

# Chief Executive's Report

on submissions/observations received to the

## Draft Naas Local Area Plan 2019-2023



Planning Department  
Kildare County Council  
10<sup>th</sup> July 2019



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Appendix 1: Summary of issues raised by the persons in the submissions or observations

## 1.0 Introduction

This report relates to submissions and observations received from the public and prescribed bodies following the publication of the Draft Naas Local Area Plan 2019-2023 (the Draft LAP) under Section 20 of the Planning and Development Act 2000 (as amended).

### 1.1 Legislative Requirements

Under Section 20 of the Planning and Development Act 2000 (as amended), the Chief Executive is required to prepare a report on the submissions and observations received during the public consultation period in respect of the Draft LAP. This report shall list the persons who made submissions and observations, summarise the issues and make recommendations in relation to the Draft LAP. The recommendations shall take into account the proper planning and sustainable development of the area, the statutory obligations of the local authority and relevant policies or objectives of the Government or of any Minister of the Government.

### 1.2 Public Consultation

The Draft Naas Local Area Plan 2019-2023 was placed on public display from Thursday, 18<sup>th</sup> April 2019 to 30<sup>th</sup> May 2019 (inclusive). The Draft LAP was displayed at Áras Chill Dara, Naas Public Library and online at [www.kildare.ie](http://www.kildare.ie)

The following documents were placed on public display with the Draft LAP:

- An Environmental Report on the likely significant effects on the environment of implementing the Local Area Plan - pursuant to the Planning and Development (Strategic Environmental Assessment) Regulations 2004 – 2011;
- Appropriate Assessment Screening Report - pursuant to the EU Habitats Directive (92/43/EEC); and
- A Strategic Flood Risk Assessment – pursuant to Section 28 of the Planning and Development Act 2000 (as amended).

A public notice was published in the Leinster Leader on 16<sup>th</sup> April 2019 notifying the public that the Draft LAP was on public display and inviting submissions over a period of 6 weeks. Groups registered with the Kildare Public Participation Network in the Naas area were notified of the consultation. Copies of the Draft LAP, associated documents and public notice were sent to prescribed bodies, including government departments and other agencies, as required by the Planning and Development Act 2000 (as amended).

An informal public consultation evening was held on Tuesday 30<sup>th</sup> May 2019 between 3pm – 8pm in Naas Town Hall. This event was attended by approximately 33 people. Kildare County Council Social Media Channels (Facebook and Twitter) along with

posters erected in a number of locations throughout Naas were used as mechanisms in promoting awareness of the Draft LAP public consultation and of the public consultation evening.

An erratum to the Draft LAP was issued on the 1<sup>st</sup> May 2019 relating to a typographical error on some of the published maps. The error was located on Map Refs: 8.1, 10.1 and 10.1a with references to Tier 1 and Tier 2 lands in the legend on these maps removed.

### 1.3 Content of the Chief Executive's Report

The Chief Executive's Report is set out as follows:

Section 1: Background

Section 2: List of persons or bodies who made submissions/observations.

Section 3: Summary of issues raised and the Chief Executive's opinion and recommendations in relation to the local area plan.

Appendix 1: Summary of issues raised by the persons in the submissions or observations.

### 1.4 Next Steps

Within six weeks of receiving the Chief Executive's Report, the Members of Kildare County Council must consider the Chief Executive's Report and the Draft LAP. Following consideration, the Members may, as they consider appropriate, by resolution, make (or not make, as the case may be), amend or revoke the local area plan.

The elected members, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the 'Code of Conduct for Councillors' (June 2014) prepared under the Local Government Act 2001 (as amended) carry out their duties in a transparent manner, must follow due process and must make their decisions based on relevant considerations.

**Note:** This Chief Executive's Report and associated Draft LAP must be considered by full Council having regard to the LAP boundary crossing the administrative boundary of both the Naas Municipal District and the Kildare-Newbridge Municipal District areas.

## 2.0 List of Persons/Bodies Who Made Submissions

### 2.1 Submissions and Observations Received

During the public consultation period a total of 225 submissions and observations were received. Two submissions were received after the closing date and therefore cannot be considered in this report. The list of persons, prescribed bodies, groups and stakeholders who made valid submissions are listed in Table 2.1. A summary of the individual submissions is listed in Appendix 1 of this report.

**Table 2.1 Persons/Organisations who made Submissions/Observations**

1	Office of the Planning Regulator (OPR)	114	Anthony Madden
2	National Transport Authority (NTA)	115	Pat Breen
3	Transport Infrastructure Ireland (TII)	116	Dara Ó Maitiú
4	Environmental Protection Agency (EPA)	117	Bob Quinn
5	Cllr. Carmel Kelly	118	Dolores Fitzgerald
6	Health Service Executive (HSE)	119	Damien Pender
7	Irish Water	120	Hillside Drive Residents Association
8	Fintan Brett	121	Diarmuid Parker
9	Padraig McEvoy	122	Edmund Murphy
10	The Housing Agency	123	Queally Group
11	Anthony Lawlor	124	Queally Group & Ardstone Homes
12	Inland Fisheries Ireland	125	Frank Fogarty
13	Dept. Of Education & Skills	126	Naas GAA
14	Office of Public Works (OPW)	127	Eileen Kiely
15	Sorcha O'Neill	128	Mary Taaffe
16	Health & Safety Authority	129	Alan Cunniffe
17	Northern & Western Regional Assembly	130	Crylock Developments Ltd.
18	Anne & Larry Breen	131	Ballymore, Tetrarch & Midwest Holdings
19	Cllr. Rob Power	132	Bernie Lardner
20	Kildare Art Collective	133	Denis Kenny
21	Joseph Bergin	134	Kings Court Residents Association
22	Brian Kavanagh	135	The Westar Group
23	Ann Horan	136	Richie Mullins
24	Sean Dunne	137	Richard Godsil & Ward Frisby
25	Martina Shannon	138	Adrian Geissel

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26	Lara Deasy
27	Drenushe Xhemajli
28	Eithne Reddy
29	Katarzyna Fiodorow
30	Noleen Kavanagh
31	Aisling Popoola
32	Susan Miller
33	Audrey O'Reilly
34	Jim MacNeill
35	Sinead D
36	Laoise Coffey
37	Niamh Devenney
38	Sally Kennedy
39	Ruth Brennan
40	Niamh Cowdell
41	John Corry
42	Celine Maguire
43	Eamonn Maguire
44	Katriona Woods
45	Carol Connolly
46	Elaine Johnson
47	James O'Donnell
48	Paul Daly
49	Simon Holt
50	Alison Ryan
51	Paul Horan
52	Esmondsdale Residents Association
53	Dee Hulse
54	Noel Geary
55	James Stephens
56	Olivia Cassidy
57	John Bracken
58	Sinead Nooney
59	Edel Gilligan
60	Sharon Fidgeon
61	William Gilligan
62	Angela Haslam
63	Fiona Moore
64	Avril Lysiak
65	John Higgins
66	Sarah Di Massa

139	Cairn Homes
140	George Maloney
141	Tetrarch Property Investments Ltd.
142	Pierce Greaney & Sallyann Freyne
143	Yvonne Gill
144	Carey Group
145	Millenium Properties
146	Caoimhe McGuckin
147	Margharita Solon
148	Naas Neighbourhood Greenway
149	Cyclist.ie
150	Craddockstown Golf Club
151	Venturis Investments Group
152	Reid Family
153	Tesco Ireland Ltd
154	Castlekeel Ltd.
155	The Burke Family
156	Dónall Ó Riagain
157	Dorothy Kinirons
158	Glengolden Builders Ltd.
159	John Kane
160	Sean Kiely
161	Keith Lynch
162	Jim O'Sullivan
163	Gerry Halton
164	Larry Swan
165	Dennison Trailers
166	Dennison Trailers
167	Dominic Fagan
168	Michael and Mary Nolan
169	Glenveagh Homes Ltd
170	Clare Cleary & Family
171	Springwood Limited
172	Springwood Limited
173	Pierce Molony
174	Naas Regeneration Group
175	McAuley Place
176	Tom Treacy
177	Applegreen
178	Robin Skelton
179	Kiva Skelton

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67	Siobhan Grogan
68	Yvonne Codd
69	Margaret Mooney
70	James Keating
71	Anthony Boland
72	Daithí Mac an Bhaird
73	Aoife Ní Ruairc
74	Mariea McCarthy
75	Helena Bradley
76	Karen Cahill
77	Martin Cahill
78	David McIntyre
79	John Byrne
80	Sheelagh Pentony
81	Siobhain Grogan
82	Padraig Franklin
83	Daithi De Fainte
84	Marc Rogers
85	Liam De Buitléir
86	Ruth Brennan
87	Brian Dempsey
88	Liz Dempsey
89	Donal Cribben
90	Joseph Bergin
91	Gerard Begley
92	Angela Begley
93	Ella Archbold
94	Paul Drennan
95	Nathan Flaherty
96	Tom Davis
97	Michelle O'Rafferty
98	Norma Long
99	Colin O'Rafferty
100	Kevin Maher
101	Graeme Crowther
102	Naas Access and Disability Group
103	Michael Crosbie
104	Aidan Begley
105	Ciaran Begley
106	Jimmy Kelly
107	Brian Dempsey
108	Colm Gordon
109	Gabriel Horan

180	Liebherr Construction Equipment Ltd
181	A. Cawley
182	P. Cawley
183	S. Cawley
184	Steven Fadian
185	Joan Purcell
186	The Colivet Family
187	Dermot O'Rourke
188	David O'Rourke
189	Eunice Finley
190	Robin Skelton
191	Krystle Foley
192	Larry Swan
193	Alan Clegg
194	Paddy Byrne
195	Alice Fennelly
196	Shane McCann
197	Mandy Kelleher
198	Peter & Paula Whyte
199	Dee Kelly
200	Hugh Statham
201	Ellen Dowling
202	Paul Dowling
203	Andy's Barber Shop
204	Catriona Byrne
205	Paul Plummer
206	Alan Furlong
207	Susan MacMillan
208	Charles McEvoy
209	David Donegan
210	Asif Iqbal
211	Pat Goulding
212	Derek Ryan
213	Lips & P's
214	Deirdre O'Hara
215	Aroma Mocha Coffee Shop
216	Regina Fahy
217	Eamon Prile
218	Anna Doyle
219	Lorraine Domican
220	Ann Marie Grace
221	Maria O'Driscoll
222	Mary Fielding

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110	Brendan Gallagher
111	Bernard Doyle
112	Helen Cully
113	Ivan Coad

223	Charlotte Mooney
224	Karolynn MacGale
225	Podium Event Production

### **3.0 Summary of issues raised and the Chief Executive's opinion and recommendations in relation to the local area plan**

The following is a summary of the issues raised in the submissions/observations received from Office of the Planning Regulator (OPR), the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) to the Draft Naas Local Area Plan 2019-2023. In this section, the Chief Executive's response is set out under each of these submissions and an overall recommendation is made at the end of this section which addresses the main issues raised in the submissions received from these bodies.

#### **3.1 Office of the Planning Regulator**

##### **Main Issues Raised**

The submission from the Office of the Planning Regulator ('OPR') acknowledges the considerable degree of effort in preparing the Draft LAP and also notes that the plan has many innovative and positive features, for which the OPR commends the Council.

The submission notes that one of the key functions of the OPR includes the assessment of statutory plans and strategies to ensure consistency with legislative and policy requirements relating to planning. Whilst the submission is complimentary of many aspects of the Draft LAP, it highlights a number of issues which are of concern. Particular reference is made to the absence of an integrated transport strategy and evidence basis for additional zonings within the Plan, compliance with the Spatial Planning and National Roads Guidelines, the lack of an updated Hydraulic Study to inform the Strategic Flood Risk Assessment and the lack of an implementation and delivery schedule to accompany the plan. The submission provides a commentary on each issue and sets out 5 recommendations to address the highlighted concerns.

##### **Consistency with the Hierarchy of Statutory Plans**

###### *National Planning Framework/Regional Spatial and Economic Strategy*

The OPR notes that the LAP was drafted before the Regional Spatial and Economic Strategy was adopted and further notes that the Planning Authority will be aware of its statutory obligations in relation to examining the current County Development Plan to determine its consistency with the NPF/RSES and may, where necessary, be required to review or vary the CDP. The submission suggests that it would be prudent for the Draft LAP to signal that the written statement, maps and policy objectives will be subject to review, in the context of the CDP, to ensure consistency with the NPF and RSES. The OPR recommends that an objective to this effect be inserted into the written statement of the LAP.

###### *Transport Strategy for the Greater Dublin Area*

The submission highlights that the Transport Strategy for the GDA is required to 'provide a long term strategic planning framework for the integrated development of transport infrastructure and services in the GDA' and notes that the transport strategy

for Naas is currently in preparation, to provide a framework for addressing transport over the next 20 years. The OPR raises concerns that the Draft LAP has been prepared in the absence of a contemporary analysis of current and future transport measures and proposals to address congestion and infrastructural deficits. The OPR also raises concerns about the proposals for additional and significantly scaled zonings for new housing and employment related uses in the absence of a transport investment and delivery plan to support such substantial growth. The OPR recommends that the Council comprehensively demonstrate that the Draft LAP is consistent with the objectives of the Transport Strategy for the GDA, and states that such demonstration shall be achieved by bringing forward the completion of the local transport strategy for Naas, and critically appraising the emerging land use and planning strategy for the town against said strategy, with particular reference to the transport implications of the land uses zonings to the west of the N7, to re-evaluate the justification for such objectives.

### **Compliance with S. 28 Ministerial Guidelines**

#### *Spatial Planning and National Road Guidelines (2012)*

The submission notes that the Draft LAP proposes a significant quantum of employment zonings along the M7 corridor and in close proximity to the junctions on the motorway.

The OPR further notes that Section 2.4 of the Spatial Planning and National Road Guidelines emphasises that there must be an evidence base to such developments that are proposed in the vicinity of motorway interchanges to ensure the avoidance of any adverse impact on the national road infrastructure. The submission highlights that the Draft LAP is not accompanied by the required traffic analysis or similar evidence basis to strategically assess the potential impact on the operation of the adjoining motorway. It recommends that the Council comprehensively demonstrate that the Draft LAP complies with the requirements of the Spatial Planning and National Roads Guidelines (2012), in particular the requirement of Section 2.4 for detailed transport modelling/analysis.

#### *Local Area Plan Guidelines (2013)*

The OPR notes that the Local Area Plan Guidelines highlight the critical need to identify infrastructural delivery phasing and funding mechanisms where significant new development is proposed within an LAP. It further notes that the Draft LAP proposes a substantial quantum of new residential and employment zonings that will require the coordinated delivery of substantial new transport, services, community, educational and other infrastructure by a number of providers. It raises concerns regarding the planned timescale for the delivery of new road infrastructure which has not been sufficiently set out in the local area plan in any appropriate phasing arrangement for the plan area. The OPR recommends that an overall Implementation and Infrastructural Delivery Schedule is developed and inserted into the LAP as required in the LAP Guidelines for Planning Authorities, which should clearly phase new housing and employment in tandem with the programmed delivery of required infrastructure.

### *Flood Risk Management Guidelines (2009)*

The OPR notes that the Draft LAP is accompanied by a Strategic Flood Risk Assessment which provides an analysis of flood risk within the Plan area with reference to the existing Catchment Flood Risk Assessment and Management (CFRAM) maps. The OPR advises that these flood zones, identified from the existing CFRAM maps, will be re-evaluated as part of an output from the updated hydraulic study that is required to progress the proposed flood scheme for Naas. The OPR recommends that the Council liaise with the OPW in relation to an updated hydraulic study that is required to progress the proposed flood scheme for Naas and ensure that the Plan is fully compliant with the 2009 Flood Risk Guidelines.

The submission concludes by requesting that the Council address the five specific recommendations (which the submission notes are made in the context of the provisions of Section 31AO (3)(a) of the Act) in order to ensure that the Draft LAP is consistent with relevant national policy obligations, guidelines and legislative requirements.

In addition, the OPR advises that where the Planning Authority decides not to comply with a recommendation of the Regulator or otherwise makes the plan in such a manner as to be inconsistent with any recommendations made by the OPR, then the Chief Executive shall inform the OPR and give reasons for the decision of the Planning Authority.

### **Chief Executive's Response**

The OPR was established on the 3<sup>rd</sup> of April 2019. One of the Regulator's functions include the assessment of statutory plans and strategies to ensure consistency with legislative and national policy requirements in relation to planning. As stated above it is noted that the Regulator has the authority to recommend to the Minister of Housing, Planning and Local Government to issue the planning authority with a Direction that may be required under Sections 31AO and 31AP in relation to the plan.

While the OPR commends the Council in relation to a number of aspects of the draft plan e.g. the regeneration strategy for the town centre, the OPR expresses concerns regarding the absence of a contemporary assessment of transport within the town and specifically the lack of a transport strategy for Naas and its integration into the LAP. The OPR also highlights concerns with new and additional employment zonings to the west of the M7 at the Newhall Interchange. The views of the OPR are mirrored in the submissions from other state agencies i.e. T.I.I and the National Transport Authority from their own perspectives. Many of the contentions in the submissions are not accepted and do not take cognisance of statutory plans which have been prepared for Naas over the past two decades and infrastructure and investment on foot of those plans.

In relation to the OPRs recommendation which requires the Council to liaise with the OPW in relation to an updated hydraulic study for Naas, it should be noted that this study is only recently underway and also, cannot be prepared within the legislative

timeframe for the Draft Naas LAP. It should be noted that a Steering Group has been set up with Kildare County Council and the OPW to deliver a Flood Relief Scheme for Naas, the first stage of which is the engagement of consultants to carry out a review of the existing hydraulic information and to develop a preferred option to manage flooding in Naas.

### **3.2 National Transport Authority**

#### **Main Issues Raised**

The NTA is supportive in principle of the preparation of the Draft LAP and notes commitment to sustainable development. However, it is unclear how the land use planning of the town and the movement and transportation measures proposed in the Draft LAP have been informed by strategic and local transport considerations.

It is stated that the development of lands in proximity to the N/M7 should accord with the Ministerial Guidance for Spatial Planning and National Roads (2012). The NTA recommends a comprehensive Transport Assessment should be carried out for development sites identified in the Draft LAP using the Area Based Transport Assessment (ABTA) guidance document issued by the NTA. These transport assessments should be required in advance of development and a policy to this effect should be included in the LAP, pending completion of the Naas Transport Strategy.

The NTA has concerns regarding the zoning of lands in proximity to major interchanges on the N/M7 which are dependent on masterplans. This includes lands at Junctions 9 and 10 and to a lesser extent the area covered by the North-West Quadrant (NWQ). It is noted that while lands to the north of the N/M7 may be suitable for certain classes of development, they are unlikely to be suitable for trip-intensive development. Lands to the south of the N/M7, such as NWQ would be more suitable for trip-intensive development. Again, reference is made to an ABTA to assist in the detailed land use and transport planning of such areas.

The NTA notes the inclusion of several policies and objectives in the Draft LAP that would support the stated vision of the town, the National Planning Framework and the NTA Transport Strategy including a Permeability Strategy, a Public Realm Strategy and a Parking Strategy for the town. The NTA state that they would welcome the opportunity to work with the Council on these aspects.

#### **Chief Executive's Response**

The comments in relation to compliance with the Spatial Planning and National Roads Guidance (2012) and the recommendation for a comprehensive Transport Assessment using the Area Based Transport Assessment are noted. The Naas Transport Strategy, which would include the required transport assessments, is currently being progressed, however due to the complexities and nature of this study, it is not feasible to expedite the preparation of same within the statutory timeframe for preparing a draft Local Area Plan (see the Chief Executive's recommendation set out below).

The positive comments from the NTA in relation to the preparation of a Permeability Strategy, a Public Realm Strategy and Parking Strategy for the town are noted and an invitation to work with Kildare County Council will be extended to the NTA during the preparation of the aforementioned studies in due course.

### 3.3 Transport Infrastructure Ireland (TII)

#### Main Issues Raised

TII highlights the importance of the N/M7 as part of the EU TEN-T Core Network and the importance of safeguarding this route. The Local Area Plan is placing reliance on the strategic national road network to accommodate local trips and is considered inappropriate by the TII and at variance with the provision of official policy. The TII recommends that consideration should be given to explicit policy provision to safeguard the strategic function of the national road network and associated junctions to be included as a specific objective under Policy MT6 – Strategic Road Connections.

The submission welcomes inclusion of an objective in the LAP (NTO 6.2) to provide for the Leinster Outer Orbital Route. TII note that an objective for an Outer Eastern Relief Road from Junction 8 to Junction 10 is not included in Project Ireland 2040 of the NTA Transport Strategy. TII advises that the Council can identify local improvements to the existing road network planned over the term of the plan but improvements relating to national roads identified at local level should be done in consultation with TII and it may not be responsible for funding any such schemes.

TII states that the consequence of the absence of an evidence based strategic transport assessment the development strategy outlined in the Draft LAP are compounded by the inclusion of development objectives that promote development in the environs of the national road network and at national road junctions which do not appear to have been subject to any detailed transport analysis.

The submission refers to specific development objectives in the Plan, as follows:.

- a) Link Route to N/M7 Junction 9a – TII no advance consultation, additional connectivity to junctions should have regard to Section 2.7 of Guidelines;
- b) Northwest Quadrant – uncertainty regarding who will prepare the masterplan for the area;
- c) Junction 9 (Maudlins Interchange) – potential impact to the national road as a result of the Enterprise and Employment zoning, request an evidence based assessment to inform the LAP;
- d) Junction 10 Newhall – refers to zoning of 71 ha, no evidence base or traffic and transport analysis is presented;
- e) Masterplan Exercises – Maudlins Interchange and NWQ masterplans should be subject to appropriate consultation undertaken by local authority, subject to evidence based transport analysis, perhaps most appropriately based on NTA Area Based Transport Assessment Guidelines. TII also recommends adoption

process clearly outlined and included in the Plan by way of variation or amendment.

- f) Additional Matters and Future Consultation – TII states that it has had no consultation of Naas Transport Strategy, and would welcome consultation on NWQ masterplan and Maudlins interchange, include requirements of Chapter 3 of Guidelines in the Plan relating to Road Safety Audit, Environmental Noise and signage.

### **Chief Executive's Response**

The general and specific comments in relation to transportation are noted. The Naas Transport Strategy, which would include the required transport assessments, is currently being progressed. However, due to the complexities and nature of such a study, it is not feasible to expedite the preparation of same within the statutory timeframe for preparing and adopting a local area plan under the Planning & Development Act, 2000 (as amended) (see Chief Executive's recommendation set out below).

### **Chief Executive's Recommendation**

The attached submissions from the OPR, TII and NTA identify the absence of integrated transport and spatial planning within the draft Plan and in particular highlight the lack of a contemporary analysis of current and future transport patterns. The OPR has also identified a requirement to integrate the updated Hydraulic (Flood) Study, being prepared in conjunction with the OPW, into the preparation of the LAP.

Having regard to the nature and extent of these concerns and the resultant requirement to progress a number of studies (Transport and Flooding) that are fundamental to addressing these concerns, it is not feasible to complete the studies within the statutory timeframe provided for the preparation and adoption of the local area plan under Section 20 of the Planning & Development Act, 2000 (as amended).

Therefore it is recommended that the Elected Members of Kildare County Council not make the Naas Local Area Plan.

It is proposed to advance a new LAP at the earliest possible date.



Oifig an  
Rialaitheoir Pleanáil  
Office of the  
Planning Regulator

30<sup>th</sup> May 2019

Ken Kavanagh  
Planning Department  
Kildare County Council  
Áras Chill Dara, Devoy Park  
Naas

**RE: DRAFT NAAS LOCAL AREA PLAN 2019-2023**

Dear Mr Kavanagh,

Thank you for your authority's work in preparing the draft local area plan for Naas. As the key urban centre in Kildare and a key town in a wider regional context, your authority has expended a considerable degree of effort in preparing a new local area plan for Naas that has many innovative and positive features and the Office commends the Council for its work in this regard.

The Office of the Planning Regulator has assessed the Draft Local Area Plan (LAP) above under the relevant provisions of the Planning and Development (Amendment) Act 2018 and under which the Office of the Planning Regulator (OPR) was established on 3<sup>rd</sup> April last.

As your authority will be aware, one of the key functions of the OPR includes assessment of statutory plans and strategies to ensure consistency with legislative and policy requirements relating to planning.

As the preparation of the Draft LAP pre-dated the establishment of the OPR and the Office is developing an overall assessment methodology for statutory plans, the submission below has been prepared to provide a high-level input to the statutory plan procedure.

**1. Overall Assessment of the Draft Naas LAP**

Section 1 of the draft LAP outlines a very good summary of the core development issues and challenges faced by your authority in securing the proper planning and sustainable development of Naas.

The town's historical development pattern is outlined in this section of the draft LAP - heavily influenced by a sustained shift towards the M7 Motorway in recent decades, followed by rapid

development of low to medium density housing development and resulting in a weak town centre. Section 1 also acknowledges new policy directions, in the shape of the Government's Project Ireland 2040 – towards compact urban development and a shift towards forms of development and associated mobility demands that can be catered for first and foremost by sustainable travel modes, not car-based travel.

The draft LAP correctly identifies that:

*“while Naas presently has a strong economic base, the location and spatial pattern of this economic activity has tended to cluster along the motorway, creating a peripheral arc which is detached from the established town centre. In addition, residential development has tended to locate outwards in a somewhat dispersed pattern of development. Movement and transport patterns have relied disproportionately on private transport modes, with a poor emphasis on public transport, walking and cycling”*

The above extract from the draft LAP sums up the core challenge in creating a strategy for the proper planning and sustainable development of Naas. How to capitalise on Naas's strategic economic and functional roles as a self-sustaining urban centre, while moving away from forms of development that are ultimately unsustainable such as low to medium density sprawl outwards from a town centre that has not reached its potential and drawing economic activity in to that town centre from an excessive focus on motorway-side development that at a practical level will tend to be car-based given its distance from where people live.

The Office notes that in addressing the challenge above, there are many notable and positive features in the draft LAP.

Elements that stand out include the Regeneration Strategy in Section 8.4, which outlines several urban development frameworks for key opportunity locales in and around the town centre of Naas, including the stalled town centre and Corban's lane area, the under-utilised Canal Harbour and key infill residential and mixed use sites.

The Office strongly supports the efforts your authority has made to bring forward these elements of the draft LAP and anticipates that they should be widely supported by other stakeholders in the planning process, subject to examining some elements of the urban design frameworks that should respond better to the recently published planning guidelines on building height – as in the height parameters for the canal harbour area that limit development in some areas to only 2 storeys. This should be revisited in the light of the above guidelines.

There are also strong commitments to securing the brownfield development targets in the NPF, which coupled to the six Core Regeneration Areas, should be the substantive focus for the finalisation and implementation of this draft LAP.

And there are strong commitments to active land management measures such as site assembly and the use of Derelict Sites and Vacant Sites legislation to move on stalled sites and such action and strategic land purchases will be required to give effect to delivery.

Notwithstanding the above and many other qualitative aspects of the draft LAP, there is also a more concerning continuation and intensification of the trend in the development of the “peripheral arc” mentioned above along, and now straddling the M7 Motorway, including two interchanges that are in the final stages of being provided/upgraded as part of the Transport Infrastructure Ireland sponsored M7 Upgrade Programme.

New land use zonings are proposed in this area, which is predominantly accessed by/accessible from the private car, not public transport and is notably distant from wider residential parts of Naas and outlying areas making it not that attractive to walk or cycle to.

There is an absence of an evidential basis for such zonings in relation to their transport impact on this key national transport artery as required under the planning guidelines on spatial planning and national roads referred to below. There is also a heavy likelihood that development in this area would be likely to add to traffic levels and energy intensive car based travel, so it would appear that this aspect of the draft LAP would not support the statutory requirement under the Planning and Development Act 2000 (as amended) that development plans, and by extension local area plans promote sustainable settlement and transportation patterns that reduce energy demand and tackle both the drivers and effects of climate change (see Section 10 (2)(n)).

In addition, and thinking ahead in strategic terms, the new and additional development lands identified for Objective Q (Enterprise and Employment) to the west of the M7 Newhall Interchange that is under construction, coupled to previous zonings under Objective H (Industry and Warehousing), would be likely to lead to further consolidation and extension of employment and retail type development along the peripheral arc mentioned above, drawing traffic to such lands from a wider area and from Naas across key interchanges that of themselves are not conducive to being attractive to walking and cycling modes, noting that a transport strategy has not yet been prepared to inform the draft LAP.

At the same time, the development of Naas in strategic employment terms, will, if this historical trend above is facilitated and continued, tend to be lop-sided, undermining the attempts in the plan to build a much stronger and vibrant town centre.

Therefore, whilst this Office strongly supports the strategic appraisal behind and objectives for this plan, the absence of integrated transport and spatial planning (as required by several statutory guidelines of the Minister) and the additional focus it contains on developing the lands along and

across the M7 motorway very much undermine those objectives and therefore need to be revisited in accordance with the observations and recommendations outlined below.

## **2. Consistency with the Hierarchy of Statutory Plans**

### National Planning Framework / Regional Spatial and Economic Strategy

Our statutory observations and recommendations seek to ensure broad policy consistency between national, regional and local levels of the statutory planning policy hierarchy, which in the case of the proposed local area plan will include the National Planning Framework, Regional Spatial and Economic Strategies and your authority's county development plan.

The Office notes that the Draft LAP was necessarily prepared before the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area was finalised and which strategy further applies the National Planning Framework (NPF) at regional level.

Nevertheless, your authority will be aware of its statutory obligation to examine the current Kildare County Development Plan to determine its consistency with the NPF/RSES and arising out of that assessment, to undertake the appropriate statutory planning policy review procedures as necessary. In turn, and as your authority's draft LAP for Naas has acknowledged, the next Kildare County Development Plan will in turn prompt a subsequent review of local area plans to ensure their consistency with a newly adopted county plan.

Therefore, and having regard to the above, it would be prudent for the Draft Naas LAP to signal at this point that it's written statement and maps and policy objectives are subject to review in the context of the next County Development Plan and ensuring consistency with the NPF and Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly area.

***Recommendation 1: The Office recommends that your authority inserts a written objective to the effect of the above into the Draft Naas Local Area Plan.***

### Transport Strategy for the Greater Dublin Area

The *Transport Strategy for the Greater Dublin Area 2016-35* prepared by the National Transport Authority is the statutory transport strategy prepared under section 12 of the Dublin Transport Authority Act 2008. Section 12(3) of the Act states that the objective of the strategy is 'to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services in the GDA'.

Section 4.2 of the LAP refers to the fact that an overarching transport strategy for Naas is currently in preparation, to provide a framework for addressing transport in the town for the next two

decades. Notwithstanding the many positive elements of this draft LAP, the Office very concerned that it has been prepared in the absence of contemporary analysis of current and future transport patterns versus measures to address congestion and infrastructure deficits.

Moreover, the draft LAP has proposed additional and significantly scaled zonings for significant new housing and employment related future development in the absence of a transport investment and delivery plan to support this substantial planned growth of the town.

Therefore, the Office is of the view that in the absence of such a transport strategy above, the draft LAP has outlined insufficient evidence to demonstrate consistency with the principles and objectives of the *Transport Strategy for the Greater Dublin Area*.

***Recommendation 2: The Office recommends that the planning authority comprehensively demonstrate that the Draft LAP is consistent with the objectives of Transport Strategy for the Greater Dublin Area 2016-35. Such demonstration shall be achieved by bringing forward the completion of the local transport strategy for Naas and critically appraising the emerging land use and planning strategy for the town against said strategy and, taking into account the sustainable transport implications of land use zonings to the west of the N7, to re-evaluate the justification for such objectives.***

### **3. Compliance with Ministerial Planning Guidelines issued under s.28 of the Act**

#### Spatial Planning and National Roads Guidelines (2012)

The Draft LAP proposes significant employment zonings along the M7 corridor and in proximity to junctions on the motorway. There is substantial public investment (in the construction phase currently) in the upgrading of capacity of this section of the motorway with these works expected to be completed later in 2019

The Spatial Planning and National Roads Guidelines (2012) under section 2.4 emphasise that there must be an evidence base to such developments that are proposed in the vicinity of motorway interchanges and a traffic assessment to ensure the avoidance any adverse impact on the national road infrastructure must be provided to this end. Such proposals must demonstrate, inter alia, consistency with the relevant regional and national development policy/strategy. The Draft LAP is not accompanied by the required traffic analysis or similar evidence basis to strategically assess potential impact on the operation of the adjoining motorway infrastructure. The approach required by the Spatial Planning and National Roads Guidelines has not been followed in the LAP and the extensive employment zonings have the potential to generate traffic volumes to limit the operation of the nearby motorway interchange.

***Recommendation 3: The Office recommends that the planning authority comprehensively demonstrate that the Draft LAP complies with the requirements of the Spatial Planning and National Roads Guidelines (2012) and in particular the requirement of section 2.4 for detailed transport modelling / analysis.***

#### Local Area Plans Guidelines (2013)

The statutory guidelines issued by the Minister for Housing, Planning and Local Government on Local Area Plans (2013) highlight the critical need to identify infrastructural delivery phasing and funding mechanisms where significant new development is proposed in an LAP. The Draft Naas LAP has proposed a substantial quantum of new residential and employment development that will require the coordinated delivery of substantial new transport, services, community, educational and other infrastructure by a number of providers. However, the planned timescale for the delivery of new road infrastructure has not been sufficiently set out in the LAP or in an appropriate phasing arrangement that clearly joins new development with the provision of identified infrastructural items.

***Recommendation 4: The Office recommends that an overall Implementation and Infrastructural Delivery Schedule is developed and inserted into the LAP as provided for in chapter 6 of the Local Area Plan Guidelines. This schedule should clearly phase new housing and employment in tandem with the programmed delivery of required infrastructure.***

#### Flood Risk Management Guidelines (2009)

The Draft LAP is accompanied by a Strategic Flood Risk Assessment (SFRA). This document provides an analysis of flood risk within the LAP including the identification of Flood Risk Zones A and B as per the Flood Risk Management Guidelines 2009. It is noted that the flood zones for Naas are being established with reference to the existing CFRAM flood maps. These flood zones will be reevaluated as part of an output from the updated hydraulic study that is required to progress a proposed flood scheme for Naas (as outlined in the Eastern CFRAM FRMP). It is stated that 'Following this exercise, the SFRA will be reviewed and the sequential approach will be revisited to assess the land zonings'. It is advisable that the Council liaise with the OPW in relation to this detailed analysis of flooding in Naas and ensure that the LAP is fully compliant with the 2009 Flood Risk Management Guidelines.

***Recommendation 5: The Office recommends the planning authority liaise with the OPW in relation to an updated hydraulic study that is required to progress a proposed flood scheme for Naas and ensure that the LAP is fully compliant with the 2009 Flood Risk Management Guidelines***

### 3. Next Steps

The Office requests that your authority addresses the 5 specific recommendations outlined above in bold that are made in the context of the provisions of Section 31AO(3)(a) in order to ensure that the Draft LAP is consistent with relevant national policy obligations, guidelines and legislative requirements.

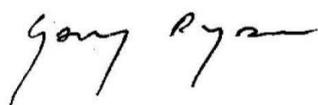
The report of the Chief Executive of your authority prepared for the elected members under Section 20 of the Act must summarise these recommendations and the manner in which they should be addressed. In addition, your authority is required to notify this Office within 5 working days of the making of the local area plan and send a copy of the written statement and maps as made.

Where the planning authority decides not to comply with a recommendation of the Office or otherwise makes the plan in such a manner as to be inconsistent with any recommendations made by the Office, then the Chief Executive shall inform the Office and give reasons for the decision of the planning authority.

Such notice requirements enable the Office to consider the matter further as regards the making of any recommendations to the Minister in relation to any Directions that may be required under Sections 31AO and 31AP.

This Office would welcome further discussion of the above with your authority's forward planning team and if you so wish to arrange such a discussion in the context of informing your responses to the above, please contact the undersigned at: [plans@OPR.ie](mailto:plans@OPR.ie)

Yours sincerely,



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**Gary Ryan**

Assistant Director (Plan Evaluation)

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076 100 2747

[gary.ryan@OPR.ie](mailto:gary.ryan@OPR.ie)

Draft Naas Local Area Plan 2019-2023,  
C/O Senior Executive Officer,  
Planning Department,  
Kildare County Council,  
Áras Chill Dara,  
Devoy Park,  
Naas,  
Co. Kildare.

30<sup>th</sup> May 2019

**Re: Draft Naas Local Area Plan 2019-2023**

Dear Sir/Madam,

The National Transport Authority (the “NTA”) welcomes the opportunity to comment on the Draft Naas Local Area Plan (LAP) 2019-2023 and, based on the *Transport Strategy for the Greater Dublin Area 2016-2035* (the NTA Transport Strategy), submits the following observations and recommendations. These comments are submitted at the strategic level, and the NTA anticipates that matters of detail will be addressed through the preparation of the Naas Transport Strategy, as set out below.

The NTA is supportive in principle of the preparation of an LAP for Naas, and notes the stated commitment in the draft LAP document to accord with the objectives of the National Planning Framework (NPF) regarding such matters as compact, consolidated urban form, sustainable transport and a high quality public realm.

The integration of land use planning and transport planning is a key policy of the NTA Transport Strategy, as set out in Section 7.1.2. There is a fundamental interdependence between the two disciplines that is a critical determinant in plan-making at the local level. In this regard, the NTA notes that the preparation of a Transport Strategy for Naas is being carried out as a parallel exercise to the LAP process. The Council has engaged with the NTA at the outset of the Naas Transport Strategy preparation, and the NTA looks forward to on-going liaison in this regard.

Although the Draft LAP states that the Naas Transport Strategy aligns closely with seven Core Themes of the Draft LAP, it is not clear how the land use planning of the town and the Movement and Transportation measures proposed in the Draft LAP have been informed by strategic and local transport considerations.

The development of lands in proximity to the N/M7 should, in the first instance, accord with the DoECLG's *Spatial Planning and National Roads Guidelines* (2012). The NTA further recommends that a comprehensive Transport Assessment should be carried out for development sites identified in the Draft LAP using the *Area Based Transport Assessment* guidance document issued by the NTA and Transport Infrastructure Ireland in 2018. Such transport assessments should be required in advance of development, and the NTA recommends that a Policy to this effect be included in the LAP, pending completion of the Naas Transport Strategy.

Of particular concern in this regard is the zoning of lands in proximity to the major interchanges on the N/M7, the development of which is dependent on the preparation of masterplans. This includes lands at Junction 9, at Junction 10 and, to a lesser extent, the area covered by the North-West Quadrant (NWQ). It is proposed to connect the NWQ lands to Junction 9A by means of a new link road, the function of which would be addressed in more detail in the Naas Transport Strategy. While lands to the north of the N/M7 may be suitable for certain classes of development, they are unlikely to be suitable locations for trip-intensive development. Lands to the south of the N/M7 such as the NWQ lands would be more suitable for trip-intensive development, as they have the potential to contribute to a compact and consolidated urban form that supports the use of sustainable transport modes. The ABTA methodology would again be an appropriate tool to assist in the detailed land use and transport planning of such areas.

Notwithstanding the strategic concerns outlined above, the NTA notes the inclusion of a number of policies and objectives in the Draft LAP that would support the stated Vision for the town and would align broadly with the policies and objectives of the NTA Transport Strategy and the NPF. These include the preparation of a Permeability Strategy, a Public Realm Strategy and a Parking Strategy for the town, and the NTA would welcome the opportunity to work with the Council on these key aspects of the wider Naas Transport Strategy in due course.

As noted, the Council has engaged with the NTA in the preliminary stages of the Naas Transport Strategy preparation. The NTA looks forward to continued engagement on this key project with a view to aligning the Final LAP with the outcomes of that Strategy.

I trust that the views of the NTA will be taken into consideration in the finalisation of the Naas Local Area Plan 2019-2023.

Yours sincerely,



**Michael MacAree**

Head of Strategic Planning



Bonneagar Iompair Éireann  
Transport Infrastructure Ireland

Draft Naas Local Area Plan, 2019 – 2023  
c/o Senior Executive Officer  
Planning Department  
Kildare County Council  
Áras Chill Dara  
Devoy Park  
Nass  
Co. Kildare

Dáta | Date  
29 May, 2019

Ár dTag | Our Ref.  
TII19-105479

**Re: Draft Naas Local Area Plan, 2019 - 2023**

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of notice concerning the current public consultation exercise relating to the preparation of the Draft Naas Local Area Plan, 2019 – 2023.

The Draft Local Area Plan identifies that Naas has excellent links to the national motorway network and is a highly accessible location within the Greater Dublin Area. The Plan also states that while the N/M7 forms part of the national road network, it is also used for local and regional purposes and that the widening and upgrading of the junctions on the N/M7 around Naas will increase capacity. However, it is acknowledged that once the current planned works are completed no further upgrades are envisaged. Stating, the motorway, coupled with Naas specific congestion issues, will therefore continue to pose a significant challenge during peak travel times without the provision of a more robust and connected network of routes and transport options within and around the town.

Within the context of the foregoing, TII provides the following observations for the Councils consideration in preparing the Naas Local Area Plan, 2019 – 2023.

## 1. Strategic Context

Importantly, the N/M7 is part of the EU TEN-T Core Network, therefore, there are European and national policy considerations to be addressed to ensure that the strategic function of the network is safeguarded in accordance with national policy and the adopted County Development Plan. The Trans-European Transport Networks (TEN-T) define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe. This approach represents National and European policy.

The NTA Transport Strategy identifies that congestion has emerged as a significant problem along the N/M7 from south of Naas towards the M50, mainly associated with the large volume of car-based commuting into the Metropolitan Area. While the upgrading of Newlands Cross to a grade-separated interchange has alleviated this to an extent, congestion on the N/M7 and connecting roads in the vicinity of Naas is a growing problem. The NTA identify that this will need to be addressed, to mitigate the negative impact of local and commuter traffic, on the N/M7's primary intended function in catering for strategic trips of high economic value.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
TII processes personal data in accordance with its Data Protection Notice available at [www.tii.ie](http://www.tii.ie).

Significant Exchequer investment in N/M7 improvements is on-going, in particular, in the vicinity of Naas, the M7 Naas-Newbridge Bypass Upgrade Scheme is currently under construction.

The Council will be aware that the N/M7 and Junctions 9, 9a and 10 adjoin the local plan boundary. This route and associated junctions are of national and regional strategic importance providing inter regional accessibility and access to national markets as well as international markets through airport and port access.

While the Plan acknowledges that the N/M7 forms part of the national road network, it also identifies that the national road is used for local and regional purposes and that the widening and upgrading of the junctions on the N/M7 around Naas will increase capacity. Local area planning placing such a reliance on the strategic national road network to accommodate local trips is considered inappropriate and at variance with the provisions of official policy.

In terms of infrastructure provision required to facilitate local development objectives, the DoECLG Spatial Planning and National Roads Guidelines are clear that local transport solutions are required for traffic/trip demand generated by local development to ensure that such requirements can be catered for in a manner that is complementary to and consistent with the strategic transport function of the national road network.

Although TII notes that the Draft Local Area Plan includes a commitment to undertake the Naas Transport Strategy, which is currently being prepared, the Draft Plan establishes zoning and land use objectives and indicates new and/or improved transport links. Determining such fundamentals of the local area plan in advance of a thorough evidence based land use and transport assessment has the potential to compromise the delivery of an integrated land use and transport strategy for the Draft Plan area.

In addressing the issues identified above and outlined in the NTA Transport Strategy and having regard to development proposals previously planned in the vicinity of junctions on the N/M7 in Naas, TII has previously advised of the need to prepare the Draft Local Area Plan on the basis of an evidence based area transport assessment in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines. This remains the position of TII and is considered a pre-requisite in preparing a sustainable and integrated land use and transport strategy to support the preparation of the Local Area Plan.

## **2. Strategic National Road Network**

The DoECLG Spatial Planning and National Roads Guidelines (2012) require that the strategic function of national roads is maintained. Local transport solutions are required for traffic/trip demand generated by local development to ensure that such requirements can be catered for in a manner that is complementary to and consistent with the strategic transport function of the national road network.

Having regard to the foregoing, TII recommends that consideration should be given to explicit policy provision to safeguard the strategic function of the national road network and associated junctions to be included as a specific objective under Policy MT6 – Strategic Road Connections. There has been and continues to be considerable investment in national roads in the Naas area and TII would welcome provisions safeguarding the national road network, in accordance with national policy objectives, included in the Local Area Plan.

TII welcomes the inclusion of Objective NTO6.2 in the Draft Local Area Plan providing for the Leinster Outer Orbital Route.

Objective MTO6.1 proposes investigation into the feasibility of providing an Outer Eastern Relief Road connecting Junction 8 (Johnstown Interchange) with Junction 10 (Newhall Interchange). Such a scheme is not included in Project Ireland 2040 or the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035. However, in terms of proposed road schemes, the Council may consider it appropriate to identify local improvements to the existing road network planned over the term of the plan to facilitate the development objectives set out in the Draft Local Area Plan.

The Authority advises that while any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, the Council will be aware that TII may

not be responsible for the funding of any such schemes or improvements. In addition, proposals for enhancements to existing junctions on national roads should be developed in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012). Similar provisions will also apply to the link road proposed to N/M7 Junction 9a, discussed further in section 3(a) below.

### **3. Specific Development Objectives**

Consequences of the absence of an evidence based strategic transport assessment supporting the development strategy outlined in the Draft Local Area Plan are compounded by the inclusion of development objectives that promote development in the environs of the national road and at national road junctions which do not appear to have been subject to any detailed transport analysis.

In relation to the foregoing, TII would identify the following key objectives from the Draft Local Area Plan that may benefit from further assessment and/or clarification;

#### **a) Link Route to N/M7 Junction 9a**

The Draft Local Area Plan includes in a number of places provision for a new link road to N/M7 Junction 9a. Reference in this regard is included in Section 4.6 Road and Street Network, Policy MT5, Table 4.2 and indicated on Map 4.1, Map 8.1 and Figure 1.3 and Figure 8.34.

While Section 4.6 of the Draft Plan advises that the link is envisaged as connection that will prioritise public transport, pedestrian and cyclist traffic, it is indicated that its exact functions will be determined by the Naas Transport Strategy.

TII has no record of advance consultation on the Naas Transport Strategy or on the provision of such additional connectivity to a national road junction. The Authority would welcome consultation from the Council on this proposal and considers that such additional connectivity to junctions on the national road network should be progressed in accordance with the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

#### **b) Section 5.3.3 Northwest Quadrant (NWQ)**

Associated with the above link road proposal, Section 5.3.3. and Section 8.6 of the Draft Plan set out a development context for 287ha of lands within the Plan boundary referred to as the North West Quadrant. Section 8.6.3 outlines that the lands will be subject to the preparation of a Masterplan. This is reflected in Objective URD2.10. It appears that the Masterplan is proposed to be prepared by the Council but this is unclear. Objective URD2.10 indicates that the masterplan 'may' be incorporated into the LAP by way of an amendment or by agreement with the local authority.

Issues in relation to the preparation of masterplans and ambiguity in the Draft Local Area Plan is addressed in further detail below in section 3(e).

#### **c) Section 5.3.4 Junction 9 (Naas North)/Maudlins Interchange**

Section 5.3.4 of the Draft Local Area Plan addresses lands in proximity to Junction 9 related to the former Cemex /Donnelly Mirrors Sites. The lands are subject to an 'Enterprise and Employment' zoning objective, are identified as 'Regeneration' Lands and are subject to Objective Q1(2) which requires that a comprehensive masterplan is prepared for the overall land parcel to ensure development does not take place in a piecemeal manner and integrates with existing development and infrastructure.

The subject lands were also considered as part of a previous planning application and appeal to An Bord Pleanála which considered transport implications arising from development proposals on the lands concerned and potential impacts to the national road network in the vicinity. The application was subsequently withdrawn, please refer to Kildare County Council planning file ref. 15/500.

Previously, the Chief Executives response to TII's submission on the Draft Development Plan concluded that the need for a Strategic Transport Assessment for the development of lands in north east Naas in the general Maudlin's area

is not a matter for the County Development Plan, TII now respectfully requests that such an evidence based assessment is undertaken to inform the Local Area Plan, prior to adoption.

**d) Section 5.3.5 Junction 10 (Naas South)/Newhall**

The Draft Plan indicates that 71ha of undeveloped commercial lands are provided in the vicinity of Junction 10. Section 5.3.5 indicates that lands subject to Objective Q1 (8) have been identified for a data centre provided no other suitable and sequentially preferable land are available. Development other than a Data Centre will be considered on a sequential basis when other Enterprise and Employment lands have been developed.

TII is of the opinion that no case has been made to include such lands in the Draft Local Area Plan in proximity to Junction 10. The Council will also be aware of the impact of the historical pattern of development in the Newhall area on the requirement to upgrade junction 10 as part of the M7 Naas-Newbridge Bypass Upgrade Scheme.

In relation to the lands concerned, no evidence base or traffic and transport analysis is presented. It does not appear that the proposed inclusion of such lands represents a consolidated framework for the Naas Local Area Plan area. In TII's opinion, it is not demonstrated that development of the subject lands is complementary to safeguarding the strategic function and safety of the N/M7 mainline and associated junctions.

**e) Masterplan Exercises**

In accordance with the provisions of official policy included in the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines, TII considers that any masterplan exercise for the lands identified above (i.e. 'NWQ' and 'Maudlins Interchange') should be subject to appropriate consultation, including with statutory stakeholders undertaken by the local authority.

While TII considers that the Local Area Plan should be subject to an evidence based transport analysis, it is imperative that the Masterplan lands identified in the Draft Local Area Plan in proximity to N/M7 Junction 9 and 9a are subject to specific strategic transport assessment, perhaps most appropriately, based on NTA Area Based Transport Assessment (ABTA) Guidance.

TII is available to assist the Council when undertaking the transport assessment recommended for the subject lands.

In addition, TII recommends that any Masterplan adoption process or framework should be clearly outlined and included in the Local Area Plan by way of variation or amendment.

**f) Additional Matters and Future Consultation**

Section 4.2 of the Draft Local Area Plan outlines the proposal to undertake the Naas Transport Strategy. TII has had no consultation on this strategy to date and would welcome active consultation where there may be implications for the national road network in the area.

As outlined above, TII would also welcome future active consultation on local authority masterplan exercises related to lands identified in the Draft Local Area Plan as the Northwest Quadrant and the former Cemex and Donnelly's Mirrors sites at Maudlins Interchange.

TII welcome reference to the requirement to subject development proposals in Core Regeneration Areas, Key Development Areas and the Northwest Quadrant to Transport Assessment, referred to as Traffic Impact Assessment in Objective MTO5.6.

Consideration should also be given to including the requirements of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines into the local area plan concerning specific objectives relating to Road Safety Audit, Environmental Noise requirements and Signage, etc.

**Conclusion**

The N/M7 is a critically important strategic road link and is part of the EU TEN-T Core Network. The Council will be aware of the priority to ensure adequate maintenance of the national road network in order to protect the value of previous investment. TII seeks to ensure that official national objectives are not undermined and that the anticipated benefits of the investment made in the national road network are not jeopardised. The Council will be aware of National Strategic Outcome 2 of the National Planning Framework which includes the objective to maintain the strategic capacity and safety of the national roads network.

It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users.

In accordance with the provisions of official policy, development proposals promoted at a local level should be developed complementary to maintaining the strategic function of such roads and associated junctions.

The Draft Local Area Plan includes significant zoning and development objectives in the vicinity of the national road network at Junctions 9, 9a and 10, including enhanced connectivity to N/M7 Junction 9a. It does not appear that any transport analysis or evidence base has been prepared to demonstrate that the development proposals outlined above can proceed complementary to safeguarding the strategic function of the national road network in the area.

TII recommends a review of the specific development proposals and the preparation of an evidence based transport analysis/area based transport assessment to demonstrate that development proposals can proceed complementary to safeguarding the investment in and the strategic function of the national road network in the area, prior to adoption of the Local Area Plan. Any amendments required should be incorporated into the Local Area Plan prior to adoption.

As advised in the foregoing, TII is available to meet the Executive of the Council to assist in addressing the considerations outlined in the above observations. It is requested that the observations of TII are taken into consideration prior to the adoption of the Local Area Plan.

Yours sincerely,



Michael McCormack  
Senior Land Use Planner

## Appendix 1 Summary of Submissions or Observations Received

Table 1.1 The issues raised in the 225 submissions/observations received

Sub. No.	Name	Summary of Submission
1	Office of the Planning Regulator (OPR)	<p>The submission from the Office of the Planning Regulator ('OPR') acknowledges the considerable degree of effort in preparing the Draft LAP and also notes that the plan has many innovative and positive features, for which the OPR, commends the Council.</p> <p>The submission notes that one of the key functions of the OPR includes the assessment of statutory plans and strategies to ensure consistency with legislative and policy requirements relating to planning. Whilst the submission is complimentary of many aspects of the Draft LAP, it highlights a number of issues which are of concern. Particular reference is made to the absence of an integrated transport strategy and evidence basis for additional zonings within the Plan, compliance with the Spatial Planning and National Roads Guidelines, the lack of an updated Hydraulic Study to inform the Strategic Flood Risk Assessment and the lack of an implementation and delivery schedule to accompany the plan. The submission provides a commentary on each issue and sets out 5 recommendations to address the highlighted concerns.</p> <p><b>Consistency with the Hierarchy of Statutory Plans</b>  <i>National Planning Framework/Regional Spatial and Economic Strategy</i>            The OPR notes that the LAP was drafted before the Regional Spatial and Economic Strategy was adopted and further notes that the Planning Authority will be aware of its statutory obligations in relation to examining the current County Development Plan to determine its consistency with the NPF/RSES and may, where necessary, be required to review or vary the CDP. The submission suggests that it would be prudent for the Draft LAP to signal that the written statement, maps and policy objectives will be subject to review, in the context of the CDP, to ensure consistency with the NPF and RSES. The OPR recommends that an objective to this effect be inserted into the written statement of the LAP.</p>

Sub. No.	Name	Summary of Submission
		<p><i>Transport Strategy for the GDA</i></p> <p>The submission highlights that the Transport Strategy for the GDA is required to ‘provide a long term strategic planning framework for the integrated development of transport infrastructure and services in the GDA’ and notes that the transport strategy for Naas is currently in preparation, to provide a framework for addressing transport over the next 20 years. The OPR raises concerns that the Draft LAP has been prepared in the absence of a contemporary analysis of current and future transport measures and proposals to address congestion and infrastructural deficits. The OPR also raises concerns about the proposals for additional and significantly scaled zonings for new housing and employment related uses in the absence of a transport investment and delivery plan to support such substantial growth. The OPR recommends that the Council comprehensively demonstrate that the Draft LAP is consistent with the objectives of the Transport Strategy for the GDA, and states that such demonstration shall be achieved by bringing forward the completion of the local transport strategy for Naas, and critically appraising the emerging land use and planning strategy for the town against said strategy, with particular reference to the transport implications of the land uses zonings to the west of the N7, to re-evaluate the justification for such objectives.</p> <p><b>Compliance with S. 28 Ministerial Guidelines</b>  <i>Spatial Planning and National Road Guidelines (2012)</i></p> <p>The submission notes that the Draft LAP proposes a significant quantum of employment zonings along the M7 corridor and in close proximity to the junctions on the motorway.</p> <p>The OPR further notes that Section 2.4 of the Spatial Planning and National Road Guidelines emphasises that there must be an evidence base to such developments that are proposed in the vicinity of motorway interchanges to ensure the avoidance of any adverse impact on the national road infrastructure. The submission highlights that the Draft LAP is not accompanied by the required traffic analysis or similar evidence basis to strategically assess the potential impact on the operation of the adjoining motorway. It recommends that the Council comprehensively demonstrate that the Draft LAP</p>

Sub. No.	Name	Summary of Submission
		<p>complies with the requirements of the Spatial Planning and National Roads Guidelines (2012), in particular the requirement of Section 2.4 for detailed transport modelling/analysis.</p> <p><i>Local Area Plan Guidelines (2013)</i>  The OPR notes that the Local Area Plan Guidelines highlight the critical need to identify infrastructural delivery phasing and funding mechanisms where significant new development is proposed within an LAP. It further notes that the Draft LAP proposes a substantial quantum of new residential and employment zonings that will require the coordinated delivery of substantial new transport, services, community, educational and other infrastructure by a number of providers. It raises concerns regarding the planned timescale for the delivery of new road infrastructure which has not been sufficiently set out in the local area plan in any appropriate phasing arrangement for the plan area. The OPR recommends that an overall Implementation and Infrastructural Delivery Schedule is developed and inserted into the LAP as required in the LAP Guidelines for Planning Authorities, which should clearly phase new housing and employment in tandem with the programmed delivery of required infrastructure.</p> <p><i>Flood Risk Management Guidelines (2009)</i>  The OPR notes that the Draft LAP is accompanied by a Strategic Flood Risk Assessment which provides an analysis of flood risk within the Plan area with reference to the existing Catchment Flood Risk Assessment and Management (CFRAM) maps. The OPR advises that these flood zones, identified from the existing CFRAM maps, will be re-evaluated as part of an output from the updated hydraulic study that is required to progress the proposed flood scheme for Naas. The OPR recommends that the Council liaise with the OPW in relation to an updated hydraulic study that is required to progress the proposed flood scheme for Naas and ensure that the Plan is fully compliant with the 2009 Flood Risk Guidelines.</p> <p>The submission concludes by requesting that the Council address the five specific recommendations (which the submission notes are made in the context of the provisions of Section 31AO (3)(a) of the</p>

Sub. No.	Name	Summary of Submission
		<p>Act) in order to ensure that the Draft LAP is consistent with relevant national policy obligations, guidelines and legislative requirements.</p> <p>In addition, the OPR advises that where the Planning Authority decides not to comply with a recommendation of the Regulator or otherwise makes the plan in such a manner as to be inconsistent with any recommendations made by the OPR, then the Chief Executive shall inform the OPR and give reasons for the decision of the Planning Authority.</p>
2	<b>National Transport Authority (NTA)</b>	<ul style="list-style-type: none"> <li>• The NTA welcomes opportunity to comment on the Draft LAP;</li> <li>• Supportive in principle of the preparation of the draft LAP and notes commitment to sustainable development;</li> <li>• NTA notes integration of land-use planning and transport is critical and notes the Transport Strategy for Naas is being carried out in parallel to the LAP;</li> <li>• It is unclear how the land use planning of the town and the Movement and Transportation measures proposed in the draft LAP have been informed by strategic and local transport considerations;</li> <li>• Development of lands in proximity to the N/M7 should accord with DoECLG's Spatial Planning and National Roads Guidance (2012);</li> <li>• A comprehensive Transport Assessment should be carried out for development sites identified in the Draft LAP using the Area Based Transport Assessment guidance document issued by the NTA. These transport assessments should be required in advance of development and a policy to this effect should be included in the LAP, pending completion of the Naas Transport Strategy;</li> <li>• Of particular concern is the zoning of lands in proximity to major interchanges on the N/M7 which are dependent on masterplans. This includes lands at Junctions 9 &amp; 10 and the area covered by the North-West Quadrant (NWQ);</li> <li>• While lands to the north of the N/M7 may be suitable for certain classes of development, they are unlikely to be suitable for trip-intensive development. Lands to the south of the N/M7, such as NWQ would be more suitable for trip-intensive development;</li> <li>• NTA notes the inclusion of a number of policies and objectives in the draft LAP that would</li> </ul>

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		<p>support the stated vision of the town including a Permeability Strategy, a Public Realm Strategy and a Parking Strategy for the town. The NTA would welcome the opportunity to work with the Council on these aspects.</p> <ul style="list-style-type: none"> <li>• NTA looks forward to continued engagement on this key project.</li> </ul>
3	<b>Department of Education and Skills</b>	<ul style="list-style-type: none"> <li>• Submission acknowledges the provision of school sites as referenced at Section 3.5.1;</li> <li>• Notes from discussions with Kildare County Council that projected population growth for the area will be between circa 11,000 and 13,000 persons;</li> <li>• Yield a requirement for 3 primary schools and 1 post-primary school;</li> <li>• The Department will continue to work closely with the Council in relation to the provision of new schools and the development of existing schools.</li> </ul>
4	<b>Environmental Protection Agency (EPA)</b>	<p>The Submission received from the EPA comprised of two parts. A letter from David Galvin SEA Section and an accompanying report. The letter outlines the EPA's role as an environmental authority and states that they provide a 'self-service approach' via the guidance document '<i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i>' (which forms part of the submission).</p> <p>The letter also outlines the following:</p> <ul style="list-style-type: none"> <li>• The SEA Regulations set out the information to be contained in an Environmental Report;</li> </ul> <p><b>Assessment of Alternatives</b></p> <ul style="list-style-type: none"> <li>• Describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative;</li> <li>• Assess the alternatives against the 'Strategic Environmental Objectives' identified in the SEA ER;</li> </ul> <p><b>Assessment of Environmental Effects</b></p> <ul style="list-style-type: none"> <li>• Assess and document the full range of likely significant environmental effects, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects;</li> </ul> <p><b>Mitigation Measures</b></p> <ul style="list-style-type: none"> <li>• Where potential for likely significant effects have been identified, you should provide appropriate mitigation measures to avoid or minimise these. You should ensure that the Plan includes clear</li> </ul>

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		<p>commitments to implement the mitigation measures.</p> <p><b>Monitoring</b></p> <ul style="list-style-type: none"> <li>• The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise;</li> <li>• Deal with the possibility of cumulative effects;</li> <li>• Monitoring of both positive and negative effects should be considered;</li> <li>• The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities;</li> <li>• If the monitoring identifies adverse impacts during the implementation of the Plan, Kildare County Council should ensure that suitable and effective remedial action is taken;</li> </ul> <p><b>State of the Environment Report – Ireland’s Environment 2016</b></p> <ul style="list-style-type: none"> <li>• Finalising the Plan, the recent State of the Environment Report Ireland’s Environment – An Assessment 2016 (<i>EPA, 2016</i>) should be considered, as relevant and appropriate;</li> <li>• Screen any future amendments to the Plan;</li> </ul> <p>Once the Plan is adopted, prepare a SEA Statement that summarises:</p> <ul style="list-style-type: none"> <li>• How environmental consideration have been integrated;</li> <li>• How the Environmental Report, submissions, observations and consultations have been considered;</li> <li>• Reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with;</li> <li>• Measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul> <p>The letter outlines the Environmental Authorities that under the SEA Regulations should be consulted.</p> <p><b>SEA of Local Authority Land-Use Plans- EPA Recommendations and Resources (Version 1.2)</b></p> <p>The report received was titled – “SEA of Local Authority Land-Use Plans- EPA Recommendations and</p>

Sub. No.	Name	Summary of Submission
		<p>Resources (Version 1.2).</p> <p>The submission outlines recommendations to consider when carrying out Strategic Environmental Assessment (SEA).</p> <p><b>Drinking Water</b></p> <ul style="list-style-type: none"> <li>• Additional zoning/development and growth of settlements within the Plan area, it is critical that development be closely linked to the ability to provide a safe and secure supply of drinking water and related critical service infrastructure;</li> <li>• Drinking water quality reports, including the Drinking Water Report for Public Water Supplies – 2017 (EPA, 2018), should be consulted;</li> <li>• Key issues identified with particular supplies, including significant issues identified through (Irish Water) Drinking Water Safety Plans, should be highlighted for individual plans;</li> <li>• The submission recommends including a commitment to collaborate with Irish Water and other relevant stakeholders in the Plan, to provide an adequate and appropriate drinking water supply;</li> <li>• The submission states that a ‘Remedial Action List’ (RAL) of problematic drinking water supplies is released by the EPA on a quarterly basis and the Council should consider including a commitment in the Plan to support Irish Water, in addressing issues where water supplies servicing the Plan area are included on the RAL;</li> <li>• The submission advises that the Plan should include an Objective/Policy promoting the need for the conservation of water resources and also the need for detection/mitigation of infrastructural leakages. It may also be useful to consider developing a Water Conservation Strategy, in association with Irish Water and adjoining local authorities, where appropriate.</li> </ul> <p><b>Wastewater</b></p> <ul style="list-style-type: none"> <li>• The submission states that the EPA’s Water Quality in Ireland 2010 – 2012 report (EPA, 2015) highlights that one of the key causes of water pollution is from point sources including discharges from waste water treatment plants;</li> <li>• The need to provide and maintain adequate and appropriate wastewater treatment infrastructure to service zoned lands and developments over the lifetime of the Plan should be included as a specific Policy/Objective in the Plan;</li> </ul>

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		<ul style="list-style-type: none"> <li>• Agglomerations with treatment or poorly performing (or at capacity) treatment plants are highlighted in the Urban Waste Water Treatment in 2017 (EPA, 2018);</li> <li>• A commitment to support the provision of appropriate measures to address these issues as a priority, in collaboration with Irish Water should be considered where relevant;</li> <li>• Measures to ensure that combined storm water overflows, sewers and trade effluent in the area covered by the Plan is also managed properly should also be included as appropriate;</li> <li>• The submission advises that the Council should consult our Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e &lt; 10), (EPA, 2009) with regard to any <ul style="list-style-type: none"> <li>- proposed rural residential development which may arise</li> <li>- or development proposals in un-sewered rural area</li> <li>- or areas where connection to the public sewer is not feasible.</li> </ul> </li> <li>• The National Inspection Plan for Domestic Wastewater Treatment Systems Implementation Report (EPA, 2016) should also be considered, as appropriate.</li> </ul> <p><b>Protection of Surface and Ground Water Resources</b></p> <ul style="list-style-type: none"> <li>• Provide clear commitments in the Plan to protect surface water, groundwater and coastal/estuarine resources and their associated habitats and species, including fisheries within and adjacent to the Plan area;</li> <li>• Where specific recommendations/concerns for water bodies within the Plan area are identified in EPA water quality reports, including the Water Quality in 2017: an Indicators Report' (EPA, 2018) and Water Quality in 2016 (EPA, 2018), these should also be addressed/considered at an appropriate level in the Plan;</li> <li>• Ensure that any specific relevant objectives and measures for individual water bodies, within the Plan area as set out in the existing relevant Water Framework Directive River Basin Management Plan, are provided for in order to ensure water quality is protected/improved/maintained;</li> <li>• Consider that subsequent water management plans (including catchment management plans) may arise out of current review of the second cycle of WFD River Basin Management Planning should be integrated as appropriate upon their adoption;</li> </ul>

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		<ul style="list-style-type: none"> <li>• The 'integrated catchment management' approach for protecting and managing water resources, should also be supported in the Plan;</li> <li>• The submissions states that the EPA's <a href="http://www.catchments.ie">www.catchments.ie</a> website provides useful resources such as GIS mapping and related information that should be useful in preparing the Plan;</li> <li>• The submission refers to the European Union (Water Policy) Regulations 2014 which sets out the roles and responsibilities of the various stakeholders and the associated requirements in relation to river basin management planning and should be integrated as appropriate and states that these responsibilities should be reflected in the Plan and the associated environmental monitoring.</li> </ul> <p><b>Protection of Groundwater Resources</b></p> <ul style="list-style-type: none"> <li>• To maintain high quality water resources within the Plan area, it is important that development is controlled and managed appropriately, in areas of high groundwater vulnerability to avoid transmission of pollutants into important aquifers;</li> <li>• The Plan should include a clear Policy / Objective for the protection of groundwater resources and associated habitats and species;</li> <li>• The Plan should also include a commitment to integrate any existing Groundwater Protection Schemes and Groundwater Source Protection Zones, as relevant and appropriate within the Plan area;</li> <li>• The Plan should also include a commitment to comply with the European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. No. 9 of 2010);</li> <li>• The submission states that the Issues to consider relating to protection of groundwater include; enforcement of planning conditions related to installation, operation and maintenance of on-site wastewater treatment / septic tank systems, connection of all remaining houses within settlement boundaries to wastewater treatment plant, the development of a wastewater leak detection programme and the implementation and enforcement of the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2009 and associated European Communities (Good Agricultural Practice For Protection Of Waters) Regulations 2010 (S.I. No 610 of 2010).</li> </ul>

Sub. No.	Name	Summary of Submission
		<p><b>Protection and Management of Bathing Waters</b></p> <ul style="list-style-type: none"> <li>• The submission references the Council’s obligation to protect bathing waters and refers to legislation which affords this protection;</li> <li>• The submission also refers to the EPA’s most recent report on bathing water quality ‘<i>Bathing Water Quality in Ireland – A Report for the Year 2017, (EPA, 2018)</i>’.</li> </ul> <p><b>Water Framework Directive and Biodiversity</b></p> <ul style="list-style-type: none"> <li>• Any sites of significant biodiversity value within or adjacent to the Plan area listed on the Water Framework Directive Register of Protected Areas, (such as Fresh Water Pearl Mussel Catchments, designated Salmonid waters, fisheries / shellfisheries), should be protected in preparing the Plan.</li> </ul> <p><b>Flooding</b></p> <ul style="list-style-type: none"> <li>• The submission states that the Plan should fully comply with The Planning System and Flood Risk Management - Guidelines for Planning Authorities (OPW/DEHLG, 2009);</li> <li>• These Guidelines place requirements on planning authorities to carry out strategic flood risk assessments and also to ensure that development/zoning of vulnerable land uses, in areas at significant risk of flooding (flood zones A and B) is avoided;</li> <li>• Where this is not possible, any proposal for development/zoning is required to include a ‘Justification Test’;</li> <li>• The submission refers to the OPW’s website <a href="http://www.floodinfo.ie">www.floodinfo.ie</a>;</li> <li>• The EPA suggest that the Plan should include a commitment to carry out strategic flood risk assessments, in line with the Flood Risk Management Guidelines, to inform the development and implementation of the County Development Plan and lower level local area plans respectively;</li> <li>• A specific Policy should be included to provide for/promote appropriate flood risk assessments to be undertaken, where development / zoning is being proposed where there is significant risk of flooding;</li> <li>• Promote the development, where appropriate, of adaptation measures to account for the likely increased risk of flooding due to climate change within the Plan area, including implementation of adequate and appropriate Sustainable Urban Drainage Systems;</li> </ul>

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		<ul style="list-style-type: none"> <li>• the Plan should provide for protection, management, and as appropriate, enhancement of existing wetland habitats where flood protection/management measures are necessary;</li> <li>• The Submission suggests that Integrated Coastal Zone Management should also be considered as relevant and appropriate, to inform the preparation of coastal plans and programmes.</li> </ul> <p><b>Climate Change/Climatic Factors</b></p> <ul style="list-style-type: none"> <li>• Climate change adaptation and mitigation measures should be included in the Plan as appropriate and the Plan should be consistent with the <i>National Policy Position on Climate Action and Low Carbon Development1</i>, the <i>National Mitigation Plan</i> and the <i>National Adaptation Framework</i>, as well as relevant sectoral, regional and local adaption plans;</li> <li>• Ireland’s Greenhouse Gas Emissions Projections for 2017-2035 (EPA, 2018) should be considered;</li> <li>• The submission outlines key aspects to be considered in the Plan and the SEA to include:</li> <li>• Direct and indirect impacts of the Plan on greenhouse gas emissions and removals (Mitigation)</li> <li>• Direct and indirect impacts of climate change on the implementation of the Plan, e.g. the resilience of critical water service infrastructure to flooding and drought (Adaptation)</li> <li>• The linkages between mitigation and adaptation (inter-relationships).</li> </ul> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li>• The Plan should reflect the need to reduce greenhouse gas emissions and to protect, maintain and enhance carbon stocks;</li> <li>• Relevant actions in the National Mitigation Plan should be integrated into the Plan;</li> <li>• Include specific policies/objectives which promote the integration of climate change mitigation measures;</li> <li>• In developing and implementing mitigation-related measures, maximise the potential co-benefits of for the wider the environment and society.</li> </ul> <p><b>Adaptation</b></p> <ul style="list-style-type: none"> <li>• The submission highlights that EPA has published guidelines to support local authorities in developing local climate adaptation strategies (<i>EPA, 2016</i>);</li> <li>• In preparing the Plan and associated SEA, the degree to which climate change impacts, individually and in combination, are likely to influence its implementation and operation should be</li> </ul>

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		<p>considered;</p> <ul style="list-style-type: none"> <li>• Include the resilience of existing and proposed infrastructure and systems to climate variability;</li> <li>• Other climate change impacts to be considered include changes in native species and habitats and the spread of invasive species, pests and pathogens;</li> <li>• To minimise any adverse impacts identified in the SEA, the Plan should include appropriate climate change adaptation measures that can be implemented either directly or through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, Integrated Coastal Zone Management Plans etc;</li> <li>• The submission refers to the website <a href="http://www.climateireland.ie">www.climateireland.ie</a> for support and advice on adaption to climate change.</li> </ul> <p><b>Monitoring</b></p> <ul style="list-style-type: none"> <li>• The Plan and SEA should consider monitoring for both climate mitigation and climate adaptation monitoring aspects, where relevant and appropriate;</li> <li>• The EPA refer to Appendix III of its submission which provides climate-related baseline information and questions to consider.</li> </ul> <p><b>Air</b></p> <ul style="list-style-type: none"> <li>• Local Authorities shall promote best ambient air quality compatible with sustainable development and these requirements should be incorporated into the Plan by means of a specific objective/policy;</li> <li>• The submission notes that the National Clean Air Strategy (DCCAIE) is currently being prepared with the intention of developing the necessary policies and measures to comply with new and emerging EU legislation, in addition to supporting climate change mitigation;</li> <li>• Recent EPA reports on air quality include the <i>Air Quality in Ireland 2017 Report</i> (EPA, 2018) which sets out the most recent status in each of the four air quality zones in Ireland;</li> <li>• The submission highlights that the pollutants of most concern are those whose main source is traffic such as Particulate Matter and Nitrogen Dioxide;</li> <li>• Information available at <a href="http://www.epa.ie/air/quality/monitor/#">http://www.epa.ie/air/quality/monitor/#</a>.</li> </ul> <p><b>Noise</b></p> <ul style="list-style-type: none"> <li>• The Plan should ensure that the objectives of EU and Irish noise legislation is complied with;</li> </ul>

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		<ul style="list-style-type: none"> <li>• The Plan should promote the implementation of Environmental Noise Directive and associated national regulations, <a href="http://www.environ.ie/environment/noise/si-140-2006-environmental-noise-regulations-2006">http://www.environ.ie/environment/noise/si-140-2006-environmental-noise-regulations-2006</a>;</li> <li>• Noise Action Plans should be considered and reviewed as required, to reflect the Plan period and associated development proposals;</li> <li>• Consideration should be given to any relevant noise maps, and action plans;</li> <li>• Protect, where relevant, any designated quiet areas.</li> </ul> <p><b>Waste Management</b></p> <p>The submission outlines that the following should be considered:</p> <ul style="list-style-type: none"> <li>• promote the integration of land use zoning and development to existing and planned availability of waste infrastructure and capacity;</li> <li>• refer to and incorporate the relevant aspects of the relevant Regional Waste Management Plan;</li> <li>• EPA National Waste Statistics at: <a href="http://www.epa.ie/nationalwastestatistics/">http://www.epa.ie/nationalwastestatistics/</a>;</li> <li>• <i>The Nature and Extent of Unauthorised Waste Activity in Ireland (EPA, 2005)</i> ;</li> <li>• National Waste Report 2012 (EPA, 2014);</li> <li>• <i>National Hazardous Waste Management Plan 2014-2020 (EPA, 2015)</i>.</li> </ul> <p><b>Radon</b></p> <ul style="list-style-type: none"> <li>• Account should be taken if significant concentrations of radon exist in the Plan area which are shown at <a href="http://www.epa.ie/radiation/radonmap/">http://www.epa.ie/radiation/radonmap/</a>;</li> <li>• Reports on radioactivity monitoring are available at <a href="http://www.epa.ie/pubs/reports/radiation/">http://www.epa.ie/pubs/reports/radiation/</a>.</li> </ul> <p><b>Wider Environmental Recommendations to Consider</b></p> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• The protection of ecological resources is a key consideration which needs to be addressed;</li> <li>• The Plan should include clear Policies/Objectives to conserve and protect all designated sites within and adjacent to the Plan area (including the habitats and/or species for which they have been selected, or which they support), and should also promote the protection of undesignated sites and local biodiversity features;</li> <li>• The Plan should also promote the need to protect wider aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity, the</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>provision of buffer zones between developments and areas of significant biodiversity and ensuring appropriate control and management measures for invasive species;</p> <ul style="list-style-type: none"> <li>• Plans should be supported / informed by available habitat mapping (including wetland mapping) and other ecological surveys;</li> <li>• The Plan should refer to and reflect the relevant commitments in Ireland's <i>National Biodiversity Action Plan 2017-21</i> (DCHG, 2017);</li> <li>• Local Heritage/Biodiversity plans should be highlighted and should promote the implementation of key actions set out in these plans.</li> </ul> <p><b>Appropriate Assessment</b></p> <ul style="list-style-type: none"> <li>• The Plan should promote the application of the guidance set out in the DECLG Publication '<i>Appropriate Assessment of Plans and Projects in Ireland- Guidance for Planning Authorities</i>' (2009; revision 2010);</li> <li>• ensure compliance with the requirements of Article 6 of the Habitats Directive;</li> <li>• The Plan should also be subject to Appropriate Assessment (AA);</li> <li>• The Plan should include a clear Policy/Objective that sets out a requirement for AA Screening for new, reviewed or amended Plans and proposed projects, which may have the potential to impact on European sites;</li> <li>• Potential for cumulative/in-combination effects associated with other relevant Plans/Programmes/Projects should also be determined;</li> <li>• consult with the National Parks and Wildlife Service (NPWS) regarding screening of the <i>Plan</i> for Appropriate Assessment;</li> <li>• The submission refers to the AA Geo Tool as a source of information.</li> </ul> <p><b>Integrated Biodiversity Impact Assessment</b></p> <ul style="list-style-type: none"> <li>• The submission highlights that in 2012, the EPA published guidance on Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes. Best Practice Guidance. The aim is to inform practitioners, plan/project proponents and consent authorities to integrate SEA, EIA and AA processes and requirements to streamline biodiversity considerations.</li> </ul> <p><b>Energy Conservation and Renewable Energy</b></p> <p>The submission states the following should be considered in the Plan:</p>

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		<ul style="list-style-type: none"> <li>• Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (DHPCLG, 2017);</li> <li>• Relevant renewable energy / energy conservation actions in the National Mitigation Plan should be integrated;</li> <li>• Include a commitment to prepare and implement an ‘Energy Conservation Strategy’ and associated awareness campaign within the lifetime of the Plan where feasible;</li> <li>• Support and promote the need for energy conservation measures to be incorporated into buildings, <a href="http://www.seai.ie">www.seai.ie</a>;</li> <li>• Include a commitment where relevant and appropriate, to use energy derived from renewable energy systems and energy storage networks.</li> </ul> <p><b>Landscape</b></p> <ul style="list-style-type: none"> <li>• The Plan should provide for the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of national, regional, county and local value;</li> <li>• The Plan should also consider the landscape character adjoining the Plan area;</li> <li>• Visual linkages between established landmarks and landscape features and views should be considered when land is being zoned and when individual development proposals are being assessed / considered;</li> <li>• The <i>National Landscape Strategy</i> (DECLG, 2015) should be considered and integrated as appropriate.</li> </ul> <p><b>Geology / Geomorphology</b></p> <ul style="list-style-type: none"> <li>• The Plan should protect any designated Geological and Geomorphological NHAs/pNHAs, which may be present/designated within or adjacent to the Plan area in consultation with the Geological Survey of Ireland.</li> </ul> <p><b>Human Health / Quality of Life</b></p> <ul style="list-style-type: none"> <li>• The Plan should ensure provision of adequate and appropriate infrastructure and to serve both the existing community and likely future predicted increases in population within the Plan area;</li> <li>• Application of existing “Quality of Life Indices” would be considered.</li> </ul> <p><b>Transportation</b></p> <ul style="list-style-type: none"> <li>• Provide for the provision of sustainable modes of transport;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• ‘Smarter Transport – A Sustainable Transport Future’ (DTTAS, 2009) should be referred to for possible initiatives;</li> <li>• The Plan should include and provide support for appropriate access to public transport, dedicated cycleways and pedestrian pathways, access to rapid charging infrastructure etc;</li> <li>• The transport-related actions in the National Mitigation Plan and the National Planning Framework, should be considered and integrated;</li> <li>• Consider and manage transport related emissions;</li> <li>• Promoting the development of traffic management measures to reduce the potential for traffic congestion and associated vehicular emissions should be considered;</li> <li>• Useful to prepare (and review existing) Integrated Traffic Management Plans;</li> <li>• Consider and address the short, medium and long-term traffic management requirements.</li> </ul> <p><b>Infrastructure Planning</b></p> <ul style="list-style-type: none"> <li>• The Plan should when considering additional development proposals, support and promote the provision of adequate and appropriate critical service infrastructure, surface and storm water drainage, public transport, waste management, community services and amenities etc. on a planned and phased basis;</li> <li>• Address existing infrastructural inadequacies to meet expected population growth;</li> <li>• Potential impact on human health, habitats and species of ecological importance, flood risk and water quality should be considered, when examining proposed additional infrastructure or in proposed upgrading of existing infrastructure.</li> </ul> <p><b>Environmental Impact Assessment (EIA)</b></p> <ul style="list-style-type: none"> <li>• The Plan should highlight that certain projects arising during the implementation of the Plan may require an EIA;</li> <li>• Projects may require Appropriate Assessment Screening;</li> <li>• EPA’s role in relation to EIA relates only to facilities/sites which are licensable by the EPA, namely IPPC, waste water and waste sites;</li> <li>• Draft Guidelines on information to be contained in Environmental Impact Assessment Reports can be consulted at: <a href="http://www.epa.ie/pubs/advice/ea/drafteiarguidelines.html">http://www.epa.ie/pubs/advice/ea/drafteiarguidelines.html</a>.</li> </ul>

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		<p><b>Appendices</b> The submission contains two Appendices. Appendix 1 contains a list of links to environmental resources and Appendix 2 contains Key national and regional plans, programmes and strategies that may be relevant.</p>
5	Cllr Carmel Kelly	<ul style="list-style-type: none"> <li>• Submission suggests that many of the objectives should become actions;</li> <li>• Home and Communities</li> <li>• Request that Objective HCO 2.1 concerning a mix of housing types, tenure, density should become an action;</li> <li>• Refers to housing for older people needing higher priority;</li> <li>• Community, Sports, Cultural and Recreational Facilities</li> <li>• In Section 3.6 regarding Community, Sports and Recreational Facilities, change the action “to investigate acquisition of land” to “acquire lands”;</li> <li>• We need to provide facilities now due to population increasing;</li> <li>• Naas Transport Strategy;</li> <li>• Objectives MTO 4.1 and MTO 4.9 should become actions and actioned without delay.</li> <li>• Urban Regeneration and Development Strategy</li> <li>• No mention of public open space within the town centre, where people can sit, watch the world go by, listen to some music, appreciate some open air artwork;</li> <li>• Naas needs a proper centre, heart or square.</li> </ul>
6	Health Service Executive (HSE)	<ul style="list-style-type: none"> <li>• Submission made under the remit of Healthy Ireland and relevant health strategies, to incorporate health actions on the spatial and built environment;</li> </ul> <p><b>Healthy Ireland in the Health Services – National Implementation Plan</b></p> <ul style="list-style-type: none"> <li>• Key action – ensure that each programme is supported by a network of partner organisations, including the community and voluntary sector, academia and professional bodies;</li> <li>• The Plan should strategically aim to support community involvement in the development of health services and Healthy Ireland Initiatives;</li> </ul> <p><b>Tobacco Free Ireland</b></p> <ul style="list-style-type: none"> <li>• Implement Tobacco free playgrounds initiative;</li> </ul>

Sub. No.	Name	Summary of Submission
		<p><b>Healthy Ireland: Get Ireland Active – National Physical Activity Plan for Ireland</b></p> <ul style="list-style-type: none"> <li>• HSE welcomes the provision of green infrastructure and promotion of cycle and pedestrian paths in the Plan;</li> <li>• Plans for Nursing Homes or Residential Care Facilities should include proposals for gardens and recreational activities. Physical activity should be incorporated into long term care planning and practice.</li> </ul> <p><b>Healthy Ireland – A Healthy Weight for Ireland</b></p> <ul style="list-style-type: none"> <li>• 66% of population falls within 0-45 age category;</li> <li>• Develop the built environment to support reducing the obesogenic environment, make healthy choice the easy choice;</li> <li>• Support community based initiatives: <ul style="list-style-type: none"> <li>○ Promote the benefits of healthy eating, physical activity and non-sedentary behaviour;</li> <li>○ Improve availability of and access to healthier food choices;</li> <li>○ Create environment to promote/encourage active living including active travel and access to recreational spaces;</li> <li>○ Support opportunities for increasing physical activity levels generally in the community through Local Sports Partnerships and supporting initiatives e.g. Park Run;</li> <li>○ Facilitate community gardens through identifying and releasing suitable publicly own lands.</li> </ul> </li> </ul> <p><b>The National Positive Ageing Strategy</b></p> <ul style="list-style-type: none"> <li>• The submission states that the key aim for older people is to ensure they live in well-maintained, affordable, safe and secure homes, which are suitable to their physical and social needs;</li> <li>• The submission states that the Plan should ensure: <ul style="list-style-type: none"> <li>○ Age –friendly public transport;</li> <li>○ Public transport links to major health facilities and personal social services;</li> <li>○ Design and develop age friendly public spaces, transport and buildings;</li> <li>○ Design age friendly environments;</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>○ Carry out an assessment of housing need and provision and consider all housing options in development (i.e. social housing, sheltered housing, retirement villages);</li> <li>○ Implement Older People Remaining at Home (OPRAH) Strategy;</li> <li>○ Promote lifetime adaptable housing and design and the use of assistive technologies;</li> <li>○ Promote access (in terms of affordability, transport availability, accessibility of venue) to a wide range of opportunities for continued learning and education for older people;</li> <li>○ Promote the concept of active citizenship and the value of volunteering, and encourage people of all ages to become more involved in and to contribute to their own communities.</li> </ul> <ul style="list-style-type: none"> <li>● The submission notes the objective in the Plan that <i>require an appropriate mix of housing type, tenure, density and size is provided in all new residential areas to meet the needs of the population including the provision of appropriate supported housing and longer term residential care solutions designed for older people.</i></li> </ul> <p><b>Time to move on from congregated settings – A Strategy for Community Inclusion</b></p> <ul style="list-style-type: none"> <li>● A strategic aim of the LAP should be to promote and improve community inclusion of people with disabilities;</li> <li>● Facilitate their engagements as stakeholders;</li> <li>● Focus on meeting the housing and accommodation needs of people with disabilities, through purchasing housing, new build housing, leased housing or rented housing;</li> <li>● A local re-housing plan should be prepared and jointly co-ordinated with the HSE;</li> <li>● The Local Authority should give consideration to reserving a certain proportion of dwellings for people with disabilities;</li> <li>● Supports for people with disabilities to live in their own homes in the community through grants;</li> <li>● Support people with disabilities to access employment, education opportunities and mainstream community services.</li> </ul> <p><b>Sustainable Development</b></p> <ul style="list-style-type: none"> <li>● Developments to be designed to reduce carbon footprint;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• HSE welcomes the environmental friendly proposals outlined in the plan; integration of public transport infrastructure, building typologies that minimise use of energy, SuDS and integration and utilisation of open space;</li> <li>• Take account 'Our Sustainable Future - A Framework for Sustainable Development;</li> </ul> <p>The submission outlines actions under various headings:</p> <p><b>Energy</b></p> <ul style="list-style-type: none"> <li>• Energy efficient design into projects;</li> <li>• Energy management programme for all public buildings;</li> <li>• The LA should deliver new skill sets in green procurement, carbon accounting, carbon management and energy management;</li> <li>• Local Authority should support a Better Energy Communities Scheme.</li> </ul> <p><b>Transport and Smarter Travel Policy</b></p> <ul style="list-style-type: none"> <li>• Specify number of maximum permitted car parking for commercial sites, with suitable public transport and walking distance of amenities;</li> <li>• Development above a certain scale; travel plans;</li> <li>• Adoption of flexible working policies;</li> <li>• Encourage e-working;</li> <li>• Schools should have school travel plans to encourage alternatives to car;</li> <li>• Measures to improve punctuality and reliability of bus services;</li> <li>• Improve bus shelters;</li> <li>• Review school transport service, the current distance eligibility criteria, where it is not feasible to provide safe walkways and/or cycle paths;</li> <li>• Provide secure bike parking and showers in public authorities;</li> <li>• Traffic signals to favour pedestrians;</li> <li>• Widen footpaths where high pedestrian flows and clear footpath of unnecessary street furniture;</li> <li>• Signpost pedestrian routes to important urban destinations;</li> <li>• Provide green, safe and enticing pedestrian routes;</li> <li>• Support private and public sector initiatives to establish car club schemes and provide on-road parking spaces to be designated for car clubs through appropriate signage.</li> </ul>

Sub. No.	Name	Summary of Submission
		<p><b>National Cycle Policy Framework</b></p> <ul style="list-style-type: none"> <li>• Take measures to reduce volumes of through traffic, especially HGVs, in town centres and especially in the vicinity of schools and colleges;</li> <li>• Introduce traffic calming measures/enforce low traffic speeds in urban areas;</li> <li>• Surfaces for cycling maintained to a high standard;</li> <li>• Secure cycling parking at all destinations;</li> <li>• Aim to integrate cycling and public transport;</li> <li>• Ensure road infrastructure to be cyclist friendly;</li> <li>• Link up all existing cycle lanes;</li> <li>• HSE welcomes the proposal to prepare a long term cycling strategy as part of the Naas Transport Strategy.</li> </ul> <p><b>Waste – A Resource Opportunity – Waste Management Policy in Ireland</b></p> <ul style="list-style-type: none"> <li>• The submission states the Plan should implement the waste hierarchy set out in the waste framework directive;</li> <li>• Landfill should be a last resort;</li> <li>• Expand and implement waste prevention measures;</li> <li>• A reuse policy should be developed in consultation with the national procurement service to ensure consideration of reuse options before embarking on the purchase of new goods;</li> <li>• Easily accessible public recycling bins for public areas;</li> <li>• Food reduction initiatives and incentives for homes and businesses.</li> </ul> <p><b>Water</b></p> <ul style="list-style-type: none"> <li>• Submission makes reference to compliance with the European Communities (Drinking Water) Regulations 2014;</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• The Plan should aim to develop a Local Biodiversity Action Plan and refers to a website for guidelines;</li> <li>• Opportunities for green infrastructure should be explored and integrated into the design of public areas;</li> <li>• Existing green areas should be preserved;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Opportunities for promoting physical activity, promoting biodiversity and meeting the needs of the elderly and people with disabilities should also be considered in the design of public areas;</li> <li>• The HSE notes the policies to protect, reinforce and strengthen the Green Infrastructure in Naas and to strengthen links to the wider regional network;</li> </ul> <p><b>Environmental Noise</b></p> <ul style="list-style-type: none"> <li>• Noise is a cause of ill health;</li> <li>• The submission states that noise should be considered in the context of a range of land uses; roads, railways. Industry recreational activities, noise sensitive properties, mixed use, public houses, night clubs, industrial operations;</li> <li>• The Plan should map noise.</li> </ul> <p><b>Air quality</b></p> <ul style="list-style-type: none"> <li>• Reduce emissions and increase air quality in Naas;</li> <li>• Participate in national air quality monitoring programmes;</li> <li>• Working to develop and promote the Air Quality Index for Health;</li> <li>• Local Air Quality Management Plans that identify pollution 'hot spots' and aim to reduce pollution through local action on emissions.</li> </ul> <p><b>Healthcare – Submission on behalf of HSE CHO Health and Wellbeing</b></p> <ul style="list-style-type: none"> <li>• Naas is well served by healthcare;</li> <li>• The submission states, the Council will continue to work with healthcare service providers and key stakeholders, including the HSE and private bodies, to strengthen healthcare services in Naas.</li> </ul>
7	Irish Water	<ul style="list-style-type: none"> <li>• Submission suggests the addition of an extra Paragraph under Section 9.2 Infrastructure, after the first paragraph in this section;</li> <li>• The text relates to the National Water Resources Plan and how the NWRP will outline how Irish Water will maintain the balance between the supply from water sources and demand for drinking water.</li> </ul>
8	Fintan Brett	<ul style="list-style-type: none"> <li>• Change the wording on the outer ring road from objective to an action;</li> <li>• Identify a site (possibly on the north east of the town)for a 2nd level school to be constructed within 7 years);</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Provide a direct route from the Millennium roundabout to the town centre that will allow for the provision of a proper transport system in the future;</li> <li>• Prioritise the development of the town by creating proper connectivity between Corban's lane, Main Street and Abbey Street with an emphasis on being pedestrian friendly.</li> <li>• Identify key sites for park &amp; ride facilities.</li> </ul>
9	<b>Pádraig McEvoy</b>	<ul style="list-style-type: none"> <li>• Ensure that the proposed scale of zoning is consistent with the Core Strategy of the County Kildare Development Plan 2017-2023;</li> <li>• Take account of the RSES which is due to come into effect on the 28th June 2019;</li> <li>• Plan should address the need for modal shift away from car dependency and identify how climate change will be addressed in terms of road use.</li> </ul>
10	<b>The Housing Agency</b>	<ul style="list-style-type: none"> <li>• Own a significant landholding at Devoy Barracks;</li> <li>• The site is a key strategic regeneration site in the LAP;</li> <li>• Provides an opportunity to provide a model of compact growth;</li> <li>• Supports the strategic direction of the LPA;</li> </ul> <p><b>Site Details</b></p> <ul style="list-style-type: none"> <li>• Site extends to 5.6 ha;</li> <li>• Largest site in Devoy Quarter, CRA;</li> <li>• Accessed directly from John Devoy Road and enjoys excellent potential for pedestrian linkages;</li> <li>• Benefits from primary foul, surface water and watermain infrastructure;</li> <li>• In single public ownership;</li> <li>• Eastern boundary adjoins MERITS;</li> <li>• The Devoy Barracks site <i>may</i> incorporate some commercial development, but will be predominantly residential, enabling a transition in character and scale from the low-density residential developments to the north, south and west.</li> </ul> <p><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• Greenfield site, with no recorded planning history;</li> <li>• The submission outlines that 3 and 4 bed dwellings are primarily in the vicinity of the site;</li> <li>• Reference is made to Elsmore for 275 units (127 houses, 126 duplex units and 22 apartments) in a mix of primarily 3 and 4 bed units and revised to change 54 apartment/duplex units to 33 semi-</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>detached units.</p> <ul style="list-style-type: none"> <li>• Reduction in the overall number of units, from 275 to 253;</li> <li>• Further amendments to the original consent were permitted in 2018, again to increase the number of houses relative to duplex units;</li> <li>• Need, to 'rebalance' the housing stock of the local area to achieve a more sustainable mix of dwelling types, sizes and tenures that is reflective of current needs and demographic trends.</li> </ul> <p><b>Opportunity</b></p> <ul style="list-style-type: none"> <li>• Vision for the site is for a high density, residential-led development that contributes to a rebalancing of the housing stock in the local area by delivering a majority of smaller units (1 and 2 bed) in a mix of high-quality duplex and apartment typologies;</li> <li>• Provide for a transition in scale from the low-density suburban character of the areas to the north, west and south;</li> <li>• Design approach will create a more pedestrian-focussed environment through reduced car parking levels and an emphasis on pedestrian/cyclist permeability and linkages rather than streets designed for the private motor car;</li> <li>• Affordability and mix will be central to any future proposals, with a high proportion of 'cost rental' units;</li> <li>• The Housing Agency has some concerns around points of detail that may inhibit the potential of the site;</li> </ul> <p><b>National Planning Framework</b></p> <ul style="list-style-type: none"> <li>• The submission references aspects of the NPF; compact growth, better use of under-utilised land, infill, consolidating places;</li> <li>• <b>The site provides an unrivalled opportunity to provide a model of compact growth in the heart of Naas, counterbalancing the low-density commuter-driven housing development that characterises the surrounding area and the town in general.</b> (Emphasis added in Submission)</li> </ul> <p><b>Draft Regional Spatial and Economic Strategy</b></p> <ul style="list-style-type: none"> <li>• Re-iterates the 'Compact Growth' agenda of the NPF;</li> <li>• Naas, Key Town, needs at least 30% of new homes to be provided for within the built-up area,</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>through regeneration of identified town centre sites;</p> <ul style="list-style-type: none"> <li>• Draft RSES emphasises that <i>“Consolidation and regeneration shall be a key priority and objective for the development of Naas town”</i>, with a focus on town centre regeneration;</li> <li>• <b>Site lies within the ‘Devoy Quarter’, an identified regeneration area, and providing for its optimal development must be a key priority and objective of the LAP. It is essential that the LAP does not unduly constrain the development potential of the site.</b> (Emphasis added in submission);</li> <li>• The strategy also recognises the strong links between Naas and nearby settlements such as Sallins and Newbridge, and states explicitly that it <i>“supports enhanced links to Sallins train station to provide for more sustainable transport choices by those living and working in Naas”</i>;</li> <li>• Reference is made to Regional Policy Objective 4.33; <i>“promote the improvement of the transport network within and serving Naas town, including delivery of a robust and efficient walking, cycling and bus network with strong links to Sallins Railway Station, key destinations within the town and to the North West Quadrant and town centre area”</i>;</li> <li>• Commitment to enhancing the town’s transport links is further strengthened in the Proposed Material Alterations;</li> <li>• New RPOs - <i>“support the delivery of a dedicated public transport interchange in Naas with associated Park and Ride”</i>;</li> <li>• The submission states, <b>it is essential that the commitment to enhancing the town’s public transport infrastructure and connectivity is afforded due prominence within the Local Area Plan.</b> (Emphasis added in submission).</li> </ul> <p><b>County Development Plan</b></p> <ul style="list-style-type: none"> <li>• Consistent with the overall strategic focus of the NPF and RSES on achieving compact growth;</li> <li>• Aims to support national investment in public transport services by <i>“focussing new development areas in key locations to achieve the integration of land uses and high-quality public transport provision”</i> and to achieve economies of scale for services and infrastructure in identified growth towns such as Naas;</li> <li>• Encourage more <i>socially inclusive</i> communities through the provision of quality homes <i>“in mixed tenure neighbourhoods, catering for a wide range of family types”</i>;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• New development can no longer be dominated by single tenure development of traditional 3 and 4 bed typologies;</li> <li>• <b>New development must provide a mix of dwelling types and sizes, and also of tenure options. This must be reflected in the Local Area Plan’s objectives for its Core Regeneration Areas.</b> (Emphasis added in submission).</li> <li>• The submission makes reference to the car parking standards in the CDP and the application of lower rates in certain circumstances;</li> <li>• It quotes from the CDP “<i>large complex developments may be assessed separately with regard to the circumstance of each case</i>”;</li> <li>• <b>It is important that the LAP acknowledges the need for alternative approaches to car parking provision as possible and, indeed, desirable, on large town centre regeneration sites such as Devoy Barracks.</b> (Emphasis added in submission).</li> </ul> <p><b><u>Ministerial Guidelines</u></b></p> <p><b>Sustainable Residential Development in Urban Areas</b></p> <ul style="list-style-type: none"> <li>• For town centre sites it states that there should, in principle, be <b><i>no upper limit</i></b> on the number of dwellings, subject to a number of standard design safeguards;</li> <li>• Density on ‘Inner Suburban’ or ‘Infill’ sites is also to be approached on a site-specific basis, with the aim of <b><i>optimising delivery</i></b> while also ensuring ‘reasonable protection’ of the amenities and privacy of adjoining dwellings;</li> <li>• <b>The approach to density on sites such as Devoy Barracks must be design-led, with a view to optimising delivery, rather than constraining design options through arbitrary standards.</b>(Emphasis added in submission);</li> </ul> <p><b>Urban Development and Building Height Guidelines</b></p> <ul style="list-style-type: none"> <li>• Building heights must be generally increased in appropriate urban locations;</li> <li>• The submission refers to the Guidelines in terms of increasing heights and that new development should not be subject to specific height restrictions;</li> <li>• The submission notes the Guidelines require a move away from a 2 storey, cul-de-sac dominated approach, returning to traditional compact urban forms which created our finest town</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>and city environments;</p> <ul style="list-style-type: none"> <li>• <b>The Devoy Barracks site must move away from the low-density suburban design approach that has characterised the surrounding area and, crucially, must not be constrained by specific height restrictions within the LAP.</b> (Emphasis added in submission).</li> <li>• Guidelines states that plans should identify an area where increased building height is not only desirable by a fundamental policy requirement;</li> <li>• Should not provide for blanket numerical limitations on building height;</li> <li>• <b>The LAP must identify areas where increased building height will be actively pursued. The Devoy Barracks site, in light of its location and scale, should be one of the areas in Naas where increased building height is actively pursued.</b> (Emphasis added in submission).</li> </ul> <p><b>Sustainable Urban Housing – Design Standards for New Apartments</b></p> <ul style="list-style-type: none"> <li>• Refers to the Guidelines which state that apartments are more the norm for urban housing solutions;</li> <li>• In accordance with the Guidelines the subject site could be considered an ‘Intermediate Urban Location’, i.e. within or close to (reasonable walking distance – up to 10 minutes) principal town centres or employment locations. Appropriate for medium to high density residential development of any scale that includes apartments to some extent (with densities generally greater than 45 units per ha);</li> <li>• Guidelines recognise need for smaller units;</li> <li>• <b>There is a need for smaller unit types to be delivered in new development. This should be reflected in the design principles for Core Regeneration Areas, including those for the Devoy Park area.</b> (Emphasis added in submission);</li> <li>• Guidelines state that development must consider a reduced overall parking standard;</li> <li>• <b>The LAP should encourage the provision of a car sharing club for new development in the Devoy Park area.</b> (Emphasis added in submission).</li> </ul> <p><b>Design Manual for Urban Roads and Streets</b></p> <ul style="list-style-type: none"> <li>• <b>The Key Design Principles for regeneration areas such as Devoy Park should include a commitment to designing streets for a user hierarchy that prioritises sustainable forms of transportation.</b> (Emphasis added in submission).</li> </ul>

Sub. No.	Name	Summary of Submission														
		<p><b>Proposed Amendments to Draft Local Area Plan</b>  The submission proposes amendments to the Plan.</p> <p><b>Movement and Transport</b></p> <ul style="list-style-type: none"> <li>Section 1.5 Guiding Principle: 7 Core Themes  <b>Sustainable Movement</b> – Developing an improved and permeable sustainable network of cycling and pedestrian routes to encourage alternative options, <b>requiring all new development proposals to promote and prioritise sustainable modes of transport</b>, improving the permeability of the town centre, <b>delivering improved public transport infrastructure and services</b>, and investigating the potential of outer urban relief routes are priorities of the Plan.</li> <li>Chapter 4 ‘Movement and Transport –  To promote and develop a sustainable transport network for Naas that improves <b>actively prioritises</b> walking, cycling and public transport <b>over less sustainable modes of transport</b>, while <del>also providing</del> <b>maintaining and providing</b> an appropriate level of road infrastructure, road capacity and traffic management to support the future development and ease of movement within the town;</li> <li>Table 4.2 (‘Strategic Transportation Projects’) – introduce two objectives: <table border="1" data-bbox="678 951 2047 1394"> <tr> <td data-bbox="678 951 934 1358">SPO 1.13</td> <td data-bbox="934 951 1205 1358">Priority bus route to Sallins railway station</td> <td data-bbox="1205 951 1496 1358">Priority bus route linking Naas town centre to Sallins railway station</td> <td data-bbox="1496 951 1776 1358">Identification and delivery of route to be advanced during the lifetime of the Plan</td> <td data-bbox="1776 951 2047 1358">Location: Dublin and Sallins Roads linking Sallins Train Station, Naas Town Centre and Millennium Park. Function: Priority Bus Route</td> </tr> <tr> <td data-bbox="678 1358 934 1394">SPO 1.14</td> <td data-bbox="934 1358 1205 1394">Public Transport</td> <td data-bbox="1205 1358 1496 1394">Public transport</td> <td data-bbox="1496 1358 1776 1394">Feasibility to be</td> <td data-bbox="1776 1358 2047 1394">Location:</td> </tr> </table> </li> </ul>					SPO 1.13	Priority bus route to Sallins railway station	Priority bus route linking Naas town centre to Sallins railway station	Identification and delivery of route to be advanced during the lifetime of the Plan	Location: Dublin and Sallins Roads linking Sallins Train Station, Naas Town Centre and Millennium Park. Function: Priority Bus Route	SPO 1.14	Public Transport	Public transport	Feasibility to be	Location:
SPO 1.13	Priority bus route to Sallins railway station	Priority bus route linking Naas town centre to Sallins railway station	Identification and delivery of route to be advanced during the lifetime of the Plan	Location: Dublin and Sallins Roads linking Sallins Train Station, Naas Town Centre and Millennium Park. Function: Priority Bus Route												
SPO 1.14	Public Transport	Public transport	Feasibility to be	Location:												

Sub. No.	Name	Summary of Submission				
			Interchange with associated Park and Ride facilities	interchange/hub linking existing residential areas and growth centres with town centre amenities and services	investigated as an immediate priority, with a view to delivery during the lifetime of the Plan	Adjacent/in close proximity to Main Street Function: Hub for local sustainable transport network
<p><b>Parking</b></p> <ul style="list-style-type: none"> <li>Section 4.4 Parking It should be noted that Chapter 17 of the Kildare County Development Plan 2017 – 2023 sets out parking standards in relation to new developments. <b>These standards must not be applied universally however – the CDP notes, for example, that lower rates of parking may be appropriate for sustainably-located sites, and that large, complex developments may be assessed separately with regard to the circumstances of each case”;</b> MTO3.1 Apply the parking standards in the Kildare County Development Plan, and/or relevant Section 28 Guidelines, to all applications for planning permission.</li> </ul> <p><b>Devoy Quarter Design Framework</b></p> <ul style="list-style-type: none"> <li>High overall density (<i>min.</i> 50 dwellings per ha.);</li> <li>Flexibility in relation to the exact location of the public amenity space. Overall, the framework provides for a coherent and legible urban structure based on the principles of permeability, continuity and urban enclosure. A defining part of the layout is the provision of a <b>high-quality</b> landscaped amenity space <del>at the centre</del> <b>as part of an overall pedestrian and cyclist-oriented environment with new links.</b> <del>This will create a focal point of the area and also provide for a pedestrian/cyclist link to the Newbridge Road and the residential areas to the west and south.</del></li> </ul>						

Sub. No.	Name	Summary of Submission
		<p><b>Suggested additions to Key Design Principles for the Devoy Quarter</b></p> <ul style="list-style-type: none"> <li>• Encourage increased building height in appropriate locations;</li> <li>• Encourage a high overall residential density, while also ensuring effective integration with surrounding residential areas;</li> <li>• Provide a high proportion of smaller unit types, and a mix of tenure options;</li> <li>• Provide for an attractively landscaped public amenity space as a focal point for the area at the centre of the Devoy Park area;</li> <li>• Ensure that all streets are designed for a user hierarchy that encourages sustainable forms of transportation;</li> <li>• Encourage reduced car parking standards and the provision of a car sharing club as part of any new development.</li> <li>• The submission removes the height restrictions on the figure associated with the Devoy Quarter.</li> </ul> <div data-bbox="1032 772 1599 1238" data-label="Image"> </div> <p data-bbox="1032 1241 1193 1262">Fig. 2 Site Location</p>
11	Anthony Lawlor	<p><b>Transport</b></p> <ul style="list-style-type: none"> <li>• Put as an action rather than an objective to investigate an outer ring route from either Junction 8/9 to the Newhall interchange on a North-eastern corridor;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• That park and ride location be clearly identified at interchanges 9,9a and 10.</li> </ul> <p><b>Town Centre</b></p> <ul style="list-style-type: none"> <li>• Identify rate support for new business in the town centre;</li> <li>• A charge to be put on charity shops, to be decided by the proposed Town Team.</li> </ul> <p><b>Education</b></p> <ul style="list-style-type: none"> <li>• Naas Community College will have 500 pupils this Sept and plan should reflect this.</li> </ul> <p><b>Housing for the elderly</b></p> <ul style="list-style-type: none"> <li>• Identify site in the town centre to replicate McAuley with the council using CPO powers to deliver this.</li> </ul> <p><b>Sport and Recreation</b></p> <ul style="list-style-type: none"> <li>• The council use its CPO powers to acquire lands adjacent to the GAA for sporting use and any other lands necessary to provide the sporting and recreational needs for the town over the next 20 years.</li> </ul>
12	Inland Fisheries Ireland	<ul style="list-style-type: none"> <li>• Naas is traversed by some of the more productive and important salmonid systems in the region;</li> <li>• The Grand Canal represents a biologically valuable fishery (and overall biodiversity) resource;</li> <li>• LAP must address not only water quality but also include the protection of the physical environment, hydrological processes and biodiversity;</li> <li>• Insidious effects of creeping/chronic pollution are often more serious than dramatic discharges which result in instantaneous fish kills, because sub-lethal pollution may reduce growth, inhibit reproduction functions or so alter the habitat as to render it uninhabitable for certain more desirable species;</li> <li>• Maintenance of habitat is a particularly important objective of fisheries authorities;</li> <li>• An important aspect in the maintenance of habitat is the protection of the food chain.</li> <li>• Welcome the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation allowing protection / enhancement of biological diversity while providing open space and recreational amenity for river users.</li> <li>• Natural heritage objectives should include maintenance of buffer zones along both banks of the surface waters in the LAP;</li> <li>• There must be sufficient treatment capacity available both within the receiving sewerage</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>systems locally and downstream of waste water treatment plants;</p> <ul style="list-style-type: none"> <li>• It is imperative that this LAP works in harmony with the Water Services Programme of Irish Water;</li> <li>• Developments such as road and bypass development, urbanisation, flood relief, afforestation, river drainage have caused and are causing major disturbances to the physical habitat.</li> <li>• The Council under the terms of the EU Water Framework Directive (WFD) (2000/60/EC) is legally obliged to protect the ecological status of river catchments and channels.</li> <li>• Consideration has to be given to other factors including flow, drainage, dams, bank erosion, quality of instream vegetation and riparian habitat etc.</li> <li>• Essential that those areas adjacent to waterways (riparian buffer zones) are managed in a manner which will lessen impacts to these habitats</li> <li>• River corridors and buffer zones are an ideal and natural way to link areas to attain a high quality Green Infrastructure network;</li> <li>• IFI would encourage GI objective 1.6 in the LAP which highlights the need to strengthen links with watercourses, grand canal and the countryside;</li> <li>• IFI welcomes objective IO 2.5 under policy I2 (Surface water and groundwater) which will “encourage daylighting/decultivating and the restoration of culverted waterbodies within the town as a natural method of flood management”.</li> <li>• The submission advocates at least a 10m buffer zone between river channel and the line of maximum extent of development;</li> <li>• It notes the plan states that buffer zones will be determined on a case by case basis, and requests that IFI be consulted as they can provide guidance on site specific measures;</li> <li>• IFI is opposed to any development on floodplain lands - a Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian habitats;</li> <li>• The submission commends the inclusion of SUDS.</li> </ul>
13	Transport Infrastructure Ireland (TII)	<p><b>Strategic Context</b></p> <ul style="list-style-type: none"> <li>• N/M7 part of the EU TEN-T Core Network. There are European and national policy considerations to be addressed to ensure the strategic function is safeguarded;</li> </ul>

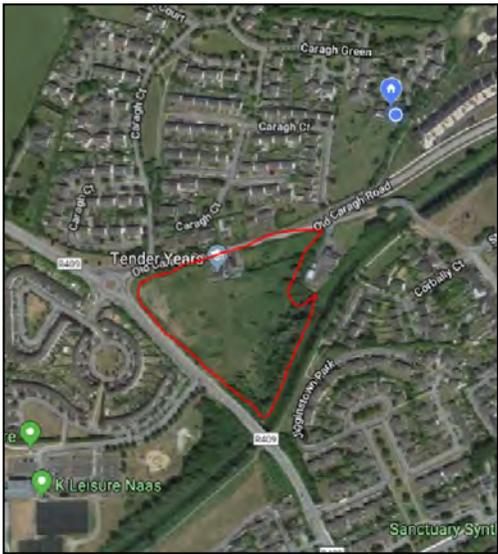
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Congestion on the N/M7 and connecting roads in the vicinity of Naas is a growing problem;</li> <li>• NTA identify that this needs to be addressed to mitigate the negative impact of local and commuter traffic on the N/M7;</li> <li>• Local area planning placing reliance on the strategic national road network to accommodate local trips is considered inappropriate and at variance with the provision of official policy;</li> <li>• Spatial Planning and National Roads Guidelines require local transport solutions for local development;</li> <li>• The Plan needs to be prepared on the basis on an evidence based area transport assessment in accordance with the Spatial Planning and National Roads Guidelines.</li> </ul> <p><b>Strategic National Road Network</b></p> <ul style="list-style-type: none"> <li>• TII recommends that consideration should be given to explicit policy provision to safeguard the strategic function of the national road network and associated junctions to be included as a specific objective under Policy MT6 – Strategic Road Connections;</li> <li>• Welcomes inclusion of Objective NTO 6.2 providing for the Leinster Outer Orbital Route;</li> <li>• Outer Eastern Relief Road from Junction 8 to Junction 10 is not included in Project Ireland 2040 of the NTA Transport Strategy;</li> <li>• The Council can identify local improvements to the existing road network planned over the term of the plan;</li> <li>• Improvements relating to national roads identified at local level should be done in consultation with TII. They may not be responsible for funding any such schemes.</li> </ul> <p><b>Specific Development Objectives</b></p> <p>TII identifies the following objectives that would benefit from further assessment and/or clarification:</p> <ol style="list-style-type: none"> <li>a) <u>Link Route to N/M7 Junction 9a</u> – TII have had no advance consultation. Additional connectivity to junctions should have regard to Section 2.7 of Guidelines;</li> <li>b) <u>Northwest Quadrant</u> – uncertainty regarding who will prepare the masterplan for the area;</li> <li>c) <u>Junction 9 (Maudlins Interchange)</u> – potential impact to the national road on the zoning and reference is made to planning file 15/500 that was withdrawn from the Board. An Evidence based assessment should inform the LAP;</li> <li>d) <u>Junction 10 Newhall</u> – refers to zoning of 71 ha. No evidence base or traffic and transport</li> </ol>

Sub. No.	Name	Summary of Submission
		<p>analysis is presented;</p> <p>e) <u>Masterplan Exercises</u> – subject to appropriate consultation undertaken by local authority, subject to specific strategic transport assessment, adoption process clearly outlined and included in the Plan by way of variation or amendment.</p> <p>f) <u>Additional Matters and Future Consultation</u> – TII have had no consultation of Naas Transport Strategy. TII would welcome consultation on NWQ masterplan and Maudlins interchange. The Plan should include requirements of Chapter 3 of the Guidelines in the Plan relating to Road Safety Audit, Environmental Noise and signage.</p>
14	Office of Public Works (OPW)	<ul style="list-style-type: none"> <li>• The National Preliminary Flood Risk Assessment Naas was designated a degree of risk;</li> <li>• Naas further assessed as part of CFRAMs;</li> <li>• Work is now progressing with the OPW and KCC towards a scheme for the area.</li> </ul> <p><b>Site Specific Flood Risk Assessment Reports</b></p> <ul style="list-style-type: none"> <li>• Welcomes recommendation to undertake Site Specific Flood Risk Assessment in the various areas referred to in the plan;</li> <li>• A large proportion of these lands were zoned pre CFRAM completion and further information now exists;</li> <li>• Consideration should be given by KCC as to whether previous zoning in the area remains suitable;</li> <li>• Robust justification at a site specific level through SFRA and Development Management Justification Test is required before any site can be developed;</li> <li>• Development should not unwittingly worsen the flooding of adjacent developed areas as each of these sites are located within Flood Zones A and B.</li> </ul> <p><b>Proposed New Residential/Education/Enterprise and Employment Lands (Canal Quarter, Tipper Road, Residential and Education NW Quadrant and new Enterprise and Employment Lands (NWQ))</b></p> <ul style="list-style-type: none"> <li>• Each of these areas have large portions of their boundaries in both Flood Zones A and B;</li> <li>• Use caution with regards the Flooding Guidelines;</li> <li>• A SFRA will need to be completed for each individual development and further hydraulic</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>modelling;</p> <ul style="list-style-type: none"> <li>• Ensure development doesn't worsen areas which are largely developed;</li> <li>• Need to pass the Development Management Justification Test;</li> <li>• RPS have indicated (in some cases) that there are other suitable alternative lands in areas at lower risk of flooding;</li> <li>• OPW recognises that a balanced view of land use and flood risk should be taken. It considers that this can be achieved in full compliance with the Guidelines.</li> </ul>
15	Sorcha O'Neill	<ul style="list-style-type: none"> <li>• The submission requests the insertion of an objective for support for the Irish Gaeilge growth, the Irish Language Strategy or obtaining the lionra status for the town;</li> <li>• Change lands adjacent to Esmondale, Kilcullen Road which border the Rathasker Road proposed from category B to category for agriculture;</li> <li>• To ensure retention of agricultural uses and protect from urban sprawl, encroachment and ribbon development;</li> <li>• To change current green areas in Esmondale Estate in Naas from category B to category F open space and amenity;</li> <li>• Need more neighbourhood centres, particularly in the south or west areas where there is none;</li> <li>• Change zoning of lands at New Caragh Road that is alongside the canal that is owned by the council from residential to open space amenity or Leisure and Amenity;</li> <li>• Suggest a park or dog park for the area;</li> <li>• Not suitable for housing that is proposed; marshy and prone to flooding;</li> <li>• Queries whether the Department of Education have put in a submission and what are the educational requirements for the next five years;</li> <li>• The submission states that 'safe active transport routes' is not on the map anywhere;</li> <li>• What zoning does Park and Ride facility need;</li> <li>• The submission states, support the delivery of a dedicated public transport interchange in Naas and associated Park and Ride;</li> <li>• Should we have green procurement as part of LAP;</li> <li>• Mention supporting Sustainable Energy Communities;</li> <li>• Derelict sites not being enforced, be more proactive;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Suggest insertion of providing opportunities to connect with other people in our public realms, encouraging people to sit and spend time in our public realms;</li> <li>• No mention of heat mapping as per RSES.</li> </ul>
16	<b>Health and Safety Authority</b>	The Authority acknowledges receipt of correspondence and state they do not have any comments to make on the proposed Local Area Plan.
17	<b>Northern and Western Regional Assembly</b>	The Assembly acknowledge receipt of correspondence and state they do not wish to make any observations.
18	<b>Anne Breen and Larry Breen</b>	<p><b>Canal Quarter</b></p> <ul style="list-style-type: none"> <li>• Not be zoned for Town Centre but rather open space and amenity;</li> <li>• Ideal for a park;</li> <li>• Residential and commercial activity will ruin the natural heritage of this historic part of Naas.</li> </ul> <p><b>Northwest Quadrant</b></p> <ul style="list-style-type: none"> <li>• Proposed development will conflict with the development and regeneration of the centre of Naas;</li> <li>• Compares it to Monread Road and describes it as satellite development;</li> <li>• Take away chance of commercial regeneration in the town;</li> <li>• The indicative route from NWQ should not include any vehicular road over the canal connecting it to Naas via Mill Bridge Avenue.</li> </ul> <p><b>Inner Relief Road</b></p> <ul style="list-style-type: none"> <li>• Not a solution to traffic problems in Naas;</li> <li>• Out of date and not fit for purpose;</li> <li>• Create its own problems;</li> <li>• Waste of money;</li> <li>• Naas needs a proper Outer Relief Road.</li> </ul>
19	<b>Cllr. Rob Power</b>	<ul style="list-style-type: none"> <li>• Acknowledge the areas within this plan which are represented in the Kildare-Newbridge Municipal district;</li> <li>• Include objective for Cycle Route from the New Caragh Road to Caragh village;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Include an objective to consider both an outer and inner relief road to the North East of Naas in the lifetime of this plan;</li> <li>• Indicative routes through NWQ should prioritise public transport and pedestrian/cycling, longer term potential of light rail should be considered;</li> <li>• Increased building heights within the town;</li> <li>• A green-lung within the castle quarter should be retained and enhanced as a public amenity;</li> <li>• Include Community Childcare Facilities in the town;</li> <li>• Concern over the lands zoned industrial (H2(8)) at Ladytown, given its rural setting and proximity of the Grand Canal and suggest should be “green-belt” to protect.</li> </ul>
20	<b>Kildare Art Collective</b>	<ul style="list-style-type: none"> <li>• Naas Library building as an artist’s studio;</li> <li>• Collective of 20 plus artists;</li> <li>• No artist studio space available in County Kildare;</li> <li>• The opportunity to work in a specific space for artists, among other like-minded people, would be of enormous benefit;</li> <li>• Having a specific place to work impacts positively on focus, drive, innovation and increases productivity;</li> <li>• The use of the old Library would allow local artists to host classes, workshops, portfolio lessons and facilitate invitations to working artists from elsewhere to do the same and thus further the cultural reputation of the area as well as local innovation and productivity;</li> <li>• Local community would also benefit, a documented fact that wherever artists gather to work, others will follow and inevitably lead to marked economic, cultural and community benefits.</li> </ul>
21	<b>Joseph Bergin</b>	<p><b>Open Space</b></p> <ul style="list-style-type: none"> <li>• Little open space suitable for recreation;</li> <li>• K-Leisure complex is for active sports but need a good old fashioned park where people can walk, children can play freely and mothers can push buggies and sit down for a break comfortably;</li> <li>• The submission suggests that the issue is becoming more pressing with the continued development of Finlay Park and more housing between there and the town centre;</li> <li>• Suggests the site bounded by the Old and New Caragh Road and the canal would be ideal for a</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>nice park. It would supplement the sports facilities at K-Leisure and integrate nicely with the proposed Greenway along the canal.</p> <ul style="list-style-type: none"> <li>The submission provides an image of the suggested site.</li> </ul> 
22	Brian Kavanagh	<p><b>Open Space and Social Housing</b></p> <ul style="list-style-type: none"> <li>Provide a much needed park leading to the canal at the triangle of land at the intersection of New Caragh Road and Old Caragh Road;</li> <li>No park at that side of the town;</li> <li>Enough social housing built on that side and not enough open space for residents;</li> <li>The submissions states that they do not wish that side of the town to be a social housing ghetto that KCC must learn from mistakes of the past in cramming social housing into one area.</li> </ul>
23	Ann Horan	<ul style="list-style-type: none"> <li>Oppose buildings houses on the triangle of land near Caragh Court;</li> <li>Seriously need proper green area on that side of Naas for recreational purposes for both young and old alike;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Have a fair share of housing in the locality and green space is needed;</li> <li>• The submission states not to build anymore houses at this is location as that would be extremely unfair and simply wrong.</li> </ul>
24	Sean Dunne	<ul style="list-style-type: none"> <li>• Need to replace kerb at junction of Rathasker Road and the Ring Road to facilitate prams, buggies and bikes;</li> <li>• The traffic speed and volume makes it necessary to cross quickly and it has become quite dangerous;</li> <li>• The submission states that they wrote about this issue previously but did not receive a response.</li> <li>• The submission provides the following image.</li> </ul> 
25	Martina Shannon	<ul style="list-style-type: none"> <li>• Urgently need Art Facilities in the form of an Art Centre for Adults and Children;</li> <li>• The Library is moving to the Town Hall. This would be an ideal location for an art centre;</li> <li>• It should offer workspaces for local artists, exhibition spaces, creative hub space for children, workshop space for clubs like Brownies, Lady Birds, Scouts etc;</li> <li>• Creative support in the form of mentoring to schools and colleges for the various projects they are involved in including, Mini Company, Junk Couture, College Portfolios etc;</li> <li>• Please note that St Marys Mini Company came 3rd in the National Finals with the help of Dross</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>Evolution, which was an art centre for children;</p> <ul style="list-style-type: none"> <li>• Art centre should have the environment as its main focus considering that we have declared climate change a national emergency, running regular recycle/ up-cycle workshops.</li> <li>• The submission refers to <a href="http://www.rediscoverycentre.ie/">www.rediscoverycentre.ie/</a> as an example;</li> <li>• The submission also states that they would be happy to put forward a more detailed proposal for an art centre in the Library with detailed plans for no cost should this be something the KCC would be interested in.</li> </ul>
26	Lara Deasy	<ul style="list-style-type: none"> <li>• Art facilities for kids to adults;</li> <li>• The submission states that art helps people express and process what is stuck deep inside;</li> <li>• A facility like this will reduce the burden of mental health issues in Naas, and thus costs from same including vandalism and wanton crime.</li> </ul>
27	Drenushe Xhemajli	<ul style="list-style-type: none"> <li>• The submission states that Naas really needs an Arts centre that is accessible by children and adults.</li> </ul>
28	Eithne Reddy	<ul style="list-style-type: none"> <li>• The submission states: “art facilities for both adults and children in Naas Town”.</li> </ul>
29	Katarzyna Fiodorow	<ul style="list-style-type: none"> <li>• Naas need an Art Centre for adults and kids.</li> </ul>
30	Noleen Kavanagh	<ul style="list-style-type: none"> <li>• Naas and surrounding area need to have an Art centre where children and adults can have a place to learn about all types of art, i.e. painting, photography, dance, art appreciation etc.</li> </ul>
31	Aisling Popoola	<ul style="list-style-type: none"> <li>• Would liek to see an Arts Centre in Naas;</li> <li>• They have shown to be very therapeutic for children and adults;</li> <li>• Art with a focus on the environment like Dross Evolution Naas.</li> </ul>
32	Susan Miller	<ul style="list-style-type: none"> <li>• Consider an Environmental Awareness project for both the young and more mature members of our community;</li> <li>• The submission refers to children beginning a club ‘noplanetb’ and utilises the Dross Evolution premises;</li> <li>• Due to high rent Dross have closed;</li> <li>• Not only provided a base for the No Planet B Club (who spoke at the recent Climate Action March in Dublin amongst other activities), but also provided a valuable community resource</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>educating people regarding the environment, advocating/teaching/supporting Environmental Art utilising non-wanted/disposed of items to create Artworks;</p> <ul style="list-style-type: none"> <li>• It is extremely disappointing that such a valuable endeavour has no local governmental supports either in the way of funding, provision of premises or other means;</li> <li>• As a town and indeed county we could lead the way in supporting both the environment and the Arts;</li> <li>• The submission invites the Environmental Dept. and Arts Officer to consider how such a resource could be used, enhanced and above all supported;</li> <li>• The loss of Dross is the loss of an educational, art and environmental resource.</li> </ul>
33	<b>Audrey O'Reilly</b>	<ul style="list-style-type: none"> <li>• The loss of Dross Evolution in Naas will be felt throughout the town and especially for those parents with young children;</li> <li>• Vital service and community spirit to the town;</li> <li>• Dross evolution should use the premises of the current library after it moves to the town hall.</li> </ul>
34	<b>Jill MacNeill</b>	<ul style="list-style-type: none"> <li>• An Arts Centre is very much required in Naas;</li> <li>• A place where classes in all types of Art can be taught and attended; painting, music, drama, dance, creativity;</li> <li>• All extremely important for people of any age to be able to access in particular to help with mental health and well being;</li> <li>• Propose the current site where the library is as it is moving back to the Town Hall.</li> </ul>
35	<b>Sinead D</b>	<ul style="list-style-type: none"> <li>• This submission states: "Naas needs art".</li> </ul>
36	<b>Laoise Coffey</b>	<ul style="list-style-type: none"> <li>• This submission states: "Art Centre".</li> </ul>
37	<b>Niamh Devenney</b>	<ul style="list-style-type: none"> <li>• This submission states that there is a huge need for a centre in Naas where issues and improvements around climate change can be implemented.</li> </ul>
38	<b>Sally Kennedy</b>	<ul style="list-style-type: none"> <li>• This submission requests an art centre for adults and children.</li> </ul>
39	<b>Ruth Brennan</b>	<ul style="list-style-type: none"> <li>• An Arts centre for adults and children is a hugely positive addition to any community;</li> <li>• Dross Evolution is wonderfully run by a fantastic Art teacher. Shocked and saddened to hear it is closing due to a lack of funds;</li> </ul>

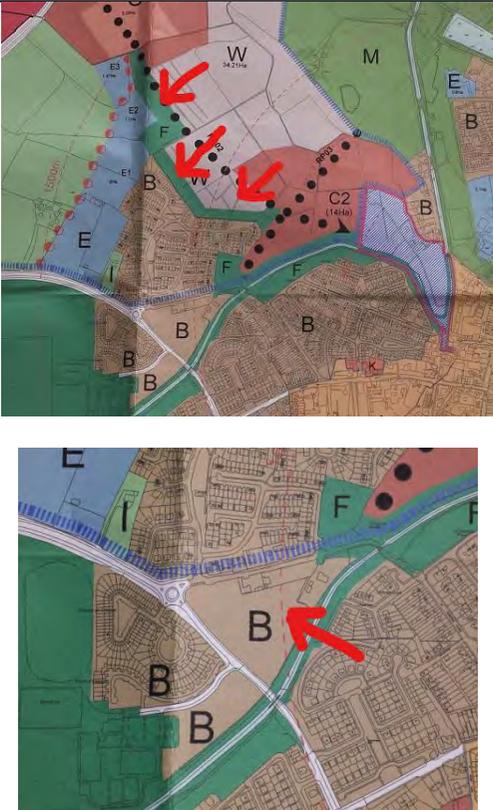
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Anyway to save it would be hugely beneficial to the community of Naas.</li> </ul>
40	Niamh Cowdell	<ul style="list-style-type: none"> <li>• Support should be given to anyone going into business with a viable plan to help with care of the Environment;</li> <li>• Dross Evolution which promotes creativity and sustainability should be funded and there for the community;</li> <li>• Dross Evolution is one of its kind and a break in the town from cafes, pubs and charity shops;</li> <li>• We must get behind this kind of venture that encourages and promotes sustainability in a creative way.</li> </ul>
41	John Corry	<ul style="list-style-type: none"> <li>• Concerned about the erosion of green areas in Naas;</li> <li>• Wants the triangle of land off the Caragh Road to be developed as a dog park.</li> </ul>
42	Celine Maguire	<ul style="list-style-type: none"> <li>• No dog park in Naas, an off-lead area where the general public can exercise their dogs;</li> <li>• Nine such areas in Dublin;</li> <li>• The submission suggests the disused land on the Old Caragh Road as a possible location;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• This land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• A dog park would bring about social inclusion by increasing social interaction among dog owners;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> <li>• Against the zoning of the land on Old Caragh Road for New Residential;</li> <li>• Reduction in open space;</li> <li>• The submission states that Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP.</li> </ul>

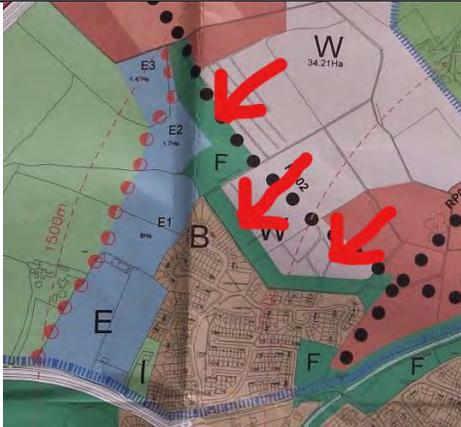
Sub. No.	Name	Summary of Submission
43	<b>Eamonn Maguire</b>	<ul style="list-style-type: none"> <li>• No dog park in Naas, an off-lead area where the general public can exercise their dogs;</li> <li>• Nine such areas in Dublin;</li> <li>• The submission suggests the disused land on the Old Caragh Road as a possible location;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• This land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• A dog park would bring about social inclusion by increasing social interaction among dog owners;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> <li>• Against the zoning of the land on Old Caragh Road for New Residential;</li> <li>• Reducation in open space;</li> <li>• The submission states that Tender Years Creche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP.</li> </ul>
44	<b>Katriona Woods</b>	<ul style="list-style-type: none"> <li>• The submission does not support that zoning of land on the attached image to New Residential;</li> <li>• There has been a reduction of facilities and amenity space in the area and huge development is already planned;</li> <li>• It refers to the demolition of the Tender Years Crèche to allow for road widening;</li> <li>• The Green Belt that was to border Caragh Court to the north has been completely removed;</li> <li>• Suggest a dog park to be created on the land referred to.</li> </ul>

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45	<b>Carole Connolly</b>	<ul style="list-style-type: none"> <li>• Plan for people to downsize post retirement;</li> <li>• Currently no small dwellings to purchase.</li> </ul>
45	<b>Carole Connolly</b>	<ul style="list-style-type: none"> <li>• Naas needs a large park and ride facility;</li> <li>• N7 needs bus corridor for shuttle service to LUAS in Saggart.</li> </ul>
46	<b>Elaine Johnson</b>	<ul style="list-style-type: none"> <li>• Would like to see a dog park on the disused land on the Old Caragh Road;</li> <li>• No off lead area where dogs can exercise in Naas;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• Against the zoning of the land on Old Caragh Road for New Residential;</li> <li>• Reduction in facilities and open space;</li> <li>• The submission states that Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park;</li> <li>• Future development will mean the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP;</li> <li>• Large social housing in the area and further should be located in other parts of the town to encourage social integration.</li> </ul>
47	<b>James</b>	<ul style="list-style-type: none"> <li>• No dog park in Naas, an off-lead area where the general public can exercise their dogs;</li> </ul>

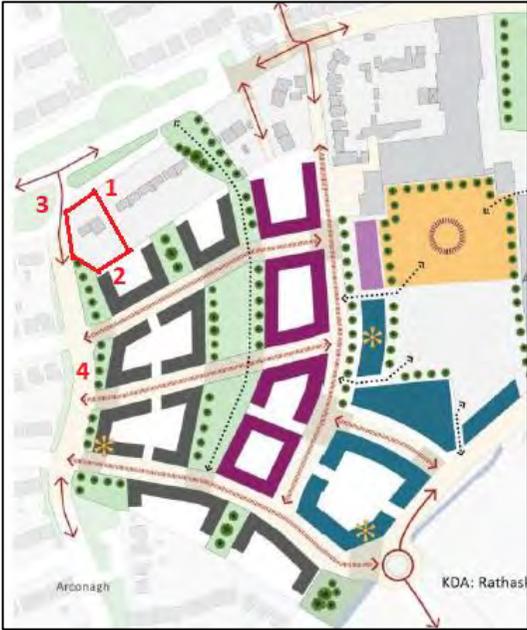
Sub. No.	Name	Summary of Submission
	O'Donnell	<ul style="list-style-type: none"> <li>• Nine such areas in Dublin;</li> <li>• The submission suggests the disused land on the Old Caragh Road as a possible location;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• This land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• A dog park would bring about social inclusion by increasing social interaction among dog owners;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> <li>• Against the zoning of the land on Old Caragh Road for New Residential;</li> <li>• Reduction in open space;</li> <li>• The submission states that Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP.</li> </ul> <p>The submission included the two following images:</p> 

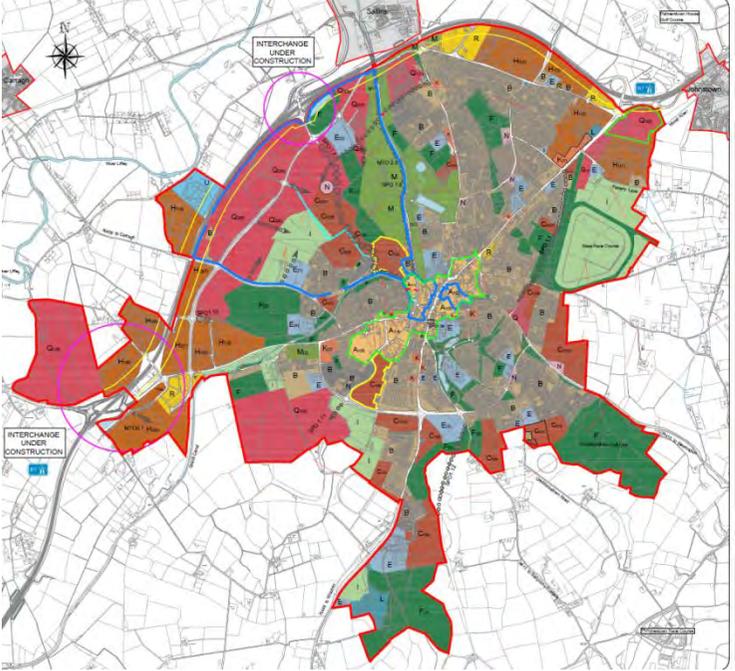
Sub. No.	Name	Summary of Submission
		
48	Paul Daly	<ul style="list-style-type: none"> <li>• No dog park in Naas, an off-lead area where the general public can exercise their dogs;</li> <li>• Nine such areas in Dublin;</li> <li>• The submission suggest the disused land on the Old Caragh Road as a possible location;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• This land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• There is a lack of social inclusion, emphasis on development;</li> <li>• A dog park would bring about social inclusion by increasing social interaction among dog owners;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> <li>• Against the zoning of the land on Old Caragh Road for New Residential;</li> <li>• Reduction in open space;</li> <li>• The submission states that Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP.</li> </ul>

Sub. No.	Name	Summary of Submission
		
49	Simon Holt	<ul style="list-style-type: none"> <li>• The submission objects to the removal of the green belt zoned F to border Court to the North;</li> <li>• Removing green belt would reduce quality of life;</li> <li>• When climate change is headline news, the removal of hedgerows and green space to accommodate houses is as puzzling as it is short sighted;</li> <li>• Naas should be leading the way in promoting sustainable and thoughtful planning rather than attempting to remove as much green space as possible.</li> </ul>

Sub. No.	Name	Summary of Submission
		
49	Simon Holt	<ul style="list-style-type: none"> <li>• The submission attaches an image showing Land Zoned B in the existing Development Plan and states that it is scheduled for further housing;</li> <li>• No actual parks for the public quiet enjoyment in the area;</li> <li>• The submission acknowledges that there are sports facilities, but there is no civic amenity such as a quiet park environment;</li> <li>• Highlights that this location would make an ideal central point for such a facility.</li> </ul> 

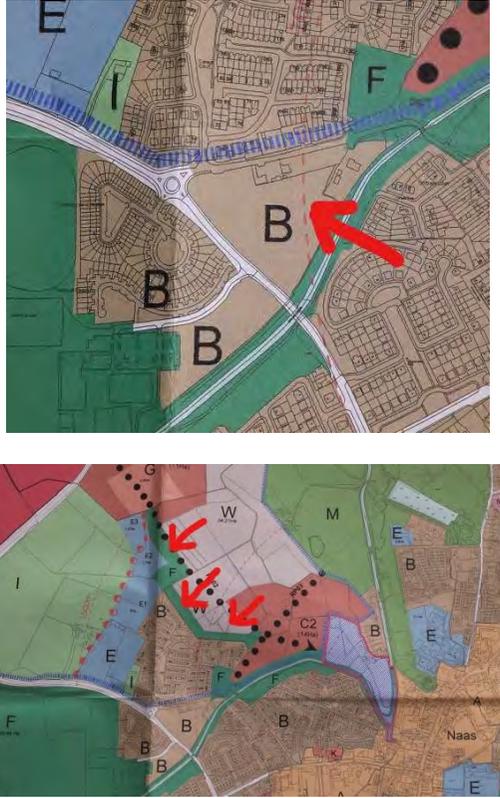
Sub. No.	Name	Summary of Submission
50	Alison Ryan	<ul style="list-style-type: none"> <li>• This submission advocates for a dog park opposite the entrance to Caragh Court;</li> <li>• No such facilities in the town;</li> <li>• Last green space in the area and would be a shame for it to be filled with houses.</li> </ul>
51	Paul Horan	<ul style="list-style-type: none"> <li>• The submission identifies where they live relative to the Devoy Quarter, Core Regeneration Area;</li> <li>• States that the ground level of the site directly to the rear of the premises is approximately at the height of their first floor;</li> <li>• Buildings built would impact on their property;</li> <li>• Asks that extra consideration is given to plans at figure two marked on the map;</li> <li>• Concerned that the image doesn't represent the reality on site;</li> <li>• Requests that a plan that minimised buildings directly behind the site in question and that is not too close should be considered or it would impact amenity and privacy;</li> <li>• Concerned over the traffic impact at the junction of the Arconagh cul-de-sac, Devoy Terrace and the Newbridge Road, in particular the extra noise, congestion and that it would become a 'short-cut';</li> <li>• Consideration should be given to creating an open space within Devoy Park for families to enjoy from all the neighbouring estates and would provide a nice linkage to the proposed civic plaza by the council offices, as there is no open public green areas for recreation in the southeast of the town;</li> <li>• A new civic plaza is shown at the current Council car park, where parking is already a challenge. Better provision should be proposed.</li> </ul>

Sub. No.	Name	Summary of Submission
		
52	<b>Esmondale Residents Association</b> c/o Annemarie Sheehan	<ul style="list-style-type: none"> <li>• Object to any proposed building on Esmondale and keep the green as open space amenity.</li> </ul>
53	<b>Dee Hulse</b>	<ul style="list-style-type: none"> <li>• Strenuously object to more social housing or any kind of housing being built on the land on the Old Caragh road opposite to Caragh Court;</li> <li>• Fair share of social housing and the problems that go with it;</li> <li>• Need a Dog Park, so they can run off the lead;</li> <li>• The traffic in this area is increasing and there is no infrastructure to support additional housing;</li> </ul>

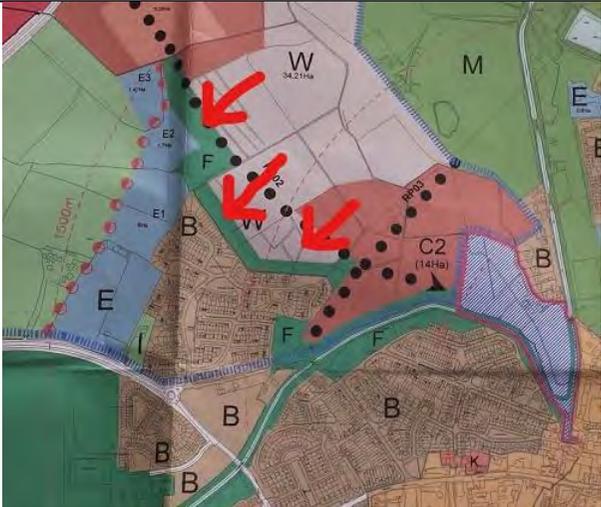
Sub. No.	Name	Summary of Submission				
		<ul style="list-style-type: none"> <li>• Use collective heads and give us a dog park;</li> <li>• Willing to be a warden to ensure that dogs and their owners behave appropriately.</li> </ul>				
54	Noel Geary	<ul style="list-style-type: none"> <li>• The submission requests that lands designated as C2 as part of the Racecourse grounds be retained as an open space amenity.</li> </ul>  <p data-bbox="1570 435 1794 499">Kildare County Council Planning Department Aras Chill Dara, Devoey Park, Naas, Co Kildare.</p> <p data-bbox="1570 499 1794 547">Draft Naas Local Area Plan 2019 - 2023</p> <p data-bbox="1570 547 1794 946"><b>Legend:</b> Local Area Plan Boundary A. Town Centre B. Existing Residential C1. New Residential (Tier 1 Lands) C2. New Residential (Tier 2 Lands) E. Community &amp; Education F. Open Space &amp; Amenity H. Industry &amp; Warehousing I. Agriculture K. Commercial / Residential L. Leisure &amp; Amenity M. Future Park / Green Wedge N. Neighbourhood Centre Q. Enterprise &amp; Employment R. Retail / Commercial U. Utilities / Services Pedestrian/Cycle Bridge over Canal (indicative only) New/improved Route Objective (indicative only) Approximate Line of Discharge of Development from M7 SPOH Interlinks from the Town Centre River/Canal/Lakes Interchange under construction-M7 Lands Subject to Watercourse Key Development Areas Regeneration Lands</p> <p data-bbox="1570 946 1794 978"><b>Land Use Zoning Objectives</b></p> <table border="1" data-bbox="1570 978 1794 1010"> <tr> <td>Scale: N.T.S.</td> <td>Map Ref.: 10.1</td> </tr> </table> <table border="1" data-bbox="1570 1010 1794 1042"> <tr> <td>Date: April 2019</td> <td>Drawing No.: 200/18/916</td> </tr> </table> <p data-bbox="1570 1042 1794 1074">© Ordnance Survey Ireland. All rights reserved. Licensing No. 2018/00000000 00000000000000000000</p> <p data-bbox="1570 1074 1794 1106">Drawn by: NH Checked by: LC</p> <p data-bbox="1570 1106 1794 1134">This drawing is to be read in conjunction with the written statement</p>	Scale: N.T.S.	Map Ref.: 10.1	Date: April 2019	Drawing No.: 200/18/916
Scale: N.T.S.	Map Ref.: 10.1					
Date: April 2019	Drawing No.: 200/18/916					
55	James Stephens	<ul style="list-style-type: none"> <li>• Submission supports a proposed motion for a park green space area which was proposed in the previous LAP;</li> <li>• Support a dog park, which was deemed in conflict with the proposed draft zoning;</li> <li>• Raises traffic concerns for children going to school each morning, in particular speeding;</li> <li>• Addition of 800 houses to Finlay Park and the resultant traffic will exaggerate the potential of a series of fatal accident in the area.</li> </ul>				

Sub. No.	Name	Summary of Submission
56	Olivia Cassidy	Homes and Communities - For.
57	John Bracken	<p>Homes and Communities</p> <ul style="list-style-type: none"> <li>• Strongly object to put social housing in the green field besides Caragh Court;</li> <li>• Ample social housing in the area adjacent to Caragh Court;</li> <li>• Land should be used for a park for the local community.</li> </ul>
58 (a)	Sinead Nooney	<ul style="list-style-type: none"> <li>• The submission is against the current draft proposal to change the zoning of the land on the Old Caragh Road to C (New Residential);</li> <li>• Reduction of facilities and amenity space in the area and huge development is already planned;</li> <li>• Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park;</li> <li>• Along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP;</li> <li>• Requests a dog park, benefit to the exploding population and soon will be the only green wedge left in an area that will be completely surrounded by development;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> </ul>



Sub. No.	Name	Summary of Submission
		<p>such objections (in this area);</p> <ul style="list-style-type: none"> <li>• Believe an ideal location for a dog park as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• Land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• This area is zoned 'B' (infill Residential) according to the current LAP and this allows for a dog park to be built on this land.</li> </ul> <div style="text-align: center;">  </div>

Sub. No.	Name	Summary of Submission
58 (c)	Sinead Nooney	<ul style="list-style-type: none"><li>• Severe lack of social inclusion in the area, the emphasis being firmly on development;</li><li>• Creating a dog park will not only be a badly needed facility for a huge number of Naas people it will be a point of increased social interaction as dog owners, dog clubs and dog lovers will all invariably interact in this area;</li><li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li></ul> 

Sub. No.	Name	Summary of Submission
		
59	Edel Gilligan	<ul style="list-style-type: none"> <li>• No dog park in Naas, an off-lead area where the general public can exercise their dogs;</li> <li>• Nine such areas in Dublin;</li> <li>• The submission suggests the disused land on the Old Caragh Road as a possible location;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• This land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• There is a lack of social inclusion, emphasis on development;</li> <li>• A dog park would bring about social inclusion by increasing social interaction among dog owners;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> <li>• Against the zoning of the land on Old Caragh Road for New Residential;</li> <li>• Reduction in facilities and amenity space;</li> <li>• The submission states that Tender Years Crèche on the Old Caragh Road is to be demolished to</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP;</p> <ul style="list-style-type: none"> <li>• Like to see a dog park being created on this land as it would not only be of benefit to the exploding population but it will soon be the only green wedge left in an area that will be completely surrounded by development.</li> </ul>
60	Sharon Fidgeon	<ul style="list-style-type: none"> <li>• Naas library, following its move to the Town Hall, an ideal location for an Artists Creative Hub;</li> <li>• Involve studio space/workshop space and exhibition space for local professional artists;</li> <li>• Through Mart.ie recently, 100 artists filled a form who require studio space – all living in Kildare;</li> <li>• Could also involve the local community where by artists would give art workshops and exhibitions.</li> </ul>
61	William Gilligan	<ul style="list-style-type: none"> <li>• Objecting to the loss of Tenders Creche and its replacement with a housing development. The crèche is a terrific amenity for the area and crèche spaces in the area are very limited;</li> <li>• Objecting to the provision of 74 social houses adjacent to Caragh Court as: the demolition of Tenders Crèche would be a significant loss; and social housing shouldn't exceed 20% of a single development;</li> <li>• Object to the provision of 800 plus houses in the Finlay Park area as: the access road and roundabout onto the new Caragh Road will not be able to accommodate the amount of traffic; the area is already congested and; there is no pedestrian crossing at Plooplock Bridge;</li> <li>• There is no dog park in Naas and the area of disused land on the Old Caragh Road would be ideal for such an amenity. There is a severe lack of social inclusion in the area and the provision of a dog park would provide a badly needed social point for Naas;</li> <li>• Against the draft proposals to change the zoning of land on the Old Caragh Road to C New Residential'.</li> </ul>
62	Angela Haslam	<ul style="list-style-type: none"> <li>• There is no dog park in Naas and the area of disused land on the Old Caragh Road would be ideal for such an amenity. There is a severe lack of social inclusion in the area and the provision of a dog park would provide a badly needed social point for Naas</li> <li>• Against the draft proposals to change the zoning of land on the Old Caragh Road to C (New Residential).</li> </ul>

Sub. No.	Name	Summary of Submission
		
63	Fiona Moore	<ul style="list-style-type: none"> <li>• Interest in the Irish language and pleased that the use of the language is growing in Naas;</li> <li>• Disappointed that there is not much about Irish in the plan;</li> <li>• 700 pupils in the town who receive their education through Irish;</li> <li>• Outside school there is nowhere to take children for activities through Irish;</li> <li>• A lot of effort going on with Sult na Sollán, Comhaltas Ceoltóirí Éireann and Naas GAA but now it is in time for KCC support.</li> </ul>
64	Avril Lyslak	<ul style="list-style-type: none"> <li>• Requests that a Tree Preservation Order is placed on an old oak tree in Sunday's Well Estate, Naas. Tree is located close to the Blessington Road, almost opposite the post office.</li> </ul>
65	John Higgins	<ul style="list-style-type: none"> <li>• Publication of the draft LAP is welcomed;</li> <li>• Number of very strong dimensions to the plan, in particular the broad structure of the LAP, based on the platform of 7 urban themes;</li> <li>• An executive summary type presentation on the introduction would have been welcome;</li> <li>• Summarise the core challenges of the LAP as follows: <ul style="list-style-type: none"> <li>- The regeneration of the town-centre</li> <li>- The integration of the periphery with the core</li> <li>- The generation of legible urban structure and the making of a public realm strategy</li> <li>- A movement strategy</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>- Integration with the hinterland.</li> <li>• Concern at gaps within the plan and the need to strengthen the implementation and governance resources required to implement the plan;</li> <li>• The Core Strategy should include 4 pillars: <ul style="list-style-type: none"> <li>- CRAs [regeneration sites]</li> <li>- Movement strategy [including all modes and parking rationalization]</li> <li>- Public realm [including carriageway, public and semi-public areas]</li> <li>- Implementation [including budget and project management methodology];</li> </ul> </li> <li>• CRAs must be specific but show how they relate to each other. The plan lacks an overall town-centre diagram that effectively ties all the CRAs together;</li> <li>• Relating to CRA 3, considers that the diagram is still a bit weak and does not constitute a convincing lynch-pin that connects the town-centre with the NWQ;</li> <li>• The overall culture of implementation must include a project management methodology, with each CRA accorded a specific project status within the overall framework, a project leader nominated, and an appropriate monitoring and reporting relationship established;</li> <li>• While the challenge of generating an integrated and spatially legible town centre is being addressed, it is less obvious how this will be tackled in the LAP area outside the town centre;</li> <li>• There is a need to address the issue of urban structure as a specific challenge. The LAP does not grasp the challenge of identifying those mid-scale building blocks that will underpin and structure a three dimensionally legible town at different scales.</li> <li>• The statement of commitment to urban design principles in terms of place-making is welcomed. Though it is unclear how these will be applied in practice in Development Management. The positive urban qualities to be found in Naas town centre and other towns are almost totally absent in suburban Naas.</li> <li>• Need for a more consistent integration of movement and connectivity with other aspects of the plan. The public realm references and the commitment to permeability studies read as standalone initiatives, and should be cross-referenced to the public realm strategy;</li> <li>• Strategic road proposals have a huge impact on urban structure thinking and this needs to be woven into the discussion around urban structure;</li> </ul>

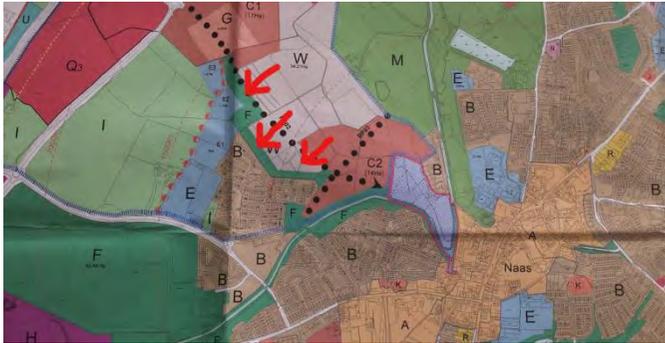
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Briefs are required to improve the 'place-making' around major connecting roads in Naas;</li> <li>• Principles of urban design applied to the North-West Quadrant are highly abstract and will not aid the development of the area. Key strategic spatial objectives should be laid out for this area to include: <ul style="list-style-type: none"> <li>- A central avenue / urban boulevard with a strong civic character and 'bookended' by two unique urban magnets, at its northern end, a new neighbourhood square at the junction with the Orbital, and at the southern end, by Grand Canal Square, designed to constitute a canal-side experience</li> <li>- A major new central park with an east-west green corridor that will transect the park, link with the canal corridor, and connect into the pleasure gardens at de Burgh.</li> </ul> </li> <li>• There is a worrying absence of social, community, and cultural infrastructure in the development model being rolled out in suburban Naas.</li> </ul>
66	Sarah Di Massa	<ul style="list-style-type: none"> <li>• Against proposed zoning of land on Old Caragh Road as C (New Residential);</li> <li>• Green belt zoned 'F' that was to border Caragh Court has been completely removed. Would like this land to be used as community green area.</li> </ul>

Sub. No.	Name	Summary of Submission
		 <p>The image contains two maps of a residential area. The top map shows a river flowing through the area, with several zones labeled 'B'. A red arrow points to a specific 'B' zone. The bottom map shows a more detailed view of the same area, with various zones labeled 'E1', 'E2', 'E3', 'F', 'W', 'M', 'C2', and 'B'. Three red arrows point to specific 'F' zones.</p>

Sub. No.	Name	Summary of Submission
67	Siobhan Grogan	<ul style="list-style-type: none"> <li>• Aim of KCC that all town plans will include Irish in the future Page. 19. Language plan <a href="http://sultnasollan.ie/language_planning/">http://sultnasollan.ie/language_planning/</a>;</li> <li>• No mention of Irish in the plan;</li> <li>• Naas/Sallins will have Irish language network recognition shortly;</li> <li>• Plan should contain an article on the Irish language.</li> </ul>
68	Yvonne Codd	<ul style="list-style-type: none"> <li>• Objective MTO6.1 which states:  <i>“Investigate the feasibility of providing an outer eastern relief road connecting Junction 8 (Johnstown Interchange) with Junction 10 (Newhall Interchange) with the aim of providing an alternative route to relieve pressure on the town centre and eastern area of the town.”</i>  Should be amended to include ‘and to construct during the lifetime of the plan’</li> </ul>
69	Margaret Mooney	<ul style="list-style-type: none"> <li>• Objective MTO6.1 which states:  <i>“Investigate the feasibility of providing an outer eastern relief road connecting Junction 8 (Johnstown Interchange) with Junction 10 (Newhall Interchange) with the aim of providing an alternative route to relieve pressure on the town centre and eastern area of the town.”</i>  Should be amended to include ‘and to construct during the lifetime of the plan’</li> </ul>
70	James Keating	<ul style="list-style-type: none"> <li>• Would like to see the land opposite the entrance to Caragh Court remain under Zone B and that an amenity such as a dog park would be very beneficial for the area;</li> <li>• Believe an additional green area and dog park is needed in the area.</li> </ul>
71	Anthony Boland	<ul style="list-style-type: none"> <li>• Two large Gael scoileanna in Naas yet not significant reference to our constitutional language;</li> <li>• Sult na Sollan have conducted a significant amount of work in this regard which has been submitted to KCC and this is not referenced;</li> <li>• Please include provisions for this so that our future generation have this part of our heritage to pass on to their children.</li> </ul>
72	Daithi Mac an Bhaire	<ul style="list-style-type: none"> <li>• The absence of out of school activities limits the potential of all the educational work being done in Naas, particularly through Irish;</li> <li>• Request that KCC revise their draft plan to include strategic planning around the Irish language and the bi-lingualising of the town;</li> <li>• Naas should have a culturlann of its own in order to achieve its potential;</li> <li>• Suggest the draft is altered to include targeted actions in terms of supporting the local Irish</li> </ul>

Sub. No.	Name	Summary of Submission
		language community and consult with those who drafted the Plean Teanga Cuig Bliana / Five Year Language Plan.
73	<b>Aoife McCarthy</b>	<ul style="list-style-type: none"> <li>• Nothing in the Town Plan about Irish, despite lots of people in the area using Irish daily;</li> <li>• There should be provision made for Irish centres;</li> <li>• Support our language.</li> </ul>
74	<b>Mariea McCarthy</b>	<ul style="list-style-type: none"> <li>• No dog park in Naas, an off-lead area where the general public can exercise their dogs;</li> <li>• Nine such areas in Dublin;</li> <li>• The submission suggests the disused land on the Old Caragh Road as a possible location;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• This land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• There is a lack of social inclusion, emphasis on development;</li> <li>• A dog park would bring about social inclusion by increasing social interaction among dog owners;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> <li>• Against the zoning of the land on Old Caragh Road for New Residential;</li> <li>• Reduction in facilities and amenity space;</li> <li>• The submission states that Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP;</li> <li>• Like to see a dog park being created on this land as it would not only be of benefit to the exploding population but it will soon be the only green wedge left in an area that will be completely surrounded by development.</li> </ul>
75	<b>Helena Bradley</b>	<ul style="list-style-type: none"> <li>• Nothing in Plan regarding Irish Language, needed as an active Irish community and two Irish schools.</li> </ul>

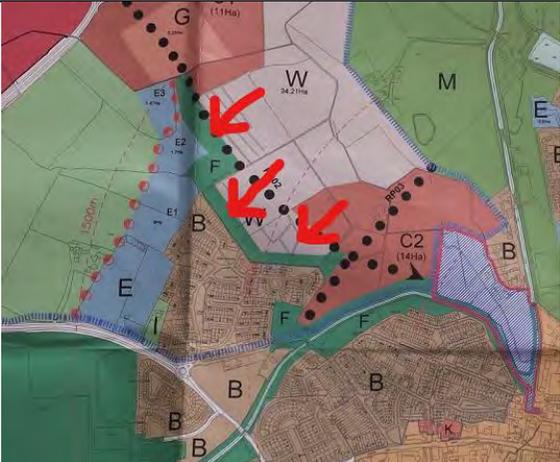
Sub. No.	Name	Summary of Submission
76	Karen Cahill	<ul style="list-style-type: none"> <li>• No dog park in Naas, an off-lead area where the general public can exercise their dogs;</li> <li>• Nine such areas in Dublin;</li> <li>• The submission suggests the disused land on the Old Caragh Road as a possible location;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• This land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• There is a lack of social inclusion, emphasis on development;</li> <li>• A dog park would bring about social inclusion by increasing social interaction among dog owners;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> </ul> 
77	Martin Cahill	<ul style="list-style-type: none"> <li>• Against zoning on Old Caragh Road to C (New Residential);</li> <li>• Reduction in facilities;</li> <li>• The submission states that Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP;</p> <ul style="list-style-type: none"> <li>• Like to see a dog park being created on this land as it would not only be of benefit to the exploding population but it will soon be the only green wedge left in an area that will be completely surrounded by development.</li> </ul> 
78	David McIntyre	<ul style="list-style-type: none"> <li>• Concerned over zoning on Old Caragh Road to C (New Residential);</li> <li>• Reduction in facilities;</li> <li>• Already big development in place for an initial 800 extra houses along with many more in the future as the proposed green belt zoned F that was to border Caragh Court to the North was completely removed;</li> <li>• Wants dog park;</li> <li>• Increase social interaction for dog owners, dog clubs and dog lovers. It could also accommodate dog obedience training and shows becoming a more diverse area where there is already a big number of social housing.</li> </ul>

Sub. No.	Name	Summary of Submission
		
79	John Byrne	<ul style="list-style-type: none"> <li>• Submission concerns the Naas West KDA;</li> <li>• Permitted type of housing units should specifically exclude apartment developments; given the established residential characteristics;</li> <li>• Completion of existing green space in Finlay Park before any future development of the KDA site should be a condition of planning.</li> </ul> <p><b>Access and Traffic Calming</b></p> <ul style="list-style-type: none"> <li>• Primary access route for the significant new development to be the existing road access to Finlay Park. Without a link to the outer ring road at the Kerry Group site, the existing road is not safe without improvements;</li> <li>• States the section from the roundabout past Caragh Court and the crèche is essentially single lane due to the presence of the cycle lane;</li> <li>• Significant traffic movements on the road from the entrance to Caragh Court, the crèche, as well as the pedestrian crossing to the canal bridge. For the safety of all road users, a modelling exercise should be undertaken and provisions for traffic calming should be prioritised in advance of any development to ensure the safety of all those using the road.;</li> <li>• Supports proposals to link site to canal and town centre.</li> </ul>

Sub. No.	Name	Summary of Submission
80	Sheelagh Pentony (a)	<ul style="list-style-type: none"> <li>• Lack of social inclusion near Old Caragh Road;</li> <li>• The submission suggests the disused land on the Old Caragh Road as a possible location for a dog park;</li> <li>• Increase social interaction among dog owners;</li> <li>• It could become a focal point of the town by accommodating dog obedience training and shows becoming a more diverse area than just a park.</li> </ul>
80	Sheelagh Pentony (b)	<ul style="list-style-type: none"> <li>• Against the zoning of the land on Old Caragh Road for New Residential;</li> <li>• Reduction in facilities and amenity space;</li> <li>• The submission states that Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed in the current draft LAP;</li> <li>• Like to see a dog park being created on the disused land on Old Caragh Road;</li> <li>• Maintain green spaces for the wellbeing of our community.</li> </ul>
80	Sheelagh Pentony (c)	<ul style="list-style-type: none"> <li>• Wants dog park in Naas, nine in Dublin;</li> <li>• The submission suggest the disused land on the Old Caragh Road as a possible location;</li> <li>• Ideal location as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• This land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool;</li> <li>• This area is zoned 'B' (infill Residential) and this allows for a dog park to be built on this land.</li> </ul>
81	Siobhain Grogan	<p>This submission was made in Irish and the following is the English summary:</p> <ul style="list-style-type: none"> <li>• The submission refers to the launch of the first County Language Plan in Ireland;</li> <li>• KCC was more than satisfied to put name to the plan showing support for the Irish language;</li> <li>• Naas and Sallins looking for network status;</li> <li>• LAP is the bible and Irish not mentioned in the draft Plan;</li> <li>• More students being educated in Irish than ever before in the town;</li> <li>• The Irish community is growing, children are being reared through Irish and local groups, including businesses, are working to promote the language;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The submission refers to the Language Plan and KCC goals;</li> <li>• A link to the Language Plan has been provided.</li> </ul>
82	Padraig Franklin (a)	<ul style="list-style-type: none"> <li>• Against the current draft proposal to change the zoning of the land on the Old Caragh Road to C (New Residential);</li> <li>• reduction of facilities and amenity space;</li> <li>• Tender Years, where many locals send their children to be cared for is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park – baffling;</li> <li>• Green belt zoned 'F' that was to border Caragh Court to the North has been completely removed;</li> <li>• Only houses and no community.</li> </ul> 

Sub. No.	Name	Summary of Submission
		
	<p><b>Padraig Franklin (b)</b></p>	<ul style="list-style-type: none"> <li>• No dog park in Naas; nine in Dublin;</li> <li>• Like to see such a facility created in the disused land on the Old Caragh Road;</li> <li>• Ideal location for a dog park as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• Land is crossed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• Area is zoned 'B' (infill Residential) according to the current LAP and this allows for a dog park to be built on this land.</li> </ul>
<p><b>83</b></p>	<p><b>Daithi de Faoite</b></p>	<ul style="list-style-type: none"> <li>• Submission is in both Irish and English.</li> <li>• 2019 first Irish County Language Plan launched;</li> <li>• Encouraged the Irish-speaking community that KCC was happy to support the promotion and development of the language in the county;</li> <li>• Naas/Sallins area is seeking Iónra (Irish language network) status this year and KCC is fully supportive of this application;</li> <li>• Irish language does not feature in the Plan;</li> <li>• More students receiving their education through Irish in the town than ever;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Irish language should be properly recognised in the Plan – as per KCC’s own commitments in the five year language plan for the county;</li> <li>• The submission refers to a website and KCC objectives on pg 19 of the language plan.</li> </ul>
84	Marc Rogers	<ul style="list-style-type: none"> <li>• Reference is made to zoning changes;</li> <li>• The green space between Caragh Court and Cois na Feadain deprives residents the opportunity of a properly developed green space/park;</li> <li>• The green buffer is to be removed adjacent to Caragh Court;</li> <li>• Completely eliminate remaining green space;</li> <li>• Request lands zoned B should be proper green space, consistent with decision to develop a community skate park adjacent to Cois an Feadain on lands zoned B;</li> <li>• Plenty of land proposed to be zoned residential to add to the towns housing stock.</li> </ul>
85	Liam De Buitléir	<ul style="list-style-type: none"> <li>• Promotion of Irish language and more facilities for the Irish Language.</li> <li>• People travel to Naas to be educated in Irish.</li> </ul>
86	Ruth Brennan	<ul style="list-style-type: none"> <li>• Site suitable for a dog park;</li> <li>• Ideal location for a park or dog park as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• Currently zoned 'B' (infill Residential) according to the current LAP and this allows for a park / dog park to be built;</li> <li>• Against zoning of the land on the Old Caragh Road to C (New Residential);</li> <li>• Reduction of facilities and amenity space; Tender Years Creche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses and proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed;</li> <li>• To build more social housing on these lands is against the principal of social inclusion;</li> <li>• More social housing beside the existing social housing;</li> <li>• Packing in all the social housing into one area.</li> </ul>

Sub. No.	Name	Summary of Submission
		
87	Brian Dempsey	<ul style="list-style-type: none"> <li>• Against the current draft proposal to change the zoning of the land on the Old Caragh Road from B (Infill Residential) to C (New Residential);</li> <li>• Reduction of facilities and amenity space; Tender Years Creche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses in Finlay Park along with many more in the future and the proposed green belt zoned 'F' that was to border Caragh Court on the North side has been completely removed;</li> <li>• Wants a dog park on this land;</li> <li>• The subject site is a valuable green asset for the town with canal frontage and pedestrian access and as such it should be used for the benefit of all residents in Naas.</li> </ul>

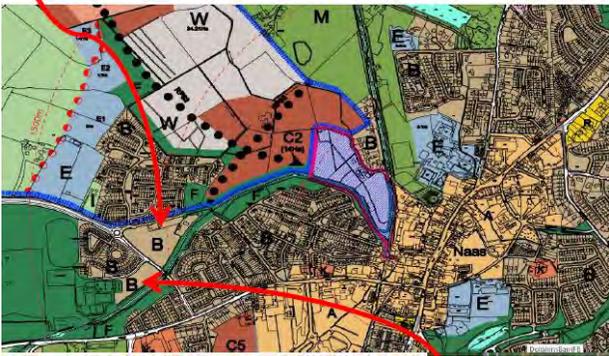
Sub. No.	Name	Summary of Submission
		
88	Liz Dempsey	<ul style="list-style-type: none"> <li>• Lack of social inclusion in the town the emphasis instead being firmly on development;</li> <li>• Little thought for green amenities;</li> <li>• Noticeable in the area surrounding Caragh Court where the explosion of Finlay Park will bring 800 houses initially with many more to come,</li> <li>• Crèche to be demolished;</li> <li>• Green belt that was to border Caragh Court on the North has been removed;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Land on the Old Caragh Road has been rezoned from B to C so that more social/affordable houses can be built in the area even though this area of Naas already has the vast majority of such houses;</li> <li>• Like a dog park be created on this land;</li> <li>• Land is the perfect location as it has canal frontage and pedestrian access and residents here a crying out for such a facility;</li> <li>• Point of increased social interaction as dog owners, dog clubs and dog lovers will all invariably interact in this area.</li> </ul> 
89	Donal Cribbin	<ul style="list-style-type: none"> <li>• Area opposite Caragh Court, led to believe this area was going to be made into a park area preferably a dog park;</li> <li>• Rezone this area C which seems mad with the amount of housing already been put into planning in this location already;</li> <li>• Green belt in Finlay Park is totally gone;</li> <li>• We need housing but then to take this small patch of waste ground opposite Caragh Court back to residential seems bonkers.</li> </ul>
90	Joseph Bergin	<p>The submission is written in both Irish and English.</p> <ul style="list-style-type: none"> <li>• Include a specific reference to the inclusion and celebration of Irish language issue, signage,</li> </ul>

Sub. No.	Name	Summary of Submission
		events.
91	Gerard Begley	<ul style="list-style-type: none"> <li>• Against the current draft proposal to change the zoning of the land on the Old Caragh Road to C (New Residential);</li> <li>• Reduction of facilities and amenity space;</li> <li>• Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate an initial 800 extra houses planned for Finlay Park along with many more thousand in the future and the proposed green belt zoned 'F' that was to border Caragh Court to the North has been completely removed.</li> </ul> <div style="text-align: center;">  </div>

Sub. No.	Name	Summary of Submission
92	Amgela Begley	<ul style="list-style-type: none"> <li>• Opposed to changing the zoning of the land on the old Caragh Road to C (New Residential);</li> <li>• Piece of land should be left as a park land as there is no parkland this side of the town;</li> <li>• Ideal for a dog park;</li> <li>• Ideal location as it is served by the walk way from the Canal, Jigginstown Bridge by road and by foot from the Ploopluck Bridge;</li> <li>• Huge development under way and planned for our area and a reduction in facilities;</li> <li>• Tender Years Crèche on the Old Caragh Road is to be demolished to allow for road widening to accommodate and initial 800 extra houses planned for Finlay Park;</li> <li>• Green Belt zoned 'F' has been removed;</li> <li>• Aware of the housing crisis and the need to build houses however we have a disproportionately higher amount of social and affordable house in the area compared to other part of the town;</li> <li>• Is there not lands ear-marked for such housing next to the Council Offices.</li> </ul>
93	Ella Archbold	<ul style="list-style-type: none"> <li>• The submission is based on establishing a 'Cultúrlann' Cultural Centre for Irish Speakers;</li> <li>• Considers it would be an asset to have a space for a 'cultúrlann or 'ionad Gaeilge';</li> <li>• Environment where people can socialise as Gaeilge and celebrate the language.</li> </ul>
94	Paul Drennan	<ul style="list-style-type: none"> <li>• Proper commitment and move towards a sustainable outer ring road which will link the N7 at Johnstown to the Kilcullen Road;</li> <li>• Feasibility study is not good enough;</li> <li>• Object strongly to the Naas Inner relief road route 2 as short term planning and will deliver only more congestion on the already affected routes.</li> </ul>
95	Nathan Flaherty	<ul style="list-style-type: none"> <li>• Make the Plan carbon neutral in line with the climate emergency that has been declared by the Dáil;</li> <li>• Consideration of supporting Naas to become a "líonra" town, by encouraging the use of Gaeilge as part of everyday life.</li> </ul>
96	Tom Davis	<ul style="list-style-type: none"> <li>• Specific reference to the Irish language.</li> </ul>
97	Michelle O'Rafferty	<ul style="list-style-type: none"> <li>• Need an outer ring road to be built with full feasibility study fully completed;</li> <li>• Complete road in next 3-5 years;</li> <li>• Short term inner relief road options will not go far enough;</li> </ul>

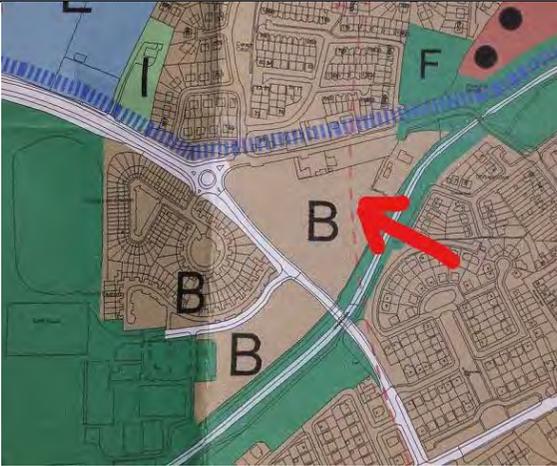
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Need a long term infrastructure solution for the town.</li> </ul>
98	Norma Long	<ul style="list-style-type: none"> <li>• Area opposite Caragh Court be zoned as a recreational area/park.</li> </ul>
99	Colin O'Rafferty	<ul style="list-style-type: none"> <li>• Proposed route 2 which has being a disaster from day. Not only not fit for purpose, some 25 years old before it was decided to try and process it;</li> <li>• Deliver proper infrastructure;</li> <li>• The submission makes reference to using the Donnelly Mirrors site, traffic at the ball needs to be looked at;</li> <li>• Future proof, don't plan now and intend to build in 25 years.</li> </ul>
100	Kevin Maher	<p>This submission forms three parts, the submission form and two additional documents were uploaded.</p> <ul style="list-style-type: none"> <li>• Ideal location for a park near Caragh Court circa 3.67 ha;</li> <li>• Waterway's Ireland are looking for access to the canal corridor, pop-up races could run races from the park;</li> <li>• Submission highlights lack of playing facilities at schools, the skate park wasn't big enough;</li> <li>• Finlay Park built on a sanctuary for wildlife;</li> <li>• Millennium Ring Road used popup races and couch to 5km groups;</li> <li>• Town is underprovided for in terms of formal open spaces such as parks and playgrounds;</li> <li>• Reference is made to current site zoning objective for Existing Residential (B);</li> <li>• Submission makes various proposals for the park such as Men's shed group would have a permanent home and aid in the maintenance and development of the park. Could include outdoor games, outdoor gym, bike track; amphitheatre, fairy forest;</li> <li>• Park would aid with health;</li> <li>• Provision of community infrastructure and services is central to fostering sustainable communities and delivering successful places to live and have a sense of belonging;</li> <li>• The submission references aspects of Chapter 11 Social, Community and Cultural Development of the County Development Plan; Strategy, Community, Services and Facilities and Children and Young People;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Children from the local communities can learn to cycle in a safe environment, and also cycle to school along the canal corridor;</li> <li>• The submission includes a number of park examples throughout the country;</li> <li>• The submission would also like to see a cultural area in the Canal Basin;</li> <li>• The old library be developed into an Irish Culture centre, Ogras (Irish Youth Organisation) could hold their meetings there;</li> <li>• The Waterways Ireland, Ecological Assessment Report of the Grand Canal – Naas Corbally Branch (2016) was submitted as a supporting document;</li> <li>• Outlines the various habitats and flora along the various sections of the canal;</li> <li>• Map 4 relates to the subject site and the habitats adjacent to this section of the canal.</li> </ul> <div style="display: flex; justify-content: space-around; margin-top: 10px;">   </div>
101	<b>Graeme Crowther</b>	Suggest that more is done to support the Gaelic community in Naas.
102	<b>Naas Access and Disability Group c/o Majella</b>	<ul style="list-style-type: none"> <li>• Universal design recommended on future planning of all public buildings, such as; health care faculties, shopping centres, new shops, offices, schools, community centres, crèches, sports facilities, entertainment and leisure facilities;</li> <li>• Wheelchairs are getting wider and getting more difficult with existing Part M requirements;</li> </ul>

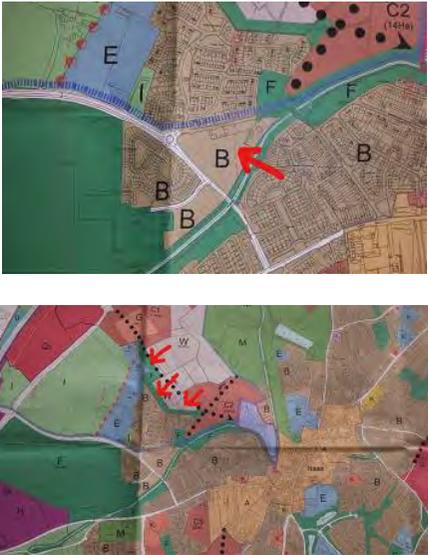
Sub. No.	Name	Summary of Submission
	<b>O'Keeffe</b>	<ul style="list-style-type: none"> <li>• With the ratification of the EU Convention of persons with disabilities Act 2018, every person with a disability has the right to a proper disabled toilet;</li> <li>• To include a hoist and adult changing bench, centrally located toilet bowl and floor space of 3m x 4 m size;</li> <li>• First one in Co. Kildare has been approved by the Access officer for the new library in Naas;</li> <li>• Open up St David's castle, creating a greener, historical centre for everybody to enjoy;</li> <li>• Make Basin St. after the junction of Abbey St. a pedestrian area except for residents;</li> <li>• Make this area a 1-way system entering by Daly's pharmacy and turning onto Abbey St and exiting by the Credit Union;</li> <li>• Use Jigginstown amenity green space land opposite Jigginstown Castle for a park area;</li> <li>• Reduce the number of Taxi spaces available on Market Square – congested;</li> <li>• Restricting signage on existing shop front, use more traditional and less plastic signs;</li> <li>• Forbid HGV trucks going through the town centre;</li> <li>• A grant for over shop accommodation;</li> <li>• No more expansions of Monread shopping centre or allow other out of town boundary shopping centres;</li> <li>• Increase more seating areas on the Main street;</li> <li>• Make town more elderly and disabled friendly town.</li> </ul>
<b>103</b>	<b>Michael Crosbie</b>	<ul style="list-style-type: none"> <li>• Change lands around Esmondale estate to agriculture;</li> <li>• Protect current green area for future generations;</li> <li>• Town is struggling to cope with the increasing traffic and excessive building will be devastating for the town with increased traffic jams/lack of parking.</li> </ul>
<b>104</b>	<b>Aidan Begley</b>	<ul style="list-style-type: none"> <li>• No dog park in Naas, nine in Dublin;</li> <li>• Like to see such a facility created in the disused land on the old Caragh Road;</li> <li>• Ideal location for a dog park as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• Land is also to be crossed by a green way route leading from harbour in the town to the swimming pool which would also make it an enhanced location for a dog park.</li> </ul>

Sub. No.	Name	Summary of Submission
105	Ciaran Begley	<ul style="list-style-type: none"> <li>• No dog park, nine in Dublin;</li> <li>• Wants facility created in the disused land on the Old Caragh Road;</li> <li>• Ideal location for a dog park as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• Land is also to be crossed by a greenway route leading from the harbour in the town to the swimming pool;</li> <li>• Area is zoned 'B' (infill Residential) according to the current LAP and this allows for a dog park to be built.</li> </ul>
106	Jimmy Kelly	<p>Submission prepared by Brian Connolly Associates – Consulting Engineers.</p> <ul style="list-style-type: none"> <li>• Rezone 26.9 ha of land at Tipper Road West from Agriculture to New Residential;</li> <li>• The new Naas Town boundary be extended to include the subject lands;</li> <li>• Reference is made to the population projections of the draft RSES wherein, Naas has been identified as a Key Town;</li> <li>• Naas is identified as the only Level 1 growth town within the settlement strategy of the CDP;</li> <li>• The subject lands meet with the Tier 1 criteria as set out in NPF;</li> <li>• If it is not possible the proposal in the lifetime of this plan, the Planning Authority should consider re-introducing white land zoning as per previous plans in order to indicate where sequential development will be located;</li> <li>• The submission outlines the following site benefits: significant road frontage, adjacent to lands that were granted permission (file ref: 15/1060 &amp; PL.09.247411), sequential extension, access from both Tipper Road and Blessington Road;</li> <li>• Could facilitate the provision of an Outer Relief Road between these two roads;</li> <li>• Subject site located within 1.5km radius of town centre and close to permitted neighbourhood centre;</li> <li>• Southern portion of lands required to undertake a FRA, adjacent lands also subject to FRA and were acceptable the Planning Authority and An Bord Pleanala.</li> </ul>

Sub. No.	Name	Summary of Submission
		
107	Brian Dempsey	<ul style="list-style-type: none"> <li>• Dog park for Naas, nine in Dublin;</li> <li>• Wants a facility in the disused land on the Old Caragh Road;</li> <li>• Ideal location for a dog park as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> <li>• Site traversed by a greenway route leading from the harbour in the town to the swimming pool which would also make it an enhanced location for a dog park;</li> <li>• Area is zoned 'B' (infill Residential) according to the current LAP which allows for a dog park to be built.</li> </ul>

Sub. No.	Name	Summary of Submission
		
108	<b>Colm Gordon</b>  <b>Needs to be summarised into Irish.</b>	<p>This submission was provided in Irish and the following is the English summary:</p> <ul style="list-style-type: none"> <li>• Nearly 800 children/students attending all Irish schools in Naas alone and it is only right that the area should be recognised as an Irish speaking area;</li> <li>• Irish should be on every sign that KCC erects;</li> <li>• Naas should have a Irish festival and Irish should be visible on all publicity;</li> <li>• Dogs should be on leads in Monread Park at all times and litter/glass should be removed promptly.</li> </ul>
109	<b>Gabriel Horan</b>	<ul style="list-style-type: none"> <li>• Opposed to zoning of lands in Naas West, between New and Old Caragh Road as Residential;</li> <li>• Should be developed as a social community park and/or amenity;</li> <li>• No park west of the canal;</li> <li>• Only green space in the area and will be surrounded by approximately 1100 houses in the next few years.</li> </ul>
110	<b>Brendan Gallagher</b>	<ul style="list-style-type: none"> <li>• Elected members should combine their efforts and wisdom with Kildare County Council Planning Officials and CEO, to support and endorse the Naas LAP;</li> <li>• Desirable and essential need to complete the final stage of the Naas Inner Relief Road;</li> <li>• It will positively benefit the County Town, together with existing and future Commercial and</li> </ul>

Sub. No.	Name	Summary of Submission
		Industrial Development, combined with expanding residential areas and a growing population.
111	Bernard Doyle	<ul style="list-style-type: none"> <li>• Against zoning of the land on the Old Caragh Road to C (New Residential);</li> <li>• Land will be sued for social and affordable housing;</li> <li>• Goes against mixed tenure developments and social inclusion, due to the high volume of existing social and affordable housing in the area;</li> <li>• Reduction of facilities and amenity space, Tender Years crèche to be demolished for road widening;</li> <li>• Green belt zoned 'F' that was to border Caragh Court to the North was ignored during previous residential planning submissions and has now been completely removed in the current draft LAP;</li> <li>• Like to see a dog park being created on this land.</li> </ul> 
112	Helen Cully	<ul style="list-style-type: none"> <li>• Oppose housing on land opposite Caragh Court;</li> <li>• Think a dog park should be built, nine in Dublin;</li> <li>• Plenty of social units and other forms of housing in the area already and not enough open amenity areas to cater for all of these families;</li> <li>• Ideal location for a dog park as it has pedestrian access via Ploopluck Bridge, vehicular access via Jigginstown Bridge and canal frontage;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Land is also to be crossed by a greenway route;</li> <li>• Severe lack of social inclusion in the area, dog park would lead to increased social interaction;</li> <li>• Reduction of facilities and amenity space, Tender Years crèche to be demolished for road widening;</li> <li>• Green belt zoned 'F' that was to border Caragh Court to the North has been completely removed.</li> </ul> <div style="text-align: center;">  </div>
113	Ivan Codd	<p><b>Statutory Context and Compliance with Core Strategy</b></p> <ul style="list-style-type: none"> <li>• The 'Estimated Capacity' of site C2 (17) Kingsfurze should be amended to 60 to tally the 'Site Area' of 2.0 Ha. with the 'Density Range' 30 units/hectare, rather than 102 as shown in the table;</li> </ul> <p><b>Movement and Transport</b></p> <ul style="list-style-type: none"> <li>• Requires clarification of the numbering of the Dublin Road and Ring road and should be used in the Plan;</li> <li>• Images showing signage with the numbering has been provided;</li> <li>• Suggested objectives:</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>○ encourage transport service providers to initiate and offer direct bus routes from Naas town to the large employment areas in Greater Dublin, e.g. Sandyford Business District, Grange Castle/ParkWest, etc;</li> <li>○ Increase awareness of existence of the service, the service provider/Irish Rail should be encouraged to display a more prominent external branding / logos / on the exterior of the shuttle /rail feeder bus to Sallins &amp; Naas railway station, as the current shuttle / feeder bus is not overtly obvious, with only a small sign placed in the windscreen.</li> <li>○ Eastern outer relief road constructed and delivered within the lifetime of this plan, reference is made to minutes of Naas MD May 2019 that this particular objective is 15 years away and the submission states this is wholly inadequate.</li> </ul>
114	<b>Anthony Madden</b>	<ul style="list-style-type: none"> <li>● Strongly object to building more social housing units in front of Caragh Court;</li> <li>● Already three estates in front of Caragh Court;</li> <li>● Have more than a fair share.</li> </ul>
115	<b>Pat Breen</b>	<p>The submission refers to Objective MTO 6.1 to investigate feasibility for an outer relief route and its stated this is not enough that this already exists as objective RP07 in the current 2011-2017 plan. A firm plan not a feasibility study.</p> <p>This submission included a copy of the Written Statement of the Draft Plan.</p>
116	<b>Dara Ó Maitiú</b>	<p>There are two parts to this submission. The online form completed in Irish and an attached document is signed by Daithí de Faoite in both Irish and English, containing the same content as the online form.</p> <ul style="list-style-type: none"> <li>● 2019 first Irish County Language Plan launched;</li> <li>● Encouraged the Irish-speaking community that KCC was happy to support the promotion and development of the language in the county;</li> <li>● Naas/Sallins area is seeking líonra (Irish language network) status this year and KCC is fully supportive of this application;</li> <li>● Irish language does not feature in the Plan;</li> <li>● More students receiving their education through Irish in the town than ever;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Irish language should be properly recognised in the Plan – as per KCC’s own commitments in the five year language plan for the county;</li> <li>• The submission refers to a website and KCC objectives on pg 19 of the language plan.</li> </ul>
117	Bob Quinn	<ul style="list-style-type: none"> <li>• Reference is made to the NWQ masterplan 2007 which amounts to a town on the periphery of Naas;</li> <li>• Before the current masterplan gets a go ahead masterplans are required for the CRAs, most notably Castle Quarter, Corban’s Lane, Canal Quarter and Main Street;</li> <li>• St David’s Castle is the jewel in the crown of historic Naas and a masterplan for this area is interconnected to both Corban’s Lane and Canal Quarter;</li> <li>• Submission warns against any interference in the integrity of St David’s Castle’s site;</li> <li>• Reference is made to page 173 and Superquinn site redevelopment, which is underway and opening as Dunnes Stores;</li> <li>• Other initiatives being pursued in CRAs and not reflected in Plan;</li> <li>• Therefore, information is out of date;</li> <li>• Serious consideration should be given to redrafting the LAP and extending the submission period as requested.</li> </ul>
118	Dolores Fitzgerald	<ul style="list-style-type: none"> <li>• No dog park in Naas;</li> <li>• Like to see such a facility created in the disused land on the Old Caragh Road;</li> <li>• A pop-up dog park worked well in Monread Park;</li> <li>• An ideal location for a dog park as it has access from several roads and via Ploopluck Bridge;</li> <li>• This area is zoned 'B' (infill Residential) according to the current LAP and this allows for a dog park to be built.</li> </ul>

Sub. No.	Name	Summary of Submission
		
119	<b>Damien Pender</b>	Promotion of Gaeilge within the community.
120	<b>Hillside Drive Residents Association</b>	<p>Submission on behalf of Hillside Drive Residents Association c/o Diarmuid Parker, Brendan Gallagher and Tony Maher.</p> <ul style="list-style-type: none"> <li>• Current zoning designation F: Open Space and Amenity be retained for the lands adjacent to Scoil Bride and the GAA;</li> <li>• All the lands currently undeveloped in the former DeBurgh domain remain either F: Open Space and Amenity and/or M:Future Park/Green Wedge;</li> <li>• Further residential development on Sallins Road would cause more congestion as there are already issues;</li> <li>• Lack of open space and sporting facilities will have a social impact on area and town.</li> </ul>
121	<b>Diarmuid Parker</b>	<ul style="list-style-type: none"> <li>• Current zoning designation F: Open Space and Amenity be retained for the lands adjacent to Scoil Bride and the GAA;</li> <li>• All the lands currently undeveloped in the former DeBurgh domain remain either F: Open Space and Amenity and/or M:Future Park/Green Wedge;</li> <li>• Further residential development on Sallins Road would cause more congestion as there are already issues;</li> <li>• Lack of open space and sporting facilities will have a social impact on area and town.</li> </ul>

Sub. No.	Name	Summary of Submission
122	Edmund Murphy	<ul style="list-style-type: none"> <li>• Need for an outer ring road is obvious;</li> <li>• An inner relief road will do nothing for traffic congestion;</li> <li>• Outer road will open up large tracts of land for development.</li> </ul>
123	Queally Group	<p>Submission received from Tony Bamford, TBP: Planning and Development Consultants.</p> <ul style="list-style-type: none"> <li>• Points made on the economic and social impact of the group in terms of community involvement and jobs;</li> <li>• Submission relates to lands zoned K1 on the Dublin Road;</li> <li>• In previous plans site zoned R1 Commercial/Retail in which a supermarket was open to consideration;</li> <li>• To the west was an E5 zoning which included for delivery of a community centre;</li> <li>• As a result nothing could happen on the R1 lands until community centre delivered;</li> <li>• The Queally Group delivered the community centre, but no planning achieved for retail on the R1 lands;</li> <li>• The submission references that net retail space shall not exceed 300sqm on the site and it considered site suitable for a small supermarket of no more than 1400sqm with 10-20% non-food seasonal items;</li> <li>• The submission makes a case for a small supermarket at this location; population, located in commercial arc, site can accommodate larger floorplates (subject to assessment), no small supermarket in area;</li> <li>• Refers to an extract of Plan considering locations for retail and simply no basis for promoting all forms of retail in the town centre;</li> <li>• Focus must be on promoting the comparison retail sector;</li> <li>• By resisting this proposal the Council is not protecting the town centre, it is protecting the private, commercial interests of Tesco and ALDI at Monread Road Shopping Centre;</li> <li>• Refers to the County Plan that that new neighbourhood centres may be required in existing residential areas to ensure their needs are met in a more efficient, equitable and sustainable way;</li> <li>• Submission requests change to the Land Use Objectives concerning neighbourhood centres as</li> </ul>

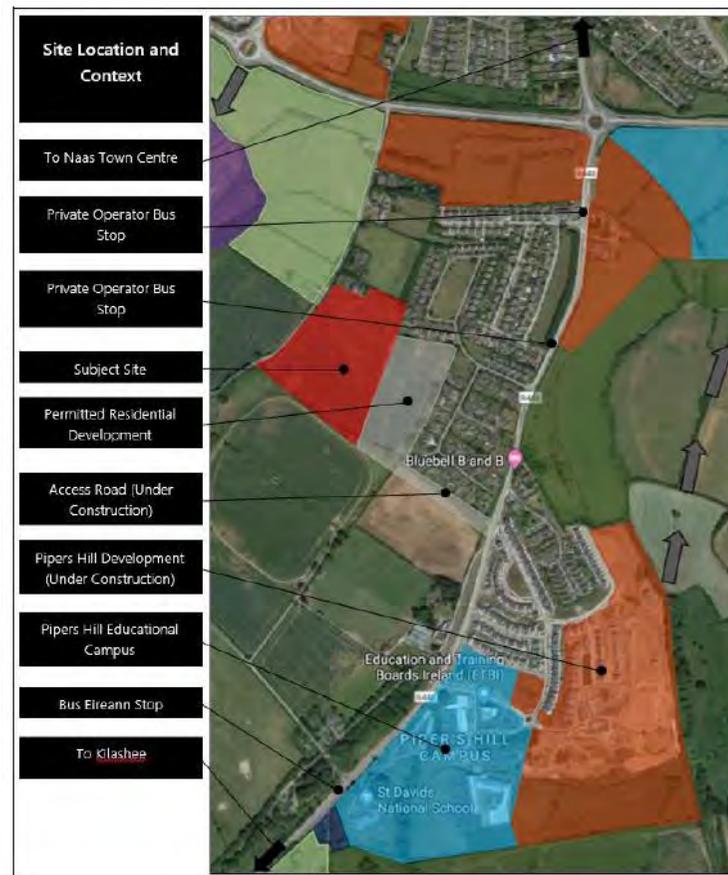
Sub. No.	Name	Summary of Submission
		<p>thresholds considered limiting;</p> <ul style="list-style-type: none"> <li>• The submission requests the land should be rezoned to N:Neighbourhood Centre subject to removing the retail floorspace thresholds;</li> <li>• Alternatively a specific objective that the site can provide for a small supermarket of not more than 1400 sqm net sales in the K1 land use objective;</li> </ul> <div data-bbox="1084 544 1547 948" data-label="Image"> </div> <p data-bbox="1084 954 1234 970">Figure 1.0: Subject lands</p>
124	<b>Queally Group and Ardstone Homes</b>	<p>Submission prepared by Declan Brassil &amp; Co, DBFL Consulting Engineers which comprises of two parts.</p> <ul style="list-style-type: none"> <li>• Subject site located in Bluebell, Killcullen Road, Naas; it extends to 4.8ha to be zoned New Residential;</li> <li>• The Queally Group and other employers have faced difficulty in retaining skilled staff; this is due to a shortage of suitable and affordable housing. The Group has now entered into a commercial arrangement with Ardstone Homes to develop its landbank;</li> <li>• Queally Group encourages and supports the provision of additional community and social infrastructure in Naas;</li> <li>• Phase 1 is the Strategic Housing Development (An Bord Pleanála (ABP) Reg. Ref. 303023-18)</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>for 125 units on a zoned site of 3.5ha immediately adjoining the subject lands;</p> <ul style="list-style-type: none"> <li>• Subject to confirmation of the proposed zoning of the lands, an application will be expedited in order to develop both sites concurrently;</li> <li>• The submission considers that the lands are suitable for consideration being Tier 1 land;</li> <li>• It proposes a zoning objective: 4.8ha of land to be zoned '<i>New Residential (objective C)</i>' to facilitate the extension, consolidation and enhancement of the adjoining established residential development at neighbourhood at Bluebell, Pipers Hill and Killashee.'</li> </ul> <p><b>Physical Context</b></p> <ul style="list-style-type: none"> <li>• Lands are strategically located and represent an urban infill and consolidation site;</li> <li>• Proximate to public transportation infrastructure, schools, and a range of employment opportunities;</li> <li>• Existing footpath and cycle infrastructure, extensive road frontage and highly accessible to a range of employment opportunities for instance the Queally Group.</li> </ul> <p><b>Assessment of the Suitability of Lands</b></p> <ul style="list-style-type: none"> <li>• On the basis of an accompanying Technical Note prepared by DBFL Consulting engineers, the subject lands can be classified as a Tier 1 site in accordance with the NPF;</li> <li>• Need – housing shortage and this site can be considered for development within the life of the Plan and are Tier 1;</li> <li>• A need for additional housing in outlined on the basis of the national housing crisis, the Rebuilding Ireland document (2016) and issues facing local employers in Naas.</li> <li>• Reference is made to the NPF in terms of encouraging population growth and the designation of Naas as a Key Town in the RSES which have the capacity and potential to accommodate above average growth;</li> <li>• Reference is made to the County Development Plan 2017-2023 and that 14.9% of future population growth for the county is allocated to Naas which equates to a new dwelling completion rate of 692 units per year for the 2016-2023 period;</li> <li>• Reference is made to the Draft Plan in terms of the Core Strategy and Housing Targets and the Infrastructural Assessment Report;</li> <li>• The submission notes that the Tier 2 zoned lands are generally reliant on the provision of</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>significant roads infrastructure as identified on the Land Use Zoning Objectives Map of the LAP;</p> <ul style="list-style-type: none"> <li>• Tier 2 lands identified as C2 (20), C2 (21), C2 (3) and C1 (4) do not currently appear to have direct vehicular, pedestrian or cycle access in the short to medium term;</li> <li>• Naas West KDA (C1 (2)), are identified as being within 'Northwest Quadrant' (NWQ), which has been designated as a component of the long-term development vision of the development of Naas up to 2040, far beyond the immediate 4 year timeframe of the Draft LAP</li> <li>• Road Objective SP01.7 (Northwest Quadrant Link) is required to service the tier 2 residential lands in the Northwest Quadrant which is after the Naas Transportation Strategy;</li> <li>• Outlines that the NWQ is to be subject to a masterplan and further flood risk assessment compared to the subject lands which are ready within the lifetime of the Plan;</li> <li>• The subject lands have a range of characteristics that make it physically suitable; accessibility, site form and area, topography, servicing, not in a flood zone or contaminated and therefore available to readily facilitate development that would ensure that the Planning Authority has a realistic prospect of achieving its housing targets;</li> <li>• The site adheres to the sequential test as per the Development Plan Guidelines;</li> <li>• The subject site would not impact on any built and natural heritage designation.</li> </ul>

Sub. No.	Name	Summary of Submission
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Figure 2.1 Location and Context of Subject Lands



The submission is also accompanied by a Technical Report prepared by DBFL Consulting Engineers which sets out a brief overview of servicing considerations associated with the subject lands.

- Report comprises of an overview of the site servicing considerations associated with the

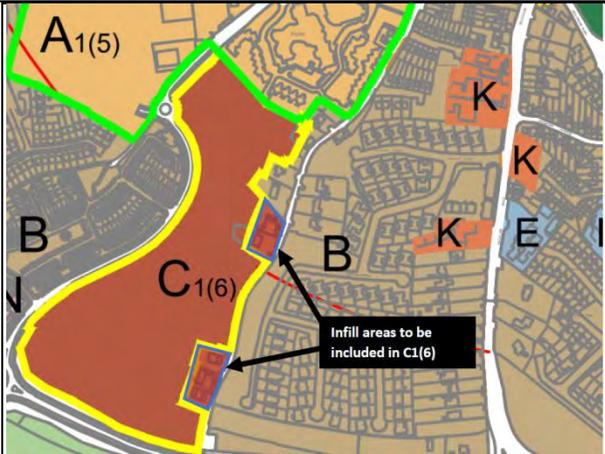
Sub. No.	Name	Summary of Submission
		<p>proposed development lands at Bluebell in terms of access and transportation, foul drainage, water supply and surface water drainage.</p> <ul style="list-style-type: none"> <li>• It advises that the Osberstown Waste Water Treatment Works has capacity to serve the development and would avail of a pumping station that was approved as part of PL.09.302130;</li> <li>• The subject lands would be accessed via the previously approved 122 units residential scheme;</li> <li>• The submission makes reference to the Eastern CFRAM maps and that there is no indication of fluvial flooding. The SFRA does not indicate any risk of flooding.</li> </ul>
125	Frank Fogarty	<ul style="list-style-type: none"> <li>• Submission refers to Site Ref: C1 (18) and that it should be developed in line with the adjacent site of Racecourse Gate in terms of housing density and housing type;</li> <li>• Both site will share the same entrance;</li> <li>• Density for site reviewed;</li> <li>• Reference is made to a previous submission on the Naas Inner Relief Road – Dublin Road to Blessington Road”, and this submission reconfirms the opposition to “route 2”;</li> <li>• Council should commit to constructing an outer eastern relief route during the life time of the plan rather than a feasibility study as this was already an objective of the 2011-2017 Plan.</li> </ul>
126	Naas GAA	<p>The submission received comprises of three elements, the written submission, a map with an excerpt from 2011 Plan land use objectives and a supporting document on Child Traffic Safety.</p> <ul style="list-style-type: none"> <li>• The submission concerns lands between Naas GAA and Sallins Road which is zoned for Open Space and Amenity and has been consistently so in previous plans and wants the current zoning preserved;</li> <li>• Scoil Bhríde has approx. 700 pupils with limited open space and amenity facilities;</li> <li>• Any rezoning of the Springwood lands will further reduce open space and amenity lands;</li> <li>• Significant traffic congestion with health and safety issues exists on the existing access road from the Sallins Road junction to Naas GAA and Scoil Bhríde which access road traverses the Springwood lands;</li> <li>• A direct consequence of the rezoning of the lands will be granting of additional access on the access route which will increase the existing pressure;</li> <li>• Increase risk to children travelling;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Dumping is an issue on the Springwood lands.</li> </ul> <div data-bbox="1025 384 1603 919" data-label="Image"> </div> <p data-bbox="577 954 1971 1029">The supporting document on Child Safety outlines how children are vulnerable road users and the nature of the safety problems and mitigation measures that can be used.</p>
127	Eileen Kiely	<p data-bbox="577 1070 1232 1102">This submission is in both in Irish and English.</p> <ul style="list-style-type: none"> <li>• 2019 first Irish County Language Plan launched;</li> <li>• Encouraged the Irish-speaking community that KCC was happy to support the promotion and development of the language in the county;</li> <li>• Naas/Sallins area is seeking líonra (Irish language network) status this year and KCC is fully support this application;</li> <li>• Irish language does not feature in the Plan;</li> </ul>

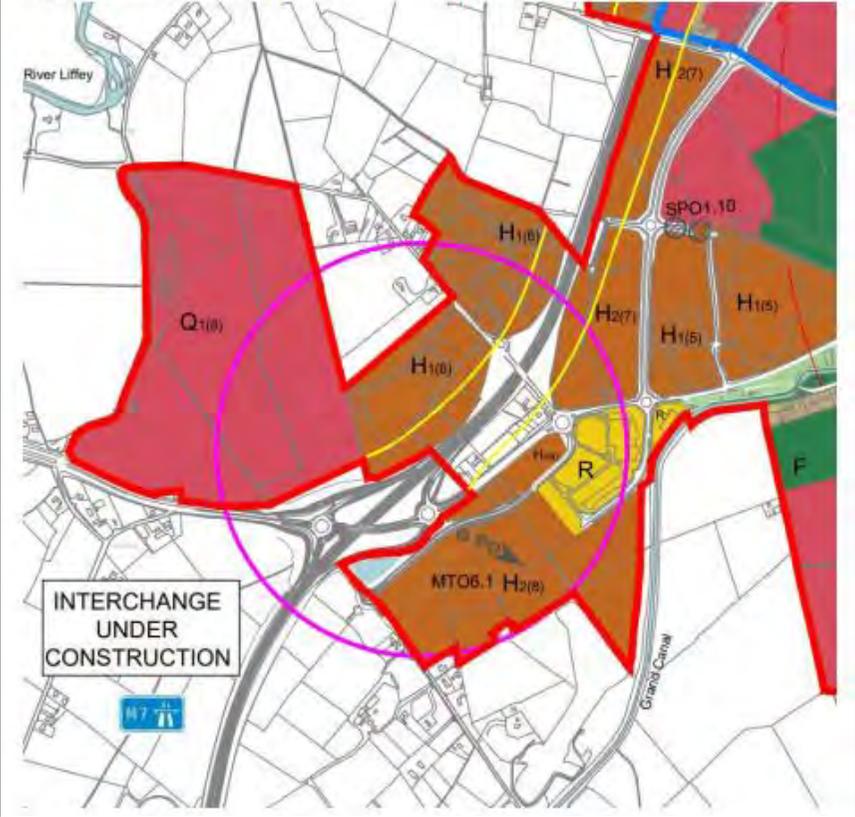
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• More students receiving their education through Irish in the town than ever;</li> <li>• Irish language should be properly recognised in the Plan – as per KCC’s own commitments in the five year language plan for the county;</li> <li>• The submission refers to a website and KCC objectives on pg 19 of the language plan.</li> </ul>
128	Mary Taaffe	<ul style="list-style-type: none"> <li>• Firm plan for Outer Eastern Relief Road;</li> <li>• A feasibility study was already included in the 2011-2017 Naas Local Area Plan;</li> <li>• Future proof Naas for years to come.</li> </ul>
129	Alan Cunniffe	<p>This submission comprises of four recommendations.</p> <p><b>Recommendation 1</b></p> <ul style="list-style-type: none"> <li>• Include a specific objective to seek funding to make Rathasker Road into an attractive and functional, shared green route for pedestrians/cyclists/motorists with natural traffic calming measures, including a 50 kmph limit;</li> <li>• Last remaining rural road with old stone walls, rounded piers etc.;</li> <li>• New formal entrance which excludes vehicular traffic is required off the Ring Road to frame the entrance;</li> <li>• Does not need heavy engineering works (footpaths) but light touch improvements and retrofitting of DMURS.</li> </ul>

Sub. No.	Name	Summary of Submission
		<div data-bbox="1137 276 1485 703" data-label="Image"> </div> <p data-bbox="577 738 880 770"><b>Recommendation 2</b></p> <ul data-bbox="629 778 2027 1074" style="list-style-type: none"> <li>• Outline Planning Permission was recently granted for 2 no. dwellings to the rear of the existing farmhouse on the Rathasker Road (Reg. Ref. 18/891). Access is via the Rathasker Road while the KDA potentially shows access via a new street on third party lands;</li> <li>• Building frontage as shown in KDA Rathasker Road West may conflict with the permitted development;</li> <li>• Amendment to the Draft LAP is therefore requested which would not preclude the implementation of the permitted development on site as part of a forthcoming application for full planning in terms of frontage and access.</li> </ul>

Sub. No.	Name	Summary of Submission
		<div data-bbox="1021 276 1608 743" data-label="Image"> <p>The image is a site plan map. At the top, it says 'Site Outlined in Blue'. The map shows a road labeled 'Rathasker Road' running vertically. To the left of the road, there is a green area with trees and a red dashed line. A red asterisk is located in the bottom-left corner of the map area. A blue outline highlights a specific site. At the bottom of the map, it says 'Reg. Ref. 18/891 as Granted'. The name 'Rathasker' is partially visible at the bottom right.</p> </div> <p data-bbox="577 778 882 810"><b>Recommendation 3</b></p> <ul data-bbox="629 818 1861 850" style="list-style-type: none"> <li>• Area denoted by C1 (6) to incorporate the entirety of the site denoted in blue above.</li> </ul> <p data-bbox="577 858 882 890"><b>Recommendation 4</b></p> <ul data-bbox="629 898 1995 962" style="list-style-type: none"> <li>• Include 3 no. small parcels under C1 (6) to allow maximum flexibility in delivering the KDA for Rathasker West.</li> </ul>

Sub. No.	Name	Summary of Submission
		
130	Crylock Developments Ltd	<p><b>Introduction</b></p> <ul style="list-style-type: none"> <li>• This submission is made by John Spain Planning and Development Consultants on behalf of Crylock Developments Ltd.</li> <li>• The submission relates to the 110 hectare landholding at Ladytown, Naas (as outlined in red below).</li> </ul>

Sub. No.	Name	Summary of Submission
		<p data-bbox="869 316 1675 339"><b>Figure 1: Site Location with extent of client landholding outlined in red</b></p>  <p data-bbox="678 922 2051 1294"> <ul style="list-style-type: none"> <li>• Welcomes the proposed planning policy framework relating to the proposed 'Q1 (8) zoning objective to the c.65 hectare eastern portion of the landholding (as outlined below).</li> <li>• Whereas the 'Q' Zoning objective seeks to deliver '<i>manufacturing, research and development, light industry, employment and enterprise related uses</i>' on such lands, it would appear that the specific objective 'Q (8) Newhall/Ladytown' restricts the range of Enterprise and Employment uses to a data centre related development.</li> <li>• The proposed zoning objective and acknowledgement of the suitability of the site to deliver a data centre is welcomed. However, the zoning matrix for Objective Q is considered to be overly constrained and should be expanded to cater for a wider range of potential enterprise and employment uses, including data centres.</li> </ul> </p>

Sub. No.	Name	Summary of Submission
		<p data-bbox="904 296 1653 320"><b>Figure 2: Extract from Land Use Zoning Map 10.1 of the Draft LAP</b></p>  <p data-bbox="577 1185 1211 1217"><b>Suggested Amendments to the Draft LAP</b></p> <p data-bbox="577 1254 857 1286"><i>Lifetime of the LAP</i></p> <ul data-bbox="678 1326 2054 1396" style="list-style-type: none"> <li>• The LAP should be for a standard period of 6 years from adoption, i.e. 2019-2025, in order to provide greater certainty to landowners and ensure that a LAP is in place when the next</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>Development Plan is adopted in 2023.</p> <p><i>Q1(8) Data Centre Objective</i></p> <ul style="list-style-type: none"> <li>The current wording of Q1 (8) could be construed as restricting the development of the subject lands to one data centre building. Given the size of the subject landholding at c. 64 hectares and availability of services it is considered that the subject lands are a suitable location for a data centre facility campus. Amendments to the LAP Zoning Objectives to this effect have been suggested as follows:</li> </ul> <p>From:</p> <p><i>Q1(8) Newhall / Ladytown: The site has been identified for a potential new data centre, provided no other more suitable and sequentially preferable lands are available for a data centre in the plan area. Development, other than a data centre, will only be considered on a sequential basis and only when other identified Enterprise and Employment lands have been developed or received planning approval. The development of these lands will require improvement to the Ladytown junction on the NaasNewbridge Road and to the local road infrastructure (L2031 and L2006) linking to the Sallins bypass.</i></p> <p><i>Lands zoned Q1(8) to the north of Junction 10 on the M7 at Newhall (Ref: Map 10.1) have been identified for a potential new data centre. A development, than data will only be considered on a sequential basis and only when other identified Enterprise and Employment (Q) lands have been developed.</i></p> <p>To:</p> <p><i>Q1(8) Newhall / Ladytown: The site has been identified for a potential new data centre <b><u>campus</u></b>, provided no other more suitable and sequentially preferable lands are available for data centre <b><u>facilities</u></b> in the plan area. Development, <b><u>other than data centre facilities and associated</u></b></i></p>

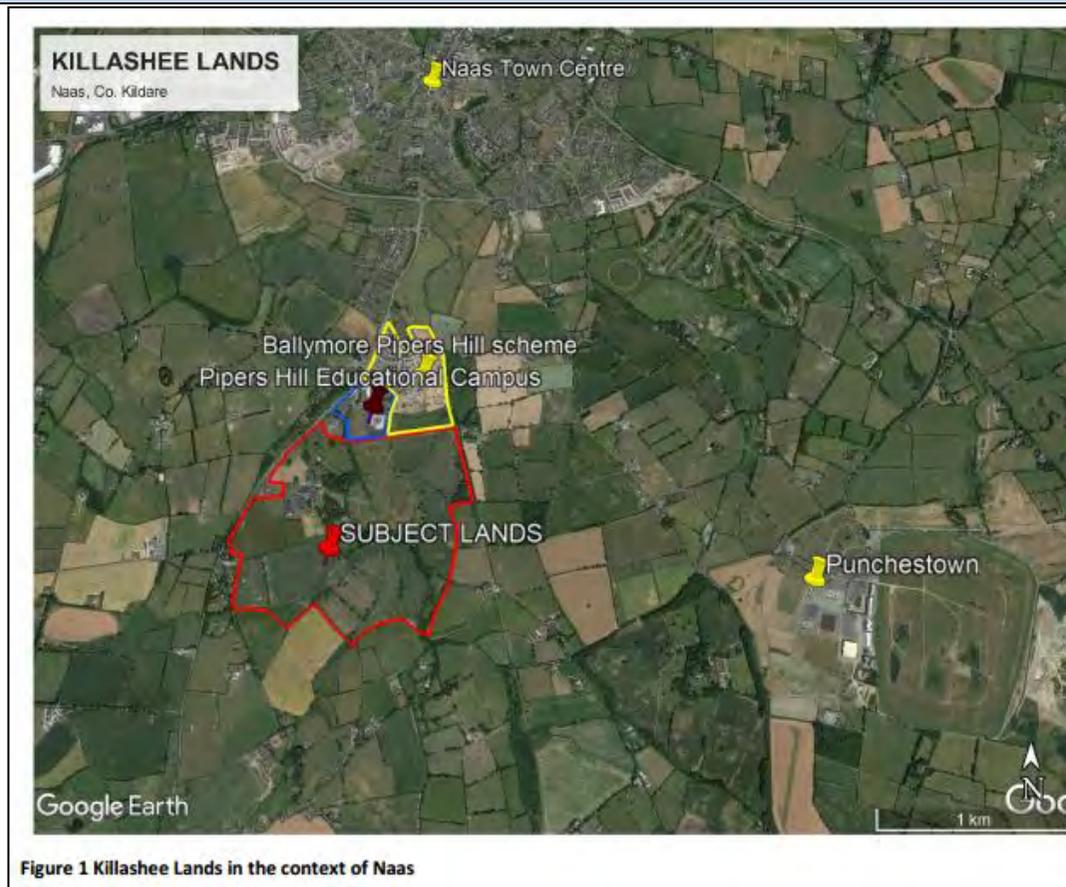
Sub. No.	Name	Summary of Submission
		<p><b><u>ancillary development / uses</u></b>, will only be considered on a sequential basis and only when other identified Enterprise and Employment lands have been developed or received planning approval. The development of these lands will require improvement to the Ladytown junction on the Naas Newbridge Road and to the local road infrastructure (L2031 and L2006) linking to the Sallins bypass.</p> <p>Lands zoned Q1(8) to the north of Junction 10 on the M7 at Newhall (Ref: Map 10.1) have been identified for a potential new data centre <b><u>campus</u></b>. A development, <b><u>other than data centre facilities and associated ancillary development / uses</u></b>, will only be considered on a sequential basis and only when other identified Enterprise and Employment (Q) lands have been developed.</p> <ul style="list-style-type: none"> <li>• The suggested amendments are supported by national and regional planning and economic policy: <ul style="list-style-type: none"> <li>- National Planning Framework 2018 contains policies supporting the development of ICT infrastructure with particular reference made to <i>datacentres</i>, National Strategic Outcome 6 of the NPF refers.</li> <li>- Draft RSES, Regional Policy Objective (RPO) 8.23 states the following Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres.</li> </ul> </li> <li>• The Planning Authority is requested to consider whether the restriction on the range of uses and reference to sequential approach to development of the Q1 (8) Ladytown lands is necessary and appropriate.</li> <li>• The key locational characteristics for data centre developments are infrastructural assets such as water, wastewater, energy supply, fibre, and a good quality road network, which the subject lands benefit from.</li> <li>• The proximity of such lands to the built-up area of an existing settlement is not a key planning requirement, as demonstrated by An Bord Pleanala (Apple, Atherry).</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>On the basis of the above, the submission suggests the following additional amendments to the Draft LAP: From:</li> </ul> <p><i>Q1(8) Newhall / Ladytown: The site has been identified for a potential new data centre provided no other more suitable and sequentially preferable lands are available for data centre in the plan area. Development, will only be considered on a sequential basis and only when other identified Enterprise and Employment lands have been developed or received planning approval. The development of these lands will require improvement to the Ladytown junction on the Naas Newbridge Road and to the local road infrastructure (L2031 and L2006) linking to the Sallins bypass.</i></p> <p><i>Lands zoned Q1 (8) to the north of Junction 10 on the M7 at Newhall (Ref: Map 10.1) have been identified for a potential new data centre. A development will only be considered on a sequential basis and only when other identified Enterprise and Employment (Q) lands have been developed.</i></p> <p>To:</p> <p>Q1(8) Newhall / Ladytown: The site has been identified for a potential new data centre <b><u>campus, including associated ancillary development / uses.</u></b> The development of these lands will require improvement to the Ladytown junction on the Naas Newbridge Road and to the local road infrastructure (L2031 and L2006) linking to the Sallins bypass.</p> <p>Lands zoned Q1 (8) to the north of Junction 10 on the M7 at Newhall (Ref: Map 10.1) have been identified for a potential new data centre <b><u>campus, including associated ancillary development uses.</u></b>”</p>

Sub. No.	Name	Summary of Submission
		<p><i>Q Zoning Matrix and Range of Uses</i></p> <ul style="list-style-type: none"> <li>The range of uses permitted, open for consideration and not permitted under the matrix for zoning objective 'Q' could have significant implications for the Development Management and assessment of uses which are considered compatible with the intent of the zoning application. This needs to be considered.</li> <li>The submission suggests that the zoning matrix should be amended to include additional uses as outlined below:</li> </ul> <p><u>from:</u></p> <p><i>Permitted In Principle:</i> Offices +100 sq.m.</p> <p><i>Open for Consideration:</i> Car park (other than ancillary), Creche / Playschool, Industry (light) / Workshops, Industry (general), Medical Consultant / Health Centre, Petrol Station, Restaurant, Utility Structures'.</p> <p><i>Not permitted:</i> Garage / Car Repairs, Heavy Commercial Vehicle Park, Industry (general), Motor Sales, Shop (Convenience), Warehouse (wholesale) / Store / Depot'.</p> <p><u>To:</u></p> <p>Permitted In Principle: Offices +100 sq.m, <b>Data Centre, Industry (light) / Workshops, Research and Development, Science and Technology, Warehouse (wholesale) / Store / Depot'</b></p> <p>Open for Consideration: Car park (other than ancillary), Creche / Playschool, Medical Consultant / Health Centre, <b>Motor Sales</b>, Petrol Station, Restaurant, <b>Shop (Convenience)</b>,</p>

Sub. No.	Name	Summary of Submission
		<p>Utility Structures’.</p> <p>Not permitted: Garage / Car Repairs, Heavy Commercial Vehicle Park, Industry (general), Motor Sales, Shop (Convenience).</p> <ul style="list-style-type: none"> <li>• The suggested amendments would ensure that the ‘Q- Enterprise and Employment’ zoning objective can cater for the future needs of the employment uses which seek to locate on these lands.</li> <li>• This approach closely reflects similar land use zonings such as the ‘High Technology’ zoning objective in Fingal and the Enterprise and Employment zoning objective in South Dublin County.</li> <li>• The landowners intend to pursue development of the subject lands for data storage facility uses in accordance with the draft zoning objective.</li> <li>• The zoning of such an extensive area of land for a very narrow range of uses does not reflect the strategic location of the lands and their potential to assist in the balanced, sustainable growth of the County Town of Naas over the coming years.</li> <li>• Modern business / employment campus requires a mix of development types including offices, light industry, science and technology, research and development uses, in addition to ancillary services such as local retail, restaurant / café uses and meeting and accommodation facilities.</li> <li>• The proposed restriction of land uses puts a significant obstacle in place for landowners / developers to attract investment and development partners to bring forward the development of these lands in accordance with the zoning objective.</li> </ul>
131	<b>Ballymore, Tetrarch and Midwest Holding</b>	<p>The submission is made by Kieran Rush Consult Ltd on behalf of Ballymore, Tetrarch and Midwest Holding.</p> <p><b>Introduction</b></p> <ul style="list-style-type: none"> <li>• It relates to c.120 ha (300 acres) of lands at Killashee, south of Naas, together with the Kilashee Hotel and Leisure centre complex itself (as outlined below).</li> </ul>

Sub. No.	Name	Summary of Submission
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- The landowners are disappointed to note that the details of the Draft LAP will not allow the Plan's vision to be realised.

**History of the Lands**

- The lands were zoned for a variety of uses in the Naas Environs Plan in the Kildare County

Sub. No.	Name	Summary of Submission
		<p>Development Plan 2011-2017 including;</p> <ul style="list-style-type: none"> <li>- NE5: Integrated Leisure Development,</li> <li>- NE 7: Small, Medium Enterprise/Industry,</li> <li>- NE8: Hotel and Leisure and</li> <li>- NE9: Agriculture.</li> </ul> <ul style="list-style-type: none"> <li>• Planning permission was granted on the lands for an Integrated Leisure Development including an 18 hole golf course with associated clubhouse, golf villas and apartments on the lands zoned NE5 and an office park on the lands zoned NE7 (Planning Ref 05/437).</li> </ul> <p><b>Proposed Development of a Revised Integrated Leisure Development</b></p> <ul style="list-style-type: none"> <li>• The submission advises that planning permission 05/437 was not implemented and is now expired.</li> <li>• There is a demand for other sports amenities, facilities and housing, including specialist housing for the active elderly in Kildare.</li> <li>• The landowners are in the process of preparing new Integrated Leisure Development that further develops Killashee Hotel and Leisure Centre as the premier destination hotel in Naas and the wider county.</li> <li>• It is intended that the development of these lands will consist of: <ul style="list-style-type: none"> <li>- An equestrian centre, with indoor and outdoor arenas, stables, paddocks, horse walkers</li> <li>- A headquarter administrative building for Horse Sport Ireland</li> <li>- An educational, training and development centre for equestrian based apprenticeships</li> <li>- A regional Centre of Excellence for the Football Association of Ireland (the 'FAI')</li> <li>- A retirement village consisting of 40 no. independent living units and associated support services</li> <li>- Approx. 20 no. 'mini studs' consisting of detached houses, stables and outbuildings each on approximately 3 acres</li> <li>- An equestrian community of c. 120 houses in clusters, dispersed around the periphery of the scheme and</li> <li>- Potential pitches and / or other facilities for local sports clubs, associations and organisations (including GAA and rugby).</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Horse Sport Ireland intends to make this centre their national headquarters and a centre of excellence in partnership with the Kildare and Wicklow Education and Training Board (the 'KWETB'), which is located in the neighbouring Piper's Hill Campus.</li> <li>• This model has been developed successfully in other countries, particularly in the US.</li> <li>• The 'equestrian community' at Killashee will be a first in Ireland and offer residents an attractive alternative to urban generated rural housing in the county. Residency of the houses in the scheme will be restricted to members of the equestrian community who must subscribe to the upkeep of the communal equestrian facilities including paddocks, stabling and arenas.</li> <li>• The proposed housing is ideally located within walking distance of two primary schools and a secondary school in Piper's Hill Campus. The Killashee equestrian community will also provide an appropriate urban/rural transition on the edge of the town.</li> <li>• The proposed FAI Centre of Excellence is intended to serve the Leinster region. It will comprise two all-weather pitches, four grass pitches and a building with changing and toilet facilities, meeting rooms etc. The FAI Centre of Excellence at Killashee will be on a par with the National Academy of the FAI at the National Sports Centre in Abbotstown.</li> <li>• Other pitches will be developed and made available to local rugby and GAA clubs, associations and academies, including Rugby Academy Ireland, which is currently based at Killashee.</li> <li>• These very high quality amenities will confirm the status of Naas as the centre of sporting excellence in the country and reinforce the role of the town as the capital of the Thoroughbred County.</li> <li>• The proposed development will also accommodate a retirement village for the active retired who can avail of the sports, social and leisure amenities and facilities on offer in the campus.</li> <li>• The proposed development will underpin and ensure the long-term viability of Killashee Hotel and enhance the tourism offering of the town of Naas.</li> </ul> <p><b>Consistency of the Proposed Development with the Draft LAP</b></p> <ul style="list-style-type: none"> <li>• The proposed development will support the following policy statement and objectives in the draft LAP: <ul style="list-style-type: none"> <li>- Section 1.3 – Overview of Core issues and Development Challenges: the development of</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<p>further residential, employment, educational, community, leisure and recreational facilities.</p> <ul style="list-style-type: none"> <li>- Policy HC 3 – education, early learning and healthcare facilities</li> <li>- Objective HCO3.3 – support the delivery of facilities and services for older people, at appropriate locations in Naas.</li> <li>- Policy HC 4 – Community, Sports and Recreational Facilities</li> <li>- Section 5.3 – Naas Economic Development Strategy</li> <li>- Section 5.4 – Tourism</li> <li>- Objective EDO1.2 – Supporting the equine industry</li> <li>- Objective EDO2.9 – supporting the diversification and intensification of equine and agriculture industries in Naas</li> <li>- Section 7.4.1 – Strategic Open Space</li> <li>- Section 7.4.1.4 – Killashee: supporting centres of excellence for sport and /or equine activity at this location</li> <li>- Zoning F4: Killashee</li> </ul> <p><b>Consistency of the Proposed Development with National Policy</b></p> <ul style="list-style-type: none"> <li>• The proposed development is consistent with the NPF and one of the 10 strategic outcomes of the NPF: Fostering enterprise and innovation and attracting investment and talent by building regional economic drivers and by supporting opportunities to diversify and strengthen the rural economy.</li> </ul> <p><b>Proposed changes to the Draft Naas Local Area Plan</b></p> <ul style="list-style-type: none"> <li>• An innovative and capital intensive development will entail significant economic risk and requires an unambiguous planning policy framework if it is to proceed. The Draft Plan does not offer such a framework. The subject lands are proposed to be zoned for a patchwork of inconsistent land uses that bears little relationship to existing uses on the ground and does not support the proposed development. In particular: <ul style="list-style-type: none"> <li>- The bulk of the lands are proposed to be zoned ‘F: Open Space and Amenity’. While the draft plan envisages a ‘Centre of Excellence for the Equine or Sport’ (F4) on these lands,</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<p>the extent of the lands proposed to be zoned as 'F: Open Space and Amenity' is not adequate to support the development envisaged;</p> <ul style="list-style-type: none"> <li>- Some lands are outside the LAP boundary and will not therefore be zoned;</li> <li>- Some of the lands are proposed to be zoned 'L: Leisure and Amenity' while a small fragment between the existing Killashee Hotel and the Kilcullen Rd are proposed to be zoned 'I: Agriculture'. This land parcel is clearly unviable as a farm and is isolated from other agriculturally zoned lands.</li> </ul> <ul style="list-style-type: none"> <li>• The fragmented nature of the zoning together with the highly restricted range of uses permitted within these zonings will mean that no development of significance will happen on these lands.</li> </ul> <p><b>Submission Proposals</b></p> <ul style="list-style-type: none"> <li>• It is proposed that the entire 120 ha (300 acres) of the subject lands is zoned for an Integrated Leisure Development (comparable to the pre-existing zoning) with a wide range of uses either permitted in principle or open for consideration. Such uses should include community / recreational / sports buildings and playing fields, stables, arena, yards, agricultural buildings, park, playground, crèche / playschool, dwellings (number to be specified), group / special needs housing, nursing home, senior / retirement living, medical consultant / health centre, offices +100 sqm, school, restaurant, pub, hotel, stable yard, tourist related facilities, utility structures and cemetery (there is an existing cemetery on the lands).</li> <li>• It is further proposed that any proposed development on the subject lands (other than any planned development of the hotel), be subject to a masterplan to be agreed with the Planning Authority.</li> </ul>
132	Bernie Lardner	<p>This submission is provided in both Irish and English.</p> <ul style="list-style-type: none"> <li>• 2019 first Irish County Language Plan launched;</li> <li>• Encouraged the Irish-speaking community that KCC was happy to support the promotion and development of the language in the county;</li> <li>• Naas/Sallins area is seeking líonra (Irish language network) status this year and KCC is fully supportive of this application;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Irish language does not feature in the Plan, the 'bible' for the town;</li> <li>• More students receiving their education through Irish in the town than ever;</li> <li>• Please recognise properly the Irish language in this area plan so that it is clear that KCC are willing to take a central role in this movement;</li> <li>• The submission refers to a website and KCC objectives on Page 19 of the language plan.</li> </ul>
133	Denis Kenny	<ul style="list-style-type: none"> <li>• The submission does not support that zoning of land on the attached image to New Residential;</li> <li>• There has been a reduction of facilities and amenity space in the area and huge development is already planned;</li> <li>• It refers to the demolition of the Tender Years Crèche to allow for road widening;</li> <li>• The Green Belt that was to border Caragh Court to the north has been completely removed;</li> <li>• Lack of social inclusion in the area and a dog park could help to alleviate this;</li> <li>• Suggest a dog park to be created on the land referred to.</li> </ul> <div data-bbox="952 783 1682 1214" data-label="Image"> <p>The image is an aerial photograph overlaid with a planning map. The map shows several land parcels. A parcel in the upper left is labeled 'E' and is colored blue. A parcel in the upper right is labeled 'F' and is colored red, with a note '(14Ha)' nearby. Several parcels in the lower half are labeled 'B' and are colored brown. A red arrow points to one of these 'B' parcels. A blue dashed line runs horizontally across the middle of the map, and a red dashed line runs vertically on the left side. The background shows a residential area with buildings and roads.</p> </div>
134	Kings Court Residents	<ul style="list-style-type: none"> <li>• The Draft Plan includes Objective MTO6.1 which refers to investigation the feasibility of a outer relief road connecting Junction 8 (Johnstown) and Junction 10 (Newhall interchange)</li> </ul>

Sub. No.	Name	Summary of Submission
	<b>Association</b>	<ul style="list-style-type: none"> <li>• This repeats a similar objective in the Naas 2011-2017 Town Plan.</li> <li>• It's considered that the objective is not ambitious enough and should be amended with the aim of providing the route, not just the feasibility of investigating the route.</li> </ul>
135(a)	<b>The Westar Group Ltd</b>	<ul style="list-style-type: none"> <li>• The submission is made by Hughes Planning and Development Consultants, instructed by The Westar Group Ltd. The submission relates to lands at North West Quadrant, Naas West.</li> </ul> <div data-bbox="750 486 1892 1141" data-label="Image"> <p>The image is a zoning map showing various residential zones. A central area is outlined in black and labeled 'C1(2)'. Other zones include 'C1(4)', 'C2(3)', 'B', 'E', 'F', and 'A1(1)'. A blue line representing a watercourse or road runs through the map. A red dashed line indicates a specific route. A red '500m' label is placed near the bottom center. The map also shows some green areas and a grey residential layout.</p> </div> <p data-bbox="750 1173 1892 1236">Figure 2.0 Zoning Map as per Draft Naas Local Area Plan 2019-2023, showing submission lands outlined in black, where the zoning is 'C - Residential'.</p> <p data-bbox="577 1276 772 1308"><b>Introduction</b></p> <ul style="list-style-type: none"> <li>• Submission requests that KCC considers the following: <ul style="list-style-type: none"> <li>- Clarify that the submission site is located within the Tier 1 land categorisation and to</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<p>clarify the omission of Tier 1 lands from the Zoning Map (change made 01/05/2019).</p> <ul style="list-style-type: none"> <li>- Increase the residential density of the submission site to allow for 55 dwellings per hectare.</li> <li>- Include apartments into the unit mix for the KDA: Naas West, and increase the building heights on the site to 4-5 storeys in line with National Planning Policy.</li> <li>- Seek clarification on the responsible body for preparing the overall North Quadrant Masterplan.</li> </ul> <p><b>Submission Lands</b></p> <ul style="list-style-type: none"> <li>• Site is approx 9.1ha and currently undeveloped</li> </ul>

Sub. No.	Name	Summary of Submission
		<div data-bbox="721 295 1921 976" data-label="Image"> </div> <p data-bbox="721 1007 1921 1066">Figure 3.0 Aerial view of subject site in the context of the Finlay Residential Development to the west of the submission site.</p> <p data-bbox="577 1125 851 1161"><b>Planning Context</b></p> <p data-bbox="577 1161 1198 1198"><b>Naas Town Development Plan 2011-2017</b></p> <ul data-bbox="629 1198 1966 1273" style="list-style-type: none"> <li>• Site is zoned Objective C – ‘New Residential’ and ‘Lands subject to Future Local Area Plan’ within the Naas Town Development Plan 2011-2017</li> </ul> <p data-bbox="577 1310 1153 1347"><b>Draft Naas Local Area Plan 2019-2023</b></p> <ul data-bbox="629 1347 2038 1383" style="list-style-type: none"> <li>• Site is zoned Objective ‘C1’ – New Residential in the draft development plan, and it is noted that</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>the Tier 1 allocation on the legend has been crossed out of the plans as per the note dated 1<sup>st</sup> May 2019</p> <p><b>Height, Density and Unit Types</b></p> <ul style="list-style-type: none"> <li>• Indicative densities are estimated for each site. However, eventual densities will depend on a number of factors e.g. land topography, proximity to public transport structures, heritage structures, availability of services, existing development, character, and other relevant policies and objectives of the Plan</li> <li>• It is considered that that due to the location of the site, and its proximity to the newly re-zoned ‘A - Town Centre’ site, that the site is capable of accommodating development in the order of 55 units per hectare.</li> <li>• Request that the Council re-examine the estimated density that has been allocated on the submission site, and allow for a density of 55 units per hectare. This would allow the site to tie in more with the lands surrounding the submission site (i.e. newly re-zoned the Town Centre site to the east) and also allow the site to accommodate apartments of 4-5 storeys in height, which would be in line with the <i>Urban Development and Building Heights - Guidelines for Planning Authorities (December 2018)</i>.</li> <li>• Request details on the body responsible to prepare the masterplan for the site.</li> </ul> <p><b>Draft Proposed Masterplan of the Submission Site</b></p> <ul style="list-style-type: none"> <li>• A masterplan of the submission site has been prepared by CW O’Brien Architects which indicates a layout for a denser development between 50-70 units per hectare which can easily be achieved on the site and is shown in the Figure below</li> </ul>

Sub. No.	Name	Summary of Submission
		<div data-bbox="689 280 1944 1114" data-label="Figure"> <p data-bbox="734 1043 1908 1102">Figure 6.0 Masterplan Prepared of the Submission Site by CW O'Brien Architects based on the Design Framework shown in Figure 5.0 above with the submission site outlined in red.</p> </div> <p data-bbox="577 1153 896 1185"><b>Land Categorisation</b></p> <ul data-bbox="629 1193 1921 1225" style="list-style-type: none"> <li>• Requests that it is clarified whether the submission site is categorised as Tier 1 or Tier 2</li> </ul> <p data-bbox="577 1267 1451 1299"><b>Infrastructure Assessment – Appendix 3 of the Draft Plan</b></p> <ul data-bbox="629 1307 2042 1372" style="list-style-type: none"> <li>• Submission requests that the Council re-considers the categorisation of this site in relation to the surrounding area, as the site is well serviced by both water and road infrastructure, and is also in</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>close proximity to frequent public transport and Naas Town Centre, more over some of the sites currently categorised in Tier 1.</p> <ul style="list-style-type: none"> <li>• Considers the site should be classified as Tier 1 for the following reasons: <ul style="list-style-type: none"> <li>- <i>Roads and Transportation</i> – there is an existing road access via Finlay Park in place which has been provided with the development as approved and constructed under Reg. Ref. 13/500055. Additionally, pedestrians and cyclists can access the Town Centre over the Ploopluck Bridge and greenway running along the canal.</li> <li>- <i>Water Infrastructure and Waste Water</i> – a letter from Irish Water has been received (see Appendix A) which shows that the submission site is well serviced by water infrastructure, and a connection to provide water and foul sewage to an additional 340 units in this area is possible.</li> <li>- <i>Drainage, SuDs and Flooding</i> – A Flood Risk Assessment has been carried out as part of the draft plan, and the only flooding issues found on the site were found along the existing drain. A site-specific Flood Risk Assessment would be prepared with any application for the submission site.</li> </ul> </li> </ul> <p><b>Regional Planning Guidelines</b></p> <ul style="list-style-type: none"> <li>• The submission lands are strategically located within a Large Growth Town within the Regional Planning Guidelines</li> </ul> <p><b>Draft Eastern and Midlands RSES</b></p> <ul style="list-style-type: none"> <li>• Consolidation and regeneration shall be a key priority and objective for the development of Naas town with at least 30% of all development to be delivered on Brownfield and infill lands with a focus on the regeneration of the town centre</li> <li>• It is considered that due to the sites proximity to the Town Centre, that higher density development and apartments on the subject site would support policies RPO 4.33 &amp; RPO 4.34 of the Draft RSES.</li> </ul> <p><b>Project Ireland 2040 – National Planning Framework</b></p> <ul style="list-style-type: none"> <li>• The NPF includes a number of relevant objectives including:</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>- NPO 3a – deliver at least 40% of all new homes nationally within the built-up footprint of existing settlements</li> <li>- NPO 11 - a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages</li> <li>- NPO 35 - Increase residential density in settlements</li> <li>- In light of these objectives, it is considered that apartments should be included in the housing mix of the development of this site, and increased building heights would be consistent with the objectives as set out in the National planning Framework 2040</li> </ul> <p><b>Urban Development and Building Height – Section 28 guidance (December 2018)</b></p> <ul style="list-style-type: none"> <li>• Guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.</li> <li>• Policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development through the planning process</li> <li>• The Specific Planning Policy Requirements contain national planning policy requirements which take precedence over the Council’s own Development Plan in an aim to break height limitations on development, and allow for the introduction of taller buildings into the landscape of Ireland.</li> </ul> <p><b>Sustainable Residential Development in Urban Areas (2009)</b></p> <ul style="list-style-type: none"> <li>• Guidelines state that land is a scarce resource and should be used as efficiently as possible</li> <li>• Guidelines encourage higher density residential development in appropriate locations and suggest that higher residential densities in areas which are within walking distance of public transport facilities can be effective in sustaining the economic viability of such transport services</li> <li>• Also suggests that ‘a minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations/bus stops, and decreasing with distance away from such nodes’</li> </ul>

Sub. No.	Name	Summary of Submission
		<p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• Requests that KCC considers the following: <ul style="list-style-type: none"> <li>- Clarify that the submission site is located within the Tier 1 land categorisation and to clarify the omission of Tier 1 lands from the Zoning Map (change made 01/05/2019).</li> <li>- Increase the residential density of the submission site to allow for 55 dwellings per hectare.</li> <li>- Include apartments' into the unit mix for the KDA: Naas West, and increasing the building heights on the site to 4-5 storeys in line with National Planning Policy.</li> <li>- Seek clarification on the responsible body for preparing the overall North Quadrant Masterplan.</li> </ul> </li> <li>• Continued zoning of this site as 'C' residential is acceptable, however we would like to request that the density and maximum building heights on the site to be increased.</li> <li>• Considered that increased density and heights will help tie in with the site to the east of the site which has been re-zoned as 'A – Town Centre'.</li> </ul> <p><b>Appendix A – Letter from Irish Water</b></p> <ul style="list-style-type: none"> <li>• Letter appended from Irish Water regarding pre-connection enquiry for 340 new house at Finlay Park, Old Caragh Road, confirming that a proposed connection could be facilitated.</li> </ul>
135(b)	The Westar Group Ltd	<ul style="list-style-type: none"> <li>• The submission is made by Hughes Planning and Development Consultants, instructed by The Westar Group Ltd. The submission relates to Site adjacent to No.38 Finlay Park, Naas West.</li> </ul>

Sub. No.	Name	Summary of Submission
		<div data-bbox="712 280 1917 1031" data-label="Figure"> <p>The figure is a zoning map showing a residential area. A river flows through the center, with a blue dashed line indicating a boundary. Several green areas are labeled 'F' for 'F-Open Space and Amenity'. A red dashed line is labeled '500m'. A black outline highlights a specific parcel. A north arrow is in the top left corner. The map is labeled 'B' in a large black font on the left side.</p> </div> <p data-bbox="741 951 1883 1007">Figure 2.0 Zoning Map as per Draft Naas Local Area Plan 2019-2023, showing submission lands outlined in black, where the zoning is 'C - Residential'.</p> <p data-bbox="577 1070 770 1098"><b>Introduction</b></p> <ul data-bbox="629 1110 1966 1214" style="list-style-type: none"> <li>• Submission requests that KCC considers the following: <ul style="list-style-type: none"> <li>- We would like to seek re-zoning of the 'F-Open Space and Amenity' portion of the Submission Site to 'B- Existing / Infill Residential'.</li> </ul> </li> </ul> <p data-bbox="577 1259 869 1286"><b>Submission Lands</b></p> <ul data-bbox="629 1299 2007 1364" style="list-style-type: none"> <li>• Site is approx 0.52ha and is fully serviced by foul, sewer and water connections. The site is currently accessed via the Old Caragh Road and cycle/pedestrian link via the Ploopuck Bridge</li> </ul>

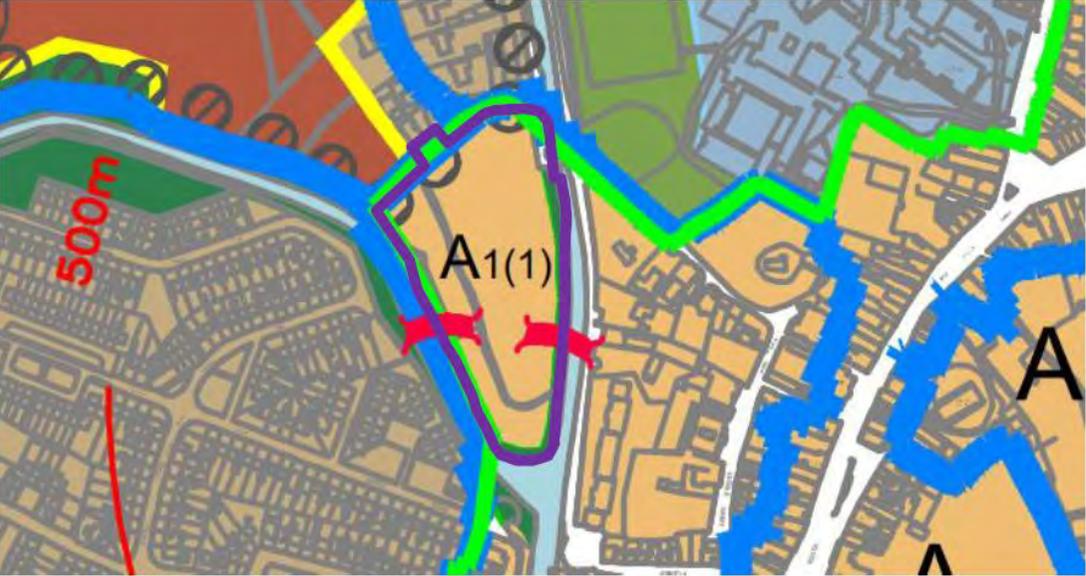
Sub. No.	Name	Summary of Submission
		<p data-bbox="674 280 1554 312">over the Canal, which connects the site to Naas Town Centre.</p>  <p data-bbox="743 826 1391 858">Figure 3.0 Aerial view of subject site outlined in red</p> <p data-bbox="577 898 1805 1010"> <b>Planning History</b>  <b>Planning Application 13/500055</b>            Permission was granted on 17 December 2013 for the construction of 60 no. dwellings         </p>

Sub. No.	Name	Summary of Submission
		 <p data-bbox="779 1027 1756 1054">Figure 4.0 Site Layout Plan of Approved Development under Reg. Ref. 13/500055</p> <ul data-bbox="629 1102 2007 1209" style="list-style-type: none"> <li>• Submission states that in granting planning permission, the planner considered that the additional Public Open Space was provided which was over the minimum requirements as set out in the Development Plan.</li> </ul> <p data-bbox="580 1251 1061 1283"><b>Planning Application 12/500042</b></p> <ul data-bbox="629 1291 2033 1398" style="list-style-type: none"> <li>• Planning permission was sought and subsequently withdrawn for 43 No. dwellings</li> <li>• Following a detailed and lengthy discussion and a request of Further Information by the Council, Kildare County Council advised that housing at this location would be in the interest of proper</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>planning and sustainable development and that permission would be obtained through material contravention.</p>  <p>Figure 6.0 Site Layout Plan of Withdrawn Development Reg. Ref. 12/500042 (Following request of Further Information by Kildare County Council)</p> <ul style="list-style-type: none"> <li>Decision on material contravention was not supported by members.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>Submission states that as the Planning Authority had the intention to grant permission for residential development on a part of the site. The Council did not deem that the Open Space zoned lands on the Submission Site were necessary to serve future residential development in this part of Naas, as enough Public Open Space already allocated in the area. Should the area remain free from development, it would result in a housing layout with dwellings backing onto open space.</li> </ul> <p><b>Quantum of Open Space</b></p> <ul style="list-style-type: none"> <li>A total of 3.75ha of Public Open Space is available in immediate lands surrounding the submission site, and it is therefore considered that the area as zoned within the submission site as 'F – Open Space and Amenity' (0.3ha in total) is not required to serve the surrounding residents</li> </ul> <p><b>Planning Context</b>  <b>Naas Town Development Plan 2011-2017</b></p> <ul style="list-style-type: none"> <li>Site is zoned Objective F – 'Open Space and Amenity' within the Naas Town Development Plan 2011-2017</li> </ul> <p><b>Draft Naas Local Area Plan 2019-2023</b></p> <ul style="list-style-type: none"> <li>Site is zoned Objective 'B – Existing/ Infill Residential' and 'F – Open Space and Amenity' in the Draft Naas Local Area Plan 2019-2023</li> </ul> <p><b>Submission Request</b></p> <ul style="list-style-type: none"> <li>Submission would like to seek the re-zoning of this portion of the Submission Site from 'F- Open Space and Amenity' to 'B – Infill / Residential zoning, as it is believed that this site represents a location where housing could be provided without delay</li> <li>Given its context in relation to the Finlay Park development, there would not be any issue with the servicing of the site as it is c.500m from Naas Town Centre and there would not be the need to provide new road infrastructure as this is already in place</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• A letter from Irish Water confirming that the site is well serviced by water infrastructure is also appended</li> <li>• The re-zoning, in association with surrounding the areas, would be well over the minimum private open space requirements required for residential development on the submission site and surrounding residential developments</li> </ul> <p><b>Regional Planning Guidelines</b></p> <ul style="list-style-type: none"> <li>• The submission lands are strategically located within a Large Growth Town within the Regional Planning Guidelines</li> </ul> <p><b>Project Ireland 2040 – National Planning Framework</b></p> <ul style="list-style-type: none"> <li>• The NPF includes a number of relevant objectives including deliver at least 50% of all new homes nationally within the 5 cities. More specifically, the NPF targets a greater proportion of future housing (40%) to be within the built-up footprint of existing settlements</li> <li>• The site is c. 500m walk away from Naas town centre and it is considered that the subject site is well serviced by public transport, has access to amenities and would be considered as an infill site which would be best utilised by residential development and would therefore be consistent with the National Planning Framework.</li> </ul> <p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• Submission requests that KCC considers the following: <ul style="list-style-type: none"> <li>- Seek re-zoning of the ‘F-Open Space and Amenity’ portion of the Submission Site to ‘B- Existing / Infill Residential’</li> </ul> </li> <li>• Requests that the eastern portion of the submission lands be re-zoned for residential development given the quantum of Public open Space already serving the area which totals 3.75ha of Public Open Space.</li> </ul> <p><b>Appendix A – Letter from Irish Water</b></p> <ul style="list-style-type: none"> <li>• Letter appended from Irish Water regarding pre-connection enquiry for 340 new house at Finlay</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>Park, Old Caragh Road, confirming that a proposed connection could be facilitated</p> <p><b>Appendix B – Report by KCC on the Material Contravention for planning application 12/500042</b></p> <ul style="list-style-type: none"> <li>• Full report of KCC on material contravention appended to the submission.</li> </ul>
135(c)	The Westar Group Ltd	<ul style="list-style-type: none"> <li>• The submission is made by Hughes Planning and Development Consultants, instructed by The Westar Group Ltd. The submission relates to Canal Bank / Harbour Site, Naas.</li> </ul>  <p>Figure 1.0 Zoning Map as per Draft Naas Local Area Plan 2019-2023, showing the submission lands (outlined in purple) zoned 'A' – Town Centre.</p> <p><b>Introduction</b></p> <ul style="list-style-type: none"> <li>• The purpose of the submission is: <ul style="list-style-type: none"> <li>- To acknowledge and support Council's proposal to rezone the submission lands from 'lands subject to a future Local Area Plan' to 'A' Town Centre in the Draft Plan and offer</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<p>a commitment to work proactively with the Council in the future preparation of a Local Area Plan for the area</p> <ul style="list-style-type: none"> <li>- To seek clarification of the amount of retail/commercial development this would be expected on the submission site.</li> </ul> <p><b>Submission Lands</b></p> <ul style="list-style-type: none"> <li>• Site is approx 2.19ha.</li> </ul>  <p>Figure 2.0 Locational context of the submission lands (outlined in red)</p> <p><b>Regional Planning Guidelines</b></p> <ul style="list-style-type: none"> <li>• The submission lands are strategically located within a Large Growth Town within the Regional</li> </ul>

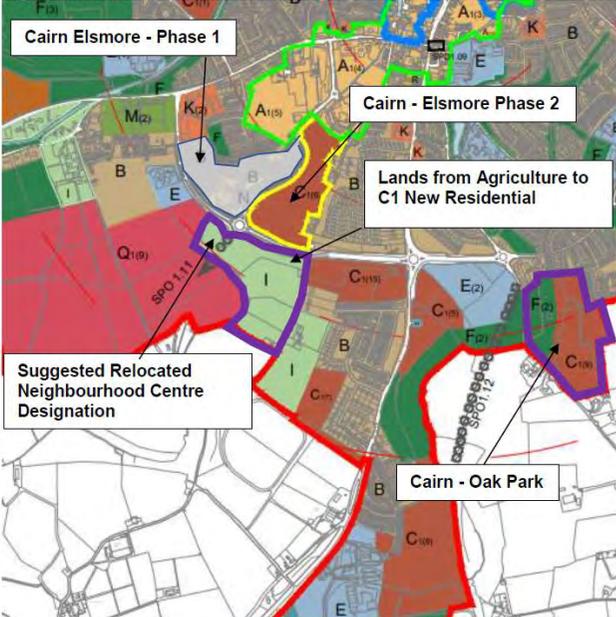
Sub. No.	Name	Summary of Submission
		<p>Planning Guidelines</p> <ul style="list-style-type: none"> <li>• Of particular relevance is Strategic Policy SIR1 which refers to the need to ensure sustainable models of development as pursued, avoiding low density car based development and providing development close to connectivity nodes</li> </ul> <p><b>Draft Eastern and Midlands RSES</b></p> <ul style="list-style-type: none"> <li>• Consolidation and regeneration shall be a key priority and objective for the development of Naas town with at least 30% of all development to be delivered on Brownfield and infill lands with a focus on the regeneration of the town centre</li> <li>• It is considered that due to the sites proximity to the Town Centre, that higher density development and apartments on the subject site would support policies RPO 4.33 &amp; RPO 4.34 of the Draft RSES.</li> </ul> <p><b>Naas Town Development Plan 2011-2017</b></p> <ul style="list-style-type: none"> <li>• Site is currently without a detailed zoning objective and appears as 'Lands subject to future Local Area Plan' within the Naas Town Development Plan 2011-2017</li> </ul> <p><b>Draft Naas Local Area Plan 2019-2023</b></p> <ul style="list-style-type: none"> <li>• Town centre boundary has been extended to include the submission site.</li> <li>• Relevant objectives in the draft Plan are HCO 1.2, HCO 1.3 and HCO 1.4 which refer to the delivery of masterplans, infrastructure and appropriate redevelopment of the area</li> </ul> <p><b>Submission Request</b></p> <ul style="list-style-type: none"> <li>• Submission does not seek any changes to the zoning objectives or policy framework in the draft plan</li> <li>• The zoning objective for the submission lands are representative of Council's commitment to deliver the housing targets forecasted for Kildare</li> <li>• It is therefore considered that due to the site's proximity to the town centre, and public transport that the submission site is located in a sustainable location.</li> </ul>

Sub. No.	Name	Summary of Submission
		<p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• The purpose of the submission is: <ul style="list-style-type: none"> <li>- To acknowledge and support Council's proposal to rezone the submission lands from 'lands subject to a future Local Area Plan' to 'A' Town Centre in the Draft Plan and offer a commitment to work proactively with the Council in the future preparation of a Local Area Plan for the area</li> <li>- To seek clarification of the amount of retail/commercial development this would be expected on the submission site.</li> </ul> </li> </ul>
136	Richie Mullins	<ul style="list-style-type: none"> <li>• The submission does not support that zoning of land on the Old Caragh Road to New Residential;</li> <li>• Additional housing will be a disaster for the area;</li> <li>• Anti social behaviour that already exists;</li> <li>• Opportunity here with this green site to make it into a small park for the local community and yet within easy access to the town of Naas;</li> <li>• It would be an ideal stopping point for users of the canal to gather for short breaks;</li> <li>• There is ample housing development planned for Naas, integration should be key;</li> <li>• Develop this area for the community of Naas.</li> </ul>
137	Richard Godsil and Ward Frisby	<ul style="list-style-type: none"> <li>• The submission is made by RPS Group Ltd., on behalf of Richard Godsil and Ward Frisby. The submission relates to Leinster Mills, Osberstown, Naas.</li> </ul> <p><b>Site Location and Context</b></p> <ul style="list-style-type: none"> <li>• Submission is made on behalf of the owners of the lands of circa 1ha at Leinster Mills, Osberstown, Naas.</li> </ul>

Sub. No.	Name	Summary of Submission
		<div data-bbox="779 295 1841 847" data-label="Image"> </div> <p data-bbox="779 863 1435 890"><b>Figure 2: Aerial View (indicative subject site outlined in plum)</b></p> <p data-bbox="779 895 958 916">Source: Google Earth</p> <ul data-bbox="629 975 2040 1043" style="list-style-type: none"> <li>• Site has been vacant since 1981 and is currently underused. Owners are keen to reintroduce an active use into the buildings and lands.</li> </ul> <p data-bbox="580 1086 842 1118"><b>Land Use Zoning</b></p> <ul data-bbox="629 1126 2018 1382" style="list-style-type: none"> <li>• Proposed zoning objective for the subject site is 'M: Future Park / Green Wedge'</li> <li>• Draft LAP includes a specific objective for M1: Leinster Mills</li> <li>• Section 7.4.1.1 reiterates the specific objective, stating: <ul data-bbox="763 1238 2011 1382" style="list-style-type: none"> <li>- <i>“Within the future park / green wedge zoning on the western side of the bank of the Grand Canal lies the former Leinster Mills. The renewal of this site represents an opportunity for a tourism, cultural and amenity destination in tandem with possible ancillary commercial and residential uses (Specific Objective M1). These uses would</i></li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<p style="text-align: center;"><i>complement the wider zoning of future park / green wedge and Grand Canal Greenway which will traverse immediately adjacent to the site.”</i></p> <ul style="list-style-type: none"> <li>• Submission welcomes the specific objective in relation to the Leinster Mills buildings and surrounding lands but considers the wording as drafted fails to provide enough flexibility to secure the adaptive reuse of the complex having regard to the commercial realities</li> <li>• Revised specific objective suggested as follows: <ul style="list-style-type: none"> <li>- “To promote an integrated commercial, residential and tourism destination that will preserve the cultural legacy of the Leinster Mills and enhance the natural amenities adjacent to the site.”</li> </ul> </li> <li>• Revised objective would provide for a range of complimentary uses</li> </ul> <p><b>Tourism</b></p> <ul style="list-style-type: none"> <li>• Submission supports the regeneration and reuse of their site as a tourism and cultural destination and supports the inclusion of the above listed policy ED 2 and Objective EDO 2.6. However, it is re-iterated that the more flexible wording of the specific objective relating to Leinster Mills is required.</li> <li>• Clients vision for the site is to create a vibrant and viable canal side destination at the northern gateway to the greenway; accommodating a broad mix of uses</li> </ul> <p><b>Protected Structure</b></p> <ul style="list-style-type: none"> <li>• Submission welcomes the policy and objectives proposed for the Naas LAP and more specifically objective BNH 2.2</li> </ul> <p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• It is considered that the subject site represents a unique opportunity to provide a range of services, draw visitors to the canal and encourage use of this important amenity area</li> <li>• Submission requests that the LAP retains a specific objective for the Leinster Mills buildings and surrounding grounds but redrafts it to encourage and promote the reuse of the Protected Structure and development of its adjoining lands with a well-considered range of uses to promote</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>and support a vibrant and viable canal side hub / destination.</p> <ul style="list-style-type: none"> <li>• A revised specific objective would allow for, inter alia: <ul style="list-style-type: none"> <li>- The established office use at Leinster Mills and additional office uses (e.g. serviced offices for 'laptop based' start-ups or online businesses in an environment that inspires creativity).</li> <li>- Hotel use providing traveller accommodation for those working and visiting the offices in nearby Millennium Park, travelling along the M7 and the recreational tourist.</li> <li>- Residential use providing a sustainable mix of serviced apartments for short-term letting to both the business and leisure market and longer tenure apartments attracting inter alia downsizers.</li> <li>- A quality local &amp; national food hall and café destination allowing for a range of local and national producers to sell quality produce at reasonable prices.</li> <li>- Complementary retailing providing opportunities for craft workshops, seasonal markets and leisure / activity retailers linked to the potential of canal greenway.</li> <li>- Integration of the mill's industrial heritage features into development proposals e.g. mill wheel and mill race.</li> </ul> </li> <li>• The success of the lands relies heavily on delivery of an integrated commercial, residential and tourism destination which rather than any one use being 'ancillary' or 'limited' to another.</li> </ul>
138	Adrian Geissel	<ul style="list-style-type: none"> <li>• Concerned with the continued dependence on the Naas Inner Relief Road, given the opposition to this road and to which the submission again objects;</li> <li>• Inclusion of a vague feasibility study on an Outer Relief Road route during the lifetime of this plan is insufficient and inadequate. Actionable planning is required for this route.</li> </ul>
139	Cairn Homes	<ul style="list-style-type: none"> <li>• The submission is made by John Spain Associates, on behalf of Cairn Homes Properties Ltd. The submission relates to lands within the ownership of Cairn Homes at Jigginstown, Naas.</li> </ul>

Sub. No.	Name	Summary of Submission
		<p data-bbox="1064 284 1400 303">Figure 1: Location of Cairn Landholdings</p>  <p data-bbox="577 978 1137 1010"><b>Summary of Grounds of Submission</b></p> <ul data-bbox="629 1023 2033 1278" style="list-style-type: none"> <li>• Serious concerns in relation to the indicated timeframe of just 4 years relating to the Draft LAP. The effect of this shortened timeframe is to limit the actual residential zoning of the required zoned land and a significant underestimation in this regard. It is estimated that the quantum of additional zoned land is in the order of 22 hectares.</li> <li>• Submission seeks the change in zoning from Agriculture to Residential use of the 12.5 hectares. The lands are considered to be an appropriate infill site and highly suitable for residential development.</li> </ul> <p data-bbox="577 1318 1686 1350"><b>Rationale for change from Agricultural to Residential zoning designation</b></p> <ul data-bbox="629 1358 1977 1386" style="list-style-type: none"> <li>• There is a recognised need in the NPF to align investment in infrastructure with housing and</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>employment</p> <ul style="list-style-type: none"> <li>• Re-zoning of lands would ensure delivery of Roads Objective 1.11 by providing access to the adjoining 'Q' lands to the west.</li> <li>• Lands are effectively an infill site circa 1500m from the town centre of Naas. The lands are no longer suitable for agricultural use and represent an inefficient use of urban serviced land.</li> <li>• The lands are sequentially placed adjacent to the existing development to the north and contiguous zoned lands to the east and west. The lands to the south have effectively leap-frogged the subject lands.</li> <li>• Lands are accessible to local facilities and services, and are located circa 600m walking distance to the town centre.</li> <li>• The lands meet all criteria for zoning lands.</li> <li>• The lands are considered Tier 1 serviced lands, served by basic development services.</li> <li>• Subject lands do not contain any protected structures, protected views and are not located in a flood zone.</li> <li>• Higher households' size (as stated in the LAP) is a consequence of the housing shortage as young adults are forced to stay at home for longer.</li> </ul> <p><b>Cairn Lands to the north of the ring road</b></p> <ul style="list-style-type: none"> <li>• Submission supports the 'C-New Residential' zonings of the lands to the north of the South Ring Road at the Devoy Link Road (C1(6)) and the preparation of an indicative masterplan for the Rathasker Key Development Area</li> </ul> <p><b>Relocation of Neighbourhood Centre</b></p> <ul style="list-style-type: none"> <li>• Submission seeks the relocation of the Neighbourhood Centre objective from the north of the Ring Road (on adjoining Cairn lands) to the south of the ring road to our client's lands. A Neighbourhood Centre in this location would act as a gateway.</li> </ul> <p><b>Conclusion of Executive Summary</b></p> <ul style="list-style-type: none"> <li>• Submission is seeking:</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>- A zoning change of the subject lands in our client's ownership from (I) 'Agriculture' to (C) 'New Residential' as identified on figure 1.</li> <li>- Relocation of Neighbourhood Centre from Elsmore Phase 1 to lands to the south of the Ring Road, adjacent to the Roads Objective 1.11 and the employment zoned lands and Cairn lands.</li> <li>- It is recommended that the Draft LAP is amended to the normal 6-year plan 2019 to 2025.</li> </ul> <p><b>Introduction (to main part of submission)</b></p> <ul style="list-style-type: none"> <li>• Submission provides detail on Cairn Homes, the business and recent activity by the group in Naas at Oak Park, Craddockstown and Elsmore.</li> <li>• Cairn currently preparing a pre-application consultation request to An Bord Pleanála on the lands to the north of the South Ring Road for the next phase of the Elmsore development</li> </ul> <p><b>Planning Policy Context</b></p> <ul style="list-style-type: none"> <li>• NPF and regional policy identifies Naas as a 'Key Town'</li> <li>• Submission summarises Tiered Approach to Land Zoning in the NPF</li> <li>• Submission outlines why they consider their clients lands are Tier 1, as they are connected to existing services and there is capacity available. The lands are also considered to be sequential to other development and represent the last unzoned landholding in the area</li> <li>• Submission considers that Naas, given its recognised status at national and regional level, would be a candidate for availing of National Policy Objective 9 (which allows for greater than 30% growth above 2016 levels)</li> <li>• The Regional Policy Objectives for Naas support the improvement of transport network and the use of the Grand Canal for amenity. It is important that the adopted LAP for Naas provides for appropriately zoned residential land to ensure that the town fulfils its role and function as a "Key Town" in the EMRA</li> <li>• The policy context makes clear that where sites are serviced, and in proximity to relevant amenities (social and retail), then there should not be an undue constraint on the capability of</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>such sites delivering housing</p> <p><b>Measuring Delivery and Active Land Management</b></p> <ul style="list-style-type: none"> <li>• In order to provide suitable pipeline of development opportunities flexibility will be required in the allocation of zoned land in Naas in the provision of headroom</li> <li>• Unclear how KCC assessed individual sites for development – no specific assessment is evident</li> <li>• Naas, as a key town, should plan for growth in accordance with National Policy Objective 9.</li> </ul> <p><b>Greater Dublin Area Transport Strategy 2016-2035</b></p> <ul style="list-style-type: none"> <li>• The provision of enhanced capacity on the motorway and bus services benefits Naas as a key town.</li> </ul> <p><b>Kildare County Development Plan 2017-2023</b></p> <ul style="list-style-type: none"> <li>• Naas is set to become a major employment centre, which may result in increased housing demand in the area</li> </ul> <p><b>Naas Town Development Plan 2011-2017</b></p> <ul style="list-style-type: none"> <li>• The town is well serviced with infrastructure. The Osberstown Waste Water Treatment plant is complete and process proving has commenced</li> </ul> <p><b>Review of Draft Naas LAP and Submission</b></p> <ul style="list-style-type: none"> <li>• The 4-year timeframe does not allow for sufficient lands for development and is contrary to the Regional Economic and Spatial Strategy, and would not therefore have sufficient land zoned. The rationale for the 4 year period is not explained. It is recommended that the Draft LAP is amended to a 6-year plan 2019 to 2025. This will provide more certainty for developers</li> <li>• It is noted that a number of sites zoned require road upgrades (such as Inner Relief Road at Tipper Road) which is not the case for the lands under our client’s ownership which are “shovel ready”. This approach is contrary to the NPF methodology for zoning land.</li> <li>• Artificially constraining growth is inappropriate</li> </ul>

Sub. No.	Name	Summary of Submission
		<p><b>Naas Development Strategy</b></p> <ul style="list-style-type: none"> <li>• Important that the future development of the town is undertaken in a balanced manner and future development is located to the south and west to balance the form and layout of the town.</li> <li>• The development of the town into lands such as the Cairn lands at Jigginstown will assist in promoting a more compact urban form</li> <li>• Rezoning of the existing 'I-Agriculture' land would benefit from the new Devoy Link Road constructed by Cairn to the north, providing a direct link to the town centre and enhancing permeability</li> </ul> <p><b>Compliance with the Core Strategy</b></p> <ul style="list-style-type: none"> <li>• It is submitted that the level of residential land currently indicated in the LAP area is deficient by 22 hectares as the plan period should be for 6 (not 4) years and the plan does not include 'headroom'</li> <li>• Naas, as a key town, needs sufficient lands to be zoned to allow for Naas to develop and should strive to include the additional 30% growth referenced at NPO 9.</li> <li>• The LAP should follow the s28 guidelines, which state that enough land should be zoned as available to meet housing needs for the next 9 years.</li> </ul> <p><b>Rationale for rezoning Cairn Lands</b></p> <ul style="list-style-type: none"> <li>• Lands are effectively an infill and no longer attractive for agricultural use</li> <li>• Lands are considered to be Tier 1 lands</li> <li>• Lands are strategically important for road access</li> <li>• Lands are contiguous to existing zoned development lands</li> </ul> <p><b>Confirmation of the Suitability of the lands for Residential</b></p> <ul style="list-style-type: none"> <li>• Subject lands consistent with zoning guidance in the Department's Local Area Plan Guidance Manual and met the criteria in the Development Plan guidelines (2007) for zoning land</li> <li>• Lands are capable of delivering a minimum of 437 residential units</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Lands are well served by local services</li> <li>• Cairn Homes Properties Ltd have a proven track record for acquiring and delivering high quality housing developments throughout the country</li> </ul> <p><b>Rezoning will deliver Road Objective 1.11</b></p> <ul style="list-style-type: none"> <li>• The rezoning of the subject lands to 'C-New Residential' can stimulate the implementation of this local access road</li> <li>• The effect of the draft zoning (of Employment land 'Q') is to effectively "<i>leapfrog</i>" the Cairn landholding, which is contrary to Development Plan/LAP Guidelines</li> </ul> <p><b>Review of the KDA Rathasker Road West</b></p> <ul style="list-style-type: none"> <li>• Cairn broadly supports the overall framework strategy and supportive of the inclusion of these lands in this KDA</li> <li>• Important that KDA is indicative and text recognises different landowners</li> <li>• Supports indicative densities</li> <li>• Supports building height but considers number of 'focal buildings' excessive</li> <li>• Provision and indicative amount of green infrastructure supported. Indicative landscape strip along link road and Rathasker Road considered inappropriate. Support the inclusion of frontage that will result in more interaction and overlooking of the proposed green link</li> </ul> <p><b>Proposed Relocation of the Neighbourhood Centre</b></p> <ul style="list-style-type: none"> <li>• Submission seeks the neighbourhood centre to be relocated to the south of the ring road to better serve the wider lands and reduce impact on the town centre</li> <li>• Relocation would also provide an opportunity to deliver a mix of uses (in accordance with SPPR 2 of Urban Height Guidelines)</li> </ul> <p><b>Conclusions</b></p> <ul style="list-style-type: none"> <li>• More land is required to be zoned for residential development</li> <li>• The lands are serviced, and deliverable in the short-term</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The lands are highly suitable for residential development</li> <li>• Rezoning would help deliver zoning objective 1.11</li> <li>• Lands are now effectively an infill and are contiguous to existing development</li> <li>• Lands are well served by local shops and strategically located close to infrastructure</li> <li>• Lands are Tier 1 and ready to go</li> <li>• Submission supports the residential zoning of Cairn lands to the north of the ring road and the preparation of an indicative masterplan for the Rathasker KDA</li> <li>• Neighbourhood Centre should be relocated to the southern side of the ring road.</li> </ul>
140	Carol-Ann Smith	<ul style="list-style-type: none"> <li>• Submission attached made by George Maloney – Statutory Receiver appointed in respect of land to which planning application 15/1060 refers;</li> <li>• Strongly supports core vision of the draft LAP to ensure that growth occurs in a sustainable and sequential manner, while prioritising a compact, consolidated and connected pattern of development;</li> <li>• Strongly supports the aims of Chapter 4 of the draft Plan (referring to sustainable transport network) and commend the commitment of the plan to delivering the required movement infrastructure to support future development of Naas in a sustainable manner.</li> <li>• Strongly supports Objective SPO1.1 to deliver the Naas Inner Relief Road connecting R410 Blessington Road to the R445 Dublin Road as key to unlocking investment and alleviating traffic congestion in the town;</li> <li>• Strongly agrees with the plan to facilitate liveable, integrated mixed use residential development in tandem with infrastructure;</li> <li>• Supports the Council's view that the opportunity to develop the Naas Inner Relief Road must be seized now.</li> </ul>
141	Tetrarch Property Investments Limited	<p>Submission prepared by RPS Planning &amp; Environment.</p> <ul style="list-style-type: none"> <li>• The subject lands extend to circa 3 ha at Fishery Lane, Naas;</li> <li>• Lands zoned Existing Residential in the 2011 Plan and the Naas Environs of the 2011 County Plan;</li> <li>• Request that lands continue to be zoned B – Existing / Infill Residential to provide for new</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>residential development;</p> <ul style="list-style-type: none"> <li>• The submission makes reference to the current CDP and the requirement for additional housing and the LAP should certainly not reduce the capacity of Naas to provide for population growth;</li> <li>• Reference is made to the change of boundary in the Draft LAP the new boundary encloses a smaller area, but that there are significant areas now included within;</li> <li>• The subject site is contiguous with the Urban Footprint defined by the CSO, but is outside of the Draft LAP boundary and that the lands are no longer to be zoned B – Existing / Infill Residential within the Draft LAP;</li> <li>• The subject site can be considered Tier 1 Serviced Zoned Lands;</li> <li>• The subject lands shall benefit from planned transport upgrades which shall facilitate sustainable transport and better link the site with Naas town centre and the wider environs;</li> <li>• The Inner Relief Road will improve vehicular, pedestrian and cycle connectivity on the eastern side of Naas including the subject site;</li> <li>• The subject lands are an appropriate and sustainable location for residential development.</li> </ul> <div data-bbox="1005 839 1621 1302" data-label="Image"> </div>
142	Pierce Greaney & Sallyann	<ul style="list-style-type: none"> <li>• Encouraging to see that the land marked F2, south of the Kilcullen and Ballymore roundabouts has been identified for appropriate use (Open Space &amp; Amenity);</li> </ul>

Sub. No.	Name	Summary of Submission
	<b>Freyne</b>	<ul style="list-style-type: none"> <li>• The submission puts forward recommendations for the layout of this area including tying in with approved plans for Piper's Hill Development;</li> <li>• These lands not suitable for any type of residential housing or commercial building development, given dramatic and extensive changes in landscape topography and a flood risk zone;</li> <li>• Hedgerows have been destroyed on the site and there is a small quarry that shelter for a range of plants and animals;</li> <li>• R448 Kilcullen Road, albeit recently upgraded is not fit for purpose;</li> <li>• It is a 50KM/Hr. zone, but it is normal that traffic travels in excess of speeds of 80KM/Hr. and some vehicles travelling over 100KM/Hr. A thorough investigation needs to be completed on the speed enforcement, design of road and the increasing level of traffic using this road. The submission includes a letter sent to the Gardaí in relation to this issue;</li> <li>• It is essential that additional traffic is directed away from this increasingly dangerous speedway and any development in the Northern section C1 (5) just below the ring road has residential traffic entering on the ring road and not on the R448;</li> <li>• In relation to the Outer Relief Road the submission request that all the development that is planned for the south of Naas allows for the road to be developed without major issue, to leave space for the road to be built;</li> <li>• Controls to be put in place as soon as possible to prevent HGV's / HCV's from using the town centre.</li> </ul>
<b>143</b>	<b>Yvonne Gill</b>	<ul style="list-style-type: none"> <li>• Against the current draft proposal to change the zoning of the land on the Old Caragh Road to C (New Residential);</li> <li>• KCC are developing Kerdiffstown (far side of Naas), Monread park (far side of Naas), there has been no green space given to this quarter of Naas;</li> <li>• Children struggle to have time on there local GAA pitch and all clubs are struggling to facilitate the demands the population of Naas currently has let alone what is envisaged;</li> <li>• WHO are recommending green spaces for your mental health, this area is within walking distance to Naas, it is along the Canal and could be a social hub for walkers and dog lovers alike;</li> <li>• Section of ground that could be so much more for the community of Naas that ticking a box that</li> </ul>

Sub. No.	Name	Summary of Submission
		you accommodated your housing requirements.
144	Carey Group Plc.	<p>Submission prepared by Brady Shipman Martin</p> <ul style="list-style-type: none"> <li>• Request that Kildare County Council rezone the subject site at Monread Road, Naas from its currently zoning this as 'H: Industry and Warehousing' to 'C: New Residential';</li> <li>• Subject site extends to 4.5 ha in size and is accessed via frontage onto Monread Road;</li> <li>• Located along the northern fringe of the Naas Town Boundary approximately 2.5 km, from Naas Town Centre. In addition, Sallins and Naas Rail Station is located just 2 km to the north-west;</li> <li>• Surrounding land uses comprise residential and Larchfield nursing home;</li> <li>• Previously zoned for industry and warehousing and no such development took place;</li> <li>• The LAP considers the site to be Tier 1 as denoted by the Infrastructure Assessment (Appendix 3);</li> <li>• Highly accessible (9 minute walk to the nearest bus stop and within a 20min walk of Sallins &amp; Naas Rail station), a range of local amenities, easily serviceable and can meet definition of Tier 1;</li> <li>• Little residential development has been permitted to the north of Naas, suggesting a possible imbalance in the provision of housing in Naas;</li> <li>• Reference is made to the housing target and the rezoning of land could achieve the objective in the Naas;</li> <li>• The submission acknowledges and refers to aspects of national policy from the NPF and RSES in relation to compact growth, additional housing and urban regeneration;</li> <li>• It is stated that re-zoning of the subject lands will help meet housing objectives of national, regional and local policies;</li> <li>• The site should be re-zoned for residential as it is consistent with Pillar 3 – 'Aim to Build more Houses' and Pillar 4: 'Improve the Rental Sector' as set out in the 'Rebuilding Ireland: The Government Action Plan for Housing and Homelessness' (2016);</li> <li>• A Residential Capacity Study comprising a conceptual residential layout for the site was prepared. It shows that the site has capacity to deliver 112 units with a density of 50 units/ ha comprising comprises 64 No. apartments and 48 dwellings;</li> </ul>

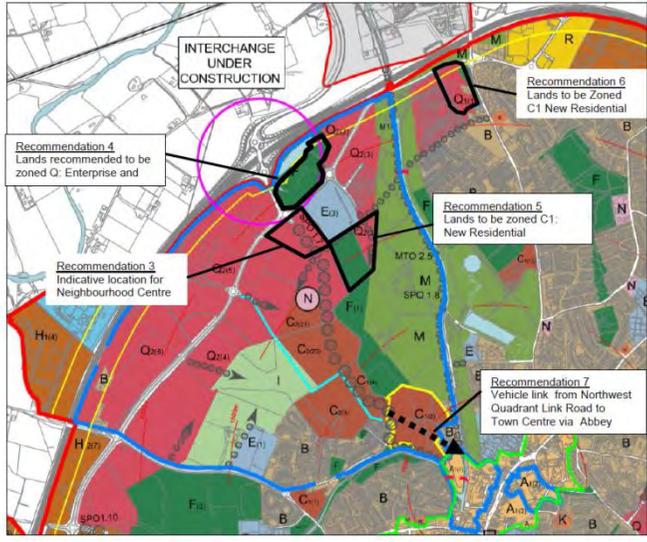
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• 91m set back from national roadway fully considered;</li> <li>• No particular sensitivities within the site in terms of built heritage or visual sensitivities.</li> </ul> <div data-bbox="1039 392 1581 810" data-label="Figure"> <p>The figure is a zoning map extract from the Naas Local Area Plan (LAP). It shows several zoning categories: C1 (New Residential) in light brown, C2 (New Residential) in dark brown, H (Industry &amp; Warehousing) in orange, and Q1(2) in red. A subject site is outlined in black and is located within the H1(2) zone. Other zones shown include H1(3), B, E, R, and Q. The map also shows the M7 motorway and the Maudings Interchange. A legend in the top right corner identifies the zoning categories.</p> </div> <p data-bbox="1039 815 1594 852">Figure 2: draft Naas LAP zoning map extract with subject site indicated in black. (Source: KCC, 2019.)</p>
145	Millennium Properties	<p>Submission prepared by RPS Group Ltd.</p> <ul style="list-style-type: none"> <li>• Lands within and in the environs of Millennium Park/North West Quadrant extending to 122ha;</li> </ul> <div data-bbox="1039 962 1594 1358" data-label="Figure"> <p>The figure is a map showing the lands within and in the environs of Millennium Park/North West Quadrant. The lands are highlighted in yellow. The map includes a north arrow and a scale bar. The ARUP logo is visible in the bottom right corner.</p> </div>

Sub. No.	Name	Summary of Submission
		<p><b>Policy</b></p> <ul style="list-style-type: none"> <li>• Development of the Northwest Quadrant accords with Regional Strategic Outcomes in the RSES through providing for the growth in population and employment of the town in a contiguous manner and served by public transport;</li> <li>• Large scale public and private infrastructural investment to enable Naas to function as a regionally significant population and employment centre;</li> <li>• Client has provided significant funding for the delivery of the Northwest Quadrant infrastructure, including in excess of €16 million for the design and planning phases and towards the construction of the M7 Millennium Park Interchange and the Sallins By-pass;</li> <li>• Also funded the Distributor Road and drainage works within the Northwest Quadrant;</li> <li>• The Draft RSES identifies Naas as a Key Town capable of providing sustainable, self- sufficient growth within the Eastern Region;</li> <li>• The submission refers to Regional Policy Objectives and states that the Draft RSES including material amendments provides for the growth of Naas and explicitly recognises the potential for employment growth within the Naas North West Quadrant;</li> <li>• The submission refers to the CDP and its relevant policies/objectives concerning population growth, employment growth and the delivery of large scale supporting infrastructure;</li> <li>• Vital that the Naas LAP maximises this opportunity afforded by the increased capacity to facilitate increased housing and employment in line with designation and land use policy;</li> <li>• To enable the delivery of this longstanding vision for the Northwest Quadrant and to benefit from the largescale investment in the Northwest Quadrant and particularly Millennium Park it is imperative that the Naas LAP be consistent with previous and current regional and local planning policy documents;</li> <li>• Reference is made to a 2017 masterplan submitted at pre-draft consultation stage of the LAP and the over arching vision set out in Section 8.6 of the Draft LAP pertaining specifically to the Northwest Quadrant accords with the 2017 Masterplan.</li> </ul> <p><b>Draft Naas LAP Appraisal</b></p> <ul style="list-style-type: none"> <li>• Supportive of vision for Northwest Quadrant – employment zone, high-quality residential, supported by infrastructure and new neighbourhood centre and providing connectivity;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>The planning authority should also be aware of existing infrastructure within the Northwest Quadrant and the need for development to enable the funding of further infrastructural provision within the lifetime of this LAP and beyond.</li> </ul> <p><b>Land Uses</b></p> <ul style="list-style-type: none"> <li>Land Use Zoning Matrix in the Naas LAP is extremely prohibitive in the range of land uses which are 'permitted in principle' within Enterprise &amp; Employment zoned lands. The only employment land uses which are permitted in principle are 'Offices +100sqm';</li> <li>The submission believes this is contrary to Objective EDO 1.2 for the Northwest Quadrant which seeks to provide employment in "high-tech manufacturing and research, ICT, food science and production, public administration, banking, tourism and bloodstock";</li> <li>The submission states that industry (general), Warehouse (wholesale)/Store/Depot, Shop (Convenience) and hotel are not permitted in principle in the Draft LAP;</li> <li>States this is not consistent with the 2011 Plan;</li> <li>Not realistic or desirable that c.100ha of Enterprise and Employment zoned lands within the Northwest Quadrant should be made up entirely or even predominantly of offices of 100+sq.m;</li> <li>Makes the comparison that the IFSC extends to only 15.8ha;</li> <li>A modern business/employment campus requires a mix of development types including offices, light industry, science and technology, research and ancillary services such as local retail, dining and meeting and accommodation facilities;</li> <li><u>Recommendation that the uses permitted in principle or at minimum to be open for consideration within the Northwest Quadrant zoned Enterprise &amp; Employment be expanded to include; Science &amp; Technology, Research &amp; Ancillary Services, Light Industrial &amp; Warehousing and hotel.</u></li> </ul> <p>Land Phasing</p> <ul style="list-style-type: none"> <li><u>Enterprise and Employment zoned lands within the Northwest Quadrant have been zoned Q2 and refers to Tier 2 and states should be designated Q1 given the existing infrastructure.</u></li> </ul> <p><b>Neighbourhood Centre</b></p> <p>The submission states the most appropriate location for a neighbourhood centre is proximate to the Northwest Quadrant Link (Objective SPO 1.7);</p> <ul style="list-style-type: none"> <li>The neighbourhood centre will serve as a northern entrance or gateway to the Northwest</li> </ul>



Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Recognised by decision by An Bord Pleanála for the M7 Osberstown Interchange and R407 Sallins Bypass Scheme</li> <li>• <u>Recommends that the strategically located area of land adjacent to the Osberstown Interchange should continue to be zoned Q: Enterprise &amp; Employment and not be rezoned F: Open Space and Amenity.</u></li> </ul> <ul style="list-style-type: none"> <li>• The submission refers to the second parcel of open space and amenity land extending to 14.1 ha;</li> <li>• No evidence in the SFRA to suggest that these lands have been designated as Open Space and Amenity Lands due to issues relating to flood risk;</li> <li>• F(1) lands and in particular the northern end of the lands, are particularly strategically located;</li> <li>• <u>The submission recommends the proposed zoning of the F1 and Q2(3) be zoned C1: New Residential. If the planning authority do not wish to zone these lands for residential use it is recommended that they be zoned Q: Enterprise and Employment.</u></li> </ul> <p><b>Requirement for additional residential zoned lands</b></p> <ul style="list-style-type: none"> <li>• <u>The submission makes a case for lands zoned Q1(1) to be rezoned for New Residential;</u></li> <li>• Lands benefit from significant infrastructural provisions, near employment lands and a permitted school and served by a greenway route.</li> </ul> <p><b>Connectivity</b></p> <ul style="list-style-type: none"> <li>• Proposed Northwest Quadrant Link does not link with the town centre;</li> <li>• <u>The submission recommends that an indicative pedestrian, cyclist and public transport route connecting the Northwest Quadrant to Naas Town Centre via the Abbey Bridge be included as an objective.</u></li> </ul>

Sub. No.	Name	Summary of Submission
		 <p>The submission contains Appendix A: Flood Risk Review.</p> <ul style="list-style-type: none"> <li>• The document outlines previous flood risk assessments carried out within the Northwest Quadrant area of Naas;</li> <li>• It is noted that KCC commissioned RPS to carry out a Strategic Flood Risk Assessment (SFRA) to support the preparation of the LAP;</li> <li>• A review of the various Cells (1-3) of CFRAMs is outlined;</li> <li>• It notes that there are areas in the NWQ which were previously zoned as both Enterprise/Employment Lands and White Lands which have now been designated as Open Space and Amenity lands;</li> <li>• It is stated that there is no evidence in the SFRA to suggest that these lands have been designated as Open Space and Amenity Lands due to issues relating to flood risk.</li> </ul>
146	Caoimhe McGuckin	<ul style="list-style-type: none"> <li>• Use of the Naas library building as an artists gallery;</li> <li>• No artist's studio in the locality;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Generate cultural and creative interest.</li> </ul>
147	Margharita Solon	<ul style="list-style-type: none"> <li>• Naas Town Centre Regeneration - first priority, the main spine of the town centre (Main Street, Poplar Square and Market Square) and work 'outwards' from there to the other 5 core regeneration areas;</li> <li>• Periphery of the town is bulking up and is not balanced;</li> <li>• Welcome the concepts of connecting town centre with periphery;</li> <li>• Vital that the plan for Naas Town Centre/Chapter 8 is actually implemented;</li> <li>• Requests that public realm plan carried out in consultation with a suitably qualified and experienced landscape architect.</li> </ul> <p>The submission outlines various specific actions for the town:</p> <ul style="list-style-type: none"> <li>○ Introducing one-way systems around the core of the town and more options/routes for cycling and walking;</li> <li>○ New footpaths initially from Finan's Corner up to Maxol Dublin Road;</li> <li>○ Pedestrian or linger areas in Poplar and Market Squares;</li> <li>○ Small 'islands' on wider parts of main street which could have seasonal planting/décor and seating;</li> <li>○ Take in charge, as a matter of urgency, all public car parks;</li> <li>○ Implement as a matter of urgency a Park and Ride system in conjunction with electric powered shuttle buses especially out to new employment zones including the Northwest Quadrant;</li> <li>○ Double the number of pay on exit (non clamping) comfort parking spaces;</li> <li>○ Comfort or Barrier Parking in Corban's Lane Shopping Centre;</li> <li>○ Increase time limit from 1 hour on main street to 3 hours and abolish time limits on side street;</li> <li>○ Move Taxi Rank in market square to a side street;</li> <li>○ Move Farmers Market up to Market Square;</li> <li>○ Work with the owner of the old Naas Mall to bring that space back into use;</li> <li>○ Work with owner of old cinema to bring it back into use.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The submission states concerns in relation to the NWQ and impact on the town centre;</li> <li>• Plan to connect NEQ to town centre is critical;</li> <li>• Naas Town Team it should be integrated and aligned with the implementation of the Local Area Plan.</li> </ul>
148	Naas Neighbourhood Greenway c/o Bill Clear	<ul style="list-style-type: none"> <li>• Disappointed LAP never mentions the plans and work done by Naas Neighbourhood Greenway;</li> <li>• Previous local area plans will have similar goals however very few have been achieved;</li> <li>• The LAP only show potential cycling tracks along the roads, ignoring parks, railway walks; smaller connections will have a more connected network;</li> <li>• Shared space on cycle lanes should be discontinued; substandard and leads to conflicts;</li> <li>• improve connectivity to key destinations;</li> <li>• quality of a town's public realm is also reduced by forcing significant numbers of pedestrians to share narrow paths with cyclists;</li> <li>• Unsustainable number of cars travelling to schools at peak time;</li> <li>• Schools should be required to open rear non-vehicular entrances to facilitate walking and cycling. Important that this is put into the Local area plan as it can be prioritised by planners when planning is applied for by the schools;</li> <li>• People require high quality infrastructure on main traffic routes or almost traffic free roads on shared spaces;</li> <li>• Little or no progress in Naas in recent years in the delivery of high-quality cycling facilities;</li> <li>• The submission outlines a number of cycling infrastructure works as a matter of priority</li> <li>• The submission states the Council should support and enable the use of sustainable active transport modes in Naas by providing for a connected network of walking and cycling infrastructure in the town;</li> <li>• Plans to pedestrianise areas many of these are adjacent to busy roads;</li> <li>• Increased incidence of continuous dished footpaths in new estates in Naas, causing a huge issue with cars parking on footpaths;</li> <li>• Clamping is a major issue in Naas, the LAP should disallow any further clamping car parks in Naas;</li> </ul>



Sub. No.	Name	Summary of Submission
		<p>options such as walking, cycling and public transport. By including sustainable movement as one of the 7 Core Themes of this LAP (refer to Chapter 1), Kildare County Council acknowledges that long-term targeted measures are required across multiple areas in order to <b>achieve sustainable mobility</b>.</p> <ul style="list-style-type: none"> <li>• Section 4.1.1 - <b>As levels of traffic on national roads are growing at 4-5% per annum, traffic could grow by approximately 50% in ten years if no action is taken.</b> The motorway, coupled with Naas specific congestion issues, will therefore continue to pose a significant challenge during peak travel times without the <b>provision of demand management measures <u>or</u> a more robust and connected network of routes and transport options within and around the town.</b></li> <li>• Section 4.1.2 – add - The quality of a town’s public realm is also reduced by forcing significant numbers of pedestrians to share narrow paths with cyclists.</li> <li>• Section 4.2 Naas Transport Strategy - <b>Through regular monitoring and reporting</b>, the Council <b>will take corrective actions, if required, to ensure that</b> the strategy will <b>achieve</b> a significant modal shift from vehicular traffic to public transport, walking and cycling.</li> <li>• The submission queries what does MTO 1.2 means in terms of balancing movement, place and safety within an appropriate traffic environment. Movement implies high levels of motorised traffic whereas appropriate traffic environment for functions of place implies low levels of traffic (or none). Multifunctional roads are not compatible with the principles of Sustainable Safety which are based on uni-functional roads. This objective is contradictory.</li> <li>• Suggest the following objective for Walking and Cycling Section 4.3 - Prepare a Cycle Network Study for each of the major towns in Kildare consisting of primary links identified in the Greater Dublin Area Cycle Network and local links, all in accordance with the National Cycle Manual. The report shall also identify pinch points on the links and propose draft widths and level of service facilities.</li> <li>• Insert into Section 4.3.2 Cycling - Although some cyclists are prepared to share roads with high levels of vehicular traffic or use low quality cycle infrastructure, this will only attract a minority - 2-3% of the population. To achieve gender equality and attract mass cycling ie people of all ages and all abilities, people require high quality infrastructure on main traffic routes or almost traffic free roads on shared spaces.</li> </ul>

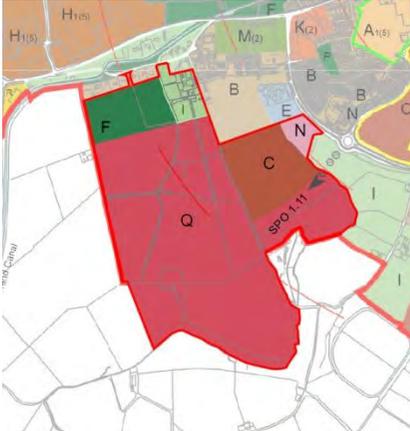
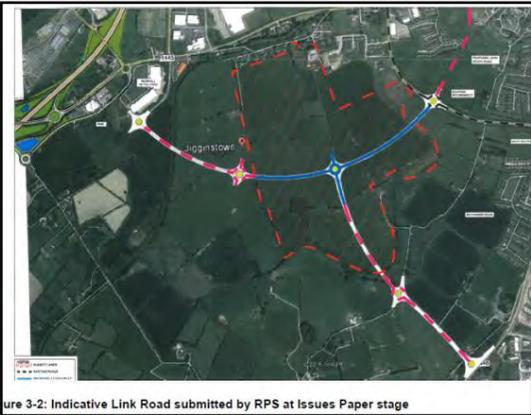
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Change first line of second paragraph to - <b>There has been little or no</b> progress in Naas in recent years in the delivery of high-quality cycling facilities <b>and</b> no existing plan in place to provide a connected cycle network <b>except for the Naas Neighbourhood Greenways plan.</b></li> <li>• The submission list the following as priority cycle infrastructure: <ul style="list-style-type: none"> <li>○ R448 Newbridge Road – between the Bundle of Sticks roundabout (Newbridge side) and Main Street Naas.</li> <li>○ R409 Sallins Road – between Mill Street and the M6</li> <li>○ R409 Sallins Road – between Mill Street and Main Street</li> <li>○ Ballycane Road – between the Blessington Rd and Ballymore Eustace Rd.</li> <li>○ Monread Road – between the Dublin Road and Sallins Road.</li> </ul> </li> <li>• The submission requests that in the absence of a public realm strategy that the Council will reduce the waiting times at controlled crossings in order to prioritise pedestrians and cyclists.</li> <li>• <b>Change to first sentence second paragraph</b> - The Council <b>will enable</b> the wider population of <b>Naas to walk</b> or cycle to school, work, town centre and community facilities.</li> <li>• Make following change to MTO 2.1- Support and <b>enable</b> the use of sustainable active transport modes in Naas <b>by providing</b> for a connected network of walking and cycling infrastructure in the town.</li> <li>• Change to MTO2.10 - Promote the town centre as a pedestrian/cyclist friendly area and to investigate the feasibility of pedestrianisation, <b>one way traffic flow or almost traffic free</b> at the following locations: <ul style="list-style-type: none"> <li>(i) <b>From Poplar Square to Market Square</b></li> <li>(ii) St. John's Lane connecting Main Street to Corban's Lane.</li> </ul> </li> <li>• Changes recommended under Section 4.4 Parking are that the Transport Strategy include a bicycle and not just car parking strategy.</li> <li>• Remove reference to relocation to the west of existing station in MTO 4.9;</li> <li>• Request an additional objective to support multi-modal transport.</li> <li>• Recommended change to first paragraph under Section 4.6 - Naas continues to experience a high level of congestion <b>due to high levels of car dependency especially for journeys less than 2km in length and the effect of induced demand.</b></li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Change to MTO5.1 - Maintain and improve, as required, the local road network to ensure a high standard of road quality and safety <b>for all road users</b> in accordance with the requirements of this Plan and relevant legislation.</li> <li>• Change to MTO5.2 - Secure the delivery of <b>cycle, greenway and</b> road projects indicated in Table 4.2 (refer to Section 4.8) and the Movement and Transportation Map 4.1 and where necessary to preserve identified routes free from development.</li> <li>• Change to MTO5.8 - <b>Implement</b> traffic management measures on all radial routes to signal the transition into an urban area. <b>Discourage unnecessary traffic from using the town centre as a through route and to encourage them to travel alternative link roads.</b></li> <li>• Delete objective concerning Leinster Orbital Route as incompatible with climate action mitigation.</li> <li>• The submission references the following objectives to be inputted into Table 4.2: <ul style="list-style-type: none"> <li>○ SPO 1.13 Ballycane Road Cycle Facilities (Blessington to Ballymore Eustace Roads)</li> <li>○ SPO 1.14 Newbridge Road Cycle Facilities (Bundle of Sticks to Main Street)</li> <li>○ SPO 1.15 Monread Road Cycle Facilities (Dublin Road to Sallins Road)</li> <li>○ SPO 1.16 Monread Avenue Cycle Facilities Upgrade (Monread Road to Sallins Road)</li> <li>○ SPO 1.6A Sallins Road Scheme (Mill St to M6) – Progress immediately</li> <li>○ SPO 1.6B Sallins Road Scheme (Mill St to Main Street) – To await results of Naas Transport Strategy.</li> </ul> </li> </ul> <p>This submission also outlines the following amendments in the Sustainable Planning and Infrastructural Assessment.</p> <ul style="list-style-type: none"> <li>○ Under Section 4.1.2 support a better balance suggest minor tweaking where a radical change is required;</li> <li>○ Reference to a number of sites require cycle lane upgrades is misleading, the facilities for cyclists are deficient and segregation is required;</li> <li>○ Reference is made on a paragraph on congestion and road projects and that the road building is not a solution to congestion, cities are opting for smart travel, i.e. walking, cycling and public transport for congestion;</li> <li>○ Reference is made for CPOs for road and junction improvements the word cycle infrastructure</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>should also be included;</p> <ul style="list-style-type: none"> <li>○ Section 6.1 Funding Sources should include potential for European sources of funding.</li> </ul>
150	<b>Craddockstown Golf Course</b>	<p>This submission is prepared by Brock McClure Planning and Development Consultants.</p> <ul style="list-style-type: none"> <li>● Request a portion (7 ha) of the wider 55ha Golf course to be zoned New Residential;</li> <li>● Rationale is based on safeguarding the viability of the golf course as income levels derived from annual subscriptions are down;</li> <li>● Natural extension of town, serviced and close proximity to the town;</li> <li>● Reference is made to changes in the permitted land uses between the LAP and previous Development Plan no longer include childcare facilities, school and places of worship. Under the current zoning objective, there are a limited range of uses that could be considered permissible. The golf Club is considering options for securing the on-going viability of the golf course as the singular use is no longer economically sustainable.</li> <li>● Introduction of a Green Infrastructure Route through the site is new and they recognises the contribution of the Golf Course lands to the open space network, however they want to future proof by looking at diversifying;</li> <li>● Supports the retention of Craddockstown Golf Club as a sports facility, notes there is insufficient facilities in Naas and for this one to remain viable they need to diversify;</li> <li>● Reference is made the Kildare CDP, Naas's status as a Large Growth Town, the target population and believe the rezoning of the land will contribute positively to the housing supply need for Naas;</li> <li>● The lands could be identified as Tier 1 as it is serviced and contiguous to developed lands.</li> <li>● Site could be a Regional Park;</li> <li>● Reference is made for the need for housing and the housing targets, subject site would be a natural extension of the existing built area of Naas and would provide much needed residential supply in the short term, ready to bring forward a proposal for residential development as soon as possible;</li> <li>● Site suitable for housing as will not create unwanted breaks in connectivity, provide diverse types of residential development, links to the town centre via the future pedestrian/cycletrack route.</li> </ul>

Sub. No.	Name	Summary of Submission
		 <p data-bbox="1234 635 1473 647">Figure 2 – Proposed Lands to be Rezoned in Draft LAP</p>
151	Venturis Investment Group	<p data-bbox="577 651 1256 683">This submission is prepared by RPS Group Ltd.</p> <ul data-bbox="629 691 2029 954" style="list-style-type: none"> <li>• The overall landholding extends to 88 ha and the submission requests that 9 ha be zoned for New Residential, a neighbourhood centre (2 ha) and portion to the south Enterprise and Employment;</li> <li>• Lands are in agriculture use with residential development in proximity, strategically located in context of road network, no subject to flooding and no heritage concerns;</li> <li>• The subject site is serviced;</li> <li>• In the Naas 2011 Plan the lands were zoned Agriculture and some were outside the boundary;</li> </ul> <p data-bbox="577 959 2029 1023">The submission outlines the key messages and recommendation made in the submission for the pre-draft that the lands are:</p> <ul data-bbox="824 1031 2029 1393" style="list-style-type: none"> <li>○ Strategically located, adjoin built up area, serviced.</li> <li>○ Comply with the NPF, NSS, Development Plan Guidelines and the Kildare County Plan;</li> <li>○ Naas not performing in relation to population targets, need housing to fulfil its role;</li> <li>○ Lands suitable for a KDA and southwest quadrant logical expansion of Naas;</li> <li>○ New Residential, Neighbourhood and Open Space the land should be zoned;</li> <li>○ A new road network in the Jigginstown area would expand the existing distributor road system on the southern side of Naas and provide a flexible and high capacity local traffic network. A new link road through Jigginstown would reduce traffic demand at the three junctions; Southern Ring Road traffic signals, Roundabout at</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>Newhall Retails Parka and Kilcullen Road.</p> <ul style="list-style-type: none"> <li>○ Close proximity to town centre, 1km/2km;</li> <li>○ Committed to promoting the linear greenway. Opening up the Corbally Line towpath will rely heavily on connectivity to development land (such as our client's land).</li> <li>○ Draft LAP boundary should be extended out to the boundary of previously zoned land in the Naas Environs Plan.</li> </ul> <p>Submission makes recommendations for the Naas LAP as follows:</p> <ul style="list-style-type: none"> <li>● Subject site to be identified as a KDA;</li> <li>● Zoned for New Residential, Neighbourhood Centre and Open Space and Amenity;</li> <li>● Introduce a roads of objective for lands at Jigginstown - To construct a road through zoned land at Jigginstown (Jigginstown Link Road) linking the Naas Southern Ring Road, the Newhall Retail Park spur road and the Kilcullen Road;</li> <li>● Identify an 'indicative walkway / cycleway routes' along the route of the Grand Canal (Corbally Line) on the Land Use Zoning Map and related map(s) in the LAP. This would link both end destinations with intermediary destinations such as Naas Sports Centre which would encourage active uses;</li> <li>● Extend the LAP Boundary out to the boundary of previously zoned land in the Naas Environs Plan.</li> </ul> <p><b>Strategic Context</b></p> <ul style="list-style-type: none"> <li>● The submission puts forward a case of the subject lands with regards the NPF in terms of population and housing target growth, draft RSES in terms of the text in relation to Naas and the County Development Plan in terms of how Naas lagged behind in terms of population growth and the objectives for housing and retail.</li> </ul> <p><b>Review and Recommendation Arising from the Draft LAP</b></p> <ul style="list-style-type: none"> <li>● 7 Core Themes, SPO 1.11, SPO 1.8 are welcomed;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• A revised zoning map is provided which reflects the zoned request;</li> <li>• The submission provides a justification for the rezoning of the subject lands in terms of location and the existing infrastructure would result in a Tier 1 classification,</li> <li>• In single ownership and can be delivered and notes some sites zoned in previous plans were not delivered and they have been rezoned again in the LAP;</li> <li>• Neighbourhood Centre would provide services for existing and future residents;</li> <li>• The limit of 300sqm per neighbourhood centre should be increased to allow for a greater variation of occupiers and a higher number of retail units;</li> <li>• Q zoning welcomed but a portion of the same landholding remains unzoned, it is requested that this is added as it would ensure that the land is developed in a complete manner.</li> </ul> <div style="display: flex; justify-content: space-around; margin-top: 20px;">    </div> <p style="font-size: small; margin-top: 5px;">Figure 3-2: Indicative Link Road submitted by RPS at Issues Paper stage</p>
152	Reid Family	<p>This submission was prepared by David Mulcahy Planning Consultants Ltd regarding lands at Newhall.</p> <ul style="list-style-type: none"> <li>• The subject lands extend to 8.09 ha close to Junction 10 and outside the draft LAP development boundary;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The submission requests the land to be zoned Industrial/Warehousing and refer to the lands as a 'gap site';</li> <li>• The Executive Summary outlines a number of points supporting this rezoning, increase employment opportunities, similar lands at the location nearly fully occupied, strategic location, can accommodate large scale development, compatible with adjoin land uses, lack of constraints, existing road infrastructure.</li> <li>• The submission provides a description of the lands and identifies the existing lands uses and infrastructure on the adjoining lands.</li> </ul> <div style="display: flex; justify-content: space-around; margin-top: 20px;"> <div data-bbox="607 624 1180 1038"> </div> <div data-bbox="1379 635 1868 1026"> </div> </div> <p data-bbox="600 1050 1122 1070">Fig No.2 Site description (Source: MyPlan.ie - OSI Licence No.EN 0080915)</p> <p data-bbox="1379 1034 1933 1066">Fig No.4 Context Map highlighting established industrial development in the area (source: Google Earth Pro, 2018).</p> <ul style="list-style-type: none"> <li>• Reference is made to the Junction 10 relocation; the new interchange will facilitate improved traffic capacity and movement.</li> </ul> <p data-bbox="584 1177 837 1209"><b>Planning History</b></p> <ul style="list-style-type: none"> <li>• No record on the Council's planning enquiry system.</li> </ul> <p data-bbox="584 1254 792 1286"><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• The submission states they engaged Donnachadh O'Brien Consulting Engineers to carry out an engineering assessment of the subject lands which concluded the site appears to be serviceable for future development;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Road infrastructure may require improvement works;</li> <li>• Sightlines appear achievable;</li> <li>• Watermain may require an upgrade which is considered standard;</li> <li>• Sufficient capacity in sewer and WwTP;</li> <li>• Expected from preliminary studies that the disposal of surface water will not be a constraint;</li> <li>• Flooding not a constraint;</li> <li>• Unlikely 220kV line would be ungrounded may be possible for the 10kV line, early consultations with ESB require 30 wayleave.</li> </ul> <p><b>Planning Context</b></p> <ul style="list-style-type: none"> <li>• The submission makes reference to various aspects of the NPF in terms of brownfield sites and securing employment</li> <li>• Naas’s designation as a Key Town in the RSES is referred to;</li> <li>• The LECP states that 40% of the total workforce living in Kildare work outside the county;</li> <li>• The submission refers to the County Development Plan in terms of economic development and the Council supporting and facilitation growth;</li> </ul> <p><b>Draft LAP</b></p> <ul style="list-style-type: none"> <li>• Subject lands are conspicuous because surrounding by employment zoned lands;</li> <li>• Extracts from the LAP are referred to; critical jobs increase, create new employment opportunities, lands to west of subject site identified for a data centre.</li> </ul> <p><b>Development Potential</b></p> <ul style="list-style-type: none"> <li>• Subject lands sufficient size to accommodate a significant sized single industrial/warehouse of multiple smaller units and to provide a buffer to adjoin dwellings and wayleaves;</li> </ul> <p><b>Submission</b></p> <ul style="list-style-type: none"> <li>• This part of the submission refers to points made in the Executive summary and previously in the report.</li> </ul> <p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• The submission concludes by recapping on the issues raised to support the rezoning request.</li> </ul> <p>Additional documentation is also provided with the submission.</p>

Sub. No.	Name	Summary of Submission
		Enclosure 1 – Engineering Constraints and Feasibility Report which states that site appears to be serviceable. The document contains Appendix A – Irish Water map, Appendix B -CFRAM maps, and Appendix C – Irish Water watermain map.
153	Tesco Ireland Limited	<p>Submission prepared by Avison Young.</p> <ul style="list-style-type: none"> <li>• Draft LAP makes no provision for existing Retail Centres and retail functions outside of the Core Retail Area or in particular, for convenience retailing;</li> <li>• ‘Out-of-centre’ retail sites, particularly the Monread Shopping Centre, have not been identified within the Draft LAP as designated centres for retailing;</li> <li>• Lack of this designation has the potential to effect the future retail operations of the Centre;</li> <li>• Monread was designated as a District Centre in the Naas 2011 Plan;</li> <li>• No provision for District Centres has been included in the Draft LAP;</li> <li>• Removal of this designation has the potential to impact on future operations of the Monread Shopping Centre and the range of services that the Centre can potentially offer in the future;</li> <li>• The submission notes that the Retail Planning Guidelines have not been changed since the Naas Town Development Plan 2011-2017 was prepared;</li> <li>• Permissions for Monread uner ABP Ref. No. PL09.130881 and PL73.130879, it was noted as being of a District Centre scale which would not have an impact on the retail function of the Town Centre;</li> <li>• It is submitted that the retail landscape hasn’t changed and that the District Centre status for Monread Shopping Centre should be maintained;</li> <li>• Neighbourhood Centres have been designated as part of the Draft LAP, which provide convenience goods outside of the Town Centre but no designation has been provided for the Monread Shopping Centre;</li> <li>• A clear hierarchy of designations is provided so as to give certainty to retailers that there is a solid planning policy framework in place to support future redevelopment and investment</li> <li>• The submission refers to objectives supporting new retail developments within the Core Retail Area, however, consideration for existing retail centres such as the Monread Shopping Centre is limited;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>The submission requests an objective for Monread Shopping Centre outlining that the scale of development that is permitted at the Monread Shopping Centre is appropriate and is reflective of the significant role that the centre plays in the context of Naas.</li> </ul>
154	Castlekeel Limited	<p>The submission lodged two documents concerning two land parcels.</p> <ul style="list-style-type: none"> <li>One letter submitted relates to a land parcel which extends to 1.01 ha on the Dublin Road referred to as C1(18) under the LAP;</li> <li>Submission requests a reduction in the density to 25-55 units from 33-55 given the size of the site and the prevailing house type in the area.</li> </ul> <p>The second letter submitted is as follows:</p> <ul style="list-style-type: none"> <li>The submission relates to land at Fishery Road which extends to 4.5 ha;</li> <li>Request that the Enterprise and Employment along with Education and Community zoning be changed to Commercial and Residential zoning;</li> <li>Located within the built up area of Naas near established residential and close to amenities;</li> <li>Buffer between industrial area and the Racecourse;</li> <li>Industrial development has not expanded in recent years at this location, Donnelly Mirrors and Cemex sites safeguard opportunity for expansion in the area;</li> <li>Peripheral lands have been proposed for rezoning which is not complaint with the sequential approach;</li> <li>The submission outlines the planning history of the lands that in 2005 it was zoned for Commercial/Residential uses and in 2006 permission granted and subsequently lapsed for a discount foodstore, 3 retail units and an office;</li> <li>In 2007 permission refused for 125 residential units refused on constraints of Osberstown WWTP;</li> <li>In 2011 lands were zoned Enterprise and Employment in response to the recession. However, no planning applications were ever made even employment levels are the highest since the recession ended;</li> <li>The subject lands are adequately serviced on both environmental grounds and movement and</li> </ul>

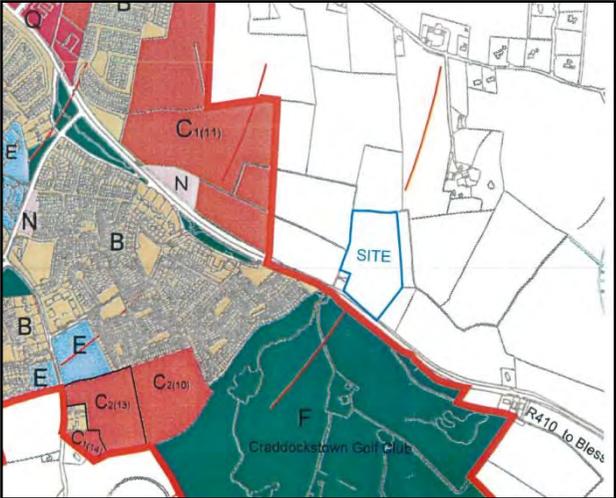
Sub. No.	Name	Summary of Submission
		<p>transport infrastructure;</p> <ul style="list-style-type: none"> <li>• Employment generating land uses appears to exceed any possible requirement for employment that could reasonably be expected to arise in Naas;</li> <li>• Only 1 hectare zoned for Commercial and Residential;</li> <li>• The submission makes reference to the economic cluster of land Naas, Newbridge, Leixlip, Celbridge, Maynooth and Kilcock and that 577 hectares is available for employment;</li> <li>• The lands zoned for employment uses in Naas represents 57% of the total quantum of employment generating land available in the combined five largest towns'</li> <li>• The submission makes reference to DunLaoghre Rathdown and that 300 ha of employment lands in the county with 60 hectares is greenfield;</li> <li>• Reference is made to the Education and Community zoning and the matrix of uses are not suited to the location and will lead to uncertainty;</li> <li>• Mix of residential and commercial proposed;</li> <li>• Compliment and respect the Racecourse and act as an important gateway to Naas;</li> <li>• In accordance with the zoning of the nearby K zoning at Maudlins which creates a buffer between residential and industrial lands.</li> </ul>

Sub. No.	Name	Summary of Submission
		
155	Burke Family	<p>This submission was made by Bernard McHugh – Chartered Town Planner and Barrister at Law.</p> <ul style="list-style-type: none"> <li>• This submission is concerning land in the Northwest Quadrant designated as a KDA Naas West;</li> <li>• The designation is welcomed;</li> <li>• The objective to realise the development of this land for residential development in the short term is also welcomed;</li> <li>• Unclear of timeframe for masterplan for NWQ and is a cause for concern as may lead to planning uncertainty;</li> <li>• Disappointing that most of land at ‘The Knocks’ were not assessed as part of the Infrastructure Assessment and is a significant omission;</li> <li>• The creation of an urban park should reflect and highlight the important man made amenity of the Naas Spur of the Grand Canal. It offers great potential as a major amenity in the form of a linear urban park that links the centre of Naas to Sallins. This would reflect the historical strategic canal system in the area;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Open space designation of 'The Knocks' at the edge of the town centre is considered excessive and not justified as it would give rise to uncertainty for landowners and create planning blight;</li> <li>• Land management difficulties for landowners in terms of trespass, vandalism, antisocial behaviour with regards the Park and open space and amenity zoning;</li> <li>• Reference is made to successful urban parks surrounded by appropriate urban development such as Herbert Park where medium height new residential buildings have been built along the boundary of park and also Bushy Park and Mount Saint Anne's Park;</li> <li>• The zoning matrix sets out an extremely limited range of acceptable or open to consideration uses in the M zone;</li> <li>• High quality residential should be open to consideration where it would make a positive contribution towards the realisation of a high quality urban park;</li> <li>• This would provide a practical means for encouraging the landowner to secure funding of the Future Park;</li> <li>• A site layout plan prepared by MHOC Conservation Project Management Architecture has been submitted for a residential scheme of apartments and duplex housing;</li> <li>• Request to reconsider the F zoning adjoining the proposed link road between the Millennium Park interchange on the M7 and the Canal Basin and that the location of playing fields and amenity areas would be best decided as part of the design and layout of the proposed new residential areas themselves and lands should be assigned C1 and C2 residential zones.</li> </ul>

Sub. No.	Name	Summary of Submission
156	Dónall Ó Riagain	<p>This submission was made in Irish and can be translated as follows:</p> <ul style="list-style-type: none"> <li>• Positive things in the plan that I would support;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>Disappointed that Irish is not even mentioned in the discussion apart from a cursory reference to the Council's obligations under the Official Languages Act;</li> <li>The use or advancement of the language is not mentioned;</li> <li>Only 3 months since the Minister of State for the Gaeltacht launched the plan for Irish at an event in Aras Chill Dara to promote the national language in daily life, it is disgraceful that there is no input into this by our own Council;</li> <li>Include a positive, substantial, supportive input on Irish as part of this plan.</li> </ul>
157	Dorothy Kinirons	<p>This submission was prepared by Maguire &amp; Associates.</p> <ul style="list-style-type: none"> <li>The change from Agricultural land use to Industrial and Warehousing is acceptable.</li> </ul> 
158	Glengolden Builders Limited	<p>This submission was prepared by Maguire &amp; Associates.</p> <ul style="list-style-type: none"> <li>Subject lands extend to 4.06 ha at Tipper South, Blessington Road;</li> <li>Requests extension of boundary to include subject lands and zone for residential use;</li> <li>Lands zoned agriculture in the Naas 2011 Plan;</li> <li>Lands are currently in agricultural use, and adjoin the Blessington Road;</li> <li>The submission refers to the population growth indicated in the NPF nationally;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• The submission refers to the applicable regional policy objectives in the draft RSES in terms of its designation as a Key Town;</li> <li>• Reference is made to the draft LAP and the future housing and population targets;</li> <li>• Major capital investment that has taken place in Naas, Osberstown WWTP, ring road systems and national road infrastructure;</li> <li>• Additional lands should be zoned residential including the subject lands;</li> <li>• The lands are in close proximity to the town centre on a major regional route;</li> <li>• Services are readily available;</li> <li>• On a public transportation route;</li> <li>• Walking distance 2000 metres of town centre and close to community, recreational and social services;</li> <li>• A sustainable proposal.</li> </ul> 
159	John Kane	<ul style="list-style-type: none"> <li>• Apply for protection for Biodiversity Garden for the Broadfield View estate under Article 10 of the Habitats Directive;</li> <li>• It's a stepping stone habitat;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Large meadow designated for planting wildflowers for pollinators and supported by a 60 metre hawthorn hedge to provide food for bees and berries for birds;</li> <li>• Have placed hedgehog boxes, bee houses and bird boxes with financial support from KCC;</li> <li>• Concerned over housing development at Bluebell Farm will have;</li> <li>• Proposal to run path through the biodiversity garden;</li> <li>• Hedges and ditches in the estate have hedgehog population and these animals enjoy protection under the Wildlife Acts (1976-2012). Therefore they will be seeking a derogation licence is any building development disrupts the wildlife;</li> <li>• Biodiversity Garden to act as a template for Naas.</li> </ul>
160	Sean Kiely	<ul style="list-style-type: none"> <li>• Submission is concerning rezoning of lands at Ladytown, (H2) to Industry and Warehousing;</li> <li>• Surplus of unused land zoned for Industry and Warehousing in close proximity to the motorway;</li> <li>• Further lands will mean many more years of unsightly, half finished industrial estates;</li> <li>• Rezoning of these lands appear to be driven by commercial interest;</li> <li>• Rezoning of these lands will facilitate the rezoning in 4 years time of the next parcel of land along the eastern boundary of the motorway, which were similarly purchased in recent years by commercial parties;</li> <li>• Given the size of the recently constructed road from the Bundle of Sticks roundabout and the new roundabout at First Choice Commercials it seems inevitable that these lands will be rezoned in the next LAP;</li> <li>• Small community, 15 houses, 45 residents the zoning will affect quality of life;</li> <li>• The area has become a rat run, cars travel in excess of 80kph and result in traffic back ups;</li> <li>• Hoped that this would end on completion of motorway upgrade works but the rezoning would result in heavier traffic using the roadway and the laneway is completely unsuitable;</li> <li>• Requests provision of a buffer zone so development can be kept at reasonable minimum distance from the nearest house;</li> <li>• What is prospect of closing off laneway from through traffic to preserve integrity of a country lane;</li> <li>• Request the Council to consider options which minimise the very negative consequences that will be visited on the residents of Ladytown.</li> </ul>

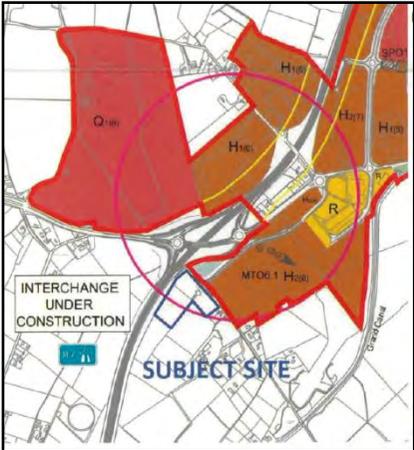
Sub. No.	Name	Summary of Submission
161	Keith Lynch	<ul style="list-style-type: none"> <li>• Strongly objects to industrial development at areas marked MTO 6.1 and H2(8);</li> <li>• Area is dispersed settlement where development proposals should be considered carefully;</li> <li>• Impact on the area; environment, wildlife and residents quality of life;</li> <li>• Other areas in Naas and Kildare zoned and have only had minor development and remain incomplete;</li> <li>• Should concentrate on other areas;</li> <li>• Ludicrous and ill thought out to have so many areas zoned for Industrial development and with only a handful of buildings constructed between them;</li> <li>• At a time when we are asked to look at our environmental footprint KCC should be looking out for residents and communities and should reconsider the proposals.</li> </ul>
162	Jim O'Sullivan	<ul style="list-style-type: none"> <li>• The submission cites extracts of the Plan referring to increasing numbers living in the town centre;</li> <li>• The submission queries how this objective will be achieved and requests that the plan to be specific regarding incentives that will be provided;</li> <li>• The submission refers to the Key Design Principles for CRA 3; to provide for the creation of a wetland style neighbourhood park along the southern portion of the Canal Bank;</li> <li>• The submission states that the following is the most commendable objective – ‘facilitate the development of the Canal Bank by providing for new pedestrian/cyclist bridges over the Grand Canal;</li> <li>• The positioning of these bridges as per the indicative points appears to be a reasonable proposal provided (i) that the design of these two units will be complementary to the canal vista and (ii) that the structures will not provide shelter for anti-social activities;</li> <li>• The indicative route through the Northwest Quadrant is a potential trans-canal route connecting to the Sallins Road via Millbridge Avenue. There is no indication as to how the connection will be achieved. Outlined concerns that it will be by means of a bridge that will be as obtrusive and damaging to the canal vista as is the New Caragh Road Bridge;</li> <li>• The submission submits that any crossing at the Millbridge point should be by subway;</li> <li>• Completion of the inner ring road is long overdue, route 2 being the optimum solution, Newbridge Road and Kilcullen Road traffic through Main Street and the Dublin Road is reminiscent of the</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>volumes prior to the M7 bypass;</p> <ul style="list-style-type: none"> <li>• States the need to develop plans not for an outer ring road that will serve the town's future requirements.</li> </ul>
163	Gerry Halton	<ul style="list-style-type: none"> <li>• Provision of accommodation for older living – no facility whereby an older person can stay within the community;</li> <li>• Unless can afford to adapt their home, little option but the leave the community;</li> <li>• Options are a nursing home or continue living in their existing house;</li> <li>• Submission suggests that for every 8/9/10 houses built that one house be constructed and designed in a way that would support older living and the house be bought by the Local Authority to be made available for older people;</li> <li>• The older person when securing a home in their community can sell their own home and rent the house from the LA/Housing Agency using funds from the sale of their house;</li> <li>• House blockers no longer block young families access to a home suited to their needs;</li> <li>• Older person contributes to their community;</li> <li>• They don't need to move out from their community;</li> <li>• District Health nurse can monitor their health if houses are clustered;</li> <li>• Houses can be designed accordingly;</li> <li>• Nursing home support if cannot maintain independence;</li> <li>• Submission refers to statistics on dementia and states that those who do not contract dementia need support from society;</li> <li>• Older persons can provide babysitting facilities, mentoring facilities, contribution to resident associations and neighbourhood watch;</li> <li>• Opportunity for KCC to provide leadership where other local authorities are striving for initiatives to support the elderly in society.</li> </ul>

Sub. No.	Name	Summary of Submission
164	Larry Swan	<p>This submission was prepared by Clarke &amp; Company: Engineers, Architects.</p> <ul style="list-style-type: none"> <li>• Subject site located off Kilcullen Road neighbouring Swans on the Green;</li> <li>• The subject site extends to 0.18 ha and finished ground level 3m above the Kilcullen Road and zoned Existing Residential;</li> <li>• Submission requests rezoning to Commercial/Residential to allow expansion of Swans on the Green;</li> <li>• Kilcullen Road has many different functions;</li> <li>• Commercial/Residential has been deemed appropriate along the road and a similar approach should be taken in regards the subject site;</li> <li>• Examples of successful designed retail development with residential units overhead have been provided. it has been submitted that this type of development would provide a positive transition between existing residential and Swan on the Green;</li> <li>• Pictures have been provided of the subject site;</li> <li>• Site is within 500 metres from the town centre;</li> <li>• Zoning in the draft LAP does not provide the opportunity for necessary expansion of Swans on the Green.</li> </ul>

Sub. No.	Name	Summary of Submission
		
165	<b>Dennison Trailers</b>	<p>This submission was prepared by Clarke &amp; Company: Engineers, Architects.</p> <ul style="list-style-type: none"> <li>• Subject site located in Maudlins direct access to the M7 and extends to 0.8 hectares that is proposed to be zoned Enterprise and Employment;</li> <li>• Submission refers to the increase in population over the Census years 2011 and 2016;</li> <li>• The site was purchased so Dennison Trailers could extend the scope of services they provide in Naas;</li> <li>• Request that zoning changed to Industry and Warehousing to facilitate the expansion;</li> <li>• Previous zoning objectives have failed to encourage new development on this disused site;</li> <li>• The neighbouring Naas Industrial and Maudlin Industrial Estates are two successful areas enjoying almost full occupancy with the exception of the subject site;</li> <li>• Industrial/Warehousing would integrate seamlessly;</li> <li>• A building of a high architectural quality to repair prominent part of the entrance to Naas;</li> <li>• The submission provides some images of a high quality design;</li> <li>• Photographs of the subject site are provided showing visibility from the R445;</li> <li>• Subject site located within a long-established area of Industry and Warehousing;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Zoning in Draft Plan only permits office over 100sqm;</li> <li>• Seven other zoning categories are uses that are not considered acceptable in principle on all parts of the relevant zoning, which is a further restriction on the site;</li> <li>• If serious about regeneration and encouraging local business to expand, promote development than restrict it.</li> </ul>  <p data-bbox="875 836 1489 863">Figure 3. -Site Entrance. View from Naas side of subject site.</p>
166		<p data-bbox="577 911 1659 943">This submission was prepared by Clarke &amp; Company: Engineers, Architects.</p> <ul style="list-style-type: none"> <li>• Subject site is located in Ladytown with direct access to M7;</li> <li>• The site is L-shaped and extends to 4.6 hectares and zoned Industry and Warehousing under the Naas Environs Plan as part of CDP;</li> <li>• Planning permission was granted for site development works and industrial buildings;</li> <li>• The LAP has omitted to include the subject site as part of the zoning for the area;</li> <li>• Photographs of the site have been provided;</li> <li>• Submission request the site be zoned Industrial/Warehousing;</li> <li>• Dennison trailers have invested significantly in carrying out site development works and are awaiting completion of work on the M7 before erecting an industrial building they have received planning for;</li> <li>• Valued employer for Naas and committed to the site in Ladytown.</li> </ul>

Sub. No.	Name	Summary of Submission
		  <p data-bbox="1330 775 1473 791">Figure 1. – Aerial view of site.</p>
167	Dominic Fagan	<p data-bbox="584 831 1659 863">This submission was prepared by Clarke &amp; Company: Engineers, Architects.</p> <ul data-bbox="629 871 2047 1361" style="list-style-type: none"> <li data-bbox="629 871 1570 903">• Subject site is located at Maudlins and extends to 6.3 hectares;</li> <li data-bbox="629 911 1861 943">• High prevalence of industrial type buildings to the south and east of the subject site;</li> <li data-bbox="629 951 1626 983">• Site direct access to the M7 network and prominent brownfield site;</li> <li data-bbox="629 991 1957 1023">• Objective for Regeneration lands on the subject site and the neighbouring site to the north;</li> <li data-bbox="629 1031 2033 1134">• Neighbouring lands owned by Applegreen Services Limited and reference is made to a planning application granted by the local authority under 15/500 for Global training hub, global logistics and food research building and motorway service station;</li> <li data-bbox="629 1142 1989 1206">• Reference is made to Naas’s growing population and need for shops so people don’t have to commute to Dublin;</li> <li data-bbox="629 1214 1312 1246">• Site provides an opportunity for employment;</li> <li data-bbox="629 1254 2007 1286">• Reference is made to the town centre containing the designation for Regeneration Lands also;</li> <li data-bbox="629 1294 2047 1361">• A greater more imaginative scope of zoning possibilities needs to be applied to the subject site to provide a starting point for appropriate development;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Current zoning proposal only permits offices above 100sqm as opposed to town centre which has 19 permittable zoning categories;</li> <li>• Provide for a mix of uses;</li> <li>• New amenity and recreational uses should address the current deficiency in the immediate locality;</li> <li>• The zoning should allow for a design approach to contribute a new coherence of primary urban frontage, and to provide a logical and coherent urban structure within the lands, which combines aspects of movement, landscape and land use;</li> <li>• Having an appropriate zoning foundation in place will allow for high quality design, material and finishes in all buildings and urban spaces;</li> <li>• The client Dominic Fagan is willing in the future to work with neighbouring property to prepare a masterplan;</li> <li>• Have engaged Loci to prepare a masterplan to include the O'Reilly lands;</li> <li>• Lands have been zoned Enterprise and Employment for a number of years and failed to accommodate new development therefore broaden zoning to Industrial /Warehouse;</li> <li>• Naas 2011 Plan permitted a broader matrix of land uses in comparison to draft LAP, included petrol station, shop, hot food takeaway, warehouse (wholesale);</li> <li>• More restrictions prevents regeneration;</li> <li>• Other permitted uses should include for a hotel and conference facility, office including warehouse, high end motor sales;</li> <li>• Reference is made to City West and landscaped buildings fronting onto the M7;</li> <li>• The submission refers to the South Dublin Council Council permitted uses and those Open to Consideration under Enterprise and Employment in SDCC which provides for a broader set of uses;</li> <li>• Images have been provided of high quality design and photographs of the site.</li> </ul>

Sub. No.	Name	Summary of Submission
		 <p data-bbox="994 695 1182 715">Figure 1. – Aerial view of site.</p>
168	Michael and Mary Nolan	<p data-bbox="577 756 1429 791">This submission was prepared by O’Loughlin Architects Ltd.</p> <ul data-bbox="636 799 2047 1134" style="list-style-type: none"> <li data-bbox="636 799 1451 834">• Request zoning of 2.75 ha of land as New Residential;</li> <li data-bbox="636 837 1980 906">• Subject lands located on the R411 within 2000 metres of Naas Town Centre and 700m from Craddockstown Roundabout; ;</li> <li data-bbox="636 909 2047 978">• The submission refers to various residential schemes in proximity to the site and Craddockstown Roundabout;</li> <li data-bbox="636 981 1966 1050">• Gradual reduction in scale from apartments to terrace/semi detached dwellings and then to detached dwellings is a welcome residential proposal for the site;</li> <li data-bbox="636 1053 1995 1134">• Consisting of 7 detached dwellings in phase 1 and an additional circa 20 dwellings and share links back to the town centre through the adjacent pink development.</li> </ul>

Sub. No.	Name	Summary of Submission
		
169	Glenveagh Homes Ltd.	<p>The submission by Glenveagh Homes Ltd. has a number of separate elements;</p> <ol style="list-style-type: none"> <li>1. Cover letter</li> <li>2. Main Submission Document</li> <li>3. Appendix 1: Technical Note - Engineering Review for Rezoning Submission</li> <li>4. Appendix 2: Urban Design Statement</li> <li>5. Appendix 3: Social Infrastructure Audit</li> <li>6. Appendix 4: Population Projection Assumptions</li> <li>7. Appendix 5: Criteria Assessment Assumptions</li> </ol> <p>Each of the above will be summarised in turn apart from Appendices 3, 4 and 5 which will be referred to in the summarisation of the main submission document. The overall submission provides many maps and images of the extent and location of the subject site, one of which is the following (taken from page 9, main submission document):</p>

Sub. No.	Name	Summary of Submission
		<div data-bbox="987 276 1641 657" data-label="Image"> </div> <p data-bbox="577 659 763 691"><b>Cover letter</b></p> <ul data-bbox="629 699 2029 995" style="list-style-type: none"> <li>• The cover letter states that the submission is being made in respect of a 14.4 hectare site located to the south of the Western Link Road in the Northwest Quadrant of Naas.</li> <li>• The letter urges the Planning Authority to implement the submission as it states that the subject lands represent a key site for the delivery of <i>'high quality residential development to serve the existing and growing population of Naas'</i>.</li> <li>• The letter states that Glenveagh Homes Ltd. has a proven track record in the delivery of high quality residential development and the submission clearly demonstrates an evidence-led solution for the development of the subject site.</li> </ul> <p data-bbox="577 1034 1014 1066"><b>Main Submission Document</b></p> <p data-bbox="577 1074 1984 1106">The main submission document comprises of the following sections (each being discussed in turn):</p> <ul data-bbox="629 1114 2029 1369" style="list-style-type: none"> <li>• Introduction – The submission begins with a introduction in which it requests the Planning Authority that the <i>'Lands at Millennium Park, lying to the north-west of Naas and to the south of the Volvo intersection on the western link road in the Northwest Quadrant, retain existing New Residential C1 zoning with a defined neighbourhood centre in the Naas Local Area Plan 2019-2023.'</i> The introduction also includes zoning maps of the subject site under the Naas Town Development Plan (2011-2017) and the Draft Naas Local Area Plan (2019-2023).</li> <li>• Site context – Details Land ownership, site access, an overview of the servicing potential of the</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>site, a summary of the local amenities in proximity to the site and images and maps of pedestrian and cycle infrastructure including walking distances to the closest bus stop (7 mins) and to Sallins Train Station (35 mins).</p> <ul style="list-style-type: none"> <li>• Policy context – <ul style="list-style-type: none"> <li>○ Details various National Strategic Objectives (NSOs) of the National Planning Framework (NPF).</li> <li>○ Details regional planning guidance including the Regional Planning Guidelines (2010-22) and several Regional Planning Objectives (RPOs) the Regional Spatial and Economic Strategy for the Eastern and Midlands Region and notes that Naas is designated a Key Town in the RSES.</li> <li>○ Details aspects of the Transport Strategy for the Greater Dublin Area (2016-2035) that have relevance to Naas.</li> <li>○ Details several policies and objectives in the Kildare County Development Plan (2017-2023) that have relevance to the development. Policies and objectives listed include those regarding the core strategy, housing development and public transport.</li> <li>○ Details policies and zoning objectives outlined in the Naas Town Development Plan (2011-2017) including the site which is zoned C1 'New Residential' and G 'Urban Village'.</li> <li>○ Details policies, objectives and the specific zoning objectives outlined in the Draft Naas Local Area Plan (2019-2023) and the provisions of the plan relating to the development of the Northwest Quadrant.</li> </ul> </li> </ul> <p>The submission uses elements of the above Plans and Strategies to argue in several responses throughout the section that the rezoning of the subject site would be in compliance with these documents and would help to realise a range of key objectives outlined therein.</p> <ul style="list-style-type: none"> <li>• A Profile of Naas – <ul style="list-style-type: none"> <li>○ Details provided key findings regarding a comprehensive socio-economic profile undertake of Naas including; demographic profiling, educational; attainment, household size/composition/occupancy rates and ownership status, employment, economic status and occupation and economic status.</li> <li>○ Details mode of transport uses, commuter flows into and out of Naas and destination of commuters who leave Naas for work and school.</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>○ Details the social and community infrastructure both existing and proposed (accompanied by a full social infrastructure audit noted as <b>Appendix 3</b>)</li> <li>● Residential and Employment Capacity Analysis – This section considers the justification for retention of the zoning designation of the Naas Town Plan 2011-2017 for the subject site and states its analysis demonstrates that there is sufficient space remaining for the development of enterprise and employment uses should this occur. <ul style="list-style-type: none"> <li>○ The section notes that the Draft LAP includes provision for an increase of 164.91 ha. in the amount of enterprise and employment (Q) zoned land. This figure the submission states equates to a 140% increase in percentage terms.</li> <li>○ The submission states that of the 117.75 ha already zoned 71.6% remains un-built and that retaining the subject site (14.4 ha) as a new residential (C) and urban village (G) zoning would reduce the total amount of enterprise and employment lands by 3.8%.</li> <li>○ Section provides further details in relation to existing and proposed residential capacity of the subject site and all existing and proposed residential lands in Naas noting that there is a decrease of 6.5% in the quantum of lands zoned ‘new residential’ in the Draft Plan and that other issues such as the development of the Naas Inner Relief Road will further constrain supply and reducing the amount of land available for development over the lifetime of the plan.</li> <li>○ It provides details on sites identified as ‘new residential’ which it states are already ‘committed’ i.e. lands which that have been granted permission with ‘almost 2,000 granted units’ as of May 2019</li> <li>○ Gives details on proposals for lands currently in the planning process.</li> <li>○ Details the results of a criteria analysis of all ‘new residential’ zoned sites in Naas along with the zoning site. They are assessed according to a 5 criteria and are scored on a range of 1-10 points based on each site’s attributes and compliance with the criteria outlined as follows – <ul style="list-style-type: none"> <li>▪ Proximity to the town and neighbourhood centres</li> <li>▪ Accessibility of public transport</li> <li>▪ Community and Social infrastructure (Primary and Secondary Schools)</li> <li>▪ Employment zones</li> </ul> </li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>▪ Serviced land (i.e. classified as Tier 1 Serviced or Tier 2 serviceable)</li> </ul> <p>It states that the resulting scoring based on the criteria set out indicates that out of an upper score of 64 for a site inside the settlement boundary to a low of 45 the average rating is 53 with the subject site scoring an above average of 57, stating that the lands are <i>'suitable and appropriate for residential development when compared to other sites zoned within the Draft LA. It is noted that the Criteria Assessment Scores is detailed in <b>Appendix 5</b></i></p> <ol style="list-style-type: none"> <li>2. The section also details projected future changes of the population in Naas including growth trajectories and future unit requirements as well as provisions of the County Development Plan and Draft Naas LAP on unit requirements for the town stating that retaining the 2011-2017 Naas Town Development Plan zoning on the subject site will help meet the targets for the delivery of new dwellings in Naas. It is noted that the population projection assumptions are detailed in <b>Appendix 4</b>.</li> </ol> <ul style="list-style-type: none"> <li>• Viability and Intent to Deliver – states intentions of Glenveagh to deliver 500 no. new dwellings on the site. States that changing the zoning of the lands to a Enterprise and Employment (Q) zoning will damage the prospects for housing in Naas over the short term and jeopardise investment and resources already committed by Glenveagh Homes. Reiterates the company's track record in the delivery of high quality residential development.</li> <li>• The Case for Zoning Retention – Outlines a detailed case for retain its zoning under the 2011-2017 Naas Town Development Plan based on 7 key reasons as follows: <ol style="list-style-type: none"> <li>1. Ensures coherent and viable development</li> <li>2. Creates an accessible and serviced site</li> <li>3. Enhances permeability and connectivity for Naas</li> <li>4. Supports national, regional and local planning policies</li> <li>5. Addresses socio-economic patterns</li> <li>6. Has a minimal impact on the provision of employment lands</li> <li>7. Provides residential capacity for Naas</li> </ol> </li> </ul> <p>The section also contains a table detailing how the proposal to retain the zoning adheres to and helps realise the five overarching development principles of the Northwest Quadrant lands as outlined in the Draft LAP.</p>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Conclusion – reiterates the need to retain the residential and neighbourhood village zoning on the subject site.</li> </ul> <p><b>Engineering Review for Rezoning Submission (referred to as Appendix 1 in main submission document)</b></p> <p>The engineering review is comprised of the following sections:</p> <ul style="list-style-type: none"> <li>• Introduction</li> <li>• Servicing – <ul style="list-style-type: none"> <li>○ Provides details on the foul water connection and water supply stating that there should be no issues with these services.</li> <li>○ Provides details on surface water drainage stating that existing watercourses or road drainage network would be suitable discharge points for the site.</li> <li>○ With regards to potential flooding it states that based on the CFRAM maps flooding is anticipated to affect portions of the southern and western boundaries of the site. But states that a watercourse near the site outside the CFRAMs study was not factored into study and consequently flood extents are less likely than those anticipated.</li> </ul> </li> <li>• Transportation - <ul style="list-style-type: none"> <li>○ Provides details on the existing road, pedestrian and cycle facilities indicating that the site offers excellent permeability and associated pedestrian and cyclist facilities.</li> <li>○ Provides details on public transport connections including Bus Éireann, private bus operators and rail services at Sallins.</li> <li>○ Provides details on local amenities including schools, leisure and health facilities and retail and employment centres within the general vicinity of the subject site.</li> <li>○ Outlines the proposed roads transport infrastructure including the new interchange on the M7 (Sallins-bypass, under construction) as well as other proposed road linkages through the Northwest Quadrant.</li> <li>○ Outlines proposed cycling facilities (those outlined in the Greater Dublin Area Cycle Network Plan) Grand Canal Greenway (K13), the western link road (NA6) and proposed links to the town centre, public transport interchange.</li> </ul> </li> <li>• Appendix A – Preliminary Servicing Strategy</li> </ul>

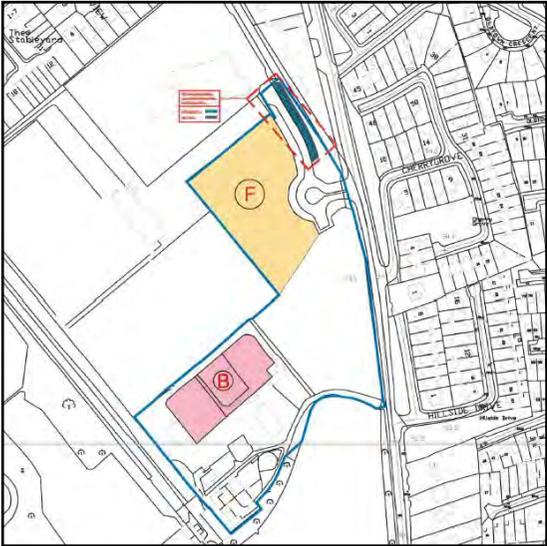
Sub. No.	Name	Summary of Submission
		<p>The review concludes with an appendix containing a number of maps providing further details on proposed site drainage and water/wastewater servicing CFRAM flood risk assessment map of the site and a map entitled 'Proposed Transportation Linkages Plan'.</p> <p><b>Urban Design Statement (referred to as Appendix 2 in main submission document)</b></p> <ul style="list-style-type: none"> <li>• The urban design statement accompanying the submission contains a very detailed proposal to build 500 residential no. units on the subject site composing of 104 no. apartments, 24 no residential duplex units, 8 no. residential of retail units, 8 no. live work units, 356 no. houses (252 terraced and 104 detached) along with associated infrastructure such, car parking (848 no. spaces), retail (1,048 m<sup>2</sup>) and a crèche (700m<sup>2</sup>).</li> <li>• The Design Statement comprises of the following sections (each being discussed in turn): <ul style="list-style-type: none"> <li>○ Introduction.</li> <li>○ Physical and Planning Contexts – Examines the location of the site, its topographic attributes and natural features, its location in relation to the Town Centre and other key services and its zoning designation under the 2011-2017 Naas Town Development Plan.</li> <li>○ Urban Design First Principles – Sets out an overarching urban design framework for the site, illustrating the location of the spine road, urban blocks, strategic open space and key routes and a 'Village Centre Plaza'. This section also takes into consideration issues such as existing hedgerows, Sustainable Urban Drainage Systems (SUDs) and areas of character.</li> <li>○ Proposed Masterplan – Illustrates an overall proposed and detailed layout for the subject site including the location and distribution of housing mix and typologies and proposed Part V mix. Also detailed are the general distribution of heights (accompanied by 3-dimensional renders), hierarchy of streets and car parking provision.</li> <li>○ Typologies – Provides specific details on proposed typologies including a comprehensive series of plans, elevations, site sections and unit sections. CGI renderings are also included to illustrate the design and finish of the proposed dwellings.</li> </ul> </li> </ul> <p>Engineering Details – Maps are provided which indicate existing public transport linkages, proposed transportation linkages, roads hierarchy and a preliminary service strategy map for the subject site.</p>
170	Clare Cleary and Family	<p>This submission was prepared by Maguire &amp; Associates.</p> <ul style="list-style-type: none"> <li>• The submission requests a change of zoning from agriculture to New Residential at Rathasker</li> </ul>

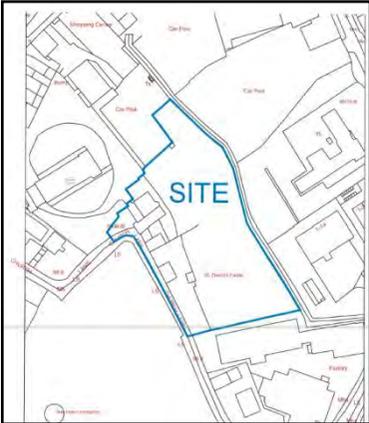
Sub. No.	Name	Summary of Submission
		<p>Road on lands which extend to 2.0088 ha;</p> <ul style="list-style-type: none"> <li>• Subject lands adjoin Broadfield View housing estate;</li> <li>• The submission provides a detailed description of the site in terms of boundaries and gradient;</li> <li>• Reference is made to the NPF in terms of additional people and additional households and total jobs and resident workers according to the Census 2016 and an the explanation of Tier 1; serviced zoned land;</li> <li>• The submission refers to the RSES in terms of 30% of new homes to be provided within the built up area, the designation of Naas as a Key Town and various regional objectives in terms of Naas as a Key Town, housing and infrastructure;</li> <li>• Reference is made to the draft plan in terms of text from the plan on Future Housing and Population Targets and that 816 housing units to be within the town footprint;</li> <li>• The submission states that the planning history for the site pertains to a permission in 1975 for one dwelling;</li> <li>• The submission states that they have carried out their own infrastructural assessment of the site and flags that the road is substandard but that given that applications on the neighbouring sites are currently being prepared it is evident that Rathasker Road will be upgraded to serve this existing residential/infill site;</li> <li>• Other services are existing;</li> <li>• The submission provided an analysis of Table 2.6 and 2.7 regarding estimated capacity of zoned lands;</li> <li>• Specific comments are made in relation to the following sites: <ul style="list-style-type: none"> <li>○ CRA2 – only delivered if timeframe is put on masterplan, suggested density of 75 more realistic due to height restrictions for residential units;</li> <li>○ CRA3 – queries how it will be developed within timeframe of Plan, no timeframe on masterplan, no road access, density excessive reduce to 144 units;</li> <li>○ CRA6 – site in different ownerships with a filling station and a supermarket and unlikely to be developed within timeframe of the Plan, remove forecast of 33 units;</li> </ul> </li> <li>• The estimate should be reduced to 556 units a reduction of 147 units; <ul style="list-style-type: none"> <li>○ Site C1(2) – overestimated density should be reduced to 239 units;</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>○ Site C1(5) – zoning should be reconsidered in light of Council’s own comments in the New Residential land use objective referring to responding to topography and residential amenity of adjoining lands;</li> <li>○ C1(12) – Existing permission 17/807 for 81 units;</li> <li>○ C1(15) – site zoned since 1990 yet no development how they can they be Tier 1 when undeveloped for so long;</li> <li>○ C1(16) – Reconsider given the Enterprise and Employment zone adjoining, development as Tier 1 is conditional on the Part 8 for the Inner Relief Road. Estimated density overstated as is the site area available for residential use amounts to 2.92 ha and there a revised figure in the range of 88-145;</li> <li>○ C1(18) – Permission refused for 26 units, density of 50 units hard to achieve given site size and complexity;</li> <li>○ C2(3) – concept of providing units on land with no direct vehicular connection to the town centre has to be re-considered, difficult to comment on units at this stage possible overestimation;</li> <li>○ C2(17) – might not be achieved till the Part 8 for the Nass Inner Relief Road has passed. Estimate is wrong 2 ha x 30 units he 60;</li> <li>○ C2(20), C2921), C1(4) need to reconsider as no access possible overestimation;</li> </ul> <ul style="list-style-type: none"> <li>● Capacity has been overstated by 184, existing permissions exist where figures may be easily calculated;</li> <li>● Overestimation could lead to shortage of units;</li> <li>● Scope for further land zoning;</li> <li>● The submission states the subject site should be zoned Existing/Infill Residential and in another part New Residential.</li> </ul> <p>There are a number of Appendices attached to the submission:</p> <ul style="list-style-type: none"> <li>● OS map, site location marked on zoning map, site photographs, a site layout scheme and context map.</li> </ul>

Sub. No.	Name	Summary of Submission
		
171	Springwood Limited	<p>This submission was prepared by Maguire &amp; Associates.</p> <ul style="list-style-type: none"> <li>• The subject lands are located at The Orchard and comprise two pieces of land extending to 0.8948 ha (Plot F) and 0.435 ha (Plot B);</li> <li>• Concerned with change from residential to Open Space and Amenity (plot B) and to change Plot F from open space and amenity to residential use;</li> <li>• Submission also relates to the provision of 28 car parking space along the access road into Naas GAA and Scoil Bhríde;</li> <li>• Removal of objective in respect of scenic routes and protected views;</li> <li>• The submission provides a description of the subject lands;</li> <li>• Reference is made to the NPF in terms of additional people and additional households and total jobs and resident workers according to the Census 2016 and an the explanation of Tier 1; serviced zoned land;</li> <li>• The submission refers to the RSES in terms of 30% of new homes to be provided within the built</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>up area, the designation of Naas as a Key Town and various regional objectives in terms of Naas as a Key Town, housing and infrastructure;</p> <ul style="list-style-type: none"> <li>• Reference is made to the draft plan in terms of text from the plan on Future Housing and Population Targets and that 816 housing units to be within the town footprint;</li> <li>• The relevant site history is detailed - 17/1451 for half-sized pitch and tennis court Further Information not responded to and deemed withdrawn. 19/330 new site entrance refused for three reasons due to prematurity;</li> <li>• View, 'everything that can be seen from a place', only way possible to have a view of the Grand Canal corridor from the Sallins Road would involve the demolition of Oldtown House and all structures between the edge of the Grand Canal and the edge of the Sallins Road – unrealistic proposition therefore remove symbols.</li> <li>• Reference is made again to the withdrawn application they hoped to use the proposed facilities in conjunction with Naas GAA and Scoil Bhríde;</li> <li>• The additional parking are necessary for school times and busy periods as cars are parked on footpath;</li> <li>• Proposal to exchange the residential land use (B) of the Walled Garden for the open space and Amenity (F) of the land adjoining the Orchard Housing Scheme is reasonable and will provide the necessary amenity facilities for the community and the residents of the Orchard Housing Scheme;</li> <li>• The additional land amounting to 0.4598 ha is quite small;</li> <li>• Concept of zoning lands for specific use by third parties seem pretty daft;</li> <li>• The submission outlines a case for the change of zoning; proximity to town centre and train station, on bus route, small scale rezoning infrastructure services in place, infill site, existing facilities and amenities and existing site entrance;</li> <li>• The site F directly adjoins the Orchard Housing Estate to the south and the site B forms part of the Orchard Housing Scheme.</li> </ul> <p>There are a number of Appendices attached to the submission:</p>

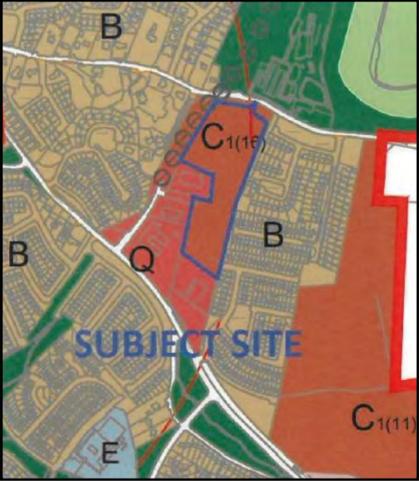
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>OS map, site layout plan, zoning map, photographs and Map 6.31 with the view to be removed marked.</li> </ul> <div style="display: flex; justify-content: space-around; align-items: center;">   </div>
172	Springwood Limited	<p>This submission was prepared by Maguire &amp; Associates.</p> <ul style="list-style-type: none"> <li>Submission relates to St David's Castle on a site which extends to 0.5536 ha;</li> <li>The submission refers to the RSES in terms of jobs ratio and that 30% of all new units to be development on Brownfield and infill lands with a focus on regeneration in particular on sites such as the Castle Quarter;</li> <li>The submission notes that the draft LAP makes reference to St David's Castle in a number of places; CRA 2, masterplan for Castle Quarter CRA, tourism, edge of centre in terms of retail;</li> <li>The CRA concerning St David's Castle has been included in the submission;</li> <li>Springwood Limited have met with councillors and officials of KCC and have awaited responses in relation to phased development of St David's Castle - they are available to meet;</li> <li>Request specific timeframe for the masterplan – completion within 12 months of adoption of Plan;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Building heights to be increased as density of 100 units/ha cannot be achieved with a height of 3-4 storeys.</li> </ul> <p>There are a number of Appendices attached to the submission:</p> <ul style="list-style-type: none"> <li>• OS map and zoning map showing site.</li> </ul> 
173	Pierce Molony	<p>This submission was prepared by Maguire &amp; Associates.</p> <ul style="list-style-type: none"> <li>• The submission relates to lands which extend to 1.34 ha located at Oldtown Demesne, Sallins Road;</li> <li>• Request is made for change from future park/green belt to community and educational (including Cemetery) land uses;</li> <li>• The site is proposed as a new cemetery with entrance from Sallins Road;</li> <li>• The submission provides a description of the site;</li> <li>• Reference is made to the County Development Plan in terms of policies for community services and facilities and burial grounds;</li> <li>• It is stated that the Naas 2011 Plan identified Site E4 on the Kilcullen Road for a cemetery and associated use;</li> <li>• The submission refers to sections of the draft LAP in relation to community, sport and</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>recreational facilities, cycling objectives, transport objects in particular SPO1.6 Sallins Road Cycle Scheme;</p> <ul style="list-style-type: none"> <li>• The site is within the cartilage and attendant grounds of Protected Structure Ref: 19-072 known as Oldtown House, the mostable contiguous area of tree cover is found within Oldtown Demesne around 15ha.</li> </ul> <p><b>The Proposal in the Submission.</b></p> <ul style="list-style-type: none"> <li>• Subject lands 600 metres form town centre, existing footpath and cycleway in front of site, on route of the Railway Station feeder bus and car parking will be provided within site boundaries;</li> <li>• According to the draft LAP there will be feeder bus, road, cycle and footpath improvements on the Sallins Road;</li> <li>• Screening from the site and protected structure;</li> <li>• Site currently used for agriculture;</li> <li>• Focal point of the 'green park' is the Grand Canal corridor, subject site is remote and removed from the Grand Canal with no connectivity;</li> <li>• There is no possibility of future connections through Oldtown House site resulting from the various land ownerships in the area;</li> <li>• Highly unlikely that owners of Oldtown House would facilitate movement of people and bicycles through their landholding connecting the subject site to the main public park along the Grand Canal corridor;</li> <li>• Siting of cemetery within mature trees on site would be idyllic, trees listed for preservation and acceptable, some may have to removed but can replaced elsewhere on site;</li> <li>• View, 'everything that can be seen from a place', only way possible to have a view of the Grand Canal corridor from the Sallins Road would involve the demolition of Oldtown House and all structures between the edge of the Grand Canal and the edge of the Sallins Road – unrealistic proposition therefore remove symbols;</li> <li>• Blanket zoning for Future Park/Green Wedge on subject site is poor planning as no connectivity between subject lands and vast majority of the M zoning;</li> <li>• Submission acknowledges that land ownership should not influence planning decisions;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Need for a cemetery set out in DB01 of the County Plan and HCO 4.7 of the draft LAP.</li> </ul> <p>There are a number of Appendices attached to the submission:</p> <ul style="list-style-type: none"> <li>• OS map, site location map within zoning, Map 6.1 with the view to be removed indicated.</li> </ul> 
174	<b>Naas Regeneration Group</b>	<ul style="list-style-type: none"> <li>• Aim to increase footfall on our Main Street;</li> <li>• Opposed to further retail on the outskirts of town; Northwest Quadrant;</li> <li>• Outlets at both ends of town have led to a donut effect and further development will kill off any hopes of reviving the Main Street.</li> </ul>
175	<b>McAuley Place</b>	<ul style="list-style-type: none"> <li>• Vital sense of person and not simply place is the catalyst for innovation and pragmatic change;</li> <li>• Welcome the initiative and strategic thinking in support of the draft Plan;</li> <li>• The opportunities promoted within the Plan must not be lost but rather exploited by nurturing community, business and public sector buy-in. Partnership approach is the only way;</li> <li>• The Plan although fixed in terms of indicators must however be fluid enough to develop further new thinking and respond to societal challenges that will arise mid plan term and beyond;</li> <li>• Public transport – can we see progression on more sustained approaches to yield greater dividends for energy efficiency, movement of persons, affordable transport offerings, and traffic</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>flows;</p> <ul style="list-style-type: none"> <li>• Residential Living – greater emphasis needs to be placed on the availability of inner town development sites and Living Over the Shop Initiatives as well as CPO powers more widely used to restrict property deterioration due to continued non improvement;</li> <li>• Ministers clearly now see the relationship between Health and Housing and we can go further in Naas to include education, leisure, arts and culture, transport, energy, tourism, business and justice;</li> <li>• The submission welcomes specifics in the Plan to deal with more age friendly offerings and awareness of demographic changes impacting on our society;</li> <li>• Inter- Generational - The submission would welcome the Plan demonstrating an awareness of intergenerational capacity. We need to plan for betterment across this platform;</li> <li>• Rural and Urban – Naas’s waterways, parks, racecourses, industrial parks, rural offerings need to keep to the fore the attraction of Naas as a rural town;</li> <li>• Naas Town Centre – opportunity for enhancement and exploitation with specialist retail and commercial contained within refurbished and upgraded old as opposed to replacement with new;</li> <li>• Health and Wellbeing – important to locate and nurture healthcare provision to both impact on the society it serves but also to enhance the quality of living;</li> <li>• Education – emphasis has to be placed on the importance of educational frameworks within the town and also how the people and infrastructure issues in support of education are managed;</li> <li>• McAuley Place are keen to play their role in developing further infrastructure that meets the needs of the demographic changes on our society but which also add value to ‘How People Live’.</li> </ul>
176	Tom Treacy	<p>This submission was prepared by Clarke &amp; Company.</p> <ul style="list-style-type: none"> <li>• The subject site is located off the Tipper Road to the south of the Racecourse;</li> <li>• The site extends to c. 2.5 ha and falls from north to south and is proposed to be zoned New Residential with an objective for the Naas Ring Road to adjoin the property to the west of the subject site;</li> <li>• The submission references the population growth in the last two census and a mix of high-quality residential units within walking distance of the town centre is required;</li> </ul>

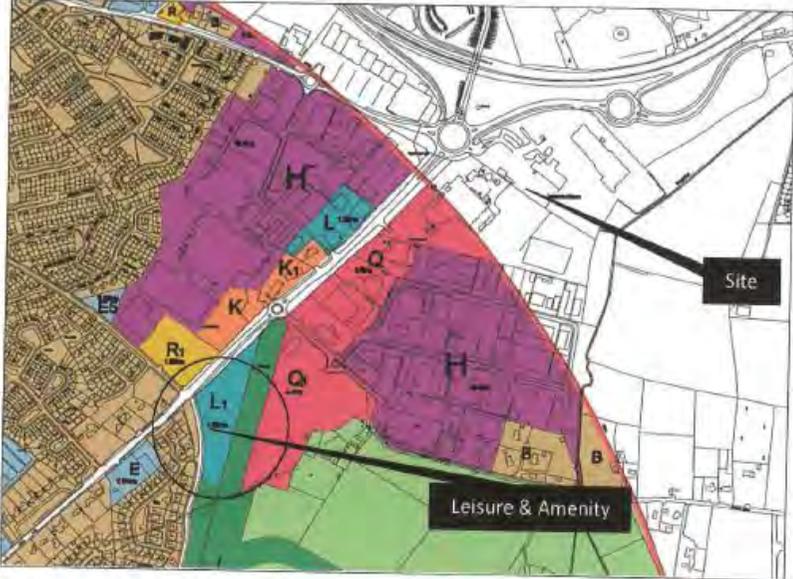
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Subject site is one of very few brownfield sites remaining within 1000m of the town centre;</li> <li>• New improved route objective will leave it highly accessible;</li> <li>• Submission requests that the site be identified as regeneration lands and an objective placed in the Plan giving precedence to brownfield sites within 1000m of the town centre.</li> </ul> 
177	Applegreen	Submission is prepared by <b>David Mulcahy Planning Consultants Ltd</b> on behalf of Applegreen and relates to the <b>Former Cemex Site, Dublin Road, Naas.</b>

Sub. No.	Name	Summary of Submission
		<div data-bbox="1048 300 1601 762" data-label="Image"> </div> <p data-bbox="1048 762 1456 782">Fig No.2 Aerial View of site (source Google Earth Pro, July 2013).</p> <p data-bbox="577 821 891 853"><b><u>Executive Summary</u></b></p> <ul data-bbox="627 861 2038 1380" style="list-style-type: none"> <li>• Subject lands are located a key gateway location and are currently on eye sore</li> <li>• Applegreen obtained permission in 2015 for an off-line motorway service station. That decision was appealed to ABP but the appeal was subsequently withdrawn. It is clear that in order to justify a motorway service station in this location, a local plan objective for this purpose is required.</li> <li>• Applegreen are disappointed that the content of their submission to the strategic issues paper is not reflected in the draft LAP</li> <li>• This submission asks for: <ul style="list-style-type: none"> <li>– Specific reference to be made to a service area on the former Cemex site</li> <li>– The permitted lands use under the Q1(2) zoning to be broadened to include shop (convenience) and hot-food takeaway (wholesale) which were previously allowable</li> <li>– The permitted land uses under the Q1(2) zoning to be broadened to include for a hotel and conference facility</li> </ul> </li> <li>• The Midway Complex at Junction 17 is an example of what could be achieved at the Cemex site</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• A draft of a proposed masterplan is included with this submission at Appendix 1</li> <li>• Applegreen are confident a proposed scheme would provide at least 400 more jobs for Naas.</li> </ul> <p><b><u>Introduction</u></b></p> <ul style="list-style-type: none"> <li>• Applegreen owns lands measuring approximately 6.37ha at the former Cemex site. Lands are zoned Q1(2) in the draft LAP and are also identified as a regeneration area along with adjoining Donnelly Mirrors site</li> </ul> <p><b><u>Background</u></b></p> <ul style="list-style-type: none"> <li>• Site as formerly operated by Cemex, who vacated in 2007 with the loss of 50 jobs</li> <li>• In July 2012, there was a significant fire at the site and main industrial unit badly damaged</li> </ul> <p><b><u>Planning History</u></b></p> <ul style="list-style-type: none"> <li>• Under planning ref 15/500, permission was granted by Kildare County Council for demolition of existing structures and construction of 3 buildings as a global training hub, global logistics and food research /production building (warehouse/logistics) and motorway services amenity building and associated Fuel Area</li> <li>• The application was subsequently withdrawn at appeal stage due to other ABP decisions relating to service stations</li> </ul> <p><b><u>Previous Development Plan</u></b></p> <ul style="list-style-type: none"> <li>• Subject site was zoned NE10 (Enterprise and Employment) in the now expired Naas Environs Plan</li> </ul> <p><b><u>Planning Context</u></b></p> <ul style="list-style-type: none"> <li>• NPF sets out a presumption in favour of development that can encourage more people and generate more jobs and activity within existing towns, cities and villages</li> <li>• TII Service Area Policy document produced in 2014 specifically identified the need for an on-line service area between J4 (Rathcoole) and J9 (Naas). In the submitted the 2015 planning application, experts considered that there was no appropriate location for an on-line facility between these junctions whilst complying with relevant standards. As such, an off-line service area is the only possible way of delivery without significant road alterations</li> <li>• The draft RSES sets out Naas a Key Town in the hinterland area</li> <li>• The LECP 2016-2021 for Kildare notes that over 40% of the total workforce living in Kildare work</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>outside of the county, mostly in Dublin</p> <ul style="list-style-type: none"> <li>• The Kildare CDP seeks to accommodate and facilitate the growth of the economy in Kildare</li> <li>• Submission repeats the zoning draft Naas LAP zoning, the stated purpose of this zoning and specific objective relating to Q1(2) Dublin Road, former Cemex and Donnelly Mirrors sites.</li> <li>• Submission repeats relevant extracts of the LAP, namely sections 5.2, 5.3, 5.3.4 and specific objective K1.</li> <li>• A number of recent decisions by ABP have highlights the absence of a specific objective for service stations, including at Dromoland, Co. Clare and Dunshaughlin, Co. Meath. The current Clare CDP now includes a specific policy for an off-line service station</li> </ul> <p><b><u>Submission</u></b></p> <ul style="list-style-type: none"> <li>• Applegreen are fully committed to developing the Cemex lands</li> <li>• Applegreen are disappointed that the contents of their submission on the strategic issues paper is note reflected in the current draft Naas LAP. The range of land uses are now more restrictive than previously. Without a service area as a core element of the new gateway site, our clients will not be able to develop the site. Therefore, appeal to the Council to amend the draft Naas LAP</li> <li>• No fundamental objection to the development of a masterplan and have been proactive in developing one – attached as Appendix 1</li> <li>• Applegreen are keen to ensure that any masterplan will not render them dependent on the owner of the Donnelly Mirrors site</li> <li>• Request that the zoning matrix is amended so that petrol station is ‘permitted in principle’ rather than ‘open for consideration’;</li> <li>• Repeat the request for the Council to include a specific reference to a ‘motorway service area’ or ‘service area’ in the land use matrix for Q1(2) zoned lands. Also request a specific map based objective relating to the former Cemex lands, or text-based objective, which clearly states that an appropriately designed off-line service area would be considered on these lands, notwithstanding that it should form part of the a wider mixed use high quality development</li> <li>• The Portlaoise LAP 2018-2024 and Togher Masterplan 2018-2024 utilise precise and unambiguous directions which set out clarity for the landowners which is a relevant precedent</li> </ul>

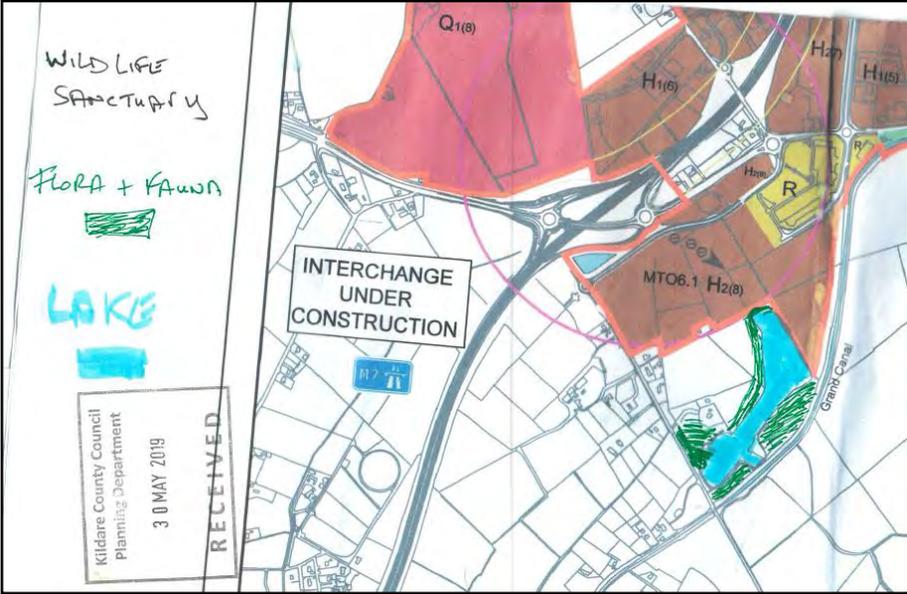
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Submission notes that, in comparison with the previous zoning for the land, the zoning in the proposed draft omits, inter alia, 'hot food take away', 'shop (convenience)' and 'warehouse'. Both 'shop' and 'hot food take away' are both integral elements of any service area and it is imperative that both land uses are included as permissible. A warehouse formed part of the application subsequently withdrawn at appeal stage and submission suggests that this should also be a permissible use.</li> <li>• Submission considers it entirely reasonable that a key regeneration site at a gateway location deserves a somewhat different mix of uses compared with other Q lands.</li> <li>• It is noted that the former Leisure &amp; Amenity Zoning objective on the Dublin Road under the previous plan has now been replaced with a New Residential Zoning. It is submitted that a 'Hotel and Conference' land use should be included as permissible under zoning Q1(2), as the provision of hotel and conference facilities would facilitate the delivery of a landmark building. Typical examples are location at J7 (City North Hotel) and J17 (Midway Hotel)</li> <li>• Should be noted that Applegreen own and operate the Midway complex and this is a successful model of what could emerge at the former Cemex site. Applegreen's wider portfolio includes 30 hotels in the UK.</li> </ul>

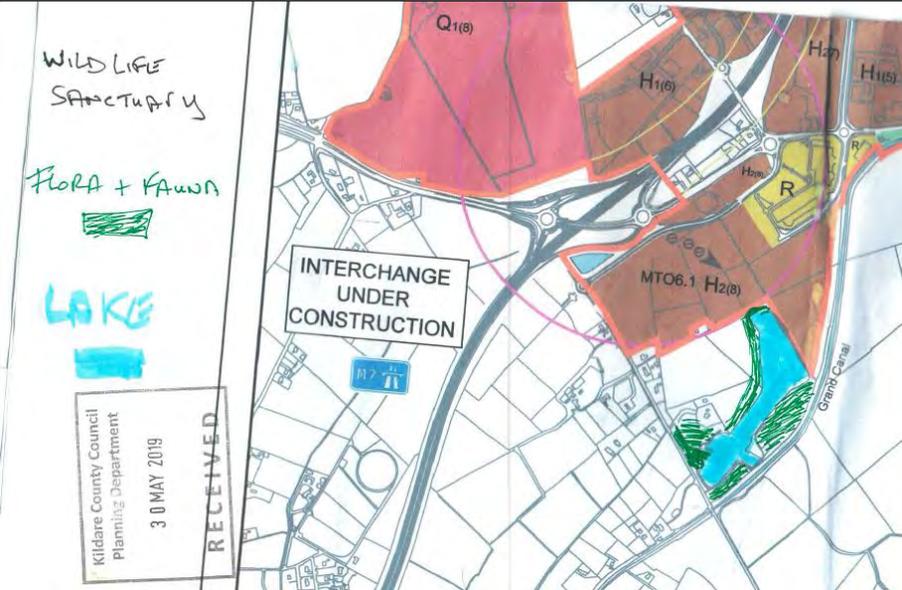
Sub. No.	Name	Summary of Submission
		 <p data-bbox="958 877 1792 925"><b>Fig No.6</b> Location of Leisure &amp; Amenity zoning objective under the previous Naas Town Development Plan 2011-17.</p>

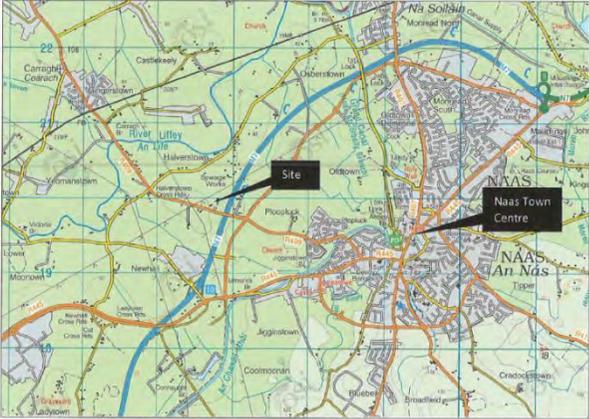
Sub. No.	Name	Summary of Submission
		<div data-bbox="945 284 1720 778" data-label="Image"> </div> <p data-bbox="945 778 1720 821"><b>Fig No.7</b> Former Leisure &amp; Amenity lands now zoned New Residential under the draft Naas LAP 2019-23.</p> <p data-bbox="577 837 757 869"><b><u>Conclusion</u></b></p> <ul data-bbox="627 877 2049 1173" style="list-style-type: none"> <li>• Applegreen are fully committed to developing the site</li> <li>• Uses are now more restrictive than previously</li> <li>• Therefore, appeal to the Council to amend the draft Naas LAP as set out</li> <li>• Applegreen are confident they can deliver high quality mixed use development and at least 400 more jobs for Naas</li> <li>• Applegreen already provide 400 jobs across its existing network in Kildare</li> <li>• The suggested amendment would encourage development of this key site and would accord with the proper planning and sustainable development of the area</li> </ul> <p data-bbox="577 1181 2027 1252"><b><u>Appendix 1 – Outline Urban Design Framework (Magna Donnelly, Cemex Lands) – prepared by Loci (the report is dated May 2019)</u></b></p> <ul data-bbox="627 1260 1467 1364" style="list-style-type: none"> <li>• The Outline Urban Design Framework (OUDF) includes: <ul data-bbox="627 1300 851 1364" style="list-style-type: none"> <li>– Introduction</li> <li>– Vision and Principles</li> </ul> </li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>- Urban Design Concepts</li> <li>- Conclusion</li> <li>• The OUDF relates to the Cemex and Donnelly Mirror sites</li> </ul> <p style="text-align: center;">Figure 3. Main land plots</p>  <ul style="list-style-type: none"> <li>• The introduction sets out the purpose of the OUDF, to provide a preliminary outline of the key aspects of urban design for these strategic lands</li> <li>• The introduction then sets out the planning and development context as well as a description of the site and surrounding lands. The introduction repeats the planning history of the site referenced in the main submission and also provides an analysis of environmental conditions</li> <li>• The Vision and Principles sets out key principles for the development of the site including inter alia: to provide a mix of uses, provide new amenity and recreation uses, to building on landscape</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>character and; provide a physically adaptable urban grain of robust and developable blocks</p> <ul style="list-style-type: none"> <li>• The Overall Urban Design Concepts consider: function, landscape and green infrastructure, routes and spaces and urban blocks and frontage</li> <li>• Appendix 2 provide an comparison of the uses detailed as acceptable in principle, open for consideration and not acceptable between the Naas Town Plan 2011-2017 and the proposed draft Naas LAP.</li> </ul>
178	Robin Skelton	<ul style="list-style-type: none"> <li>• Strongly oppose the planned zoning of land ref MT06.1 H2(8) to industry and warehousing;</li> <li>• Proposed zoning will seriously impact the quality of life on the Rathasker Road, an area already suffering from speeding traffic. An increase in traffic from an industrial estate will only make things worse;</li> <li>• Proposed zoning will reduce value of residential properties;</li> <li>• If used as a storage facility for fruit and vegetables, it would bring a rat infestation;</li> <li>• Wildlife would be potentially affected.</li> </ul>

Sub. No.	Name	Summary of Submission
		
179	Kiva Skelton	<ul style="list-style-type: none"> <li>• Strongly oppose the planned zoning of land ref MT06.1 H2(8) to industry and warehousing</li> <li>• Proposed zoning will seriously impact the quality of life on the Rathasker Road, an area already suffering from speeding traffic. An increase in traffic from an industrial estate will only make things worse</li> <li>• Proposed zoning will reduce value of residential properties</li> <li>• If used as a storage facility for fruit and vegetables, it would bring a rat infestation</li> <li>• Wildlife would be potentially affected.</li> </ul>

Sub. No.	Name	Summary of Submission
		
180	Liebherr Construction Equipment Ltd	Submission is prepared by <b>David Mulcahy Planning Consultants Ltd</b> on behalf of Liebherr Construction Equipment Ltd and relates to the <b>Site 16 Osberstown Business Park, Caragh Road, Naas.</b>

Sub. No.	Name	Summary of Submission
		 <p data-bbox="1077 719 1666 738">Fig No.1 Site Location Map (source: Myplan.ie - OSI Licence No.EN 0080915)</p>  <p data-bbox="1095 1257 1641 1300">Fig No.2 Site Context Map (source: Myplan.ie - OSI Licence No.EN 0080915). The red line boundary is indicative only.</p>

Sub. No.	Name	Summary of Submission
		<p><b><u>Executive Summary</u></b></p> <ul style="list-style-type: none"> <li>• Site is 1.01ha. majority of lands zoned Industry / Warehousing under draft Naas LAP 2019-23. A small portion in the south-west corner is outside the development boundary of the draft LAP and remains unzoned.</li> <li>• Council previously granted planning permission to ‘square-off’ the overall landholding for a new factory.</li> <li>• Liebherr Construction Equipment Ltd have an imminent planning application to lodge with the Council to relocate their existing factory from South Dublin to Co. Kildare</li> <li>• Submission seeks that the south-west corner of the landholding to be zoned for Industry / Warehousing</li> </ul> <p><b><u>Introduction</u></b></p> <ul style="list-style-type: none"> <li>• Squaring off of the landholding will facilitate an imminent planning application for the land;</li> <li>• Background;</li> <li>• Subject lands are 2.6km to the west of Naas;</li> </ul> <div data-bbox="1070 826 1659 1305" data-label="Image"> </div> <p data-bbox="1070 1310 1659 1353"><b>Fig No.3</b> Aerial image of lands owned by Liebherr Construction Equipment Ltd (source: Google Earth Pro, June 2018).</p> <ul style="list-style-type: none"> <li>• Planning permission was granted in 2008 to construct an industrial unit with ancillary offices on</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>the site but this was not acted upon and has expired;</p> <ul style="list-style-type: none"> <li>• Planning permission was granted in 2009 for parking and storage on unzoned lands. This was not acted upon and expired;</li> <li>• Submission sets out the planning context and quotes policies ECD1, ECD2 &amp; ECD10 of the Kildare CDP. Also reference the zoning objective NE1 in the Naas Environs Plan 2011-2017.</li> </ul> <div data-bbox="1137 475 1594 842" data-label="Figure"> <p>Legend:      Naas Town Council      NE 1: Industry / Warehousing      NE 2: Existing / Permitted Retail / Commercial      NE 3: Public Utilities      Roads Objective</p> </div> <p data-bbox="1137 849 1594 890">Fig No.6 Extract from Naas Environs Plan under the Kildare CDP 201-17 showing subject lands predominantly zoned Industry &amp; Warehousing Zoning [H] with south-west corner unzoned.</p> <div data-bbox="1137 912 1594 1279" data-label="Figure"> </div> <p data-bbox="1137 1279 1594 1295">Fig No.7 Extract from the draft Naas LAP 2019-23 showing south-west corner unzoned.</p> <p data-bbox="577 1305 766 1337"><b><u>Submission</u></b></p> <ul style="list-style-type: none"> <li>• Clients are preparing an imminent planning application for development of the landholding.</li> </ul>

Sub. No.	Name	Summary of Submission
		<p><b><u>Conclusion</u></b></p> <ul style="list-style-type: none"> <li>• Submit that the zoning of this small portion of land will make a significant improvement to the lands owned by Liebherr Construction Equipment Ltd in terms of facilitating future development of this key vacant site.</li> </ul>
181	A. Cawley	<p>The submission refers to the proposed construction of the Naas Inner Relief Road outlining a number of issues including:</p> <ul style="list-style-type: none"> <li>• No benefits to the residents of King's Court.</li> <li>• Moving congestion from the town centre to this area.</li> <li>• Negative impacts in terms of noise, pollution and danger of fatalities.</li> <li>• States that proposed 12 foot walls alongside sections of the road are inappropriate and have complete disregard for residents who will feel "imprisoned by them"</li> <li>• Road will be used by increased numbers of HGVs (HCVs).</li> <li>• Route first proposed in 1992 and is completely outdated.</li> <li>• Road will damage the visual amenities of the area and will be a major thoroughfare. Such arterial routes do not integrate with existing residential estates.</li> <li>• Speed limit of 50kph will likely be ignored.</li> </ul>
182	P. Cawley	<p>The submission refers to the proposed construction of the Naas Inner Relief Road outlining a number of issues including:</p> <ul style="list-style-type: none"> <li>• No benefits to the residents of King's Court.</li> <li>• Moving congestion from the town centre to this area.</li> <li>• Negative impacts in terms of noise, pollution and danger of fatalities.</li> <li>• States that proposed 12 foot walls alongside sections of the road are inappropriate and have complete disregard for residents who will feel "imprisoned by them"</li> <li>• Road will be used by increased numbers of HGVs (HCVs).</li> <li>• Route first proposed in 1992 and is completely outdated.</li> <li>• Road will damage the visual amenities of the area and will be a major thoroughfare. Such arterial routes do not integrate with existing residential estates.</li> <li>• Speed limit of 50kph will likely be ignored.</li> </ul>

Sub. No.	Name	Summary of Submission
183	S. Cawley	<p>The submission refers to the proposed construction of the Naas Inner Relief Road outlining a number of issues including:</p> <ul style="list-style-type: none"> <li>• No benefits to the residents of King's Court.</li> <li>• Moving congestion from the town centre to this area.</li> <li>• Negative impacts in terms of noise, pollution and danger of fatalities.</li> <li>• States that proposed 12 foot walls alongside sections of the road are inappropriate and have complete disregard for residents who will feel "imprisoned by them"</li> <li>• Road will be used by increased numbers of HGVs (HCVs).</li> <li>• Route first proposed in 1992 and is completely outdated.</li> <li>• Road will damage the visual amenities of the area and will be a major thoroughfare. Such arterial routes do not integrate with existing residential estates.</li> <li>• Speed limit of 50kph will likely be ignored.</li> </ul>
184	Steven Fadian	<p>The submission refers to the proposed construction of the Naas Inner Relief Road outlining a number of issues including:</p> <ul style="list-style-type: none"> <li>• Hundreds of homes and thousands of residents affected but no benefits to the residents of King's Court.</li> <li>• Will separate the King's Court estate from the Naas Racecourse and will ruin the racecourse as an amenity for walkers.</li> <li>• Moving congestion from the town centre to this King's Court estate area, the junction with the Gallops and junction with Sallins Road.</li> <li>• Disputes the figures provided for traffic numbers and states that there will be 15,000 on day one not the 7,500 projected.</li> <li>• Negative impacts in terms of noise, pollution and danger of fatalities.</li> <li>• Concerns over proposed 7-12 foot walls alongside sections of the road.</li> <li>• Argues the need for an outer ring road to be built around Naas.</li> <li>• Outlines several concerns in relation to the selected route chosen; argues that it is the cheapest route chosen for economic reasons.</li> <li>• States that funding was provided for the route before traffic counts took place.</li> </ul>

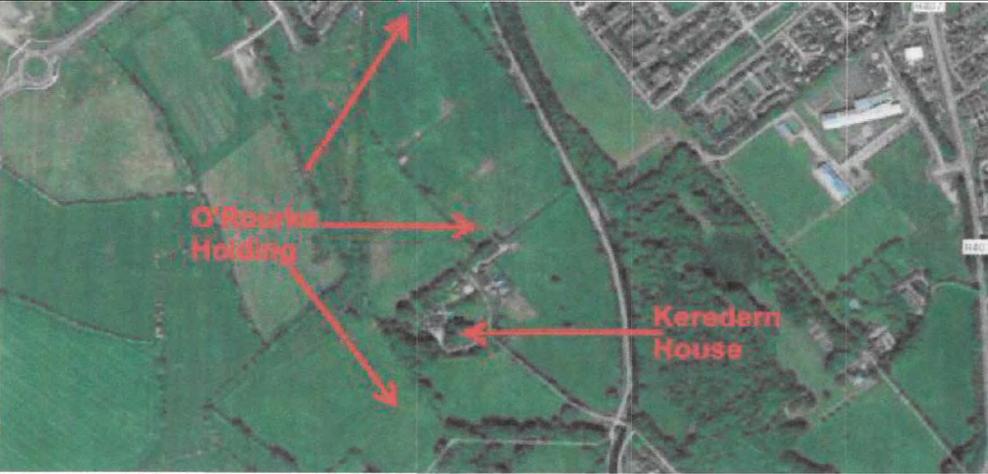
Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Route first proposed in 1992 and is completely outdated.</li> <li>• States that no analysis has been included in the report in relation to the severe negative consequences of this proposal for the residential estates, where proposed routes is within 50 metres of the same.</li> </ul>
185	Joan Purcell	<p>Submission relates to the proposed zoning of lands at Craddockstown North, Naas, Co Kildare.</p> <p>Appendix A of the submission provides a map of the lands in question (see below)</p> <div data-bbox="1021 560 1603 975" data-label="Image"> </div> <ul style="list-style-type: none"> <li>• The submission notes that the lands in question were zoned Agricultural with a small portion 'E: Community and Education' 2011-17 Naas Town Development Plan (NTDP). Under the Draft LAP the majority of the lands are zoned 'E: Community and Education' while a small portion to the south is zoned 'F: Open Space and Amenity'. Another small portion in the extreme south of the lands lies outside the LAP boundary.</li> <li>• The submission questions the planning rationale behind the zoning of the lands in the Draft LAP stating that the Draft Plan does not provide justification for the zoning on this site.</li> <li>• It believes the lands would be more appropriately suited for residential purposes representing a logical expansion of the Naas Urban Area and that the site is surrounded by residential lands.</li> <li>• The submission provides a policy context and site specific policy context on the subject site.</li> <li>• As part of its general observations it states that there is no envisaged need for educational uses on</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>the lands in the immediate future given the granting of planning for a post primary school at Millennium Park.</p> <ul style="list-style-type: none"> <li>States that Millennium Park would be a more appropriate location option providing a more balanced allocation for educational zoning in the town.</li> </ul>
186	Colviet Family	<p>Submission is prepared by David Mulcahy Planning Consultants Ltd, Waterman Moylon Engineering Consultants and Demesne Architecture.</p> <p><b>Zoning:</b> The submission relates to lands located to the north of the Pipers Hill Development along the Kilcullen road. It proposes that the lands proposed to be zoned F2 – Open Space and Amenity in Draft plan should be amended to either;</p> <ol style="list-style-type: none"> <li>Zone the entire landholding of 10.5ha as new residential or</li> <li>Zone the lands part new residential and part education/community (an indicative framework for development of this option has been provided).</li> </ol> <p>It is also put forward that in the event that neither option 1 or 2 are favoured that the proposed F2 zoning be removed as this zoning renders the lands uninsurable for farming due to trespassing and antisocial problems.</p> <p>It is contended that the subject landholding and removal of the open space and amenity zoning should be considered favourably as:</p> <ul style="list-style-type: none"> <li>– This area of land does not form an important habitat;</li> <li>– The zoning of c. 73% of the landholding for open space and amenity is excessive;</li> <li>– The lands in question are fully serviced;</li> <li>– A more reasonable approach to zoning the subject lands would be to provide a ratio similar to the Celbridge (Corduan Lands) of 10ha residential to 2ha open space and amenity.</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>- The ecological appraisal of the subject lands set out in Appendix D demonstrates that the subject F lands are not of high importance;</li> <li>- The open space and amenity zoning does not benefit from any passive surveillance and will result in anti-social behaviour.</li> <li>- The permitted development at the Killashee planning ref. No. 16/635 fails to provide for any passive surveillance of the open space and amenity lands. The development of the subject landholding for residential purposes would facilitate such passive surveillance of these lands to the south.</li> <li>- The proposed zoning of the subject lands residential would contribute towards addressing the housing crisis, would be in line with the designation of Naas as a 'Key Town' within the RSES, would provide a residential edge along the Kilcullen Road while also connecting the Piper's Hill development back into the town.</li> <li>- The submission refers to a habitat survey which was carried out as part of the LAP process. It advises that whilst the entire lands have been identified as an area of green infrastructure (No.6 Broadfield and Pipershill); a significant part has been zoned for Residential, Community and Education. Only the southern part has been zoned Open Space/Amenity. The fact that these lands have been zoned for future development demonstrates that this particular habitat is not of particular importance.</li> <li>- The submission outlines an appraisal of the area. A Strength, Opportunities and Constraints diagram prepared by demesne Architects is attached to Appendix B. A Key Developable Area diagram has also been provided. The submission also refers to services available to the site; these are outlined in Appendix C.</li> <li>- An integrated Neighbourhood Centre, Crèche, Nursing Home would be suitable. There is a notable absence of neighbourhood faculties in the area south of the Naas ring road. The lands west of the escarpment should therefore include a neighbourhood objective.</li> </ul> <p>The report concludes by stating the Colviet family welcome the zoning of the northern end of the landholding for residential purposes however the open space and amenity zoning is considered to be excessive and disproportionate to other landholdings in Naas and does not represent the proper planning and development in terms of the gross lack of potential for passive surveillance of any</p>

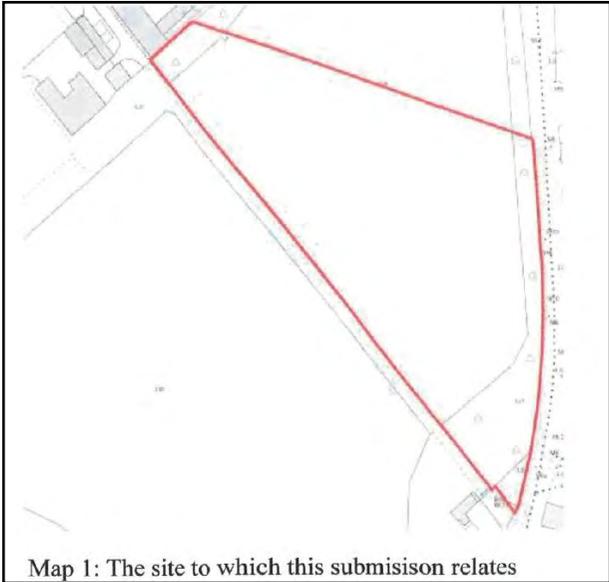
Sub. No.	Name	Summary of Submission
		recreational space that would result from the zoning objective. It is considered that both options 1 and 2 put forward represent proper planning sustainable development of the area.
187	Dermot O'Rourke	<ul style="list-style-type: none"> <li>• This submission is made in respect of lands at Keredern House, Tandy's Bridge;</li> <li>• Requests that a one off residential dwelling be 'open for consideration' on M - zoned lands;</li> <li>• The submission is accompanied by a report from Vincent Farry &amp; Co, Planning and Development Consultants.</li> </ul> <p><b>Report from Vincent JP Farry and Co Ltd</b></p> <p><u>Site and Environs</u></p> <ul style="list-style-type: none"> <li>• Keredern House is on about fifty acres, used for equine purposes;</li> <li>• The submission refers to the zoning in the 2011 Plan as being Future Park/Green Belt and a table in the Plan states the quantity of this type of zoning extends to 87 ha;</li> </ul> <p><u>Re-zoning Request</u></p> <ul style="list-style-type: none"> <li>• Asks to amend the narrative for the zoning;</li> <li>• The change sought would only affect land in the client's ownership;</li> </ul> <p><u>Legal and Historical Events</u></p> <ul style="list-style-type: none"> <li>• Grounds within Oldtown House have been entrusted to the Council for public usage;</li> <li>• Subject site is privately owned with existing equine business;</li> <li>• Does not form part of arrangements for use by the public;</li> <li>• Reference is made to the High Court case Mahon V An Bord Pleanála where it is stated a sharp distinction is drawn between public and private property;</li> <li>• The submission places emphasis on the following extract from the case "the lands herein are privately owned and one has to ask what is to stop the owner of the land from enclosing the property which he owns. Clearly, zoning of the lands as public open space does not have the effect of making the lands available to members of the public in the ...area".</li> <li>• The current zoning arrangements do not reflect the existing equestrian business on the landholding;</li> </ul> <p><u>Future Equine Plans</u></p> <ul style="list-style-type: none"> <li>• The farm business is being transferred to the daughter and wants to build a house on the</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>landholding;</p> <ul style="list-style-type: none"> <li>• Need for accommodation for persons with responsibility for animals, especially thoroughbred bloodstock;</li> <li>• No house likely to cause cessation of equine activities on the lands;</li> <li>• New dwellings for person working in equine industry acknowledged by An Bord Pleanála;</li> <li>• Submission refers to appeal case PL09.212556 (Ref: 05/560) where the Bord overturned a KCC decision and refers to an extract in the inspectors report which recognises the importance of equine industry, houses/lodges reflect the needs of the land use and applicant's involvement in such represents proper planning and sustainable development;</li> <li>• Wants to Council to recognise the existing equestrian business cannot continue without on-site accommodation.</li> </ul> <p><u>Planned Park</u></p> <ul style="list-style-type: none"> <li>• One house would not prejudice the parkland goal;</li> <li>• Use of land for agriculture purposes is exempted development and the site can be used for a range of equine activities regardless of whether the policy change request is accepted;</li> <li>• The submission refers to Classes 6,9 and 10 of the Planning and Development Regulations and the range of agricultural structures that would not require planning permission;</li> <li>• A dwelling on the land would not impact on views of Grand Canal or the function of the planned future park.</li> </ul> <p><u>Concluding Comments</u></p> <ul style="list-style-type: none"> <li>• Refers to Howth SAAO that new residential development is permitted at a density of one dwelling per 2.5 hectares and invite the Council to relax the M-zoning controls.</li> </ul>

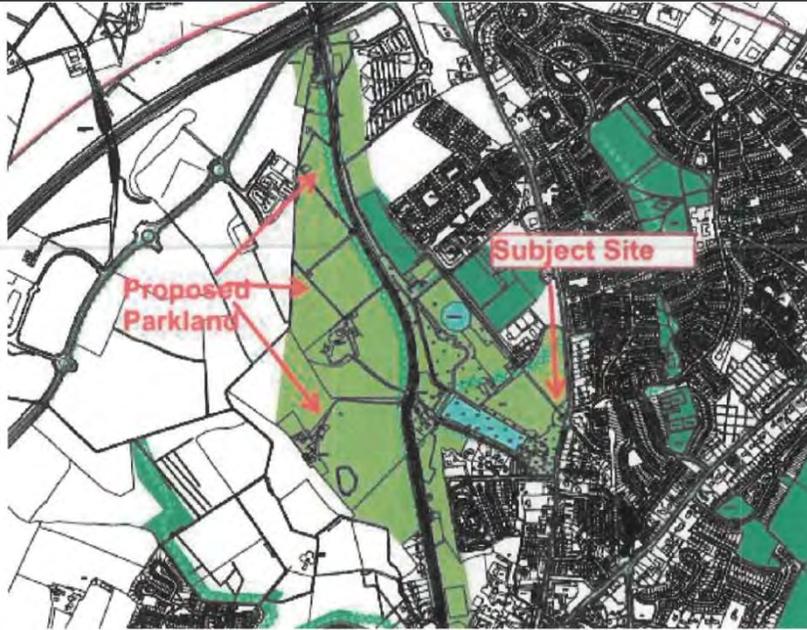
Sub. No.	Name	Summary of Submission
		 <p>An aerial photograph showing a rural landscape with green fields, roads, and buildings. Two red arrows point to specific locations: one labeled 'O'Rourke Holding' pointing to a field area, and another labeled 'Keredern House' pointing to a cluster of buildings. A road with a '140' sign is visible on the right side of the image.</p>

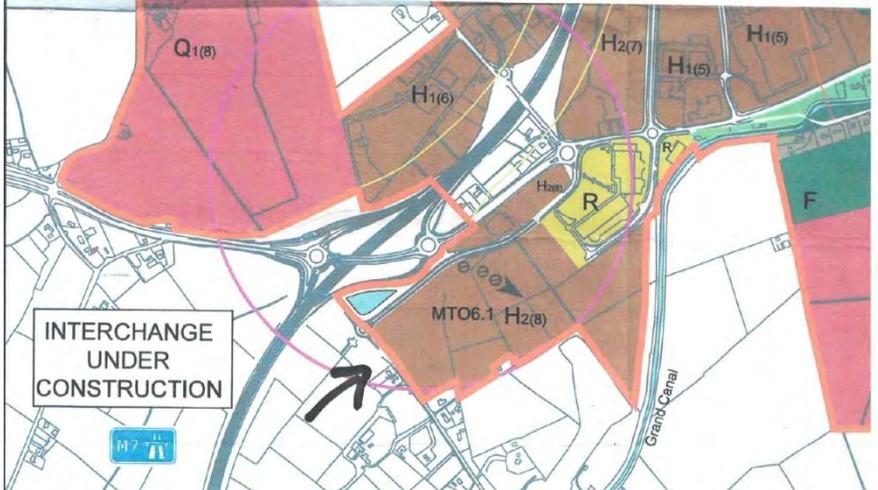
Sub. No.	Name	Summary of Submission
		
188	David O'Rourke	<ul style="list-style-type: none"> <li>• This submission is accompanied by a report from Vincent Farry &amp; Co, Planning and Development Consultants;</li> <li>• The submission seeks residential zoning on 3.3 acres of an infill site on the Sallins Road within the grounds of Oldtown House.</li> </ul> <p><b>Report from Vincent JP Farry and Co Ltd</b></p> <ul style="list-style-type: none"> <li>• Requests land to be rezoned from Open Space to Residential;</li> <li>• The subject site extends to 3.3 acres and is triangular in shape and located within the grounds of Oldtown House, Sallins Road, Naas;</li> <li>• Level site laid out in grassland;</li> <li>• Demarcates eastern boundary of Oldtown Demense;</li> <li>• Served by an historical entrance and by a longstanding driveway which leads from Sallins Road and which serve Oldtown House;</li> <li>• The submission refers to the zoning of the site in the Development Plan 2011, as Open Space</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>and Green Network;</p> <ul style="list-style-type: none"> <li>• Requests the existing narrative which accompanies the New Residential zoning should be carried forward into the Naas LAP;</li> <li>• The submission puts forward planning factors to justify the rezoning request as follows: <ul style="list-style-type: none"> <li>○ Principles of Sustainability – site directly abuts urban and suburban development, proper growth, not best use of land within the built up area thus encroachment into the countryside;</li> <li>○ Sequence of Development – Refers to Section 4.19 of the Development Plan Guidelines in relation to sequential approach; growth outward from the centre, encouraging infill, contiguous to existing zoned lands. It would accord with the zoning to the north for New Residential and Existing/Infill Residential.</li> <li>○ Services and Infrastructure – already accommodates a network of water supply, stormwater and sewage pipes. Other centres cannot accommodate development due to technical difficulties. Existing vehicular access.</li> <li>○ Historical Considerations – subject site occupies potentially sensitive location to Oldtown House a protected structure (NS 19-072) but is physically and visually separated by mature landscaping (images provided). Site could accommodate low-profile residential development, behind the historic wall to the rear of tall trees ensuring the development is not visible from Sallins Road.</li> <li>○ Impact on Parkland Objective – Subject site miniscule proportion of planned 87 ha parkland and will not jeopardise the open space objective to rezone. Subject site is a peripheral location relative to the M lands. Submission refers to Section 4.13 of Development Plan Guidelines regarding the amount of zoned land must be clearly based on and justified by, a realistic assessment of need and queries the need for 87 ha of public open space.</li> </ul> </li> <li>• The submission states that status of the site as privately owned land must be considered when assessing the re-zoning request;</li> <li>• Other land is of Oldtown Demense is governed by legal agreements the subject site is not;</li> <li>• Reference is made to the High Court case Mahon V An Bord Pleanála where it is stated a sharp</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>distinction is drawn between public and private property;</p> <ul style="list-style-type: none"><li data-bbox="629 320 1991 464">• The submission places emphasis on the following extract from the case “the lands herein are privately owned and one has to ask what is to stop the owner of the land from enclosing the property which he owns. Clearly, zoning of the lands as public open space does not have the effect of making the lands available to members of the public in the ...area”.</li><li data-bbox="629 472 2047 539">• The submission states the site has no physical or functional factors to prevent the site from being developed for housing purposes.</li></ul> <div data-bbox="1010 579 1619 1161"><p data-bbox="1032 1134 1525 1161">Map 1: The site to which this submission relates</p></div>

Sub. No.	Name	Summary of Submission
		 <p data-bbox="864 722 1767 751">Map 2: The land is currently zoned for parkland purposes (M-zone in the Development Plan)</p>

Sub. No.	Name	Summary of Submission
		 <p data-bbox="936 930 1709 959">Map 3: The juxtaposition of the site with the remainder of the parkland</p>
189	Eunice Finley	<ul data-bbox="629 967 2040 1385" style="list-style-type: none"> <li>• Strenuously objects to proposed industrial zoning;</li> <li>• Impact on their landholding which they use for equestrian;</li> <li>• Current road works already impacting and the additional volumes of noise/traffic;</li> <li>• Industrial zoning will exacerbate these issues and make it harder to handle and exercise horses;</li> <li>• Horse riders exposed to dangers/impact on safety as a result;</li> <li>• Quiet residential area and industrial zoning will alter and intrude on home lives;</li> <li>• Traffic and junction on the road already problematic and will further deteriorate with industrial zoning;</li> <li>• General environment already affected by construction work and many habitats already destroyed;</li> <li>• Why need for more industrial zoned areas with myriad of vacant lots;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>Local chaotic construction in area and looking forward to it finishing and this would extend this unacceptable disruption further.</li> </ul> 
190-224	Numerous replica submissions	<p><b>Robin Skelton, Krystle Foley, Larry Swan, Alan Clegg, Paddy Byrne, Alice Fennelly, Shane McCann, Mandy Kelleher, Peter &amp; Paula Whyte, Dee Kelly, Hugh Statham, Ellen Dowling, Paul Dowling, Andy's Barber Shop, Catriona Byrne, Paul Plummer, Alan Furlong, Susan MacMillan, Charles McEvoy, David Donegan, Asif Iqbal, Pat Goulding, Derek Ryan, Lips &amp; P's, Deirdre O'Hara, Aroma Mocha Coffee Shop, Regina Fahy, Eamon Price, Anna Doyle, Lorraine Domican, Ann Marie Grace, Maria O'Driscoll, Mary Fielding, Charlotte Mooney and Karolynn MacGale.</b></p>
		<p>The above referenced names and businesses made individual submissions under a group called the Naas Working Together. The submission is summarised as follows:</p> <ul style="list-style-type: none"> <li>The submission outlines who they are, their objectives and projects across the town that they have been involved in;</li> <li>The submission highlights the struggle towns like Naas face with regards; out of town retail</li> </ul>

Sub. No.	Name	Summary of Submission
		<p>           parks, free parking, online shopping;         </p> <ul style="list-style-type: none"> <li>• Reference is made to a meeting in 2016 over concern for the Main Street and that KCC were not proactive enough and not listening to the public and traders were saying;</li> <li>• June 2016 a Retail Support Programme was started which has evolved to Naas Working Together, from this initiatives were introduced such as the Town Gift Card Scheme, town map/retail directory;</li> <li>• Still businesses closing e.g. Imagination Station, Moat Mall;</li> <li>• Attempts of regeneration by KCC have had no real effect;</li> <li>• Issues of traffic flow, parking, public realm, civic space, regeneration of the 'Historic Core' have been highlighted;</li> <li>• The LAP should set out the specific measures that will be employed to ensure delivery of Town Centre Plan with a specific timeframe that reflects the urgency of the matter;</li> <li>• Waterford has been used as an example where the Local Authority brought about cutting edge city centre regeneration;</li> <li>• The submission suggests that the services of 'place making' professional like Colliers International should be engaged;</li> <li>• The submission queries whether the town is ready for the opening of Dunnes Stores;</li> <li>• The main spine is dominated by car, noisy, chaotic, grubby and visually lacking a coherent public realm;</li> <li>• Concerns are raised over lack of civic spaces and substandard footpaths and public realm approved for Poplar Square have been forgotten;</li> <li>• The issue of clamping in private car parks and the time limits on on-street parking are a deterrent.</li> </ul> <p><b>Submission</b></p> <ul style="list-style-type: none"> <li>• Key concern that the Plan in Chapter 8 is actually implemented for Naas Town Centre;</li> <li>• Unchartered territory for KCC taking control of derelict sites, compulsory purchase orders and major scale public realms works;</li> <li>• Welcome concepts of connecting town centre with the periphery and investment in cycle walk and public transport modes;</li> </ul>

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> <li>• Proposals for 6 Core Regeneration Areas are exciting albeit ambitious, breaking new ground for KCC;</li> <li>• Focus on the main spine of the town centre and work outwards;</li> <li>• Revise timeframe for Public Realm Strategy, 4 years minimum is way too long to have a plan;</li> <li>• The submission outlines specific actions that are required: <ul style="list-style-type: none"> <li>○ Reduce traffic flow by introducing one-way systems;</li> <li>○ More options/routes for cycling and walking;</li> <li>○ Ring road to alleviate congestion;</li> <li>○ New footpaths from Finan's Corner up to Maxol Dublin Road;</li> <li>○ New road surface for entire of Naas;</li> <li>○ Pedestrian or linger areas in Poplar and Market Squares;</li> <li>○ Small islands on wider parts of Main Street which could have seasonal planting/decor and assist people crossing the road;</li> <li>○ Take in charge, as a matter urgency, all public car parks;</li> <li>○ Fast track the electronic parking information signs;</li> <li>○ Implement a Park and Ride system with electric powered shuttle buses as a matter of urgency;</li> <li>○ Double pay-on-exit parking spaces;</li> <li>○ Increase time limit for 1 hour to 3 hours;</li> <li>○ Move taxi rank in Market Square;</li> <li>○ Work with owners of the old Naas Mall to bring that space back into use;</li> <li>○ Work with old cinema owners – could be like the Stella Cinema in Rathmines.</li> </ul> </li> <li>• Concern over the NWQ expansion ramification on town centre especially if connections does not come to pass;</li> <li>• Naas Town Team should be integrated and aligned with the implementation of the LAP;</li> <li>• The Executive of the Town Team should have an experienced individual focussed on the implementation of the town centre plan;</li> <li>• Currently the Town Centre is not represented in the Town Team Executive but the NWQ is;</li> <li>• Someone is is dynamic young enough to understand current market landscape but old enough to</li> </ul>

Sub. No.	Name	Summary of Submission
		have the necessary experience and credentials in place making and regeneration.
225	<b>Podium Event Production</b>	<ul style="list-style-type: none"> <li>• Express an interest in constructing and operating a bespoke, purpose built corporate conference centre and want confirmation the relevant zoning exists;</li> <li>• Naas ideal location when researched sites in both Kildare and Dublin;</li> <li>• Serve as hub for rest of the country;</li> <li>• Shortage of conference facilities in Naas region;</li> <li>• Provide a shuttle service to local transport hubs, Sallins and Red Cow and amenities in Naas, Sallins and Kildare Village;</li> <li>• Staffing levels initially 40 people.</li> </ul>