

Statement of Response to Kildare County Council's Opinion

In respect of

A 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 Ltd, we hereby submit this Statement of Response report which seeks to address the issues raised within the Opinion of Kildare County Council, issued following pre-application consultation in respect of the proposed development. The Opinion of Kildare County Council was issued on the 23/08/2022.

This Statement will refer to other documentation which forms part of the final planning application pack, where more detailed and specific responses are provided to the issues dealt within this Statement by the relevant experts / design team members and consultants.

This Statement demonstrates that the issues raised in the Council's Opinion have been fully and satisfactorily responded to in the Large-scale Residential Development planning application.

2.0 RESPONSE TO KILDARE COUNTY COUNCIL OPINION

The Opinion of Kildare County Council (KCC) on the pre-application stage for the proposed development noted that KCC *"is of the opinion that the documentation submitted constitute a reasonable basis on which to make an application for permission for the proposed LRD."*

The Opinion set out headings with specific information that should be submitted with the LRD planning application. The following sections of this report set out these specific items and summarises how these items have been addressed in the final application.

The first item of specific further information relates to the design height and strategy for the proposed development. This following point of the Council's Opinion was as follows:

Item 1 (1) – Design Height and Strategy - Visual Impact Assessment

Visual Impact Assessment and Photomontages/CGIs should include views from various locations in the vicinity including Old Caragh Road, The Harbour, Sarto Park and adjacent properties within Finlay Park residential scheme to the west.

Response: A Landscape Visual Impact Assessment (LVIA) has been prepared by Mullin Landscape and Photomontages/CGI's have been prepared by Gnet. These documents are submitted with this planning application and include views from Old Caragh Road, The Harbour, Sarto Park and adjacent properties. The LVIA concludes:

"Through a combination of advanced screening and woodland planting the overall landscape and visual impacts will be minimised. Typically impacts will be greatest during the initial establishment phase. As proposed landscape treatment matures impact will diminish. It is considered that landscape and visual impacts at this site are below the threshold considered to be 'significant'"

Item 1 (2) – Design Height and Strategy – Sunlight Daylight Assessment

There are concerns regarding the level of sunlight/daylight entering certain apartment buildings within Block A, Block C and especially Block B where it is noted that a number of apartments have failed the relaxed Living/Dining/Kitchen targets outlined with the Preliminary Sunlight, Daylight and Shadow Assessment. This would indicate a substandard form of development for a number of apartments in these blocks. The Applicant is requested to address this issue.

Response: The design team has designed the proposed development in order to achieve high levels of sunlight/daylight. A sunlight/daylight report has been prepared by Chris Shackleton and is submitted with this planning application. The report notes that, *"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".

Item 1 (3) – Design Height and Strategy – Screen Planting

Details including drawings of screen planting along the ground floor apartment private amenity space is required. Similarly, details of the screening proposed for the first floor apartments fronting onto the podium area are also required.

Response: A full landscaping strategy has been prepared by Landmark Design and is submitted with this planning application. The landscape proposals provide appropriate screening as requested by KCC. Please refer to Drawing 01_Landscape Design and 05_Landscape Sections for the extent and location of all soft landscape features including the location and extent of robust hedgerow and shrub screen planting at ground floor units and first floor units fronting onto the podium space.

Item 1 (4) – Design Height and Strategy – Finishes

A report that specifically addresses the proposed materials and finishes having particular regard to the requirement to provide high quality durable finishes which have regard to the surrounding area.

Response: The design statement prepared by C+W O'Brien is submitted with this planning application. This statement sets out the proposed materials and finishes.

Item 1 (5) – Design Height and Strategy – Undercroft Car Park

Details of security and surveillance regarding the under-croft car park are to be provided to the safety of all users.

Response: The applicant is happy for a condition to be included for CCTV which will be monitored by the management company. The under croft car park has been designed to RSA standards to include pedestrian routes which makes the carpark safe for pedestrians.

Item 1 (6) – Design Height and Strategy – Green Wall

It is noted that a green wall is proposed between Block A and B. Further details are required regarding this feature. The green wall should front onto both the western space and podium space to help reduce the visual impact of the development on the surrounding area.

Response: As part of the ongoing design development of this site, the green wall embankment feature is no longer part of the proposed design. A more appropriate stabilised grass slope is provided at these locations as indicated on Drawing 05_Landscape Sections prepared by Landmark Design.

Item 1 (7) – Design Height and Strategy – Pedestrian/Cycleway

Further details are required regarding the delivery of the pedestrian/cycleway which runs along the southeast of the site to the indicative cycle bridge. The Planning Authority has concerns regarding the dead-end nature of the path prior to the bridge being delivered. Furthermore, there appears to be a lack of passive surveillance along this route and could lead to anti-social behaviour.

Response: The proposed greenway is provided to the south of block B which provides passive supervision. The greenway will be extended with future phases of development. Please see the design statement prepared by C+W O'Brien which outlines current greenway location to be provided under this application. This phase of the greenway route was agreed with KCC following further discussions with Stephen Deegan in the Roads Department.

ITEM 2 (1) – Open Space and Biodiversity – Play Areas

The applicant should provide revisions to Item 7, 8 and 12 of the play areas outlined on the Landscape Masterplan.

Response: The landscape masterplan has been redesigned to comply with the above statement. The landscape masterplan prepared by Landmark Design is submitted with this planning application. The mentioned items have been amended in accordance with KCC Park's recommendations. All Equipment and Surfacing within the Play Areas, the extent of which is shown on Drawing 01_Landscape Design, 02_Landscape Detail Plans and 03_Play Detail Plan is to be issued to Kompan Ireland Ltd for design risk assessment, installation and inspection. All play items and surfacing is to comply with EN1176 and EN1177.

ITEM 2 (2) – Open Space and Biodiversity – Arboricultural Assessment

The applicant should provide an Arboricultural Assessment report of the trees and hedgerows located on and adjacent to the proposed development site prepared by an independent, qualified Arborist as an Arboricultural Consultant shall include all of the following:

(a) Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site.

Response: We refer the Planning Authority to the enclosed Finlay Park Tree Constraints Plan 1/1 _ Scale 1:500 @ A1, prepared by The Tree File.

(b) Tree Survey Schedule; a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.

Response: With reference to the above, we refer the Planning Authority to Appendix A2, Table 1 of the Arboricultural Report prepared by The Tree File Ltd – Consulting Arborists, enclosed with the application which provides a tree survey schedule which includes tag nos., species, size, age, condition and useful life expectancy.

(c) Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (Total number surveyed and total numbers/percentage to be retained and felled respectively).

Response: With reference to the above, we refer the Planning Authority to Appendix A2, Table 1 of the Arboricultural Report prepared by The Tree File Ltd – Consulting Arborists, enclosed with the application which provides a tree survey schedule which includes tag nos., species, size, age, condition and useful life expectancy.

According to the Arboricultural Report, the "red line" area supports a total of 8no. individually described trees and 2No. hedge alignments. These have been categorised as:

- No category "A" items
- 1no, category "B" tree

- 1no. category "C" trees and 2no. Hedges.
- 6no. category "U" trees

The Arboricultural Report notes that the tree loss breakdown for the proposed development will be-

6 category "U" trees (100% of category "U" trees)

The tree retention breakdown for all none-category "U" trees across the proposed development will be-

1 category "B" tree

1 category "C" tree

This equates to the retention of 100% of all none-category "U" trees.

(d) Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.

Response: We refer the Planning Authority to the enclosed Finlay Park Tree Constraints Plan 1/1 _ Scale 1:500 @ A1, prepared by The Tree File.

(e) Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.

Response: As set out in the Arboricultural Report, "the design and management recommendations as set out in "BS5837:2012" are considered as "best practice" regarding the selection, retention, protection, and management of tree within the scope of new developments.

In respect of tree protection, whether vertical or horizontal, all must conform or equate to the recommendations of Section 6, BS5837: 2012, must be fit for purpose and commensurate with the nature of development and the expected day-to-day activities of the site works.

(f) Arboricultural Method Statement: clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.

Response: The Arboricultural Report, provides a "Preliminary Arboricultural Method Statement" at "Appendix 1" as well as the associated "Tree Protection Plan" drawing "Finlay Park Tree Protection Plan".

(g) Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.

Response: We note this was provided above in item no. 2(c).

(h) Arborist's name, Arboricultural qualifications and contact details.

Response: As set out in the Arboricultural Report the following is noted:

Andy Worsnop B.Sc. Env Mgmt, Tech Arbor A, NCH Arb (PTI LANTRA), The Tree File Ltd., Ashgrove House, 26 Foxrock Court, Dublin 18, D18 R2K1.

(i) Date that the survey was carried out (surveys > 12 months are unacceptable).

Response: As set out in the Arboricultural Report, the survey was compiled in October 2022.

ITEM 2 (3) – Open Space and Biodiversity – Arboricultural Assessment

The applicant should submit landscape and Arboricultural proposals that provide comprehensive details of the location of construction in relation to the existing trees and hedgerow and clarify how the existing trees and hedgerow are to be effectively retained and protected during construction.

Comprehensive details including a programme of works shall also be provided for remedial and improvement works to these existing trees and hedgerow. Submitted details shall include; written specifications, detailed plan, and section drawings (north-south and east - west) of tree protection fencing locations and construction work zones. This is to enhance the amenity value of the development and minimise future maintenance costs.

Response: Full details of construction in relation to the existing trees and hedgerow and clarify how the existing trees and hedgerow are to be effectively retained and protected during construction is provided by the landscape plans and Arboricultural assessment. These details are submitted with this planning application.

As set out in the Arboricultural Report, “*In line with the Arboricultural Method Statement and the “Tree protection Plan” that accompany this report, sustainable retention will be best accomplished with the adoption of a system of fenced construction exclusion for the duration of construction works.*”

The Tree Protection Plan shows tree protection locations along with the construction areas. Details of the construction fencing (section) are also provided.

The Arboricultural report provides a "Preliminary Arboricultural Method Statement" at "Appendix 1, as well as the associated "Tree Protection Plan" drawing "Finlay Park Tree Protection Plan". In the drawing, the "Construction Exclusion Zone" is defined by an orange hatching with bold "Orange" lines representing the proposed location of the primary protective "Construction Exclusion Fencing"

The applicant would be happy for the inclusion of a condition to submit construction stage" version of the "Tree Protection Plan" drawing. All recommended protection measures will be installed before the commencement of any site works and must remain in situ (unless under the guidance of the site Arborist) until the completion of all site works.

ITEM 2 (4) – Open Space and Biodiversity – Landscape Design Rationale

A comprehensive Landscape Design Rational & Landscape Proposal should be prepared by a suitable and qualified Landscape Architect (or qualified Landscape Designer). The following shall be included;

Response: A comprehensive Landscape Design Rational & Landscape Proposal masterplan has been prepared and submitted by Landmark Design. A response to each point has been provided by Landmark Design in the document “LRD Opinion Response Document” as noted below. Please refer to Drawing 01_Landscape Design, 02_Landscape Detail Plans, 03_Play Detail Plan, 04_Combined Services and Tree Planting Plan, 05_Landscape Sections and 06_Landscape Details. Figure 2.1 below illustrates the overall landscape masterplan.

Figure 2.1: Landscape Masterplan



Source: Landmark Design

(a) A scaled Landscape Masterplan with cross-sections (where appropriate) showing the general layout and hard and soft landscape treatment of all external areas/spaces (including front and rear gardens), boundaries, structures, and features. This shall be generally provided at a maximum scale of 1/200.

Response: Please refer to Drawing 01_Landscape Design and 05_Landscape Sections.

(b) Details of Hard Landscape Design (where applicable) for boundaries, (walls, fences, screens), lighting, seating, kerbing, edging, surfacing.

Response: Please refer to Drawing 04_Combined Services and Tree Planting Plan.

(c) Details of Soft Landscape Design: detailed Planting Plan(s) and Planting Schedule(s) [species/varieties, quantities, sizes, rootball presentation, spacings]. Proposed planting should have a wide variety of species/varieties, using both native planting and non-native planting. The overall objective of planting in areas that are anticipated to be taken in charge is that they are easily manageable, visually appealing, enhances biodiversity and is pollinator friendly.

Response: Please refer to Drawing 01_Landscape Design for the extent and location of all soft landscape features. The All Ireland Pollinating Plan has informed the selection of native and non-native species of planting incorporated in the design, together with site appropriate grass seed mixes taking into account location and functionality of the open space areas.

(d) A clearly outlined Landscape Plan which demonstrates that the proposed location of underground/over ground services will not impinge on the proposed trees or open space usage.

Response: Please refer to Drawing 04_Combined Services and Tree Planting Plan. Where tree planting occurs in close proximity to underground services, Root Barriers are to be incorporated as shown on the drawing.

ITEM 2 (5) – Open Space and Biodiversity – Sections drawings

Sections drawings (north-south and east – west) through the proposed development to illustrate the existing and proposed finished topography and the finished topsoil depths (allowing for settlement) of open space areas should be submitted. This is to minimise future maintenance costs and to provide enhanced amenity value to open space areas.

Response: Please refer to Drawing 01_Landscape Design and 05_Landscape Sections. In general, all finished grass areas follow the existing topography of the site and will be topsoiled to a minimum of 200mm depth to ensure proper establishment of planting medium. The exception will be adjacent play items in the southern public open space where grassy mounds are natural play features incorporated into the play design and are to be surfaced with Safa Gras Safety Mats in correspondence with EN1177.

The blue dashed line below illustrates the existing ground level (C+W O'Brien Drawing no. 0114).

Figure 2.2: Proposed Site Section A-A'



Source: C+W O'Brien

ITEM 2 (6) – Open Space and Biodiversity – Landscape Design

The Landscape Design indicates proposed footpaths and cycle tracks in open space areas of the development. The applicant is advised to submit landscape proposals that detail the surface types and edges of all proposed footpaths and cycle tracks.

Response: The Landscape design submitted by Landmark Design indicates proposed footpaths and cycle tracks in open space areas of the development. Furthermore, the plans detail the surface types and edges of all proposed footpaths and cycle tracks. Please refer to Drawing 06_Landscape Details indicating section details of proposed surfaces through public open space areas.

ITEM 2 (7) – Open Space and Biodiversity – Landscape Design Underground Services

The Landscape Design shall detail locations of all proposed underground services e.g. foul sewer, water and SuDs and their location in relation to existing trees and hedgerows, and proposed trees and planting. The applicant shall be requested to submit landscape plans that provide details of the locations of all proposed

underground services and associated manholes and ensure that their location will not compromise existing trees and hedgerows, and proposed trees and planting.

Response: The Landscape design submitted by Landmark Design indicates locations of all proposed underground services. The design ensures that their location will not compromise existing trees and hedgerows, proposed trees and planting. The Landmark Design Response Document outlines that: *“Please refer to Drawing 04_Combined Services and Tree Planting Plan. Where tree planting occurs in close proximity to underground services, Root Barriers are to be incorporated as shown on the drawing. Attenuation features have not sterilised open space area and because nature based solutions have been adopted within the public open space areas, they are integrated within the proposed landscape scheme enhancing the overall amenity of the site”.*

ITEM 2 (8) – Open Space and Biodiversity – Watersport hub

Regarding the proposed future water sport hub, the applicant shall be requested to submit detailed construction plans of the proposed ‘platform’. Submitted details should include; written specifications, plan and section drawings (north-south and east-west)

Response: As part of the ongoing design development of this site, the Future Water Sports hub' is no longer part of the proposed design. It is intended that the water sports hub would form part of a separate planning application in a future phase of development which will require further engagement with stakeholders such as Waterways Ireland and Kildare County Council. An indicative location is shown on the site layout outside the site boundary but it does not form part of the application.

ITEM 2 (9) – Open Space and Biodiversity – Arboricultural Assessment

A boundary treatment plan is required which should contain comprehensive details regarding all proposed boundary treatments to the proposed development.

It is a requirement of the KCC Parks Section that appropriate permanent boundary types shall be incorporated in addition to any existing or proposed planting, where necessary. Submitted details shall include; written specifications, detailed plan, and section drawings (north-south and east - west) of the locations.

Response: All existing trees and hedgerows are being retained and protected as part of the proposed development scheme. Please refer to Drawing 05_Landscape Sections indicating how existing vegetation along boundaries is to be protected during the course of construction and locations of permanent boundary treatments. Please refer to Drawing 04_Combined Services and Tree Planting Plan indicating the extent and location of temporary and permanent boundary treatments. It should also be noted the southern hedgerow adjoining the Grand Canal will not have a permanent boundary treatment in keeping with the existing conditions on site, where the hedgerow provides the natural boundary between the Grand Canal and adjoining open spaces. All permanent proposed boundary treatments are steel and powder coated to ensure longevity.

ITEM 3 (1) – Traffic and Transportation – Technical Layout Details

Response: The documents submitted with this planning application satisfy requirements set out in points raised above by the council. A response to each point is noted below:

The applicant should submit Site Layout Plan at a scale of 1:500 indicating the following:

(a) Vehicular parking for apartment, and future crèche development to be in accordance with Table 17.9 of the Kildare County Development Plan 2017 - 2023.

Response: A(a) C+W O'Brien has submitted a site layout plan which illustrates parking provision. Justification is provided below in response to item no. 3 (12) in respect of the parking provision.

(b) Parking for apartment development to be in accordance with Section 4.4.9 of the Design Manual for Urban Roads and Streets 2019 (DMURS) pertaining to the requirement for off street / basement parking having regard to apartment residential densities. Full details of the proposed undercroft parking spaces to accord with the foregoing.

Response: Section 6.2.3 of the DOBA Engineering Services Report provides detail on compliance with DMURS which notes:

"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 is an existing road which serves the existing Finlay Park residential development. This existing road has been designed with a width of 6.5m to serve the proposed future development of the Northwest Quadrant as part of the Naas Sallins Transport Strategy;

Local Streets: The local street in the proposed development has been 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 including a raised speed table at the junction with the arterial street; With the objective of encouraging low vehicle speeds, regular changes of direction have been included across the local street network with long straight sections <70m in length; Reduced corner radii of 6m have been included at junctions to encourage lower speeds; Slow Zone signage has been erected on the access road to the existing Finlay Park residential development

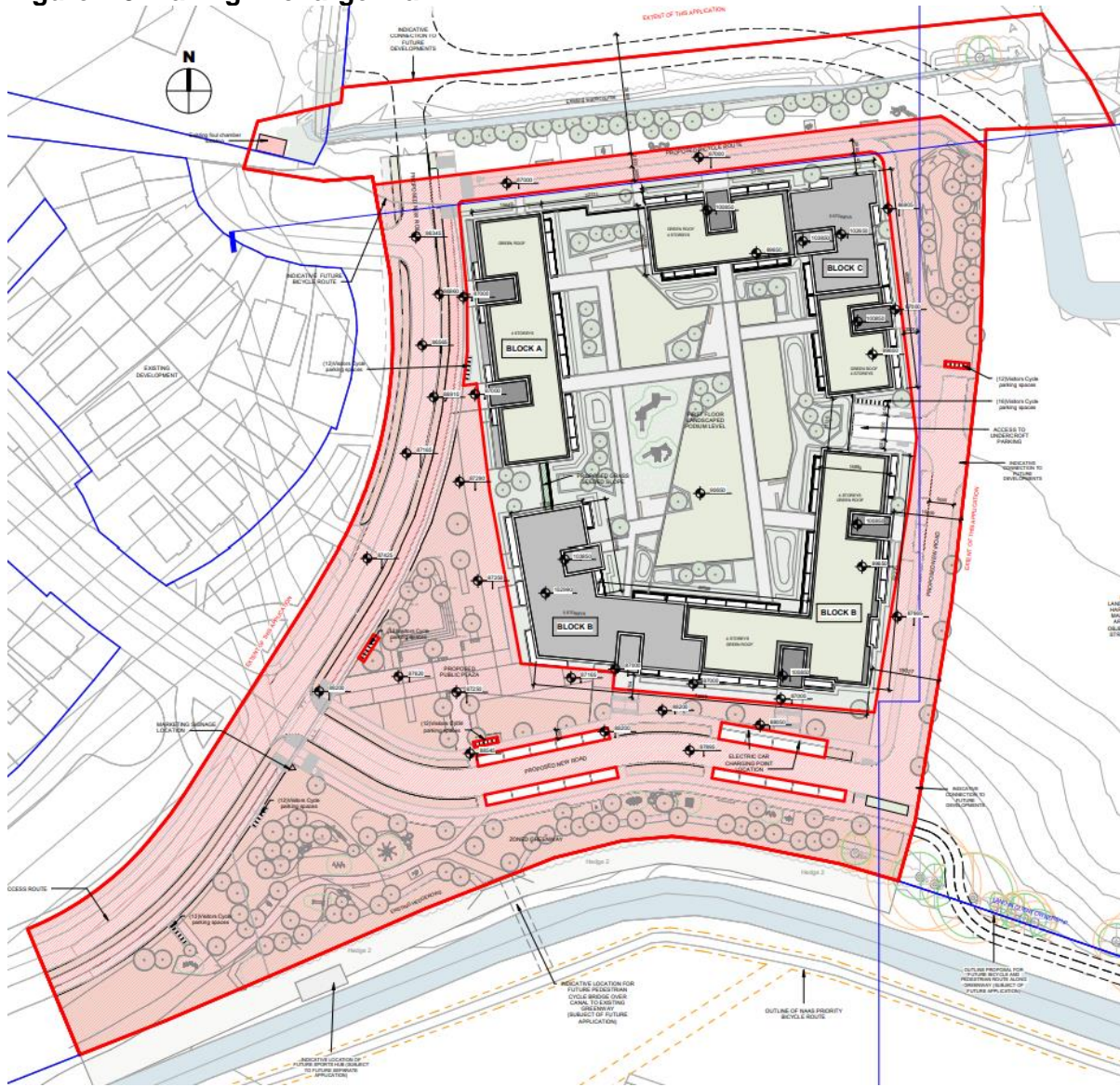
Exit sightlines of 23m (Slow Zone speed limit is 30 km/h) at 2.4m setback from the edge of the existing Finlay Park access road have been provided in accordance with the DMURS Table 4.2 (see drawing C-0055)."

(c) Off-street electric car charge points to serve the apartment and future crèche development. Elevation and plan details of these arrangements are to be indicated on these drawings at a scale of 1:25.

Response: Full details of electric car parking spaces are provided by C+W O'Brien on the "Car Parking Allocation Plan" drawings no. DR-A-2002, included with the application.

(d) Areas of the development to be taken in charge by the Local Authority omitting the locations of electric car charge points.

Response: We refer the Planning Authority to the C+W O'Brien drawing DR-A-0112 which shows the taking in charge areas (Figure 2.3)

Figure 2.3: Taking in charge Plan

Source: C+W O'Brien

(e). Bicycle parking and storage arrangements for apartment and future crèche development to be in accordance with Table 17.10 of the Kildare County Development Plan 2017 - 2023.

Response: (e) The bicycle parking is well in excess of the minimum standard as set out in Table 17.10. The proposed development provides for 338 no. cycle spaces.

(f) Road widths for local streets within the development to be a minimum of 5.5 metres in widths. All associated footpaths to be a minimum of 2.0 metres in width. (g). Longitudinal gradients of the roads and lines of sight and corner radii at the junctions within the application site to be in accordance with the Design Manual for Urban Roads and Streets (DMURS) 2019.

Response: We refer the Planning Authority to section 6 of the DOBA Engineering Services Report which states:

"The local streets serving the development is 5.50m in width. 2m footpaths are proposed throughout the development. Longitudinal sections through the proposed roads are included on drawings C-0150. Gradients of the road, lines of sight and corner radii are in accordance with DMURS."

(h) The manner in which surface water is collected and not discharged onto the existing public road network.

Response: We refer the Planning Authority to section 6 of the DOBA Engineering Services Report which states:

“Surface water runoff from the proposed roads is to be collected via a combination of permeable paving, bio retention swales and road gullies. Refer to drawing C-0020.”

(i) Details of 30 km/h Slow Zones signage and their respective locations (having consideration to overall landholding of the applicant) in the residential development in accordance with the Department of Transport, Tourism and Sport's (DTTAS) traffic signs advice note TSAN2016-02.

Response: We refer the Planning Authority to section 6 of the DOBA Engineering Services Report which states:

Slow zone signage has been erected along the existing access road serving the existing Finlay Park residential development.

See Figure 2.4 below which illustrates 30km/h road signs along the Old Caragh Road.

Figure 2.4: Slow Zone Signage on existing Finlay Park access road



Source: Google Maps

(j) Mitigation measures on the local streets in order to prevent speeding in 30 km/h zones.

Response: We refer the Planning Authority to section 6 of the DOBA Engineering Services Report which states:

“Straight sections of the proposed access road are less than 70m in length to reduce speeding. A raised speed table is proposed at the junction between the proposed access road and the existing access road to provide pedestrian priority and reduce speeds.”

(k) All signage and road markings to be in accordance with the Department of Transport, Tourism and Sport's (DTTAS) Traffic Signs Manual.

Response: The DOBA Engineering Services Report confirms that:

“All signage will be in accordance with DTTAS Traffic Signs Manual.”

(l) Cycle lanes within the development to be in accordance with the National Transport Authority (NTA) National Cycle Manual.

Response: We refer the Planning Authority to section 6 of the DOBA Engineering Services Report which states:

“An existing cycle lane has been constructed along the existing access road serving the existing Finlay Park development. The new cycle lanes within the development are in accordance with the National Cycle Manual.”

(m) Pedestrian crossing points to be dished with the incorporation of tactile paving providing connectivity within the footpath network of the proposed development.

Response: The DOBA Engineering Services Report confirms that:

“Dished kerbs and tactile paving have been included at pedestrian crossing points within the footpath network.”

(n) Surface water attenuation within the application site and surface water disposal arrangements. This shall be in accordance with the Greater Dublin Strategic Drainage Study (GSDSDS) and the recommendations pertaining to Sustainable Urban Drainage Systems (SUDS).

Response: Section 2.1 and Section 2.2 of the DOBA report sets out compliance with the Greater Dublin Strategic Drainage Study (GSDSDS) and the recommendations pertaining to Sustainable Urban Drainage Systems (SUDS). The DOBA report confirms that:

“The surface water attenuation within the application site has been designed in accordance with GSDSDS and SuDS.”

(o) Critical Swept Path Analyses for a 3 axle Refuse Lorry 9.86 metres by 2.5 metres in dimension and a fire tender demonstrating access and egress to and from the site and manoeuvrability on the site.

Response: Critical Swept Path Analyses has been prepared by DOBA. This swept path is shown on drawing C-0070 and C-0071.

ITEM 3 (2) – Traffic and Transportation -Traffic and Transportation Impact Assessment

The applicant should submit a Traffic and Transport Impact Assessment (TTA) in accordance with the NRA (TII) Traffic and Transport Assessment Guidelines May 2014.

Response: A Traffic and Transport Assessment (TTA) has been prepared by Systra and is submitted with this planning application. Section 1.1.1 of the TTA states that:

“The assessment has been undertaken in line with the guidelines set out in Transport Infrastructure Ireland’s (TII’s) ‘Traffic and Transport Assessment Guidelines’.”

The TTA also notes the following:

“Initial Pre-Application discussions took place in April 2021. An Interim Transport Assessment (TA) was prepared in June 2022 to accompany a pre-planning application to Kildare County Council (KCC). KCC’s Large-scale Residential Development (LRD) Opinion was issued on 23rd August, and contained detailed advice on traffic and transportation matters. This concluded that the documentation submitted would constitute a ‘reasonable basis’ on which to make an application for permission.

This TA takes into account the comments received in KCC’s LRD Opinion, and supports the planning application itself. The key changes since the draft TA submitted with the LRD consultation are:

- The red line boundary of the application has been amended. A footpath / cycleway on the north side of the canal, which would link the development to the Abbey Bridge is no longer proposed, as passive surveillance would not be provided on this path. This is likely to be delivered in later phases of the development.*
- No pedestrian / cycle bridges linking the north side of the canal to the south side /town centre are proposed during this stage of the development. They are to be included in future phases of the development.*

Other points that have been specifically addressed are:

- A Mobility Management Plan (MMP) accompanies the Transport Assessment*
- A Construction Traffic Management Plan (CTMP) forms part of the wider Construction Management Plan (CMP).*
- A rationale on the number of cycle and car parking spaces provided is included within Section 4.7,*
- The junction capacity modelling section of the TA has been expanded to include an additional ‘Full Masterplan’ scenario, which considers the potential impact of future development in the harbour area.*

ITEM 3 (3) – Traffic and Transportation – Mobility Management Plan

Response: A Mobility Management Plan has been prepared by Systra and is submitted with this planning application.

The applicant will be required to submit a Mobility Management Plan that is to contain:

(a) Full details of all existing public transport links and timetables serving Naas and links to commuter rail timetables at Sallins. This is also to list all public transport links to prominent employment centres in order to reduce car borne journeys.

Response: Section 3.3.4 of the MMP includes details of a selection of key employment centres, and the bus journey time to them from Naas as follows:

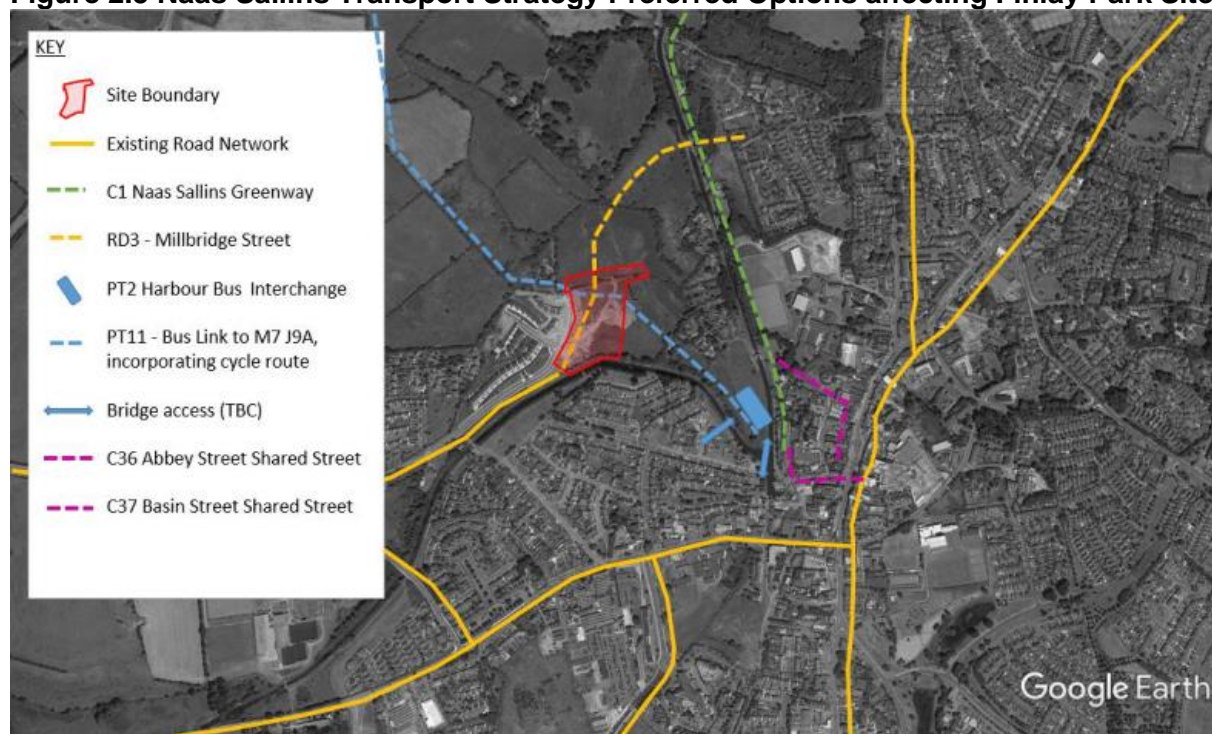
- Sallins and Naas Rail Station – 10 minutes;
- Newbridge – 18 minutes;
- Red Cow Luas – 30 minutes;
- Dublin Airport – 45 minutes;
- Dublin City Centre (Connolly Station) – 50 minutes; and
- Citywest Business Campus – 60 minutes.

The above list demonstrates that a wide range of employment centres is within a one-hour bus journey from Naas, and therefore that bus travel represents a viable option for Finlay Park residents. Full bus timetables are included in Appendix A of the MMP

(b) Existing and proposed walking and cycling routes in Naas. The applicant will be required to have consideration to the Naas Sallins Transport Strategy and the Naas Sallins Greenway project.

Response: Section 3.6 of the MMP includes detail in respect of the Naas Sallins Transport Strategy. The Naas Sallins Transport Strategy (2020) identifies a multi-modal package of preferred measures, which are earmarked to be delivered in the short, medium and longer term over the next ten years (Figure 2.5). The site is not reliant on these but will benefit from the interventions.

Figure 2.5 Naas Sallins Transport Strategy Preferred Options affecting Finlay Park Site



Source: SYSTRA

The detail above from the MMP identifies eight measures that are identified in the Strategy are considered to have the potential to interact with the Finlay Park development. These are:

- PT2 Bus Interchange at Naas Harbour;
- PT4 Western Spine' Local Bus route;
- PT 11 Bus -Only' link to Sallins Bypass;
- RD3 Millbridge Street Road Link;
- C1 Naas to Sallins Greenway;
- C16 Northwest Quadrant Link Road Cycle Route;
- C36 Abbey Street Shared Street improvement; and
- C37 Basin Street Shared Street improvement.

The above developments will deliver improved connectivity to residents of Finlay Park, particularly strengthening local walking and cycling links into the town centre and canal Greenway, and public transport connections to the Sallins and Naas rail station

As set out in the MMP, the development will provide a segregated cycle track on the east side of Old Caragh Road within the site, which will link into existing facilities on Old Caragh Road. This will provide 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 the K Leisure site.

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 main Naas-Sallins Greenway alongside the canal, providing recreational routes in both directions between the two settlements.

The future continuation of a road link from Old Caragh Road, through the Northwest Quadrant, to M7 J9a, will incorporate some form of cycle provision. Once complete, this will provide a continuous cycle link from the site to Sallins.

(c) The manner in which the Mobility Management Plan will be made available to future residents.

Response: Section 7 of the MMP, includes the proposed MMP measures which includes the appointment of a Mobility Manager. The MMP states that:

“A Mobility Manager will be appointed, and their role is to manage the implementation of the MMP. The role involves being the main point of contact for travel information, promotion, and improvements. This may also be organised in the form of a resident’s group once the development is fully occupied and operational. The remit of the Mobility Manager includes the following:

- *To develop and oversee the implementation of the initiatives outlined in the MMP Action Plan;*
- *To monitor the progress of the plan, including carrying out annual Residential Travel Surveys;*
- *To actively market and promote the social, economic, and environmental benefits of sustainable travel to residents; and*
- *To provide sustainable travel information, support and advice to residents including available bus service timetables, walking, and cycling maps, car-sharing, the site’s car club and cycle hire services, and local cycling and walking schemes and events.*

(d) During the lifetime of this Mobility Management Plan, the developer shall submit annual survey results of the modal splits and origin of trips of staff of the crèche and future residents of the development.

Response: Section 8 of the MMP includes detail on MMP monitoring and review. Section 8.3 of the MMP outlines that that the *“Mobility Manager will carry out annual follow-up travel surveys with future residents. These surveys should take place in the same month and be of the same format as the original baseline survey to ensure compatibility of results.”*

ITEM 3 (4) – Traffic and Transportation – Lighting Report

The applicant should submit a Lighting Report and Site Lighting Layout drawings at scales of 1:500 demonstrating the development will not be a source of light pollution to adjacent lands, property, the canal and the public road network. The applicant will be required to review the existing public lighting arrangements on the existing adjacent public road network and submit proposals for the upgrade of public lighting (as deemed required) at this location.

Response: A lighting report and lighting layout drawings has been prepared by Rexel and is submitted with this planning application. The drawings show the lux levels and extent of lighting in the area. The details have also been reviewed by the Bat ecologist (Brian Keeley).

ITEM 3 (5) – Traffic and Transportation – Draft Construction Management Plan

The applicant should submit to a draft Construction Management Plan that is to contain:

Response: An Outline Construction and Environmental Management Plan has been prepared by DOBA and is submitted with this planning application.

(a) A Construction Traffic Management Plan indicating all haul routes to and from the site. Delivery times for plant and materials and waste collection shall have consideration to morning and evening peak school times in the area and peak traffic periods. Construction related traffic is not permitted to travel through Naas Town Centre. This plan is also to contain mitigation measures to minimize the effects the proposed development would have on the immediate public road network and existing traffic movements.

Response: Section 5 of the Outline Construction Management Plan includes an outline Construction Traffic Management Plan which states:

“An outline Construction Traffic Management Plan (CTMP), as noted in Item 5 of the KCC Notice of LRD Opinion, has been prepared by Systra and is included in the following section. This section sets out a framework for a CTMP that will be put in place to support the construction of the proposed development at Finlay Park. The CTMP will be finalised by the main contractor (once appointed), who will confirm the programme of works, the agreed routes to Site, and details of a Site Liaison Officer who will have responsibilities for managing traffic, and mitigating transport impacts, during construction.”

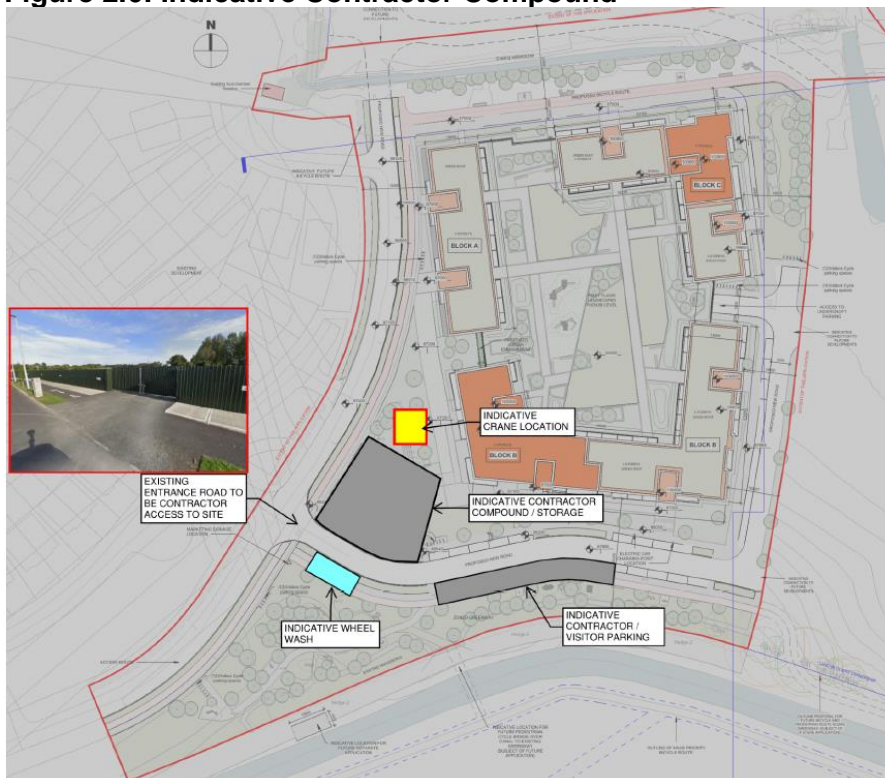
(b) Wheel wash arrangements and locations for the construction phase.

Response: Section 5.7 of the OCMP states that:

“Wheel Washing

In order to reduce mud and debris being deposited onto the local road network, a wheel washing facility will be installed. Old Caragh Road will be regularly swept by a road sweeping vehicle to ensure that it is kept free of dust and dirt.” Figure 2.6 below outlines the indicative wheel washing location.

Figure 2.6: Indicative Contractor Compound



Source: DOB

(c) Location of the construction compound, use of cranes, parking and storage areas during the construction phase. (This is in the interest of the existing residential amenity of properties in the area).

Response: Appendix A of the OCMP includes a location of the construction compound including the approximate location for cranes, as well wheel washing and parking (Figure 2.6). The construction compound will include storage areas. The crane location will be agreed with the Planning Authority.

(d) Relevant construction site warning signs shall be in accordance with the Department of Transport, Tourism and Sport (DTTAS) Traffic Signs Manual.

Response: Section 4.2 of the OCMP states that

'Site warning signs shall be in accordance with the Department of Transport, Tourism and Sport (DTTAS) Traffic Signs Manual (as noted in the KCC Notice of LRD Opinion).'

(e) A draft Construction Waste Management Plan. This is to contain final destination of each waste stream generated on site.

Response: In response to this item, we refer the Planning Authority to the Resource Waste Management Plan, prepared by RedKite Consulting. The RWMP states that:

This RWMP shall be updated regularly and submitted to KCC throughout the construction phase. A final report will be prepared at the end of the project detailing at a minimum, the rates of reuse, recycling and recovery of material and associated costs.

Once construction contractors and waste contractors have formally been appointed, and prior to removal of any C&D waste materials offsite, details of destination of each waste stream will be provided to the KCC Waste Regulation Unit.

KCC will also be consulted, as required, throughout the site development and construction phases in order to ensure that all available waste reduction, reuse and recycling opportunities are identified and utilised and that compliant waste management practices are carried out.

In addition, as part of standard procedures the contractor will be required to:

- *Identify all waste collectors to be engaged to transport each of the resources / wastes off-site.*
- *Identify all destinations for resources taken off-site. As above, any resource that is legally classified as a 'waste' must only be transported to an authorised waste facility by permitted waste collectors.*
- *Address end-of-waste and by-product notifications with the EPA where required.*
- *Clarify any other statutory waste management obligations, which could include on-site processing.*
- *Maintain full records of all resources (both wastes and other resources) for the duration of the project, and*
- *Prepare a RWMP Implementation Review Report at project handover.*

(f) Hours of operation during the construction phase to be 08.00 hours to 18.00 hours Monday to Friday and 0.800 hours to 14.00 hours Saturday. No work permitted on the Sundays and public holidays. (This is in the interest of the existing residential amenity of properties in the area).

Response: Section of the OCMP states that:

'Working Hours

The proposed hours of operation, as noted in Item 5 of the KCC Notice of LRD Opinion, during the construction phase are as follows:-

Start	Finish	Day(s)
08 00	18 00	Monday to Friday
08 00	14 00	Saturday

No works are proposed on Sundays or Bank Holidays or after the hours noted above. In exceptional circumstances works required outside of these hours, such as Night Works or Weekend Works during certain construction activities such as Road Junction Works, or concrete pouring, shall be agreed in advance with the local authority'.

ITEM 3 (6) – Traffic and Transportation – Road Safety Audit

The applicant will be required to submit a stage 1 and 2 Road Safety Audit/ Assessment (RSA) by an independent approved and certified auditor. The RSA is to assess: (a) The internal areas of the proposed residential and crèche development. (b) The interface with the existing public road/ foot path network. The applicant is required to make the necessary changes to the design proposals following the stage 1 and 2 RSA. The applicant is requested to note that if the application is subsequently granted, then the applicant will be required to carry out a stage 3 audit/ assessment.

Response: A stage 1/2 Road Safety Audit has been prepared by Road Plan Engineers and is submitted with this planning application. The applicant would be happy for the inclusion of a condition to undertake a stage 3 audit/assessment in the event of a grant of permission.

ITEM 3 (7) – Traffic and Transportation – Bus Only Cross Section

Status of the Bus Only Route and cross section (6.5m c/w width) should be confirmed and clarity provided as to whether this be used by other vehicular and HGV Traffic.

Response: A traffic and transport assessment has been prepared by Systra and outlines the following, *'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. Provision has been made for a bus route through the north of the development site, which would link into the interchange'.* A future route will be subject to the future Master plan of the Northwest Quadrant. The bus only route is not part of the current application site. The bus only route will form part of a future planning application on lands to the north of the application site as agreed with KCC Transportation Department. Please see attached correspondence between DOB&A and KCC in Appendix F.

ITEM 3 (8) – Traffic and Transportation – Pedestrian and Cycle Permeability

Details of proposed pedestrian/ cyclist permeability links to be submitted which should provide passive surveillance and public lighting and should be a minimum of 4m in width.

Response: Material prepared by C+W O'Brien outlines how the proposal provides passive surveillance along cyclist and pedestrian links. The public lighting plan is prepared by Rexel and is in compliance with the minimum of 4m in width. Pedestrian and cyclist permeability links are shown on drawing C-0050 prepared by DOB.

ITEM 3 (9) – Traffic and Transportation – Pedestrian/Cyclist Route Details

Details of proposed pedestrian/ cyclist route along the Canal should be submitted to provide passive surveillance and public lighting and should be a minimum of 4m in width.

Response: Building block B provides passive surveillance along the greenway which is located north of the Grand Canal. Further extension to the greenway will be completed with future phases of development.

ITEM 3 (10) – Traffic and Transportation – Indicative Design Details of Footbridges

Indicative design details of the proposed pedestrian/ cyclist footbridges to be submitted which should be a minimum of 5m in width.

Response: Indicative design details of the proposed pedestrian/ cyclist footbridges have been provided by C+W O'Brien. These designs are subject to future masterplans and agreed with Eoghan Ryan from KCC.

ITEM 3 (11) – Traffic and Transportation – Details of Naas Sallins Greenway Future Connection

Design details of the connection into the Naas Sallins Greenway to be submitted as part of future development on the site.

Response: The connection to the Naas Sallins Greenway is not part of the current LRD application site. The connection will form part of a future planning application as agreed with KCC Transportation Dept. See Appendix F of DOB ESR. The material prepared by C+W O'Brien and Systra outlines the future connection into the Naas Sallins Greenway. This connection will be provided with future phases of development and is subject to a future masterplan agreed with Eoghan Ryan. Connection to the Greenway will eventually be provided via the new footpath / cycleway along the north bank of the Grand Canal and the pedestrian over-bridges. Future, more direct connection to the Greenway is likely to be possible via the Abbey Bridge link.

ITEM 3 (12) – Traffic and Transportation – Cycle & Car Parking Rationale

Cycle parking spaces 222 in CDP and 148 being provided with shortfall of 74 spaces. Car parking spaces 259 in CDP and 208 being provided with shortfall of 51 spaces. Vehicular parking to be in accordance with Table 17.9 of Chapter 17 of the Kildare County Development Plan 2017- 2023. A rationale for the shortfall in spaces is to be provided.

Response: The proposed development provides for 388 no. cycle parking spaces. The proposal provides for 201. no car parking spaces which is a shortfall of 34 no. car parking spaces. The proposal provides for 1.3 spaces per unit. The inputs by Systra, C+W O'Brien and JSA outlines the rationale for the shortfall in car parking spaces and notes that providing 201 no. spaces is acceptable.

Section 4.7 of the TTA provides a justification for the parking strategy and the reduction in car parking spaces. The following is noted within the TTA.

“The ‘Design Standards for New Apartments – Guidance for Planning Authorities’ document, published by the Department of Housing, Planning and Local Government in 2020, 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 Guidance sets out suggested standards for sites by three types of location:

- **Central and/or Accessible Urban Locations** – highly accessible areas such as those adjoining city cores, or at the confluence of public transport systems.
- **Intermediate Urban Location** – 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.
- **Peripheral and/or Less Accessible Urban Locations** – for apartments in these relatively peripheral or less accessible urban 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.

SYSTRA would contend that the Finlay Park site’s location currently lies between an ‘Intermediate Urban Location’ and a ‘Peripheral’ location. The parking provided within the development is in line with the more conservative assessment of the site as a peripheral location. Future development in the Northwest Quadrant, and associated improvements in public transport provision, will mean that the site’s location will firmly evolve into an intermediate urban location.

Based on the above, the proposed parking provision is deemed to be adequate”.

The Devoy Barracks SHD (TA09.313276) in Naas was granted with a parking rate of 1.22 spaces per unit. The inspectors report noted the following,

‘I consider that a reduction in car parking provision for houses and apartment units (relative to the CDP standard) is warranted at this location, in accordance with national policy, given the site’s proximity to the urban core of Naas and that there is a need to limit overall car parking provision to promote sustainable transport options. I note that following on from the last SHD application (which was refused), the applicant has increased the level of parking from the then proposed 0.85 spaces per apartment to the now proposed 1.22 spaces per apartment, which is more in keeping with the location of this site in a town centre with facilities and services in walking distance, and acknowledging that the bus services available are commuter services primarily and not town services, however, there are plans to improve local bus services as well as active modes in Naas’.

A recent LRD application in Celbridge (Reg. Ref. 22221052) was granted by Kildare. This scheme provided 1.5 spaces per apartment unit +1 visitor space per 4 apartments. The KCC planners report noted the following *‘Having regard to the proximity of the site to key public transport, the car and bicycle parking spaces provided is considered satisfactory’.*

ITEM 3 (13) – Traffic and Transportation – Acoustic Design Statement

The site is located adjacent to Public Roads and the applicant is requested to submit an Acoustic Design Statement by a suitably qualified acoustic specialist to ensure the proposed development including external areas will not be exposed to noise levels in excess of the Kildare County Third Noise Action Plan Lden threshold of 70 dB (A) and Lnight threshold of 57 dB (A). (Mitigation measures are to be included as deemed required).

(a) A noise monitoring survey conducted midweek during school-term that is to contain a full set of noise monitoring results. These results are to include the Time Run

Duration, LAeqT (1 hour), LAeqT (15min), LAFmax, LAF10, LAF90, calculated Lden noise levels and measured Lnight noise levels.

Response: As set out in the RedKite Noise and Vibration Report, 2 no. surveys were undertaken. The first in March 2020 and the second in September 2022 (12th to 15th). Section 5 of the report sets out the results of the monitoring.

Figure 2.7: Noise Monitoring Locations – March 2020



Source: Redkite

(b) Calculated Lden and measured Lnight values at the facades of the proposed development at levels not less than 1.5 metres above each of the respective floor level. The useability of balconies (If applicable) are to be subject of this assessment.

Response: We refer the Planning Authority to the RedKite Noise and Vibration Report. Section 9.2 sets out commentary in relation to balconies within the proposed development which states that:

“Based on the ambient monitoring undertaken, all proposed private and public amenity space will comply with the ideal range 50 -55 dB LAeq, 16hr.

In the future, should the transport link be built out in 15 -20 years, the balconies proposed on Block A and Block B directly facing the road will not meet the above criterium.

However, other external amenity space, screened or set-back from traffic will be provided within the proposed development thus demonstrating good acoustic design as follows:

- *The units in Block A with rooms facing the road are dual aspect. The facades facing east will be screened from traffic noise.*
- *Access will be provided to the canal and to screened public spaces within the development.*
- *Part of the canal greenway will be developed.*
- *The provision of planted areas and water features in urban settings can qualitatively improve the soundscape for local residents and enjoyment of the proposed amenity areas. Natural features as provided in the design have been shown to improve perceived tranquillity.”*

(c) The predicted internal noise levels to be in accordance with the recommended indoor ambient noise levels as prescribed under the British Standards BS 8233:2014.

This is also to have an assessment with regard to opening windows at night (in summer months) and the impact on internal ambient noise levels. This assessment shall have consideration to the number of LAFmax events from 11 pm to 7.00 am having regard to potential sleep disturbance.

Response: Please refer to Section 9.0 of the Noise & Vibration Impact Assessment Report.

(d) Concluding statement with regard to the compliance with the Kildare County Council Third Noise Action Plan 2019 - 2023 and the British Standards BS 8233:2014.

Response: An acoustic report has been prepared by Redkite and is submitted with this planning application. Section 6 of the noise report by Redkite provides commentary on the KCC Noise Action Plan.

ITEM 3 (14) – Traffic and Transportation – Surface Water

Surface water runoff to be collected and disposed of at the vehicular entrance and not discharged onto the public road network. Finished ground levels and falls to be indicated on a drawing.

Response: All surface water drainage details are indicated within the material prepared by DOBA which is included within this planning application. Refer to Section 2.2.2 of the ESR.

ITEM 3 (15) – Traffic and Transportation – Surface Water

Surface water to be collected, attenuated and disposed of to a suitable outfall with petrol interceptors to be installed (in view of the HGV traffic) to protect the existing outfalls and water courses. This should be in accordance with the Greater Dublin Strategic Drainage Study (GSDSDS) and the recommendations pertaining to Sustainable Urban Drainage Systems (SUDs).

Response: As set out in the DOBA Engineering report, all surface water drainage details are indicated within the material prepared by DOBA which is included within this planning application. This material is in accordance with the Greater Dublin Strategic Drainage Study (GSDSDS). Refer to Section 2.2.2 of the ESR.

ITEM 4 (1) – Environment – Resource Waste Management Plan

“Report needs to be included outlining the applicant's compliance with Appendix C of the "EPA Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)" in terms of Tier 2 type projects. Applicant to demonstrate clearly their proposals regarding the "designing out" of waste in terms of the following:

- Reuse and recycling of existing onsite materials,***
- Green procurement,***
- Off-site construction, and***
- Material optimisation.”***

Response: A Resource Waste Management Plan (RWMP) has been prepared by Redkite and is submitted with this planning application. The RWMP notes that,

“The Project comprises 134 dwellings and therefore falls above the thresholds and is classed as a Tier 2 development. Accordingly, a bespoke RWMP is required and designed in accordance with the requirements for structure and content (pre-construction) set out in Appendix C of the 2021 Guidelines. This document will be updated throughout the life of the construction phase of the proposed development as set out in Appendix C of the 2021 Guidelines.

The RWMP covers the following areas:

- *Introduction or Overview – to include commitments and policies of the operator, overview of relevant legislation etc.*
- *Project Description to include location, history, and proposed demolition (if any), material balance, project programme and description etc.*
- *Roles and Responsibilities assigned to manage resource efficiency and waste out.*
- *Design approach – “waste out” initiatives.*
- *Key Materials, quantities and costs.*
- *Site Management and Infrastructure.*
- *Audits & Inspections.*
- *Communications with the Local Authority.”*

ITEM 4 (2) – Environment – Operational Waste Management Plan

Applicant's proposals regarding management of operational waste for the proposed development is unclear. Applicant to outline clearly the proposed waste storage facilities for the development occupants, as well as access arrangements for bin collection trucks in accordance with current road design standards for such developments.

Response: An Operational Waste Management Plan has been prepared by Redkite and is submitted with this planning application. Section 6 of the OWMP sets out the waste storage facilities will be located Waste Storage Areas (WSAs) are provided at Podium Car-parking Level and ground floor level in Blocks B&C. A separate secure area within the closest WSA (Area 2) in Block B will be provided for the commercial unit.

Section 6.2 of the OWMP sets out the collection arrangements as follows:

“Waste Collection

On collection days, waste bins will be moved from the WSAs to a waste bin collection area near the entrance to the undercroft parking. Refuse trucks will reverse into the turning point (hammerhead) provided at the access to the undercroft parking to collect the bins.

There are numerous private contractors that provide waste collection services in the Kildare area. All waste contractors servicing the proposed development will hold a valid waste collection permit for the specific waste types collected.

All waste collected will be transported to registered/permitted/licensed facilities only.

Waste collection is expected to occur on a weekly basis. Placing and removal of bins following emptying will comply with KCC bye-laws.”

Drawing no. DR -C-0070 prepared by DOBA includes Autotrack analysis for a refuse vehicle.

ITEM 4 (3) – Environment – SUDs Details

Applicant to clarify their proposals regarding the incorporation of Nature Based SuDS into their proposed surface water management plans in terms of:

- ***Swales,***
- ***Porous paving (roads and pathways),***
- ***Tree pits,***
- ***Rain gardens,***
- ***Roof gardens,***
- ***etc***

Response: DOBA has prepared drawings and an Engineering Services Report which outlines the range of nature-based SuDS incorporated into the proposed development.

ITEM 4 (4) – Environment – Waste Management Act

Applicant to clarify if their intention is to raise the level of the site in any way as part of the proposed development works. If so, they need to clarify their proposals regarding regularising this in accordance with Section 39 of the Waste Management Act.

Response: The applicant does not intend to raise the level of the site so no fill being imported. Cut and fill is to create a suitable platform.

ITEM 5 (1) - Water Services – Flood Risk Assessment

(a) Flood Risk Assessment (FRA) submitted with any future LRD planning application shall be in compliance with the Planning System Flood Risk Management Guidelines and the flood risk management policies and objectives in Naas LAP and CDP. (i) Recently published revised fluvial flood mapping for Naas Flood Relief Scheme indicates the subject site is in Flood Zone C. This element of the FRS is due to be finalised by the end of this year. (ii) Pluvial flood risk shall be assessed in FRA as follows: a. the current phase of Naas FRS assessed pluvial flood risk and the risk posed to the proposed development from this source shall be assessed in FRA and b. relating to the new drainage system shall be assessed and compliance with the requirements of GSDSDS Volume 2 Chapter 6 Stormwater Drainage Design Criterion 3 shall be demonstrated and c. Overland surface water flows from external sources shall be addressed appropriately. (iii) Groundwater and residual flood risks shall also be assessed. (iv) The effects of future climate change on all flood risk types shall be assessed.

Response: A Flood Risk Assessment has been prepared by JBA consulting. This assessment is submitted with this planning application. **The FRA notes the following,**

‘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'.

ITEM 5 (2) – Water Services – SUDS

The SuDS and Drainage Strategy for the proposed development shall comply with the attached WSD SuDS and Drainage Strategy Guidance Document for Large Developments, GDSDS, CIRIA SuDS Manual, Water Sensitive Urban Design Interim Best Practice Guidance Document and surface water drainage policies and objectives of Naas LAP and CDP.

Response: DOBA has ensured that the SuDS and drainage strategy comply with WSD SuDS and Drainage Strategy Guidance Document for Large Developments, GDSDS, CIRIA SuDS Manual, Water Sensitive Urban Design Interim Best Practice Guidance Document and surface water drainage policies and objectives of Naas LAP and CDP.

The SuDS and drainage strategy has been designed in compliance with the WSD SuDS and drainage guidance document for Large Developments and GDSDS and is described in Sections 2.2.2 and 2.2.3 of the DOBA Engineering Services Report.

ITEM 5 (3) – Water Services – Section 50 Consent

“OPW Section 50 consent will be required for any changes ie diversions, bridging, culverting or piping to the site watercourse.”

Response: We refer the Planning Authority to section 2.2.1 of the DOBA Engineering Services report which confirms that:

“No diversion, bridging, culverting or piping of the site watercourse is proposed as part of this development.”

ITEM 5 (4) – Water Services – Watercourse Capacity

Where required, consent to discharge runoff to the site watercourse shall be submitted. Condition and capacity of the site watercourse to cater for runoff from the proposed development should also be addressed.

Response: The engineering services report prepared by DOBA outlines that:

“The existing discharge to the watercourse serving the existing Finlay Park development is to be reused with slight amendments to the outfall to include a new headwall (see drawing C-0110). Any works adjacent to the watercourse will be agreed with Inland Fisheries prior to commencement on site (see Section 2.3 below for correspondence with Inland Fisheries). The capacity of the watercourse to cater for runoff from the proposed development is accounted for in the SSFRA prepared by JBA.”

ITEM 5 (5) – Water Services – Preliminary Design Surface Water Audit

Stage 1 Preliminary Design Surface Water Audit to be undertaken by independent, impartial, accredited and competent consulting engineer shall be submitted with any planning application.

Response: A Stage 1 Surface Water Audit has been carried out by JBA Consulting on the proposed surface water drainage design. The design and drawings have been amended following the comments raised during the audit process and JBA have accepted the design

responses. The audit report and supporting documents are attached in Appendix B of the DOBA Engineering Services Report.

ITEM 5 (6) – Water Services – Watercourse Capacity

“SuDS and Drainage Design shall comply with GSDS and other relevant standards and consider utilising 30% climate change factor and 10% urban creep factor”.

Response: The DOBA Engineering Services Report confirms that:

“30% climate change and 10% urban creep have been included in the design calculations and this has been addressed in the Stage 1 SW Audit.”

The calculations are included in Appendix B of the DOBA Engineering Services Report.

ITEM 5 (7) - Water Services – Attenuation

“Proposed re-location of attenuation for Finlay Park phase 1 should be addressed in any planning application.”

Response: With reference to phase 1 attenuation, the attenuation storage serving the existing Finlay Park development is being relocated to the north of the proposed development. The flows from the existing development have been accounted for in the SW design for the proposed new development. The existing attenuation and the new SW design were addressed in the Stage 1 SW Audit included in Appendix B of the DOBA Engineering Services Report.

ITEM 6 (1) – Irish Water

New Pre Connection Enquiry application submitted to Irish Water and they confirm Confirmation of Feasibility (CoF) is imminent. The prospective applicant should continue their dialogue with Irish Water on any required network infrastructure upgrades identified in CoF and the proposed foul infrastructure diversion and maximise the certainty on these issues in any planning application, particularly on timelines for delivery of upgrades and diversions.

Response: A Confirmation of Feasibility has been received by Irish Water on the 3rd of August 2022 which notes that the proposed development can be facilitated. This Confirmation of Feasibility is submitted with this planning application in the particulars and the DOBA Engineering Services Report within Appendix D.

ITEM 6 (2) – Irish Water – Statement of Design Acceptance

Water services designs and layouts will be subject to a Statement of Design Acceptance which should be submitted with any planning application.

Response: A Statement of Design Acceptance was received from Irish Water on the 26th of October 2022. Please find this statement submitted with this planning application in the particulars and the DOBA Engineering Services Report.

ITEM 7 (1) – Fire Safety

As the proposed development is connected by a shared car park the development will be considered as one building from a Fire Safety Certificate perspective.

Response: A letter from Pro Fire notes that the proposed design is in compliance with regulations. The letter notes *“We have assessed the whole building design in order to ensure that the layout in principle complies with Part B and M of the building regulations and as such, we confirm that compliance is achieved”.*

ITEM 7 (2) – Fire Safety

Access for Fire Service vehicles to be in accordance with Table 5.1, Table 5.2 and Diagram 32 of Technical Guidance Document B; Fire Safety. The current view of the Fire Authority is that access for the Fire Service is not adequate.

Response: Pro Fire has provided a letter which demonstrates compliance with Table 5.1, Table 5.2 and Diagram 32 of Technical Guidance Document B; Fire Safety please find letter included with this planning application.

ITEM 8 – Other

The eighth item of specific further information relates to the submittance of relevant documentation for the proposed development. This item of the Council's Opinion was as follows:

The following documents are also required,

a) Planning Statement

Response: A Statement of Consistency with Planning Policy has been prepared by John Spain Associates (JSA) and is submitted with this planning application. It also constitutes a planning statement.

b) Statement of Consistency with Planning Policy

Response: A Statement of Consistency with Planning Policy has been prepared by JSA and is submitted with this planning application.

c) Housing Quality Assessment

Response: A Housing Quality Assessment has been prepared by C+W O'Brien and is submitted with this planning application.

d) EIA Screening

Response: An EIA Screening has been prepared by Redkite and is submitted with this planning application.

e) AA Screening

Response: An AA Screening has been prepared by Openfield and is submitted with this planning application.

f) Ecological Impact Assessment

Response: An Ecological Impact Assessment has been prepared by Openfield and is submitted with this planning application.

g) Community and Social Infrastructure Audit (including schools and childcare)

Response: A full Community and Social Infrastructure Audit (including schools and childcare) has been prepared by JSA and is submitted with this planning application.

h) Proposals Under Part V

Response: Part V proposals have been prepared C+W O'Brien Architects and is submitted with this planning application.

i) Arboricultural Assessment Report

Response: An Arboricultural report and associated drawing have been prepared by The Tree File and is submitted with this planning application.

j) Acoustic Design Statement

Response: An Acoustic Assessment has been undertaken by Redkite and is submitted with this planning application.

k) Construction Management Plan

Response: An Outline Construction Management plan has been prepared by DOBA and is submitted with this planning application.

l) Lighting Report

Response: A Lighting Report and associates drawings has been prepared by Rexel and is submitted with this planning application.

m) Taking in Charge Plan

Response: A taking in charge plan has been prepared by the applicant and C+W O'Brien Architects. This plan is submitted with this planning application.

3.0 CONCLUSION

In conclusion, all the issues raised by Kildare County Council in its opinion have been comprehensively addressed in the planning application submitted to the Local Authority as set out within this statement of response and the accompanying documentation.

The proposed development provides for a significant number of high-quality residential units across a range of sizes and tenures and within a range of building typologies, with associated open space, in a scheme which effectively responds to the characteristics and constraints of the subject lands with a considered and site-specific design.

The development provides for a range of connections to adjacent areas and adjoining proposed and existing development, including pedestrian and cycle linkages, the existing road network and to adjacent existing and future residential development.