movement and Transport/Infrastructure Objectives and Policies

Table 7.13 – Evaluation of the Proposed Development in terms of Movement and Transport/Infrastructure Objectives and Policies

Policies/Objectives	Consistency
MT 4 Develop sustainable transport solutions within and around the major towns in the county that encourage a transition towards more sustainable modes of transport, whilst also ensuring sufficient road capacity for trips which continue to be taken by private vehicles.	The Proposed Development will encourage sustainable modes of transport. The emphasis is linking to the cycle and pedestrian routes to the existing cycle network on the Old Caragh Road. Pathways along open spaces within the proposed development allow for walking and cycling.
WC 1 Prioritise sustainable modes of travel by the development of high-quality walking and cycling facilities within a safe street environment.	The Proposed Development will encourage sustainable modes of transport. The emphasis is linking to the cycle and pedestrian routes on the Old Caragh Road. Provision is made for future pedestrian/cycle link to the east. Walking/cycling is promoted due to the location in close proximity to the proposed development.
WC 2 Promote the development of safe and convenient walking and cycling routes.	See WC1
WC 3 Ensure that connectivity for pedestrians and cyclists is maximised in new communities	See WC1

⁶ 1 space per unit + 1 visitor space per 2 apartments (134 X 1 = 134. 134/2 = 67 Total =201)

Policies/Objectives	Consistency
and improved within the existing areas in order to maximise access to town centres, local shops, schools, public transport services and other amenities	
WC 5 Identify new walking and cycling routes and linkages on all sites where new development is proposed and to ensure that all streets and street networks are designed to prioritise the movement of pedestrians and cyclists.	See WC1.
WC 8 Require the provision of secure cycle parking facilities in towns, at public service destinations and in all new residential and commercial developments.	Secure cycle parking spaces provided for the apartments in the scheme.
RS 8 Ensure that the planning, design and implementation of all road and street networks within urban areas across the county accord with the principles set out in the Design Manual for Urban Roads and Streets (2013), the National Cycle Manual (2010) and other relevant standards where appropriate.	We refer the Planning Authority to the DOB ESR document which provides detail on compliance with DMURS.
RR 2 Restrict new access onto regional roads where the 80km per hour speed limit currently applies, except in the following exceptional circumstances.	Not applicable. Access points to road are within 60kmph.
PK 2 Design car parking layouts in accordance with the Design Manual for Urban Roads and Streets (2013).	See RS8.
PK 3 Carefully consider the number of parking spaces provided to service the needs of new development.	This proposal provides for a sustainable level of car parking having regard to its location and the Apartment Guidelines. (Please refer to the Systra Traffic and Transport Assessment Report and Mobility Management Plan).
RS 2 Ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment, through a multi-disciplinary team approach (e.g. engineers, planners, architects, landscape architects, urban designers)	See RS8.
PL 1 Ensure street lighting is provided in accordance with Kildare County Councils 'Street Lighting and Planning Guidance' policy document in either draft or adopted form. The document outlines the general principles and requirements for street lighting in the county.	Street lighting is included in the proposal. Full details relating to the design, location and specification of the street lighting to be provided on site are provided in the Lighting Report and associated drawings prepared by Rexell. and submitted with this application under separate cover.
PL2 Ensure that all new developments are connected into the public footpath network and that adequate public lighting is provided.	See PL2 and a lighting plan has been prepared by Rexel which is submitted with this planning application.
PL 3 Ensure that planned landscape planting takes cognisance of the need to protect the area surrounding street light installations to avoid possible adverse effects on the delivery of effective street lighting.	Location of planting has been taken into account in the layout in an integrated approach to design.
WS 4 Ensure that adequate water services will be available to service development prior to the granting of planning permission and to require developers to consult with Irish Water regarding	A Confirmation of Feasibility and Confirmation of Design Acceptance has been issued by Irish Water and are both submitted with this application.

Policies/Objectives	Consistency
available capacity prior to applying for planning permission.	
WQ 6 Protect recognised salmonid water courses in conjunction with Inland Fisheries Ireland such as the Liffey catchment, which are recognised to be exceptional in supporting salmonid fish species	The proposed design includes SUDs measures to ensure protection of surface water quality. Full details are provided in the Engineering Services Report, prepared by DOB that is submitted with this application under separate cover.
WW 4 Ensure that adequate wastewater services will be available to service development prior to the granting of planning permission. Applicants who are proposing to connect to the public wastewater network should consult with Irish Water regarding available capacity prior to applying for planning permission.	A Confirmation of Feasibility and Confirmation of Design Acceptance has been issued by Irish Water and are submitted with this application.
WW 8 Require all new development to provide a separate foul and surface water drainage system and to prohibit the discharge of additional surface water to combined sewers other than in exceptional circumstances	Separate surface foul water and drainage systems are provided in the development proposal. Refer to DOB Engineering Services Report and drawings that are submitted with this application.
SW 1 Manage, protect, and enhance surface water quality to meet the requirements of the EU Water Framework Directive.	Design includes SUDs measures to ensure protection of surface water quality. Refer to DOB Engineering Services Report that is submitted with this application.
SW 2 Incorporate Flood Risk Management into the spatial planning of the county, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive.	The subject lands are (residential footprint) are located in Flood Risk Zone C, and appropriate for development. Please refer to the Site-Specific Flood Risk Assessment that has been prepared by JBA Consulting Engineers and is submitted with this application under separate cover.
SW 5 Manage flood risk in the county in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and circular PL02/2014 (August 2014), in particular when preparing plans and programmes and assessing development proposals. For lands identified in the Strategic Flood Risk Assessment a site-specific Flood Risk Assessment to an appropriate level of detail, addressing all potential sources of flood risk, is required, demonstrating compliance with the aforementioned Guidelines or any updated version of these guidelines, paying particular attention to residual flood risks and any proposed site-specific flood management measures.	See SW 2
SW 8 Incorporate Sustainable Urban Drainage Systems as part of all plans to address the potential for sustainable urban drainage at district or site level.	SUDS measures have been incorporated into the design of the Proposed Development as required. Please refer to the Refer to DOB Engineering Services Report that is submitted with this application.
SW 9 Limit the surface water runoff from new developments through the use of Sustainable Urban Drainage Systems (SuDS). These systems should not adversely impact on open space provision in residential areas.	SUDS measures have been incorporated into the design of the Proposed Development as required. Please refer to the Refer to DOB Engineering Services Report submitted with this application and submitted with this application under separate cover.
WM 7 Secure appropriate provision for the sustainable management of waste within	Communal bin stores are provided in the scheme as required. Please refer to the Operational

Policies/Objectives	Consistency
developments, including the provision of facilities for the storage, separation, and collection of such waste.	Waste Management Plan prepared by Redkite Environmental that is submitted with this application.

7.5.10 Water/ Waste Water

With reference to the above (WS13, which requires compliance with the habitats directive), the proposed development includes an Appropriate Assessment (AA) screening report.

The management of surface water for the proposed development has been designed to comply with the policies and guidelines outlined in the Greater Dublin Strategic Drainage Study (GSDSDS) and with the requirements of Kildare County Council.

7.5.11 Energy Efficiency in Buildings

The proposed development will meet or exceed where feasible the requirements of Part L. Apartments have been assessed using the Sustainable Energy Authority of Ireland (SEAI) DEAP 3.2.1 software which demonstrates Part L compliance. The proposed Finlay Park residential development will comply with Part L regulations for both houses and apartments.

7.5.12 Consistency with Community Infrastructure Policies

A Community and Social Infrastructure Audit (including schools and childcare) has been prepared and outlines the high level of social infrastructure with Naas and is submitted with this planning application.

7.5.13 Consistency with Natural Heritage & General Green Infrastructure Policies/Objectives

Table 7.14 – Evaluation of the Proposed Development in terms of Natural Heritage & GI

Policies/Objectives	Consistency
NH 1 Facilitate, maintain, and enhance as far as is practicable the natural heritage and amenity of the county by seeking to encourage the preservation and retention of woodlands, hedgerows, stone walls, rivers, streams, and wetlands. Where the removal of such features is unavoidable, appropriate measures to replace like with like should be considered, subject to safety considerations.	The proposal includes an ECIA, Bat Assessment, Arboricultural Assessment, EIA Screening Report to inform the design of the layout to integrate with the existing trees and landscape features which is to be enhanced and included in the design. Mitigation is provided, where required.
NH 2 Promote the carrying out of basic habitat assessments to inform the design of new developments in order to ensure that proposals for development integrate the protection and enhancement of biodiversity and landscape features wherever possible, by minimising adverse impacts on existing habitats (whether designated or not) and by including mitigation and/or compensation measures, as appropriate.	The proposal includes an ECIA, Bat Assessment, Arboricultural Assessment, EIA Screening Report to inform the design of the layout to integrate with the existing trees and landscape features which is to be enhanced and included in the design. Mitigation is provided, where required.
NH 3 Require compliance with Article 10 of the Habitats Directive with regard to encouraging the management of features in the landscape which are of major importance for wild fauna and flora. Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as	The landscape drawings prepared Landmark Design and Tree Protection Plan and arborist report outline compliance with Article 10. These inputs are submitted with this planning application.

Policies/Objectives	Consistency
stepping stones (such as ponds or small woods), are essential for the migration, dispersal, and genetic exchange of wild species	
NH 5 Prevent development that would adversely affect the integrity of any Natura 2000 site located within and immediately adjacent to the county and promote favourable conservation status of habitats and protected species including those listed under the Birds Directive, the Wildlife Acts, and the Habitats Directive.	An Appropriate Assessment Screening Report and has been prepared by Openfield and is included with this application and confirms that, <i>“This project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects to the Natura 2000 network. No mitigation measures are relied upon to arrive at this assessment. This assessment is based upon the best available scientific evidence..”</i>
NH 6 Ensure an Appropriate Assessment, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive and with DEHLG guidance (2009), is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest.	See NH 5
NH 11 Ensure that development does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2012, the Birds Directive 1979 the Habitats Directive 1992 and the Flora Protection Order species.	As per NH5.
NH 12 Ensure that, where evidence of species that are protected under the Wildlife Acts 1976-2012, the Birds Directive 1979 and the Habitats Directive 1992 exists, appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment. In the event of a Proposed Development impacting on a site known to be a breeding or resting site of species listed in the Habitats Regulations or the Wildlife Acts 1976 - 2012 a derogation licence, issued by DAHRRGA, may be required.3.	We refer the council to the ECIA prepared by Enviroguide. The ECIA notes the predicated impacts of the proposed development, <i>“With mitigation, the majority of the impacts can be reduced so that no moderate negative impact remains..”</i>
GI 1 Ensure the protection, enhancement and maintenance of Green Infrastructure and recognise the health benefits as well as the economic, social, environmental, and physical value of green spaces through the integration of Green Infrastructure (GI) planning and development in the planning process	This proposal minimises any loss of green infrastructure where possible. Planting is provided throughout the development. This is detailed further in the landscape material provided by Landmark Design and in the Arborist Report prepared by The Tree File, included with the application.
GI 7 Promote a network of paths and cycle tracks to enhance accessibility to the Green	The proposed landscaping will integrate into the existing cycle paths. A greenway route is

Policies/Objectives	Consistency
Infrastructure network, while ensuring that the design and operation of the routes respect and where possible enhances the ecological potential of each site.	proposed. When complete this greenway route will link up to the existing Naas/ Sallins Greenway. The design of same has taken cognisance of the ecology of the subject lands.
GI 9 Ensure that proper provision is made for the consideration, protection, and management of existing networks of woodlands, trees and hedgerows when undertaking, approving, or authorising development.	A full arborist assessment has been undertaken by The Tree File. Landscaping and ecology inputs further ensure the protection of the existing woodlands, trees and hedgerows. These inputs are submitted with this planning application. The landscaping strategy ensures retention and integration of the existing green infrastructure.
GI 10 Ensure a Tree Management Plan is provided to ensure that trees are adequately protected during development and incorporated into the design of new developments.	This is detailed further in the Arborist Report prepared by The Tree File, included with the application.
GI 11 Ensure that hedgerow removal to facilitate development is kept to an absolute minimum and, where unavoidable, a requirement for mitigation planting will be required comprising a hedge of similar length and species composition to the original, established as close as is practicable to the original and where possible linking in to existing adjacent hedges. Native plants of a local provenance should be used for any such planting	See GI9.
GI 14 Contribute towards the protection where possible of the trees which are considered an important component of demesne landscapes.	This is detailed further in the Arborist Report prepared by The Tree File, included with the application. This plan indicates which trees are required to be removed in order for the proposed development to take place.
GI 15 Encourage the protection of historic hedgerows or significant hedgerows which serve to link habitat areas to each other and the surrounding countryside.	This is detailed further in the Arborist Report prepared by The Tree File and Landscaping material prepared by Landmark Design, included with the application.
GI 27 Require all new developments to identify, protect and enhance ecological features by making provision for local biodiversity (e.g. through provision of swift boxes or towers, bat roost sites, green roofs, etc.) and provide links to the wider Green Infrastructure network as an essential part of the design process.	The Proposed Development includes a high-quality landscape design which will enhance local biodiversity and include 15 no. bat boxes and green roofs. The landscape plan (prepared by Landmark Design) links to the wider green infrastructure network.
GI 30 Require multifunctional open space provision within all new developments; this includes provision for ecology and sustainable water management.	The proposal includes a series of open space areas. The proposals include communal open space and more public open space integrated with the Grand Canal. We refer the council to the Engineering Services Report prepared by DOB Consulting Engineers.
GI 31 Promote and support the development of Sustainable Urban Drainage Systems (SuDS).	The Proposed Development includes SuDS measures as set out in the Engineering Services Report prepared by DOB Consulting Engineers.
GI 32 Promote and support the development of Sustainable Urban Drainage Systems (SuDS) such as integrated constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins at a site, district, and county level and to maximise the amenity and bio-diversity value of these systems	See Engineering Services Report prepared by DOB Consulting Engineers.

7.5.14 Height

Section 17.2.1 of the CDP notes that in general, heights should respect the local streetscape. In towns, varied building heights are supported across residential, mixed use and town centre areas to support consolidation and to create a sense of place, urban legibility and visual diversity.

The CDP outlines that the appropriate height will be determined by the prevailing height of the area, proximity to existing housing, and the formation of a cohesive townscape. It is noted the buildings heights in the proposal range from four to five storeys with a max height of 17.8 meters. Tall buildings are defined as *“buildings that exceed five storeys and/or 15 metres, will only be considered at areas of strategic planning importance identified in a Local Area Plan.”*

Furthermore, the LAP notes that there will be no height limitations placed on new development within Naas *‘this Plan does not propose to place any height limitations on new development in Naas’*. The proposal is therefore in compliance with the height policies within the development plan.

7.5.15 Site Coverage

According to the Kildare CDP, the maximum site coverage shall be 50% for residential development. The proposal will result in site coverage of 29% (on the net site area).

7.5.16 Plot Ratio

The Kildare CDP notes that the plot ratio range for inner suburban sites is between 0.5 and 1.0. The overall plot ratio is c. 0.8 (including undercroft parking areas).

7.5.17 Separation Distance

The Kildare CDP outlines that in general, a minimum distance of 22 metres between opposing above-ground floor level windows is required for habitable rooms. In cases of innovative design where overlooking into habitable rooms does not occur, this figure may be reduced. A 22m separation is achieved throughout the residential element of the proposal.

Section 17.3 of the Kildare CDP requires a design statement to be prepared which is included in this application prepared by C+W O’Brien Architecture.

7.5.18 Housing and Apartment Standards

The Development Management Standards chapter of the Kildare CDP sets out quantitative minimum standards for new residential units. The proposed scheme is fully compliant with and exceeds these standards. The housing quality audit prepared by C+W O’Brien Architects provides a detailed breakdown of room sizes, unit sizes, private open space and storage space.

7.5.19 Private Open Spaces

With reference to private open space the C+W O’Brien Design Statement provides detail in relation to private open space provision. Each unit receives an acceptable amount of private open space in accordance with the ‘Sustainable Urban Housing: Design Standards for New Apartments December 2020’.

8.0 STATEMENT OF HOUSING MIX

Objective MDO3 and Section 17.4.3 of the Kildare County Development Plan require that a Statement of Housing Mix be submitted with planning applications for 50 units or more within a Large Growth Town or a Moderate Sustainable Growth Town.

The 2023-2029 County Plan notes the following:

“HO O16 c) Require the submission of a ‘Statement of Housing Mix’ with all applications for 10 or more residential units.”

With reference to the proposed mix, it is considered that the proposed development has support from national, and local planning policy, and will provide a sustainable mix of unit types across the Westar landholding at Finlay Park, Naas.

The Naas LAP notes the following aim:

“Policy HC2 - Residential Density, Mix and Design It is the policy of the Council to ensure that all new residential development provides for a sustainable mix of housing types, sizes and tenures and that new development complements the existing residential mix.”

8.1 National Guidelines

The National Planning Framework highlights a core principle in the delivery of future housing as *“allowing for choice in housing location, type, tenure and accommodation in responding to need.”*

The National Planning Framework recognises that “currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms.”

The proposal is in compliance with Specific Planning Policy Requirement 4 of the Urban Development and Building Height Guidelines (December 2018) which requires that developments meet the Sustainable Residential Development in respect of density and provides an appropriate mix of building heights and typologies and to avoid mono-type building typologies.

Paragraph 1.8 the Apartment Guidelines (2020) state: “It is therefore critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts both the investment and the seeking out of this crucial form of housing by households, that will then result in greater delivery of apartments in Ireland’s cities and towns and other appropriate locations

Furthermore, it noted the Apartment Guidelines 2020 recognise that apartments *“are a key and growing part of the way in which we live in various parts of our country and particularly in our cities and towns”*.

The overall development provides a wide range of unit types in a sustainable mix which will ensure a wide variety of tenures for a cross section of society.

According to the CSO⁷ apartments still make up a minority of built development for Kildare at just 0.9% of the total number of units in 2020. It is also noted that for the first 2 no. quarters the percentage of apartments rose to 16.6%. While there may have been some Covid related factors in delaying the delivery of apartments, in 2020 the level of apartment development for the first 2 quarters of 2021 as a proportion of the overall number of new dwellings is falling well short of what is promoted in Government Policy such as the National Planning Framework and also S.28 Guidelines such as the Apartment Guidelines 2020.

Table 8.1 – Housing Completions Kildare 2017-2022

	2017	%	2018	%	2019	%	2020	%	2021	%	2022*	%
Single house	168	17.1%	158	12.9%	204	10.7%	171	10.3%	173	8.5%	76	8.7%
Multi House Scheme	792	80.4%	1,032	84.5%	1,633	86.0%	1,478	88.8%	1,610	79.1%	704	80.9%
Apartment	25	2.5%	31	2.5%	62	3.3%	16	1.0%	253	12.4%	90	10.3%
	985		1,221		1,899		1,665		2,036		870*	

Note: 2022* Q2 [NDQ06 - New Dwelling Completion \(cso.ie\)](#)

The unit mix has been influenced by the need for smaller household sizes and the trend in Ireland of smaller households over the last 50 years. Whilst it is acknowledged that household size increased between 2011 and 2016, evidence suggests that this was due to a lack of supply in housing and as a result the restricted ability to create new households.

There is a demand for 1 bed units from young people and workers starting out in their career. The 1 bed units are also suited to the elderly population.

The proportion of 2-bedroom units, is typical of many other residential schemes throughout Ireland and accommodates the reduced household size. The three bed units are intended to accommodate the larger family unit thereby ensuring diversity and social balance within the overall apartment development.

8.1.1.1 Statement of Mix

In summary, the proposed development of 134 no. dwellings comprising a mixture of 2 storey apartments and apartments consisting of 22 no. 1 bedroom apartments, 77 no. 2 bedroom units and 35 no. 3 bedroom units.

2 storey apartments account for 52% of total units and apartments make up 48%. The overall unit mix across the scheme comprises 16% 1-bedroom units, 58% 2-bedroom units, 26% 3-bedroom units as follows:

Table 8.2 – Overall Dwelling Mix

	1 bedroom	2 bedroom	3 bedroom	Overall	%
2 storey apartments		56	14	70	52%
Apartments	22	21	21	64	48%
Total	22	77	35	134	100%
Overall Mix %	16%	57%	26%	100%	100%

Source: C+W O'Brien Architecture Schedule of Areas

⁷ <https://statbank.cso.ie/px/pxeirestat/Statire/SelectVarVal/saveselections.asp>

A range of unit types are proposed as part of this development including apartments and 2 storey apartments. The proposed development provides for a range of unit types which will allow for a new mixed community through providing a choice of housing, suitable to all age groups and persons at different stages of the life cycle.

8.2 Conclusions

The overall development provides an appropriate range of unit types in a sustainable mix which will ensure a variety of tenures for a cross section of society. The proposed development includes diversity in the form, size and type of dwellings within the layout which policy HC2 is seeking. It is considered that the proposed mix as submitted provides for an appropriate and sustainable mix which will allow for a broad range of household formation.

It is considered that the proposed mix presented provides for an appropriate and sustainable mix which will allow for a broad range of household formation. The objective of the design team has been to include for a range of dwelling and tenure types for a cross section of society.

9.0 PART V

The applicant has entered into initial discussions with the Housing Department of Kildare County Council in respect to Part V. The applicant agrees to accept a condition on a grant of planning permission, if the council is minded to approve the proposed development, which requires the applicant to enter into a Part V agreement with Kildare County Council as per their requirements prior to the commencement of development.

The applicants Part V proposes to provide 15 no. units (5 no. 1 bed, 8 no. 2 bed and 2 no. three bed). Please find submitted, costing plan, proposed units to be transferred and solicitor letter confirming the lands were purchased in November 2015 and April 2016. The proposals are described and mapped by C+W O'Brien Architects in the Part V material accompanying this planning application.

10.0 CONCLUSIONS

This Planning Statement and Statement of Consistency with Planning Policy set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context. At a national and regional level, this statement has demonstrated the consistency of the development with the following:

- National Planning Framework;
- Regional Spatial and Economic Strategy for the East and Midlands Region 2019-2031;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Urban Development and Building Height Guidelines (December 2018);
- Delivering Homes, Sustaining Communities (2008);
- Design Manual for Urban Roads and Streets (2019);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- The Planning System and Flood Risk Management (2009);
- Draft Water Services Guidelines for Planning Authorities (2018);

Consistency is also demonstrated with the policies and provisions of the Kildare County Development Plan 2017-2023 and the Naas Local Area Plan 2021 which are the key planning policy documents at a local level.

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development comprising residential, open space, and a commercial/health/medical unit on the subject lands.

The proposed development and accompanying documentation and reports have been prepared following extensive pre-planning consultation with Kildare County Council as detailed above which forms a part of this LRD planning application Kildare County Council.

In conclusion, it is respectfully submitted that the proposed development is consistent with and in accordance with the proper planning and sustainable development of the area, and complies with all relevant national, regional and local planning policies and guidelines and that the proposed development is in accordance with the proper planning and sustainable development of the area.

11.0 APPENDIX 1 PRE-APPLICATION DISCUSSIONS (UNDER S. 247 OF ACT)

KCC Meeting Notes Finlay Park 28-4-2022	 John Spain Associates Planning & Development Consultants Chartered Town Planners & Chartered Surveyors
Fiona Breen Kildare County Council EP (FB) Transport Department Kenny Oluwatosin SEP (KO) Bevin O Shea (Not on call) Joe Kean Transport (JK) Colm Lynch Transport (CL) Linda Behan Housing (LB) Carmel O Grady Parks (COG)	Will Fadden Westar Pat Fadden Westar Brian Bolger CWOB Vanessa Machado CWOB Donnachadh O'Brien DOB Gwen Tierney Landmark Designs John Spain (JSA) Rory Kunz (JSA)

General

- KCC queried whether any requirement at all for a creche – social infrastructure assessment to be included in application
- KCC noted development location acceptable in principle in relation to zoning– apartments acceptable in principle and that detailed design for application.
- KCC commented on importance of integrating into future development to the south in the town and to Sallins to the north.
- KCC noted that EV car parking would be supported and whether parking was basement or undercroft and attenuation proposals.
- KCC recommended that a Mobility Management Plan should be included with the application.

Housing Department

- General commentary on the Housing Quality Assessment and to provide Part V details on ownership to be included with the application.

Landscape Department

- Importance of landscaping design to cater all ages was stressed by KCC.
- KCC noted that open space was to include nature based solutions for SUDs and that the finishes and design should be of a high quality.
- KCC noted that the podium open space should be usable

AOB – General Points

- KCC recommended that design team liaised with Fire Section.
- In relation to Biodiversity an ecological assessment as well as full tree survey reports and archaeology required for the application.
- KCC noted that a Visual impact Assessment required along with 3 D imagery from Finlay Park, Canal, Sarto Park.
- KCC noted that EIA screening and AA screening required.

S247 Pre-Planning Meeting – Finlay Park, Naas

Date	30 th March 2021, 9.30am via Microsoft Teams
Attendees	KCC – Eoghan Ryan (ER, Dir Services Planning), Elaine Donohue (EF, David Reel (DR, Roads), George Willoughby (GW, Roads), Colm Lynch Jonathan Hennessy (JH, Roads), Chanel Ryan (CR), Deborah Crummey Patrick Harrington (PH), Lisa Kirwan (LK), Bridget Loughlin (BL) David Hall (DH, Water Services), Carmel O' Grady (COG, Parks) <i>Project Team</i> - William Fadden (WF), Patrick G. Fadden, Patrick J. Fadden Frank O'Rourke (FOR), Jeremy Maguire (JM, CW + O'Brien), Arthur O'Brien (AOB, CW + O'Brien), James Fennelly (JF, CW + O'Brien) John Spain (JS, JSA), Rory Kunz (RK, JSA), Gwen Tierney (GT, Landmark) Donnachadh O' Brien (DOB, DOBA), Alan Lambe (AL, DOBA) David Casey (DC, JBA), Andrew Archer (AA, Systra), Steve Livingstone (SL, Systra)
Absentee	

Agenda

Additional Formal S247 pre-planning meeting to discuss proposed SHD planning application on lands at Finlay Park, Naas. Two no. previous formal S247 meetings took place 17/09/2019 and 02/07/2020 – minutes on file.

The updated application involves a proposal for c. 350 no. residential units, creche and associated site works on zoned lands on site west of the Naas Town Centre. NOTE: application updated to take account of previous discussions with the Local Authority, in particular change from parkland type layout to a more urban block format. Also the provision of central open space corridor.

Discussion

KCC referenced the recently published Draft Naas LAP 2021-2027 and detail contained within this draft document, advising that the proposed application should have regard to the document.

Roads Department

KCC referenced the importance of strategic connections possible within the subject lands and requested KCC Roads Dept to discuss further.

KCC noted previous meeting held with the Applicant and advised that the objective contained within the Naas Sallins Transport Strategy as they relate to the subject site should be accounted for. Noted Roads Dept wish at this point in time for proposed bus only route from harbour towards Sallins Train Station but accepted that further discussion to fully assess the merits of Bus only versus a shared route should follow before a final decision is made.

KCC noted discussions re TIA Study ongoing and queried the parking ratio proposed and whether any basement parking was to be included.

Layout & Architecture

KCC noted that the presentations had been very useful more full explain the proposed scheme. Noted understanding of the 4 zones proposed and constraints on site.

KCC requested further information regarding the proposed podium parking at zone 1 and proposed street edge in these zones and the need to create a lively street edge with units facing on.

KCC welcomed the inclusion of podium parking proposals. Noted units should front onto open space and requested that gaps in urban blocks in be reduced. Noted that the maisonettes proposed at northern boundary should be brought into the scheme.

KCC noted that application should include a full assessment by suitably qualified arborist and that this person should be retained for duration of site works. Noted importance that any proposals re fencing off of hedgerows etc. that are included in the application must carried out on site

Heritage and Biodiversity

KCC noted hedgerows along canal and central in site that should be retained and enhanced. Proposals for management of hedgerows during construction should be included also.

KCC advised that canal area and water to be adequately protected during construction phase and requested that the internal watercourse in the site be retained as open drain.

KCC referenced green infrastructure and habitats map contained within the Naas Habitats Report previously shared with the Applicant. Noted that the application documentation should reference this report. Noted wet grassland areas on site and advised that these areas should be treated appropriately.

KCC advised that lighting should be assessed and impact on the canal minimised.

KCC noted that an AA Screening Report should accompany the application. Referenced views to and from the canal and historic canal bridges in the area should be assessed. Photomontages should be provided.

KCC noted that a waste management and construction management plan should be included in the application.

Fire Department

KCC advised re Part B of the Building Regs that hydraulic access is required for building heights above 10m and that design should account for same.

KCC advised requirement for 2,200l per minute at 2 bar mains pressure for 60 minutes.

Noted also that autotrack assessment should be carried out for fire tender access and that each phase of proposed development should consider fire access and retain access always.

Water Services

KCC noted location of 750mm pipeline running through zone 1 and questioned if layout had accounted for same. Advised that 20% climate change factor should be included for in designs. Noted existing and draft Naas LAP and advised that policies and objectives in these plans should be included for.

Re SUDS, nature based solutions should be included and those with high amenity value be prioritised. Advised that unsealed basins should be avoided and instead be sealed/lined to become ponds.

KCC requested that proposals allow for future development where reasonable.

KCC referenced the 2020 inland fisheries documentation as it relates to urban environments and requirement for buffer zones in certain areas.

KCC noted comments from previous meetings should be addressed and states availability for further meetings and discussions.

Director of Services Planning / Manager Naas Municipal District

KCC noted the unique opportunities presented by the site given proximity to town centre and presently undeveloped state. Noted priority of KCC to prepare a masterplan for the wider north west quadrant to include the subject lands. Referenced previous masterplan prepared re Millennium Park.

Regarding the draft Naas LAP 2021-2027 and accompanying land use zoning map, KCC noted that flood risk concerns and awaited updated FRA for the area had informed the draft map – KCC noted however progress and work carried out in house by KCC since publication of the draft LAP

KCC noted suitability for higher density and building height (5 stories) along the corridor towards M7 with potential for neighbourhood centre and office use as this route further towards Millennium Park with bus stops along the route.

KCC noted that DMURS advocates a multidisciplinary approach to design and requested that the KCC planning department be present at further/future meetings regarding roads, flood risk, parks etc. All agreed that this would be facilitated.

Date	2 nd July 2020, 2.30pm via Microsoft Teams
Attendees	KCC – Eoghan Ryan (ER, Dir Services Planning), Emer Uí Fhatharta (EF, Planning) David Reel (DR, Roads), George Willoughby (GW, Roads) Martin Ryan (MR, Planning), Nollaig Curran (NC), Patrick Harrington (PH) Colm Flynn (CF, Water Services), David Hall (DH, Water Services) Project Team - William Fadden (WF), Patrick G. Fadden, Patrick J. Fadden Jeremy Maguire (JM, CW + O'Brien), Arthur O'Brien (AOB, CW + O'Brien) Kevin Hughes (KH, HPDC),
Absentee	KCC Part V, KCC Parks

Main Points

- KCC noted preference for an open space corridor running through the site. Noted that creation of greenway would be a positive for the area and potential for creation of a destination area for users of the Canal greenway.
-
- KCC noted Naas LAP requires completion of various other reports including; Naas/Sallins Transport Strategy & FRA for wider Naas Area
-
- KCC queried the layout of apt blocks and sought further clarification over public and private open space. Recommended that green roofs be include in apt blocks.
-
- KCC stated that work to finalise the Draft Naas/Sallins Transport Study was ongoing – no date available for expected completion. Noted requirement for a bus station in the Harbour

KCC Meeting 17th September 2019, 9.30am in KCC Offices, Aras An Chontae, Naas.

Date	17 th September 2019, 9.30am in KCC Offices, Aras An Chontae, Naas.
Attendees	KCC – Elaine Donoghue (ED, Planning), Aoife Brangan (AB, Planning), Patrick Harrington (PH, Architecture), George Willoughby (GW, Roads) David Hall (DH, Water Services), Colm Lynch (CL, Roads) Project Team - William Fadden, Patrick G. Fadden, Patrick J. Fadden (Westar) Jeremy Maguire (JM, CW+O'Brien), Margaret Commene (MC, HPDC), Kevin Hughes (KH, HPDC), John Casey (JC, CORA)
Absentee	KCC Parks, KCC Part V

Main Points

- Review KCC comments and address same in next stages of project design
- Complete full site-specific FRA
- Prepare further study and reports for full pre-planning application to ABP
- Prepare masterplan for entire landholding and include same in planning application.
- Further discussion required then with KCC
- Follow-up meeting required to discuss Transport Strategy and potential 'transport hub in
- Harbour Lands. GW to facilitate