**Comhairle Contae Chill Dara**
Kildare County Council

Date: 28th September 2026
Our Ref: ED/1377

Naas AFC,
C/O Keenan Lynch Architects,
47 Herbert Lane,
Dublin 2,
D02 NY89.

**RE: Application for a Declaration of Exempted Development under Section 5 of Planning and Development Act 2000 (as amended) for development at Naas Sports Centre, Caragh Road, Naas, Co. Kildare, W91 TE29.**

Dear Sir/Madam,

I refer to your correspondence received on 3rd June 2026 in connection with the above.

Please find attached declaration made under Section 5 of Planning and Development Acts 2000 (as amended) in this regard.

Yours sincerely,

PP

**Senior Executive Officer,**
**Planning Department.**

**Comhairle Contae Chill Dara**
Kildare County Council

**Declaration of Development & Exempted Development under Section 5 of the Planning and Development Act 2000 (as amended).**

**ED/1377**

**WHEREAS** a question has arisen as to whether alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of topsoil and the installation of a new artificial grass surface with line markings for 1 no. 100m x 64m football pitch, and the provision of associated subsurface drainage constitutes exempt development at Naas Sports Centre, Caragh Road, Naas, Co. Kildare, W91 TE29

**AS INDICATED** on the plans and particulars received by the Planning Authority on 3rd June 2026

**AND WHEREAS** Naas AFC requested a declaration on the said question from Kildare County Council,

**AND WHEREAS** Kildare County Council as the Planning Authority, in considering this application for a declaration under Section 5 of the Planning and Development Act 2000 (as amended), had regard to;

a. Sections 2, 3, and 4 of the Planning and Development Act 2000 (as amended);
b. Articles 6 of the Planning and Development Regulations, 2001, (as amended);
c. Class 33 (c) of the Planning and Development Regulations 2001 (as amended), and
d. The nature, extent and purpose of the works/development,

**AND WHEREAS** Kildare County Council has concluded that:

a. The alteration to ground levels of less than 200mm arising from the removal of approx. 250mm of topsoil and installation of a new artificial grass surface for 1 football pitch involves the carrying out of works, which constitutes development under Section 3 of the Planning and Development Act 2000 (as amended)
b. The development complies with the scope and thresholds of exempted development provided by Article 6 contained in Class 33 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001 (as amended)

**NOW THEREFORE** Kildare County Council, in exercise of the powers conferred on it by Section 5(2)(a) of the Planning and Development Act 2000 (as amended), hereby decides that -

Alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of topsoil and the installation of a new artificial grass surface with line markings for 1 no. 100m x 64m football pitch, and the provision of associated subsurface drainage at Naas AFC, Naas Sports Centre, Caragh Road, Naas, Co. Kildare **IS development and IS EXEMPTED development pursuant to the provisions of the Planning and Development Act, 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended).**

Please note that any person issued with a declaration under Section 5 of the Planning and Development Act 2000 (as amended) may on payment to the Board of the prescribed fee, refer a declaration to An Coimisiún Pleanála within 4 weeks of the issuing of the decision.

**28th September 2026**

pp
**Senior Executive Officer,**
**Planning Department.**

**KILDARE COUNTY COUNCIL**

**PLANNING, ENTERPRISE & ECONOMIC DEVELOPMENT DEPARTMENT**

**Section 5 referral & declaration on development & exempted development**

**Planning & Development Act 2000 (as amended)**

**Reference No. ED/1377**

| | |
|---|---|
| **Name Of Applicant(s):** | Naas AFC |
| **Address Of Development:** | Naas Sports Centre, Caragh Road, Naas, Co. Kildare W91 TE29. |
| **Development Description:** | Alterations to ground levels of less than 200mm arising from the removal of approx. 250mm of topsoil and installation of a new artificial grass surface for 1 football pitch. |
| **Due date** | 01/07/2026 |

## Introduction

This is a request for a **DECLARATION** under Section 5(1) of the Planning and Development Act 2000 (as amended) to establish whether under Section 5 of the Act the works consisting of:

- alterations to ground levels of less than 200mm arising from the removal approximately 250 mm of topsoil, and
- Installation of a new artificial grass surface for 1 football pitch

**is** or **is not** development and **is** or **is not** exempted development.

## Site Location

The subject site is located on the grounds of Naas AFC, located within the Naas Sports Centres (also known as K Leisure). The site is located adjacent to the main building, to the southwest of the lands. There is a stream located to the south of the site and the Grand Canal proposed Natural Heritage Area is located approximately 100m to the south of the site. Under the Naas Local Area Plan 2021-2027, the site is zoned Objective E 'Community and Education' which seeks '*To provide for education, recreation, community and health.*'




*Site Location Map (submitted as part of application documents)*

## Planning History

There is an extensive planning history pertaining to the overall site including but not limited to:

**ED1024** – This site is located to the south of the site subject of this Section 5 Declaration (different red line boundaries). KCC determined the following:

> "the alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of topsoil, the installation of a new artificial grass surface for a 7 aside pitch and a 4 aside pitch and associated drainage works at Naas ACF, Caragh Road, Naas West, Naas, Co. Kildare" ***is development and is exempted development*** *pursuant to Sections 3 and 4 of the Planning and Development Act as amended and Article 6, Article 9 of the Planning and Development Regulations as amended.*

**23/387** - Permisison **granted** the installation of new 2.4m high fencing with 2.6m high ball stopping net installed on top for a total height of 5m around soccer pitch with pedestrian gates provided at the north-west and north-east corners of the pitch, a larger maintenance gate is to be provided at the east end of the pitch and associated site works at Naas Sports Centre.

**15/276** - Permission **granted** for 2 no. Extension to the existing K-Leisure Naas Sports Facility.

**12/500038** - Permission **granted** for the development of a 237 sqm extension to the existing K-Leisure Naas Sports Facility.

**12/500032** - Permission **granted** for the development of a new all-weather soccer pitch on site of existing pitch, 15m high floodlights, 90m 5 lane running track with floodlights and all ancillary works including fencing.

**Relevant Legislative Background**

Planning and Development Act 2000 (as amended)

**Section 2(1)**

*'works' includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.*

**Section 3(1)**

*In this Act, 'development' means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land.*

**Section 5(7) EIA Screening**

The proposed development is not specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001(as amended). In any event, it is considered, having regard to nature, size and location, the proposed development would not be likely to have significant effects on the environment. Therefore, EIA is not required.

Planning and Development Regulations 2001 (as amended)

**Article 6(1)**

Subject to article 9, development of a class specified in column 1 of Part 1 of Schedule 2 shall be exempted development for the purposes of the Act, provided that such development complies with the conditions and limitations specified in column 2 of the said Part 1 opposite the mention of that class in the said column 1.

**Article 9 (1)(a)(i)**

Restrictions on exemption.

9. (1) Development to which article 6 relates shall not be exempted development for the purposes of the Act—

(a) if the carrying out of such development would—....

*(i) contravene a condition attached to a permission under the Act or be inconsistent with any use specified in a permission under the Act,*

*(ii) consist of or comprise the formation, laying out or material widening of a means of access to a public road the surfaced carriageway of which exceeds 4 metres in width,*

*(iii) endanger public safety by reason of traffic hazard or obstruction of road users,*

*(iiia) endanger public safety by reason of hazardous glint and/or glare for the operation of airports, aerodromes or aircraft, Commented*

*(iv) except in the case of a porch to which class 7 specified in column 1 of Part 1 of Schedule 2 applies and which complies with the conditions and limitations specified in column 2 of the said Part 1 opposite the mention of that class in the said column 1, comprise the construction, erection, extension or renewal of a building on any street so as to bring forward the building, or any part of the building, beyond the front wall of the building on either side thereof or beyond a line determined as the building line in a development plan for the area or, pending the variation of a development plan or the making of a new development plan, in the draft variation of the development plan or the draft development plan,*

*(v) consist of or comprise the carrying out under a public road of works other than a connection to a wired broadcast relay service, sewer, water main, gas main or electricity supply line or cable, or any works to which class 25, 26 or 31 (a) specified in column 1 of Part 1 of Schedule 2 applies, (vi) interfere with the character of a landscape, or a view or prospect of special amenity value or special interest, the preservation of which is an objective of a development plan for the area in which the development is proposed or, pending the variation of a development plan or the making of a new development plan, in the draft variation of the development plan or the draft development plan,*

*(vi) consist of or comprise the excavation, alteration or demolition (other than peat extraction) of places, caves, sites, features or other objects of archaeological, geological, historical, scientific or ecological interest, the preservation, conservation or protection of which is an objective of a development plan or local area plan for the area in which the development is proposed or, pending the variation of a development plan or local area plan, or the making of a new development plan or local area plan, in the draft variation of the development plan or the local area plan or the draft development plan or draft local area plan,*

*(vii) (viiA) consist of or comprise the excavation, alteration or demolition of any archaeological monument included in the Record of Monuments and Places, pursuant to section 12 (1) of the National Monuments (Amendment) Act 1994, save that this provision shall not apply to any excavation or any works, pursuant to and in accordance with a consent granted under section 14 or a licence granted under section 26 of the National Monuments Act 1930 (No. 2 of 1930) as amended,*

*(viiB) comprise development in relation to which a planning authority or An Bord Pleanála is the competent authority in relation to appropriate assessment, and the development would require an appropriate assessment because it would be likely to have a significant effect on the integrity of a European site,*

*(viiC) consist of or comprise development which would be likely to have an adverse impact on an area designated as a natural heritage area by order made under section 18 of the Wildlife (Amendment) Act 2000.*

*(viii) consist of or comprise the extension, alteration, repair or renewal of an unauthorised structure or a structure the use of which is an unauthorised use,*

*(ix) consist of the demolition or such alteration of a building or other structure as would preclude or restrict the continuance of an existing use of a building or other structure where it is an objective of the planning authority to ensure that the building or other structure would remain available for such use and such objective has been specified in a development plan for the area or, pending the variation of a development plan or the making of a new development plan, in the draft variation of the development plan or the draft development plan,*

*(x) consist of the fencing or enclosure of any land habitually open to or used by the public during the 10 years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility,*

*(xi) obstruct any public right of way,*

*(xii) further to the provisions of section 82 of the Act, consist of or comprise the carrying out of works to the exterior of a structure, where the structure concerned is located within an architectural conservation area or an area specified as an architectural conservation area in a development plan for the area or, pending the variation of a development plan or the making of a new development plan, in the draft variation of the development plan or the draft development plan and the development would materially affect the character of the area, (b) in an area to which a special amenity area order relates, if such development would be development:— (i) of class 1, 3, 11, 16, 21, 22, 27, 28, 29, 31, (other than paragraph (a) thereof ), 33 (c) (including the laying out and use of land for golf or pitch and putt or sports involving the use of motor vehicles, aircraft or firearms), 39, 44 or 50(a) specified in column 1 of Part 1 of Schedule 2, or (ii) consisting of the use of a structure or other land for the exhibition of advertisements of class 1, 4, 6, 11, 16 or 17 specified in column 1 of Part 2 of the said Schedule or the erection of an advertisement structure for the exhibition of any advertisement of any of the said classes, or (iii) of class 3, 5, 6, 7, 8, 9, 10, 11, 12 or 13 specified in column 1 of Part 3 of the said Schedule, or 42 (iv) of any class of Parts 1, 2 or 3 of Schedule 2 not referred to in subparagraphs (i), (ii) and (iii) where it is stated in the order made under section 202 of the Act that such development shall be prevented or limited, (c) if it is development to which Part 10 applies, unless the development is required by or under any statutory provision (other than the Act or these Regulations) to comply with procedures for the purpose of giving effect to the Council Directive, (d) if it consists of the provision of, or modifications to, an establishment, and could have significant repercussions on major accident hazards. (2) (3) Changes of use. 10. (1) Sub-article (1)(a)(vi) shall not apply where the development consists of the construction by any electricity undertaking of an overhead line or cable not exceeding 100 metres in length for the purpose of conducting electricity from a distribution or transmission line to any premises. For the avoidance of doubt, sub-article (1)(a)(vii) shall not apply to any operation or activity in respect of which a Minister of the Government has granted consent or approval in accordance with the requirements of regulation 31 of the Habitats Regulations 1997, and where regulation 31(5) does not apply.*

**Schedule 2, Part 1, Article 6**

| Description of Development | Conditions and Limitations |
|---|---|
| *Development for amenity or recreational purposes*<br><br>**CLASS 33**<br><br>Development consisting of the laying out and use of land—<br><br>(a) as a park, private open space or ornamental garden,<br><br>(b) as a roadside shrine, or<br><br>(c) for athletics or sports (other than golf or pitch and putt or sports involving the use of motor vehicles, aircraft or firearms), where no charge is made for admission of the public to the land. | The area of any such shrine shall not exceed 2 square metres, the height shall not exceed 2 metres above the centre of the road opposite the structure, and it shall not be illuminated. |

**Assessment**

Question 1 - Is it development?

The first question to address is whether or not:

1. Alterations to ground levels of less than 200mm arising from the removal approximately 250 mm of topsoil, and
2. Installation of a new artificial grass surface for 1 football pitch

would constitute development in accordance with the provisions of the Planning and Development Act, 2000 (as amended). The Act defines "development" as the carrying out of any works **on**, in, over or under land or the making of any material change in the use of any structures or other land (Section 3(1)) and defines "*'works' to include any act or operation of* construction, ***excavation,*** *demolition, extension,* ***alteration,*** *repair or renewal"*

It is considered that the alteration to ground levels is an **act of excavation and alteration** and therefore constitutes 'works' which constitutes **development**.

Question 2 - Is it or is it not exempted development?

Is the development of:

1. Alterations to ground levels of less than 200mm arising from the removal approximately 250 mm of topsoil, and
2. Installation of a new artificial grass surface for 1 football pitch

exempted development?

Having regard to:

Secondary Legislation

Class 33 of Part 1, of Schedule 2 of the Planning and Development Regulations entitled- '*Exempted Development – General'* applies. Class 33 provides for:

"Development consisting of the laying out and use of land - *(c) for athletics or sports (other than golf or pitch and putt or sports involving the use of motor vehicles, aircraft or firearms), where no charge is made for admission of the public to the land.*

A cover letter has been submitted as part of the Section 5 application. It is stated that:

*"Naas AFC is not for profit voluntary community sports organisation based on the grounds of the Naas Sports Centre, Caragh Road, Naas. (..) Our membership fees are modest and have not changed in c. 10 years. Our fees cover league registration, insurance, coaching, facility maintenance, gear, referee fees and other club outgoings. There is NO SPECIFIC CHARGE for access to our facilities."*

The documentation submitted outlines that it is proposed to enhance the facility by providing astro training areas for players. The proposal is replacing the existing grass with astro. No other material changes are proposed.

Having regard to the requirements set out within Class 33 (c) in Schedule 2 of Part 1 (c) of the Planning and Development Regulations 2001 (as amended) which relates to layout and use of land for athletics or sports (other than golf or pitch and putt or sports involving the use of motor vehicles, aircraft or firearms), where no charge is made for admission of the public to the land, the required changes to ground level, it is considered that the proposed works **is development and is exempted development.**

**Conclusion**

Having regard to:

a. Sections 2, 3, and 4 of the Planning and Development Act 2000 (as amended);
b. Articles 6 of the Planning and Development Regulations 2001 (as amended);
c. Class 33 (c) of the Planning and Development Regulations 2001 (as amended), and
d. The nature, extent and purpose of the works;

It is considered that:

a. The alteration to ground levels of less than 200mm arising from the removal of approx. 250mm of topsoil and installation of a new artificial grass surface for 1 football pitch involves the carrying out of works, which constitutes development under Section 3 of the Planning and Development Act 2000 (as amended)

b. The development complies with the scope and thresholds of exempted development provided by Article 6 and contained in Class 33 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001.

And therefore, it is concluded that:

*Alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of topsoil and the installation of a new artificial grass surface with line markings for 1 no. 100m x 64m football pitch, and the provision of associated subsurface drainage at Naas AFC,* Naas Sports Centre, Caragh Road, Naas, Co. Kildare **constitutes development** as defined in Section 3(1) of the Planning and Development Act 2000 (as amended) and **is exempted development** as defined by the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended).

Caitriona Dockery

Executive Planner
08/09/2026

J. O'Reilly

J. O'Reilly
A/Senior Planner
28/09/2026

**Declaration of Development & Exempted Development under**

**Section 5 of the Planning and Development Act 2000 (as amended)**

**WHEREAS** a question has arisen as to whether *"Alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of topsoil and the installation of a new artificial grass surface with line markings for 1 no. 100m x 64m football pitch, and the provision of associated subsurface drainage."*

**AS INDICATED** on the plans and particulars received by the Planning Authority on 03/06/2026

**AND WHEREAS** *Naas AFC* requested a declaration on the said question from Kildare County Council,

**AND WHEREAS** Kildare County Council as the Planning Authority, in considering this application for a declaration under Section 5 of the Planning and Development Act 2000 (as amended), had regard to;

a) Sections 2, 3, and 4 of the Planning and Development Act 2000 (as amended);
b) Articles 6 of the Planning and Development Regulations 2001 (as amended);
c) Class 33 (c) of the Planning and Development Regulations 2001 (as amended), and
d) The nature, extent and purpose of the works.

**AND WHEREAS** Kildare County Council has concluded that :

A) The alteration to ground levels of less than 200mm arising from teh removal of approx. 250mm of topsoil and installation of a new artifical grass surface for 1 football pitch involves the carrying out of works, which constitutes development under Section 3 of the Planning and Development Act 2000 (as amended)
B) The development complies with the scope and thresholds of exempted development provided by Article 6 and contained in Class 33 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001.

**NOW THEREFORE** Kildare County Council, in exercise of the powers conferred on it by Section 5(2)(a) of the Planning and Development Act 2000 (as amended), hereby decides that -

> *Alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of topsoil and the installation of a new artificial grass surface with line markings for 1 no. 100m x 64m football pitch, and the provision of associated subsurface drainage at Naas AFC,* Naas Sports Centre, Caragh Road, Naas, Co. Kildare.

***IS development and IS EXEMPTED development pursuant to the provisions of the Planning and Development Act, 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended).***

Please note that any person issued with a declaration under Section 5 of the Planning and Development Act 2000 (as amended) may on payment to the Board of the prescribed fee, refer a declaration to An Bord Pleanála within 4 weeks of the issuing of the decision.

**Appendix 1: Appropriate Assessment Screening**

| | |
|---|---|
| | **APPROPRIATE ASSESSMENT SCREENING REPORT AND DETERMINATION** |

| **(A) Project Details** | |
|---|---|
| **Planning File Ref** | ED1377 |
| **Applicant name** | Naas AFC |
| **Development Location** | Caragh Road, Naas |
| **Site size** | Approx. 0.8179 ha |
| **Application accompanied by an EIS (Yes/NO)** | No |
| **Distance from Natura 2000 site in km** | Mouds Bog SAC approximately 7km from the site |
| **Description of the project/proposed development –** Alterations to ground levels and installation of artifical grass | |

| **(B) Identification of Natura 2000 sites which may be impacted by the proposed development** | | | |
|---|---|---|---|
| | | | **Yes/No If answer is yes, identify list name of Natura 2000 site likely to be impacted.** |
| 1 | **Impacts on sites designated for freshwater habitats or species.**<br><br>Sites to consider: River Barrow and Nore, Rye Water/Carton Valley, Pollardstown Fen, Ballynafagh lake | *Is the development within a Special Area of Conservation whose qualifying interests include freshwater habitats and/or species, or in the catchment (upstream or downstream) of same?* | **No** |

| | | | |
|---|---|---|---|
| 2 | **Impacts on sites designated for wetland habitats - bogs, fens, marshes and heath.** Sites to consider: River Barrow and Nore, Rye Water/Carton Valley, Pollardstown Fen, Mouds Bog, Ballynafagh Bog, Red Bog, Ballynafagh Lake | *Is the development within a Special Area of Conservation whose qualifying interests include wetland habitats (bog, marsh, fen or heath), or within 1 km of same?* | **No** |
| 3 | **Impacts on designated terrestrial habitats.** Sites to consider: River Barrow and Nore, Rye Water/Carton Valley, Pollardstown Fen, Ballynafagh Lake | *Is the development within a Special Area of Conservation whose qualifying interests include woodlands, dunes or grasslands, or within 100m of same?* | **No** |
| 4 | **Impacts on birds in SPAs** Sites to consider: Poulaphouca Resevoir | *Is the development within a Special Protection Area, or within 5 km of same?* | **No** |

**Conclusion:**
If the answer to all of the above is **No**, significant impacts can be ruled out for habitats and bird species.
No further assessment in relation to habitats or birds is required.
If the answer is **Yes** refer to the relevant sections of **C**.

| **(G) SCREENING CONCLUSION STATEMENT** *Selected relevant category for project assessed by ticking box.* | | |
|---|---|---|
| 1 | AA is not required because the project is directly connected with/necessary to the conservation management of the site | |
| 2 | No potential significant affects/AA is not required | **X** |
| 3 | Significant effects are certain, likely or uncertain. Seek a Natura Impact Statement Reject proposal. (Reject if potentially damaging/inappropriate) | |
| **Justify why it falls into relevant category above (based on information in above tables)** | | |
| Having regard to the proximity of the nearest SAC site and the relatively small-scale nature of the proposal, it is not considered a potential exists for significant effects on the Natura 2000 network | | |
| **Name:** | C. Dockery | |
| **Position:** | ~~Executive Planner~~ | |
| **Date:** | 08/09/2026 | |

# COMHAIRLE CONTAE CHILL DARA

# KILDARE COUNTY COUNCIL

## Director of Services Order

I, Alan Dunney, Director of Services of Planning, Enterprise & Economic Development, by the powers conferred on the Chief Executive of Kildare County Council under Section 151 of the Local Government Act 2001, as amended by the Local Government Reform Act 2014, and which powers are delegated to me pursuant to Section 154 of the Local Government Act 2001 (as amended ) by Chief Executive's Order number: CE63325, do hereby make the following Order:

**ORDER NO:** DO68111 **Section:** Planning

**SUBJECT:** ED/1377
Naas AFC, C/O Keenan Lynch Architects, 47 Herbert Lane, Dublin 2, D02 NY89 Exempt Development Application for alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of topsoil and the installation of a new artificial grass surface with line markings for 1 no. 100m x 64m football pitch, and the provision of associated subsurface drainage at Naas AFC, Naas Sports Centre, Caragh Road, Naas, Co. Kildare.

**SUBMITTED:** File Ref. ED1377 with recommendation from the Senior Executive Planner and reports from the Council's Technical Officers.

**ORDER:** **I hereby order the following** Kildare County Council, in exercise of the powers conferred on it by Section 5(2)(a) of the Planning and Development Act 2000 (as amended) hereby decides that the proposed development is development and is exempted development.

MADE THIS 28TH DAY OF SEPTEMBER YEAR 2026

SIGNED: Alan Dunney

**DIRECTOR OF SERVICES**

# Kildare County Council

## Declaration of Exempt Development under Section 5, of the Planning and Development Act 2000 as amended

**Incomplete application forms will be deemed**

**All responses must be in block letters**

| | Details of Applicants |
|---|---|

**1.** Name of Applicant(s): Naas AFC
Phone No: [redacted] Fax No.....

**2.** Address: Caragh Road, Naas, Co. Kildare, W91 TE29

| Section 2 | Person/Agent acting on behalf of applicant (if applicable) |
|---|---|

**1.** Name of Person/Agent: Keenan Lynch Architects
Phone No: 01 662 0944 Fax No.....

**2.** Address: 47 Herbert Lane, Dublin 2, D02 NY89

| Section 3 | Company Details (if applicable) |
|---|---|

**1.** Name of Company: Naas AFC
Phone No: [redacted] Fax No.....

**2.** Company Reg. No:

**3.** Address: Caragh Road, Naas, Co. Kildare, W91 TE29

| Section 4 | Details of Site |
|---|---|

**1.** Planning History of Site

Planning File Numbers: 12500032, 12500038, 15276

**2.** Location of Proposed Development

Naas Sports Centre, Caragh Road, Naas West, Naas, Co. Kildare

**3.** Ordnance Survey Sheet No

3558-B

**4.** Please state the Applicants interest in the site

Long term Leaseholder

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

**5.** Please state the extent of the proposed development

New 11v11 full-size pitch (FIFA Quality / Quality Pro) with area of 8179.28m$^2$.

**6.** Under what Section of the Planning and Development 2000 as amended and/or what provision of the Planning and Development Regulations 2001 as amended is exemption sought *(specific details required)*

Planning & Development Regulations 2001 as amended Schedule 2 Part 1 – Exempted Development – General CLASS 33 Development consisting of the laying out and use of land— (c) for athletics or sports (other than golf or pitch and putt or sports involving the use of motor vehicles, aircraft or firearms), where no charge is made for admission of the public to the land.

**7.** Please give a detailed description of the Proposed Development (*Use separate page if necessary*)

Alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of topsoil and the installation of a new artificial grass surface with line markings for 1no. 100m x 64m football pitch, and the provision of associated subsurface drainage.

| **Section 5** | **The following must be submitted for a valid application** |
|---|---|

**(Please Tick)**

| | | |
|---|---|---|
| 1. | Site Location Map (1:2500 Rural Areas) (1:1000 Urban Areas) | ✓ |
| 2. | A Site Layout Plan (Scale 1:500) in full compliance with Article 23 of Planning and Development Regulations 2001 as amended | ✓ |
| 3. | Drawings of the development (Scale 1:50) in full compliance with Article 23 of Planning and Development Regulations 2001 as amended | ✓ |
| 4. | All drawings to differentiate between the original building, all extensions and proposed development | ✓ |
| 5. | Fee of 80 Euro | N/A |

| **Section 6** | **Declaration** |
|---|---|

I, **Cormac Wren** certify that all of the above information is correct and I have submitted all the required documents as outlined at Section 6 above.

Signature: 

Date: 22/04/2026

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

KEENAN LYNCH
ARCHITECTS

**Attn: Planning Department**
Head Office Áras Chill Dara
Devoy Park,
Naas
Co. Kildare W91 X77F

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

OUR REF: **AM12** YOUR REF: **N/A** DATE **22.04.2026**

**Re: Naas AFC Section 5 Submission**

Dear Sir/Madam,

On behalf of our client Naas AFC, we wish to apply for a section 5 for a replacement of an existing natural grass soccer training area with an artificial grass training pitch surface together with minor alterations to ground levels constitutes development and where it constitutes development, whether such development is or is not exempted development.

**Attached documentation:**

- 1no. Copy of Completed Kildare County Council Section 5 Application Form.
- Letter of consent from owner
- Letter from the Naas AFC committee
- 2 no. Copies of **Keenan Lynch Architects** information as follows.
  - Drawing No. AM12 - PL001– Site Location Map
  - Drawing No. AM12 - PL002– Existing Site Layout Plan
  - Drawing No. AM12 - PL003– Proposed Site Layout Plan

**Naas AFC Background**

Founded in 1990 Naas AFC and is a non -profit organisation which has grown significantly over the years and now has over 400 juvenile members and 50+ adult members. It has over twenty-five teams from U8s to Over 35s and a highly successful Academy catering to the youngest members from U5 upwards

**The Works**

Replacement of an existing natural grass soccer training area with an artificial grass training pitch surface with an area of 8179.28m2, with 1no. 100x64m 11 v 11 full size football pitch (FIFA Quality / Quality Pro) with associated subsurface drainage.

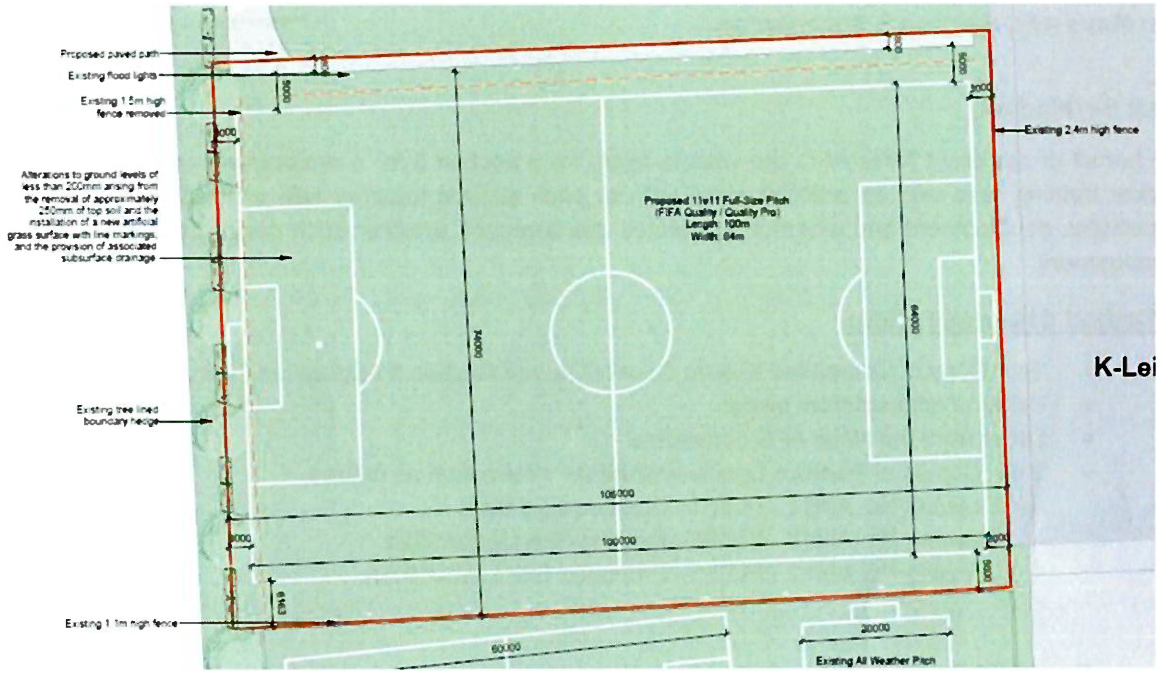
The proposed submission wishes to determine that the works to be undertaken constituted exempted development under Class 33(c) of Part 1 of Schedule 2 of the Planning and Development Act 2000, as amended.

- The replacement of an existing natural grass training area with an artificial grass training pitch surface;
- Alterations to ground levels of less than 200mm arising from the removal of approximately 250mm of top soil and the installation of a new artificial grass surface, the provision of associated subsurface drainage;



**Keenan Lynch Partnership Ltd. Reg No 334330 Trading as Keenan Lynch Architects**
DIRECTORS: **Paul Keenan** B.Arch. MRIAI Dip Arb | **Bernard Lynch** Dip. Arch. Tech. MRIAI
ASSOCIATE DIRECTORS: **Cormac Wren** BA Arch | **Gavin Mc Carron** BSc(Hons) MRICS MSCSI

There will be no material intensification of use, as the use will remain associated with Naas AFC activities only. The grass training area has been established for many years since sports centre inception by Naas AFC and we are proposing the same activity and use, but with a new Astro surface in leu of a grass surface. No fencing or floodlighting will be erected as part of the works undertaken and no trees or hedging will be removed as a result of the works.




Subject Area Indicated In Red

**Site Location:**

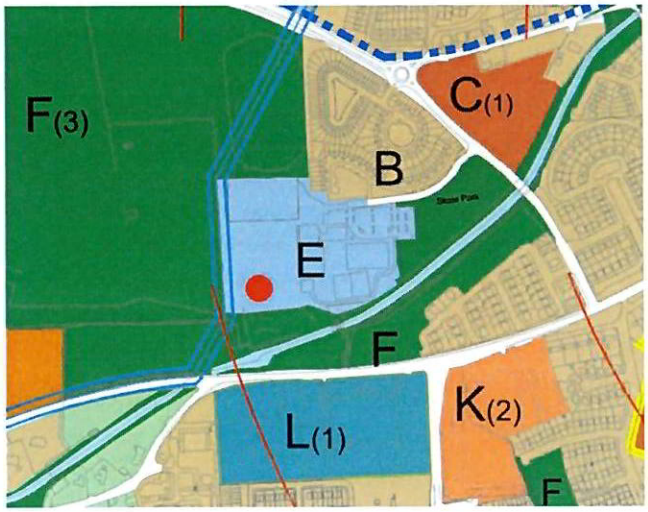
The works involve the alteration of the existing grass training area within the grounds of Naas Sports Group Management CLG. Caragh Rd, Naas West, Naas, Co. Kildare. The training area is located south of the soccer pitches to the west of the Naas Sports Centre and Kleisure buildings.

The lands to the north of the training area accommodate large grass football pitches, artificial hockey pitch and athletics track. To the south, there is a dense band of shrubs and trees separating the training area from the canal. To the west of the area is agricultural lands. To the east there is the Kleisure building.

Naas Local Area Plan 2021 – 2027 indicate a zoning E: Community & Education (S1,S2,S6) Zone E: Community and Educational - To provide for education, recreation, community and health.

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED




Subject Area Indicated In Red

All the adjacent lands are zoned F: Open Space and Amenity - To protect and provide for open space, amenity and recreation provision.

**With respect to Planning and Development Regulations:**

*"Schedule 2, Part 1 – Exempted Development – General. Class 33(c) "development consisting of the laying out and use of land for athletic or sports (other than golf or pitch and putt or sports involving the use of motor vehicles, aircraft or firearms) where no charge is made for admission of the public to the land".*

Naas AFC are registered as not for profit with the Revenue, they are a community club that provides recreational activities (football) to the wider Naas community. Naas AFC now has over 900 members. All membership fees are reinvested in the club facilities and running costs. Naas AFC membership payment by its members, is not a payment to use the pitch, but a payment for insurances and upkeep of the club facilities and future upgrades such as this. Currently the training area is being used by Naas AFC for their associated activates and there is no charge made for admission of the public and the new Astro turf training field will not alter this established use. From Naas AFC's own website they state:

***"What does your membership pay for and where does it go?***

*Contrary to what some may believe, Registration/Membership Fees are not for profit for the club. We try to provide excellent facilities for members of the club and the cost of maintaining this is significant. We make a significant contribution to the sports centre who maintain the excellent facilities. Our grass pitches have to be sanded and maintained every year. Other costs entailed in running the club are Insurance for each player, League Registration Fees for every team and player, Legal Fees and all other administrative costs. Also buying equipment for every team (training & match footballs, bibs, cones etc.) and paying referees fees for every home game throughout the season"*

The lands are owned by Naas Sports Group Management CLG but is used and operated by Naas AFC who are a local soccer club in Naas that used this space as a training area during the summer. In winter this area in unusable and the various underage groups have to move to the all-weather pitches within the Naas Sport Centre complex at great cost to the Naas AFC club. We are proposing the new full-size pitch (FIFA Quality / Quality Pro) in this area which will be solely used by the club and its members, and no revenue will be generated from outside groups or individuals.

Kildare County Council
Planning Department
03 JUN 2023
RECEIVED



The works to be undertaken will also involve the removal of approximately 250 millimetres of the top layer of the existing pitch and when the artificial pitch is laid on top the overall ground level will be altered by less than 500 millimetres. There may be a small amount of levelling, but it is predicted to be less than 500mm. Class 33(c) does not specify any conditions or limitations regarding alterations of grounds levels. Class 6 of the Exempted Development Regulations relates to alterations of ground levels for landscaping associated with a domestic dwelling. Under this class any alterations of ground levels of less than 1 metre would constitute exempted development. We propose that the alteration of ground levels of less than 500 millimetres would not be "material" in terms of planning. Therefore, the alterations of ground levels as part of the works proposed would not be significant or material in nature and would not result in any alteration of ground levels which would render it significant or incongruous in terms of surrounding ground levels.

**Precedent for Consideration**

Reference of previously approved application in 2023 February, for a section 5 exemption within the same grounds of Naas Sports Group Management CLG. Replacement of an existing natural grass soccer training area with an artificial grass training pitch surface with an area of 3912m², with 1no. 60x35m 7 a side football pitch and 1no. 30x20m 4 a side football pitch with associated drainage.

Planning Authority: Kildare County Council
Reference Number: ED/1024

There is an adjudicated case between An Bord Pleanála and the Dublin City Council where a question has arisen as to whether the replacement of an existing natural grass rugby pitch with an artificial grass rugby pitch together with the alteration of ground levels of less than 200 millimetres arising from the removal of the grass rugby pitch and the provision of associated subsurface drainage, is or is not development or is or is not exempted development: the board deemed the works is development and is exempted development.

Planning Authority: Dublin City Council
Planning Register Reference Number: 0275/17
ABP Reference Number: RL29S.RL3803

*"An Bord Pleanála, in exercise of the powers conferred on it by section 5 (3) (a) of the 2000 Act, hereby decides that the replacement of an existing natural grass rugby pitch with an artificial grass rugby pitch together with the alteration of ground levels of less than 200 millimetres arising from the removal of the grass rugby pitch and the provision of associated subsurface drainage at The High School, Zion Road, Rathgar, Dublin is development and is exempted development."*

**Fees**

Based on Planning Regulation Article 157 1(A) we are claiming a fee exemption.

*Exemptions. 157.*

*(1) Where a planning application consists of or comprises development which, in the opinion of the planning authority, is development proposed to be carried out by or on behalf of a voluntary organisation, and which in the opinion of the planning authority—*

*(a) is designed or intended to be used for social, recreational, educational or religious purposes by the inhabitants of a locality, or by people of a particular group or religious denomination, and is not to be used mainly for profit or gain,*

Naas AFC are registered as not for profit with the Revenue, and thus exempt from a submission fee.

**Conclusion**

We are proposing to resurface the existing training pitch with an artificial grass training pitch. No fencing, lighting or permanent goals are proposed in these works. The existing training area and other pitches goal posts are stored in a secure area and are only positioned when training or a match are occurring. We currently do not impose an admission fee for the training area and we are not proposing to do so with the resurfacing.

We trust that the above and enclosed information is clear and will allow the Planning Authority to make a positive decision. Have you any further queries please do not hesitate to contact me.

Yours sincerely,



Cormac Wren

Keenan Lynch Architects

47 Herbert Lane, Dublin 2, D02NY89

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

**Naas AFC**
Naas Sports Centre,
Carragh Road,
Naas, Co. Kildare

Planning Department
Kildare county council
Aras Chill Dara
Devoy Park
Naas
Kildare

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

24 February 2023

To whom it may concern

Naas AFC is a not for profit voluntary community sports organisation based on the grounds of the Naas Sports Centre, Caragh Road Naas

The club was founded in 1990 and has been using the playing pitches at Caragh road since that date. We are founding member and shareholder of Naas Sports Centre sports group and the football pitches / grass areas there have been used by members of the club over that period for training and matches.

We are proud that our members come from all parts of the Naas community and we have a wide diversity of members from all groups and backgrounds. Our inclusivity has encourage significant growth in membership over recent years and we are approaching a record 600 members for the upcoming 23/24 season. Including parents/ guardians and supporters of the club that amounts to a direct community of c2k and probably more indirectly. We are one of the largest soccer clubs in Kildare and our growth has placed massive demands on our facilities and providing year round access to training pitches for example. With the growth in population in Naas we expect these demand to increase significantly.

Our membership fees are modest and have not changed in c10 years. Our fees cover league registration, insurance, coaching, facility maintenance, gear, referee fees and other club outgoings. There is NO SPECIFIC CHARGE for access to our facilities. Any improvement to the facilities we make DOES NOT LEAD TO INCREASED MEMBERSHIP FEES. We therefore would be categoric in our assertion that any facility improvements are provided FREE OF CHARGE to members and indeed the wider naas soccer community. As an example the facilities are also used by local schools (NAAS CBS) for school matches for which there is no charge by the club.

In light of the above we are proposing to enhance our facility by providing astro training areas for players. This would facilitate year round access and avoid training area closures due to weather/ grass pitch conditions in the winter. The proposal is replacing the existing grass with astro. No other material changes are proposed to the existing site.

**Naas AFC**
Naas Sports Centre,
Carragh Road,
Naas, Co. Kildare

To fund this development we are seeking grant aid from the upcoming sports capital grant program. The club have put in a massive amount of work to prepare an application and in pulling together a significant own funding commitment to support our grant application. However without a successful grant application we will not be able to proceed.

The grant application required that we have necessary planning consents in place. Without this we may be prevented from applying or have our application marked down. We expect the grant application process to open shortly and will be open for a 4 to 5 week period. If we miss this application deadline we have a real risk of the project not being eligible for another application for a number of years or it may not happen at all.

We are therefore in good faith submitting a section 5 planning exemption application for a new astro training pitch to replace the existing grass pitch. If approved by the council, this would provide us with the necessary planning consents to make the grant application and maximise our ability to successfully obtain grant monies for the project. As a not for profit community organisation we also understand we are exempt from planning fees for this application and would be grateful if you could confirm his in due course.

As a large local community based club we look forward to our councils support in progressing our grant application and to ensure this much needed facility improvement becomes a reality.

Yours in Sport

Padraig Ahearne
Chairman

Naas AFC

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

*New Caragh Road,*
*Naas,*
*Co. Kildare,*
*ph. (045) 896 166*
*naassportscentreinfo@gmail.com*

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

29/05/2026

To whom it may concern:

The Naas Sports Group Management CLG give consent to Naas AFC to change the surface of Pitch one soccer pitch from grass to Astro.

Thank you for your consideration in this matter.

Kind regards

Yvonne Maher
Manager
On behalf of the Board of Management.

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

Description:
==========
Digital Landscape Model (DLM)
Publisher / Source:
==========
Ordnance Survey Ireland (OSi)
Data Source / Reference:
==========
PRIME2
File Format:
==========
Autodesk AutoCAD (DWG_R2013)
File Name:
==========
v_50308745_1.dwg

Clip Extent / Area of Interest (AOI):
==========
LLX,LLY= 687563.4054,718884.6128
LRX,LRY= 688146.4054,718884.6128
ULX,ULY= 687563.4054,719314.6128
URX,URY= 688146.4054,719314.6128
Projection / Spatial Reference:
==========
Projection= IRENET95_Irish_Transverse_Mercator
Centre Point Coordinates:
==========
X,Y= 687854.9054,719099.6128
Reference Index:
==========
Map Series | Map Sheets
1:2,500 | 3558-B
1:1,000 | 3559-06
Data Extraction Date:
==========
Date= 19-Dec-2022
Source Data Release:
==========
DCMLS Release V1.159.114
Product Version:
==========
Version= 1.4
License / Copyright:
==========
Ordnance Survey Ireland 'Terms of Use' apply.
Please visit 'www.osi.ie/about/terms-conditions'.

© Ordnance Survey Ireland, 2022

Compiled and published by Ordnance Survey Ireland, Phoenix Park, Dublin 8, Ireland.

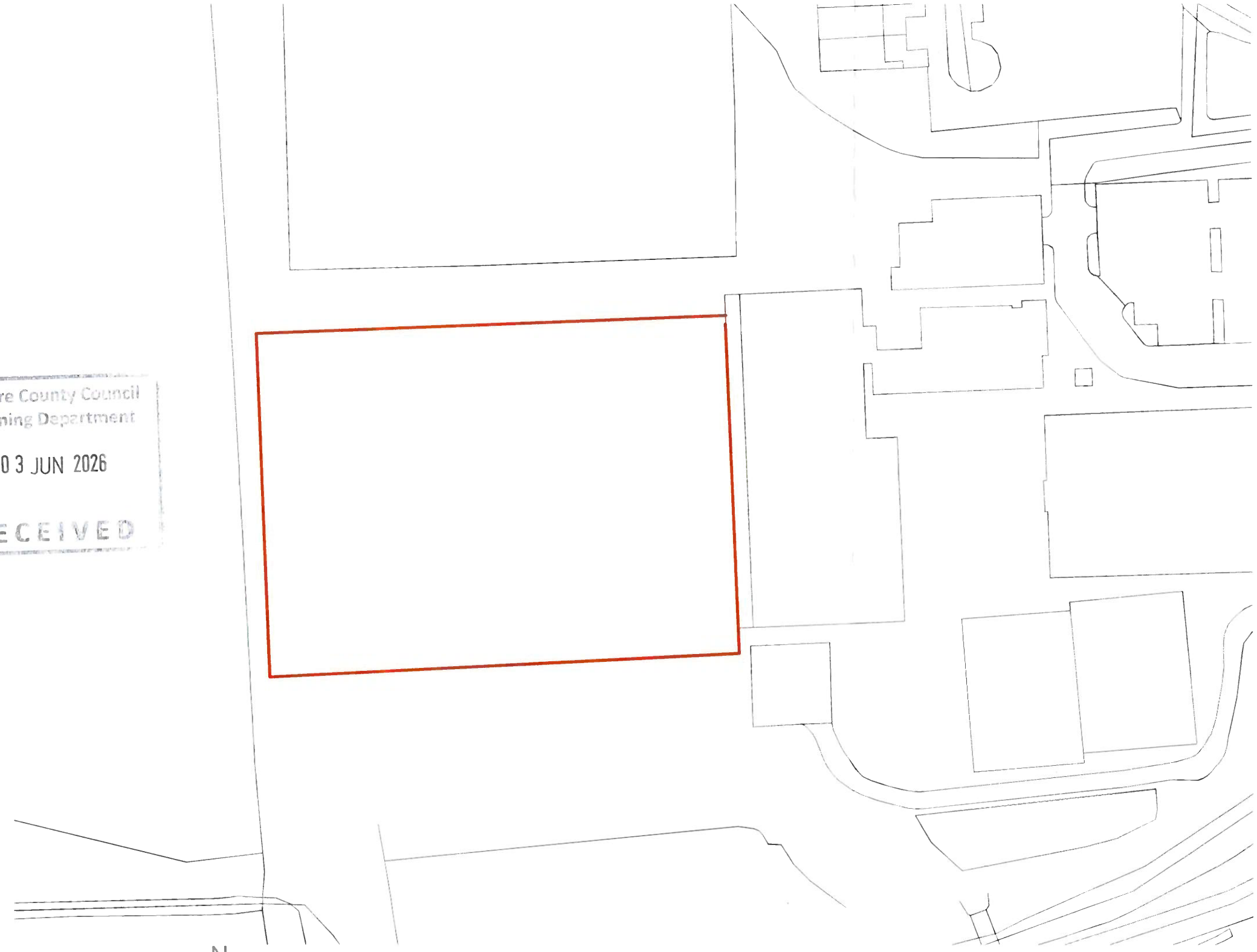
Unauthorised reproduction infringes Ordnance Survey Ireland and Government of Ireland copyright.

All rights reserved. No part of this publication may be copied, reproduced or transmitted in any form or by any means without the prior written permission of the copyright owners.

The representation on this map of a road, track or footpath is not evidence of the existence of a right of way.

Ordnance Survey maps never show legal property boundaries, nor do they show ownership of physical features.

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED



**Site Location Map**
Scale: 1 : 1000

THIS DRAWING IS PROTECTED BY COPYRIGHT AND MUST NOT BE COPIED OR REPRODUCED WITH OUT THE WRITTEN CONSENT OF KEENAN LYNCH ARCHITECTS.

DIMENSIONS ARE NOT TO BE SCALED FROM THIS DRAWING.

IN THE EVENT OF ANY DISCREPANCIES BETWEEN DRAWINGS, THE CONTRACTOR IS TO INFORM THE ARCHITECT IMMEDIATELY.

ALL DIMENSIONS AND SIZES TO BE CHECKED ON SITE.©

NOTES / LEGEND

Ordnance Survey Ireland Licence No. AR 0016926
© Ordnance Survey Ireland
Government of Ireland

Key:
Site Boundary Line
Site Area: 8179.28 m²

| REV. | DATE | DESCRIPTION | ISSUED |
|---|---|---|---|

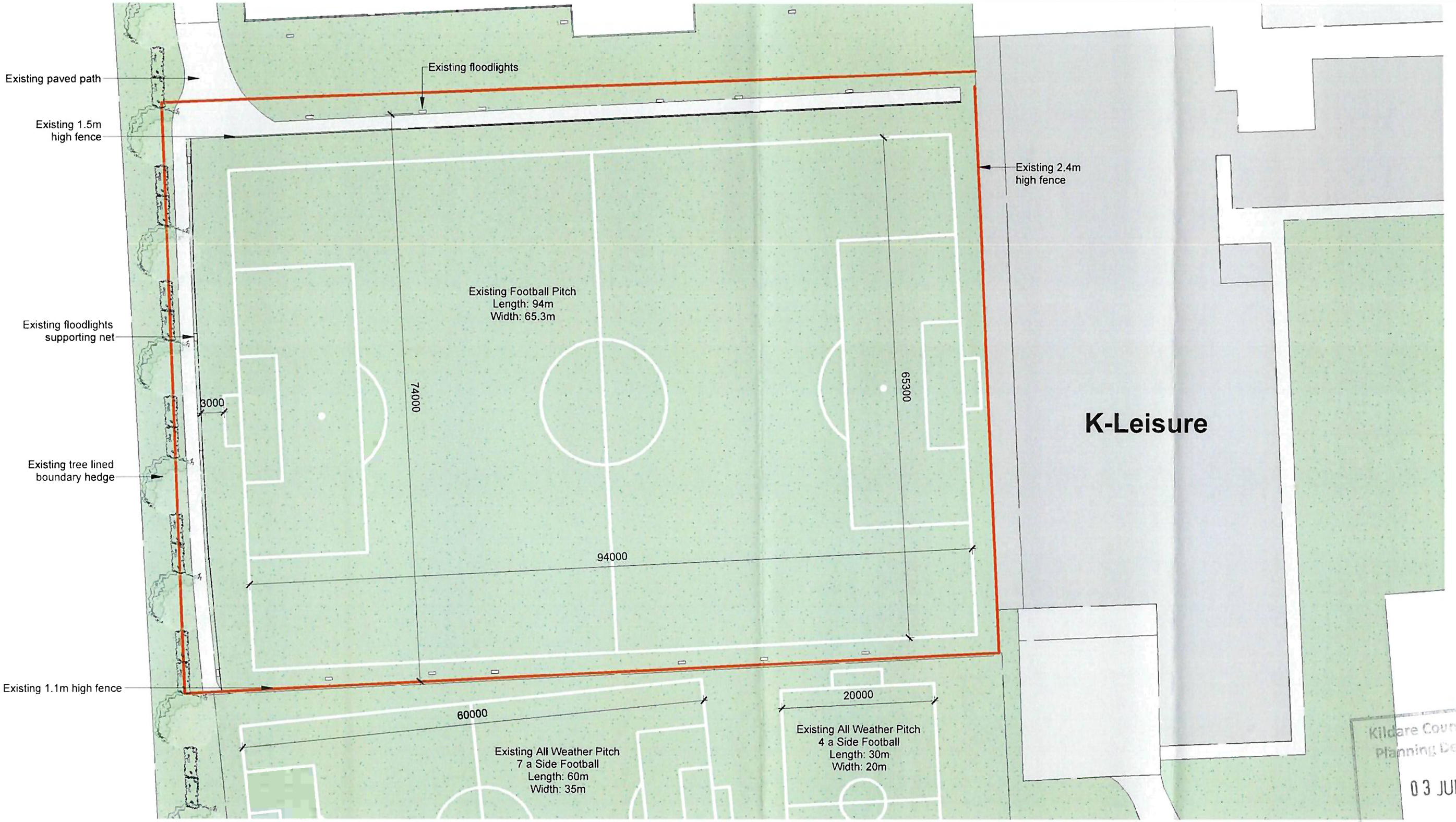
KEENAN LYNCH ARCHITECTS

©KEENAN LYNCH ARCHITECTS
ADDRESS 47 HERBERT LANE
DUBLIN 2, D02 NY89
PHONE 01 662 0944
EMAIL info@kla.ie

# Planning Exemption

| | |
|---|---|
| CLIENT: | Naas Sports Group Management CLG |
| PROJECT: | Naas Sports Centre |
| TITLE: | Site Location Map |
| DRAWN BY: MD | DATE: MAR 2026 — SCALE: As indicated @ A3 |

| CODE | ORIGINATOR: | PHASE: | LEVEL: | TYPE: | ROLE: | NUMBER: | REVISION: |
|---|---|---|---|---|---|---|---|
| - | KLA | - | - | - | - | PL001 | - |




N

**Existing Site Layout Plan**
Scale: 1 : 500

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

THIS DRAWING IS PROTECTED BY COPYRIGHT AND MUST NOT BE COPIED OR REPRODUCED WITH OUT THE WRITTEN CONSENT OF KEENAN LYNCH ARCHITECTS.

DIMENSIONS ARE NOT TO BE SCALED FROM THIS DRAWING.

IN THE EVENT OF ANY DISCREPANCIES BETWEEN DRAWINGS, THE CONTRACTOR IS TO INFORM THE ARCHITECT IMMEDIATELY.

ALL DIMENSIONS AND SIZES TO BE CHECKED ON SITE.©

NOTES / LEGEND

Key:

Site Boundary Line

Site Area: 8179.28 m²

| REV: | DATE: | DESCRIPTION: | ISSUED: |
|---|---|---|---|
| | | | |

KEENAN LYNCH ARCHITECTS

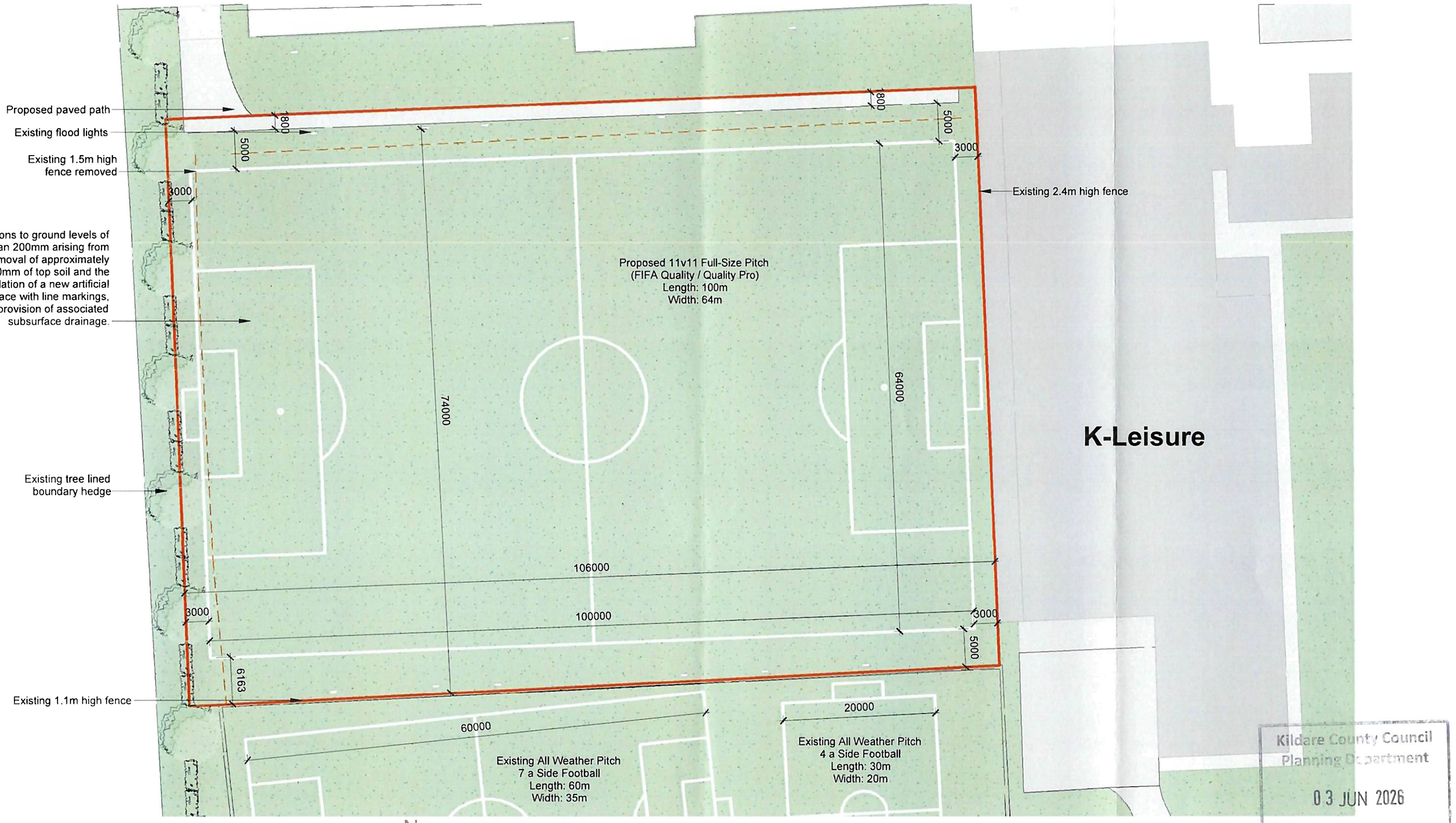
©KEENAN LYNCH ARCHITECTS

ADDRESS: 47 HERBERT LANE
DUBLIN 2, D02 NY89
PHONE: 01 662 0944
EMAIL: info@kla.ie

**Planning Exemption**

| | |
|---|---|
| CLIENT: | Naas Sports Group Management CLG |
| PROJECT: | Naas Sports Centre |
| TITLE: | Existing Site Layout Plan |
| DRAWN BY: MD | DATE: MAR 2026 — SCALE: As indicated @ A3 |

| CODE | ORIGIONATOR: | PHASE: | LEVEL: | TYPE: | ROLE: | NUMBER: | STATUS: | REVISION: |
|---|---|---|---|---|---|---|---|---|
| - | KLA | - | - | - | - | - PL002 | - | - |




**Proposed Site Layout Plan**
Scale: 1 : 500

N

Kildare County Council
Planning Department
03 JUN 2026
RECEIVED

THIS DRAWING IS PROTECTED BY COPYRIGHT AND MUST NOT BE COPIED OR REPRODUCED WITH OUT THE WRITTEN CONSENT OF KEENAN LYNCH ARCHITECTS.

DIMENSIONS ARE NOT TO BE SCALED FROM THIS DRAWING.

IN THE EVENT OF ANY DISCREPANCIES BETWEEN DRAWINGS, THE CONTRACTOR IS TO INFORM THE ARCHITECT IMMEDIATELY.

ALL DIMENSIONS AND SIZES TO BE CHECKED ON SITE.©

NOTES / LEGEND

| Key: | |
|---|---|
| | Site Boundary Line |
| Site Area: | 8179.28 m² |

| REV: | DATE: | DESCRIPTION: | ISSUED: |
|---|---|---|---|
| | | | |

**Planning Exemption**

KEENAN LYNCH ARCHITECTS

©KEENAN LYNCH ARCHITECTS
ADDRESS 47 HERBERT LANE
DUBLIN 2, D02 NY89
PHONE 01 662 0944
EMAIL info@kla.ie

| CLIENT: | Naas Sports Group Management CLG | | |
|---|---|---|---|
| PROJECT: | Naas Sports Centre | | |
| TITLE: | Proposed Site Layout Plan | | |
| DRAWN BY: | MD | DATE: MAR 2026 | SCALE: As indicated @ A3 |

| CODE | ORIGIONATOR: | PHASE: | LEVEL: | TYPE: | ROLE: | NUMBER: | STATUS: | REVISION: |
|---|---|---|---|---|---|---|---|---|
| - | KLA | - | - | - | - | - PL003 | - | - |

FINANCE CASH OFFICE
Kildare County Council
Áras Chill Dara
Devoy Park
Naas
Co Kildare
03/06/2026 15 21 33

Receipt No : FIN1/49335/525025
***** REPRINT *****

Meiling Dekorne
Section 5 Application

PLANNING EXEMPT DEVELOP FEES 80 00
GOODS 80 00
VAT Exempt/Non-vatable

Total : 80 00 EUR

Tendered :
Credit Card 80 00
vd
3788

Change : 0 00

Issued By : Margaret Jordan Finance Cash Office
From : Financial Lodgement Area
Vat reg No 0440571C