Response to LRD Opinion

For a Large - Scale Residential Development

Lands at
Southgreen Road and Old Road,
Kildare Town,
Co. Kildare

On behalf of

Pousterle Limited

March 2026

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Table of Contents

1 INTRODUCTION 2

2 RESPONSE TO SECTION 32D OPINION - REASONS 3

2.1 ITEM 1 4
2.2 ITEM 2 6

3 RESPONSE TO SECTION 32D 2 OPINION – INFORMATION SOUGHT 8

3.1 RESPONSE TO ZONING 8
3.2 RESPONSE TO ACCESS/AMENITY LANDS TO THE NORTH – F1 8
3.3 RESPONSE TO SOCIAL INFRASTRUCTURE 9
3.4 RESPONSE TO LANDSCAPE/PARKS 9
3.5 RESPONSE TO BICYCLE STORAGE 13
3.6 RESPONSE TO TRANSPORTATION 14
3.7 RESPONSE TO ENVIRONMENT 17
3.8 RESPONSE TO KILDARE FIRE SERVICE 19
3.9 RESPONSE TO APPROPRIATE ASSESSMENT 20
3.10 RESPONSE TO 3D IMAGES / PHOTOMONTAGES 20

4 CONCLUSION 21

5 APPENDIX A - LRD OPINION – MAIN DOCUMENT 22

6 APPENDIX B - MINISTERS LETTER 28

1 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin are instructed by our client **Pousterle Limited, 12 Torrent Business Park, Donaghmore, Co. Tyrone BT703BF to prepare this response to Kildare County Council's** Large-Scale Residential Development (LRD) opinion issued 12 September 2025 to support the planning application now submitted for a Large Scale Residential Development of 146 residential units and a childcare facility at Southgreen Road, Kildare Town, Co. Kildare.

This report is prepared as a response to the matters raised in the LRD Opinion dated 12th September 2025 (LRD Reference Number: LRD2025005) following the pre-application process and with regard to the consultation meetings held under Section 247 and 32 of the Planning and Development Act 2000 (as amended) for the application for a Large-scale Residential Development (LRD) on the subject site.

This response is prepared in association with the Design Team appointed to prepare the particulars enclosed with this planning application. Each item is addressed in turn and relevant cross references to other accompanying documentation are provided.

Following consideration of the issues raised during the LRD meeting, the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act would not constitute a reasonable basis for an application for Large-scale Residential Development.

This report responds to the reasons for the opinion and provides the specific information requested.

2 RESPONSE TO SECTION 32D OPINION - REASONS

In correspondence dated 12 September 2025, the Planning Authority have set out that following consideration of the issues raised during the LRD meeting, the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32b of the Act would not constitute a reasonable basis for an application for Large Scale Residential Development for the following reasons:

1. *The subject lands are zoned C – New Residential Phase 2 in the Kildare Town Local Area Plan 2023-2029 where it is an objective;*

   "To protect future development lands from inappropriate forms of development which would impede the sequential expansion and consolidation of the town in terms of providing for new residential development for future plans(75). The inclusion of these lands will not in any way infer a prior commitment regarding the nature of any future zoning. Such a decision will be considered within the framework of the need for additional zoned lands and the proper planning and sustainable development of the area"

   Footnote 75 states the following:

   The land identified as Phase 2 could be brought forward for New Residential through a statutory amendment under Section 20 of the Planning and Development Act 2000 (as amended) to align the local area plan with any future revised population growth contained in any possible variation to the Core Strategy of the Kildare County Development Plan 2023-2029.

   Please note that the proposed residential development is considered to be premature until such time as the local area plan aligns with any future revised population growth contained in any possible variation to the Core Strategy of the Kildare County Development Plan 2023-2029.

2. *Please note that there are concerns that there is inadequate bridge infrastructure to accommodate the scale of the development, without an investment in transport infrastructure to connect the development with the town centre. The increased amount of development is likely to lead to obstruction of the carriageways at junctions crossing the railway line where there is currently no two-way bridge over the railway line. The proposed development would therefore be premature pending proposals to upgrade the railway bridge in accordance with RD1 of the Kildare Town Local Area Plan 2023-2029 (RD1: Closure of Old Road Bridge to vehicular traffic and the replacement/upgrade of Southgreen Bridge to facilitate two-way traffic with improvements to approach roads (the upgrade must be delivered prior to the closure).*

Notwithstanding the above, the Planning Authority sought submission of information in relation to the following where any future LRD application is made:

- Zoning
- Access/Amenity Lands to the North – F1
- Social Infrastructure
- Landscaping/Parks
- Bicycle Storage
- Transportation
- Environmental
- Kildare Fire Service Requirements
- Appropriate Assessment
- 3D Images/Photomontages

A response to the 2no. Reasons are set out below. Thereafter, Section 3 of this report sets out a response to the information by the Planning Authority where the LRD is to come forward.

2.1 Item 1

The subject lands are zoned C – New Residential Phase 2 in the Kildare Town Local Area Plan 2023-2029 where it is an objective;

"To protect future development lands from inappropriate forms of development which would impede the sequential expansion and consolidation of the town in terms of providing for new residential development for future plans(75). The inclusion of these lands will not in any way infer a prior commitment regarding the nature of any future zoning. Such a decision will be considered within the framework of the need for additional zoned lands and the proper planning and sustainable development of the area"

Footnote 75 states the following:

The land identified as Phase 2 could be brought forward for New Residential through a statutory amendment under Section 20 of the Planning and Development Act 2000 (as amended) to align the local area plan with any future revised population growth contained in any possible variation to the Core Strategy of the Kildare County Development Plan 2023-2029.

Please note that the proposed residential development is considered to be premature until such time as the local area plan aligns with any future revised population growth contained in any possible variation to the Core Strategy of the Kildare County Development Plan 2023-2029.

Applicant Response:

The LRD opinion was issued on 12 September 2025. In October 2025, Variation No. 3 to the Kildare County Council Development Plan was published, which in essence responded to the Section 28 Ministerial NPF Implementation Guidelines published in 2025. These Guidelines directed each Planning Authority to review their Development Plans to ensure consistency with the new national housing targets set by the National Planning Framework (NPF) in April 2025.

Having specific reference to Kildare, the NPF Ministerial guidelines set out that there was an annual growth requirement to 2035 of 2,755 units for Kildare County Council. By way of response, a proposed variation to the Kildare County Council Development Plan (Variation No. 3) was put forward in October 2025 with revisions proposed to Chapter 2 of the Development Plan and specifically the publication of a new Core Strategy supplementary table to outline how these figures will be delivered. Within that context and to ensure that the housing targets identified are deliverable, the Planning Authority introduced additional Development Plan Objectives to achieve the housing growth targets set out. We note specifically that Objective CS 029 is proposed as part of the variation as follows:

"Facilitate the sequential development of urban areas by releasing the lands zoned 'Phase 2' specified in Table 2.8A so that appropriate residential developments and ancillary uses may be progressed. The lands to which this objective refers to are:

i. *Land zoned 'New Residential Phase 2' in the Naas Local Area Plan 2021-2027 on the Kilcullen Road and the Blessington / Tipper Road as identified in Map V3-2.1,*
ii. *Land zoned 'New Residential – Phase 2' in the Newbridge Settlement Plan, and*
iii. *Land zoned* ***'Phase 2 New Residential' in the Kildare Town Local Area Plan 2023-2029 at Southgreen****, Ruanbeg, Dunmurray Road, Green Road South and An Talamh Ban identified in Map V3-2.2.*

For development management purposes, the uses which are permitted in principle, open for consideration and not normally permitted shall be taken to be those as listed under the 'New Residential' zoning objective contained in the Land Use Zoning Matrix of the relevant Local Area Plan. This objective does not relate to land identified as 'Phase 2' or 'Strategic Reserve' in any other settlement."

The identification of phase 2 lands at Southgreen in Table 2.8a of the proposed variation as a site to be released by Objective CS029 ensures that the lands can now come forward for development with an appropriate zoning context in place. We wish to acknowledge that the overall variation procedure is currently at Material Alterations stage with public consultation set to conclude on 9 March 2026 next. There is not change to the planning context outlined above with Objective CS 029 remaining in place. It is envisaged that a Chief Executive Report will be prepared within the relevant statutory timings and that a final variation will be forthcoming thereafter. We note also the recent direction issued by the Minister in letter dated 20 February 2026 (Appendix B of this report), which in essence reminds various consenting Local Authorities as to their obligations under the Planning and Development Act to ensure that sufficient and suitable land is zoned to accommodate the allocated population and housing growth targets, and with and instruction to address these matters immediately. It states specifically that where a variation process to incorporate the new housing growth targets has already commenced, it should be completed **no later than 30 April 2026**.

The current zoning for this site CP2 – C Phase 2 Residential provides for 'dwelling' and 'creche' as a use class within the context of the zoning matrix for this site, which allows for this application to come forward and be considered under the LRD system. The currently proposed variation to the Development Plan endorses the release of these lands for residential development. It is with the above in mind that this application for 146 no. residential units and a creche facility are now presented for consideration. There is a clear, current and future planning context to support the principle of residential development at this site. It is submitted that the current application is well founded and will deliver welcome residential development at a location in the north west of Kildare that has been historically earmarked for long term development. Furthermore, the designation of this site as forming part of a wider Key Development Area within the Kildare LAP further reinforces, the suitability of residential in principle at this location. The Planning Report enclosed herewith has also set out a review of Phase 1 lands across Kildare which concludes that settlement of Kildare must now move to release Phase 2 lands, which aligns with the intent of the currently proposed variation and specifically Objective CS 029.

We wish to take this opportunity to remind the Planning Authority that they must consider the proposed variation in their assessment of the current Large Scale Residential Development submitted. We note specifically that Section 34 (2) (a) of the Planning and Development Act sets out that when making its decision in relation to an application, the planning authority must consider the proper planning and sustainable development of the area having regard to the provisions of the development plan and any guidelines issued by the minister under Section 28. Where there are conflicting objectives, permission should be granted having regard to regional planning guidelines, statutory guidelines (including Section 28 Ministerial Guidance), strategic policy objectives, statutory obligations of the Local Authority and Government policy. It is submitted that the proposed variation to the Development Plan can be considered in this context and given the recent updates the National Planning Framework and new Local Authority annual targets set for housing as set out the NPF National Implementation Guidelines. Policy Objective 1[1] of these guidelines is particularly relevant.

All considered, the coming forward of this planning application can no longer be considered premature given the clear planning context that supports the release of this site for residential development. Notably Variation No. 3 of the Development allows for the release of Phase 2 New Residential Zoned lands at this location paving the way for the future development of this site.

[1] **Policy Objective 1 - It is a policy and objective of these Guidelines that the housing growth requirements for each planning authority set out in Appendix 1 are reflected in the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.**

2.2 Item 2

Please note that there are concerns that there is inadequate bridge infrastructure to accommodate the scale of the development, without an investment in transport infrastructure to connect the development with the town centre. The increased amount of development is likely to lead to obstruction of the carriageways at junctions crossing the railway line where there is currently no two-way bridge over the railway line. The proposed development would therefore be premature pending proposals to upgrade the railway bridge in accordance with RD1 of the Kildare Town Local Area Plan 2023-2029 (RD1: Closure of Old Road Bridge to vehicular traffic and the replacement/upgrade of Southgreen Bridge to facilitate two-way traffic with improvements to approach roads (the upgrade must be delivered prior to the closure).

Applicant Response:

We direct the Planning Authority to the LRD Opinion Response prepared by Waterman Moylan submitted as part of this Planning Application. For the benefit of the Planning Authority, we include the response from Waterman Moylan below:

"A full Traffic and Transport Assessment (TTA) has been prepared with a traffic assessment of the main junctions in the surrounding area, including an assessment of the signalised single-lane shuttle system at the Southgreen Road Railway Overpass. The results of the analysis demonstrate that all assessed junctions, as well as the shuttle link on Southgreen Road, will operate within their respective capacities for all forecast years and scenarios considered.

The TTA includes a comprehensive traffic assessment, analysing the likely impact of the subject site in combination with all committed and potential future developments at the assessed junctions.

In order to understand the existing traffic flow rates during peak hours, traffic flow surveys were carried out at three junctions providing access to existing neighbourhood. As results, inbound and outbound traffic flows were recorded. Based on the survey results and the number of existing housing units, real arrival and departure trip rates for the AM and PM peak hours were derived.

The TTA includes two traffic distribution scenarios:

- *The current scenario, with Old Bridge open to traffic; and*
- *The future scenario, with Old Bridge closed and all traffic redistributed to the remaining open routes.*

Both traffic distributions were assessed under each forecast year in accordance with the Transport Assessment Guidelines (May 2014).

In addition, a Stress Scenario was developed to assess the performance of the shuttle link by increasing the adopted trip rates by 50%. This stress scenario was also assessed under each forecast traffic flow, in line with the Transport Assessment Guidelines (May 2014).

The results of the analysis demonstrate that all assessed junctions, as well as the shuttle link on Southgreen Road, will operate within their respective capacities for all forecast years and scenarios considered.

Further information is provided in Waterman Moylan Consulting Engineer document No. 25-003r.003 – Traffic and Transport Assessment (Phase 2) included in the document package.

It is noted that significant road infrastructure upgrades are proposed as part of the proposed development that will assist in traffic movements whilst promoting and facilitating a modal shift towards sustainable modes including pedestrian and cycle links as part of the Southgreen Road upgrade that will also benefit the proposed public park north the site, pedestrian and cycle only links from the development to the south and southeast and the 4m cycle and pedestrian only east-west link at the northern boundary of the site, abutting the proposed public park."

The response from Waterman Moylan has clearly set out that all assessed junctions, as well as the shuttle link on Southgreen Road will operate within their respective capacities for all forecast years and scenarios considered.

With regard to the assertion that the proposal is premature pending proposals to upgrade railway bridge in accordance with RD1 of the Kildare Town Local Area Plan, 2023-2029, it is submitted that the assessment and supporting evidence prepared and submitted by Waterman Moylan clearly demonstrate that the development will not lead to an obstruction of carriageways at junctions crossing the railway bridge. There are significant upgrades delivered as part of this phase 2 residential proposal including:

1. A new public pedestrian/cycle path to the north of the site on lands zoned Open Space and Amenity in line with:

   Greenway Cycling Measure Cycle 7 – Northwestern Greenway

   Greenway Permeability Measure – PERM 5 – Creation of a northwestern greenway linking from the Monasterevin Road (R445) to the Dunmurray Road (R401) and connecting with Green Road, Southgreen Road and Old Road.

   We note specifically that this measure is delivered along the full length of the northern boundary for the site. This proposal delivers on LAP objectives MTO 1.1[2] of the LAP.

2. New unidirectional pedestrian and cycle pathways along Southgreen Road.
3. New pedestrian and cycle infrastructure throughout the site increasing permeability across the lands and to lands to the north, south, east and west of the site.
4. Upgrades/widening to Southgreen Road including amendments to the existing cycle tracks and footpaths on Southgreen Road north of Southern Internal Link Road are proposed.

This suite of upgrades to local infrastructure will be significant in a modal shift towards sustainable modes of transport and will greatly benefit the subject site; existing and future residential areas; and future open space and amenity lands to the north.

We ask the Planning Authority to review in full the comprehensive analysis enclosed from Waterman Moylan in support of the current proposal, which clearly addresses any concerns in terms of prematurity regarding pending proposals to upgrade the railway bridge.

We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

[2] *MTO 1.1 - Support and promote the use of sustainable active transport modes in Kildare Town and seek to implement a connected network of walking and cycling infrastructure in the town as detailed in Table 7-1 and 7-2 and illustrated on Map 7.1 and 7.2. in conjunction with the National Transport Authority, Transport Infrastructure Ireland, other statutory agencies, and relevant stakeholders (where applicable). The indicative measures will form the basis for individual projects, when the detailed design will be configured, and each project will be subjected to rigorous analysis, including environmental / ecological assessment, where applicable, to ensure that they are the most suitable option at the particular location. All measures will be designed in accordance with a public realm palette devised for the town by the Council's Strategic Projects and Public Realm team and shall incorporate nature-based surface water management as a solution for surface water management.*

3 RESPONSE TO SECTION 32D 2 OPINION – INFORMATION SOUGHT

The following sections sets out the applicants proposal to address Kildare County Council's request for specific additional information in respect of the proposed development where a proposed Large Scale Residential Development planning application is forthcoming.

3.1 Response to Zoning

KCC Request:

Please ensure that the entirety of the residential development, including internal access roads are fully contained within the C Residential Land Use Zoning and that there is no encroachment onto adjoining amenity lands apart from services etc.

Applicant Response:

It is submitted that the Site Layout Plan has been revised to show the entirety of the residential development, including the internal access roads, are now fully contained within the 'C' Residential Land Use Zoning. There is no encroachment onto the adjoining amenity lands for residential use. Proposals delivered within the zoning include a new pedestrian/cycle connection and servicing arrangements for Surface Water Drainage. These particular proposals align with the requirements of the Kildare LAP 2023-2029 for delivery of pedestrian/cyclist and servicing infrastructure.

We direct the Planning Authority to the submitted Site Layout Plan S*GK-MCORM-AR-00-DR-ZZ-ZZ-ZZ-1002*, prepared by MCORM Architects, which overlays the zoning line on the proposed layout. We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

3.2 Response to Access/Amenity Lands to the North – F1

KCC Request:

It is noted that discussions are taking place with Kildare County Council regarding the future transfer/sale of the F1 zoned lands to the north of the subject site and this has been shown on submitted drawings. From discussions with the Community Department of KCC, it is considered that an additional access road to the north of the subject site would be beneficial to provide vehicular access to the adjoining parklands/playing pitches. It is suggested that further discussion take place regarding the layout of the northern portion of the proposed development to accommodate additional access.

Applicant Response:

As part of this application, the applicant is committing to the delivery of a new vehicular access point to serve future proposals for the F1 zoned Open Space and Amenity lands to the north of the main development site. This access proposal is delivered to the north west of the main development site via Southgreen Road. This infrastructure will support the future development of the F1 zoned Open Space and Amenity lands to the north of the site, which ware coming forward as part of planned integrated approach of the development of the Southgreen Key Development Area.

We also wish to set out that indicative concept proposals for these F1 zoned open space and amenity lands to the north are included within this planning application. We refer specifically to the plans and particulars enclosed from Hayes Ryan Landscape Architects. We wish to highlight that whilst these proposals are not delivered by way of the current application and are in effect outside the red line boundary for the planning application currently before the Planning Authority, the applicant is committed to releasing these lands for development. These lands have the potential to offer up significant strategically located open space to be developed sequentially from the south. These lands will not only provide for the long term sporting and recreational needs of the growing community in Southgreen but also for the wider settlement of Kildare.

The applicant is amenable to ensuring that the development of the residential development subject of this current application happens in tandem with any future proposals for F1 zoned lands to the north. To this end, the applicant is amenable to the attachment of a phasing condition, which restricts the occupation of the first residential unit until such time as a planning application is lodged by Pousterle Limited or other entity for the park and associated facilities contained within. We trust that this approach will be accepted by the Planning Authority as a reasonable approach to phasing and the integration of the current proposal with the lands to the north.

3.3 Response to Social Infrastructure

KCC Request:

Notwithstanding the information contained with the SIA, it is noted that the construction/operation of extant childcare facilities has yet to take place in Kildare Town. It is considered that the proposed development should cater for a childcare facility in accordance with the S28 Childcare Guidelines. Please also note Section 11.2 South Green Key Development Area of Kildare Town Local Area Plan 2023-2029 which states the following: "Should any housing scheme be brought forward on the 'Phase 2' zoned lands (in accordance with footnote 74 of Table 11-4 of this Plan), a creche, where required, and a community room/space should be included to front onto the Southgreen Road (north of 'U: Utility' zoned lands) to cluster with the Neighbourhood Centre and Education site." Please submit revised proposals to address the above.

Applicant Response:

It is submitted that the proposed development now submitted to the Planning Authority proposes an approx. 161 sqm creche which can accommodate up to 39 no. children. The creche facility is located in Block A of the proposed Duplex Apartments and generally aligns with the location intended for this facility i.e. north of 'U' Utility zoned lands. The design team have also carefully and intentionally sought to locate the creche at where the topography for the site allows for appropriate vehicular access and creche drop off via Southgreen Road. The creche is also accompanied by 60 sqm of external open space. The Social Infrastructure Audit accompanying this application has been updated accordingly to reflect this new development proposal.

We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

3.4 Response to Landscape/Parks

KCC Request:

The KCC Parks Section has reviewed the documents and submitted drawings and notes the following:

1. The proposed water network and site drainage indicate that public water is directed into tree pits/rain gardens located within private curtilage. These pits would not be accessible for future maintenance, which is not acceptable. Water from public space cannot drain into private space. Revisions are required.

Applicant Response:

We direct the Planning Authority to the LRD Opinion Response prepared by Waterman Moylan submitted as part of this Planning Application. For the benefit of the Planning Authority, we include the response from Waterman Moylan below:

"The drawings will be revised to ensure that all surface water runoff from public areas is directed solely to SuDS features located within public open space or the public realm. Tree pits and rain gardens located within private curtilage will be served by private drainage only and will not receive runoff from public areas."

We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable. We further direct the Planning Authority to the accompanying Engineering and Landscape Drawings which deliver a co-ordinated approach to overall site drainage.

2. The proposed play equipment includes movable elements, which will require revision. Additional clarification is required regarding the calisthenics unit, associated surfacing, and access arrangements. Further detail is needed on the construction of street tree pits, including how proposed trees will interact with proposed underground services.

Applicant Response:

We direct the Planning Authority to the Cover Letter prepared by Hayes Ryan Landscape Architecture submitted as part of this Planning Application. The cover letter details the response to the LRD Opinion items. For the benefit of the Planning Authority, we include the response from Hayes Ryan Landscape Architecture to this item below:

"The play equipment has been revised as requested, the previous proposed springer with moving part has been removed. All of the pieces proposed now contain no moving parts. The callisthenic pieces are as outlined on sheet no 11 and these are located along the principal access routes through the open spaces. The individual pieces proposed are low key pieces that cater for a range of exercise options and contain no moving parts, ropes etc. These are located immediately adjacent to the footpaths in the adjusted locations shown, and they will be set back 1 metre from the footpath edge, the ground surface to be surfaced in 'safagrass' safety matting rather than a hard surface material, similar to that proposed for the natural play timber pieces, to extend to an area of one metre width around the edge of each piece.

Regarding tree pits, most of the tree pits within the development are now within softscape areas rather than streetside areas. Bioretention tree pits are shown for selected areas as per engineers' requirements. Regarding tree pits and underground services, the coordination drawing (landscape sheet no 12) illustrates tree positions in relation to underground services and also illustrates the proposed tree pit planting detail. Where trees are adjacent to underground services or flexible paved areas a root barrier is shown for use on all trees that are planted within 3 metres of proposed underground services.

Further development of open spaces ref Suds / Natural play:

In addition, from a follow-on informal meeting with Michael Yallop (KCC Parks dept) subsequent to the LRD opinion meeting, some further adjustments to the play elements and locations, the sculpting and earthmodelling of the suds basins have been made in line with KCC preferences for integration, suds guidelines and requirements for a fully integrated scheme of earthmodelling, natural play provision and access through open spaces. The detentions basins bare shaped and gently integrated into the topography. This is challenging given the sloping site and wide variation of site levels between east and west. The scheme is balanced to incorporate suds basins, natural play, earth modelling and footpath access to facilitate desire lines and a sequential user experience and journey through the open spaces In the southern open space the natural play items have been integrated at various levels with the suds / earthmodelled surrounds, and play elements generally confined to one zone within each principal open space as preferred. For the northern open space, the play elements are clustered into an adjacent sloping zone to the northwest with access from the northern path to an adjacent passive supervision seating area on slightly higher ground overlooking the natural play zone and informal suds basin."

We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable. We further direct the Planning Authority to the accompanying Landscape Drawings which show the same.

3. Any proposed planting should not be over reliant on Malus, Pyrus, Prunus, and Sorbus species. Tree species that produce fruit should not be located along streets. The current proposal involves significant hedgerow removal, with no evidence of efforts to retain hedgerows through the site or elsewhere. Greater consideration must be given to accommodating existing hedgerows.

Applicant Response:

We direct the Planning Authority to the Cover Letter prepared by Hayes Ryan Landscape Architecture submitted as part of this Planning Application. The cover letter details the response to the LRD Opinion items. For the benefit of the Planning Authority, we include the response from Hayes Ryan Landscape Architecture below:

> *"As requested, the content of Malus, Pyrus, Prunus and Sorbus has been reduced. Pyrus has been eliminated for the scheme. Also, Malus as street tree has been eliminated as requested. The tree selection now incorporates selected long-term tree and stately varieties where appropriate such as Querus robur, Quercus robur Fastigiata, Fagus sylvatica 'Dawyck' , some of the robust Maples where open space permits eg. Acer platinoides 'Emerald Queen.' Also some trees not co commonly planted such as Alnus incana Aurea, Corylus colurna etc..*
>
> *Regarding hedgerow removal, the comments and request for further hedgerow retention was thoroughly reviewed with the design team, but given the sloping site and the wide range of levels, together with the particular location the east-west central hedgerow within the site, its retention would render the alteration of levels to achieve the required densities and infrastructure impossible to achieve. Similarly for the north south hedgerow along Southgreen road, due to proposed cycle-track / pathways requirements and densities it was not possible to retain this hedgerow. As requested by KCC the Southgreen road cycle path has been moved approx. 1metre eastwards to accommodate the necessary road widths etc, incorporating the desired cycleways while protecting the western hedgerow.*
>
> *There is a short section of hedgerow to the south east of the site near the ESB property which will be removed also, again due to the proximity of dwellings and the necessary alteration of levels in this area. All other boundary hedgerows are retained.*
>
> *As a mitigation measure, substantial additional hedgerows, and a comprehensive scheme of tree planting is proposed for the site. To compensate for the loss of the corridor effect of the east-west running existing hedgerow be removed, a new hedgerow is proposed for the northern boundary running the full east-west width of the site for similar effect. This will be a mixed native biodiverse hedgerow, supplemented with additional tree planting at intervals consisting of hawthorn trees, with various other focal point trees at intervals for repetition and unity. In addition the margin beet the northern hedgerow and the site access road will be planted with irregular drifts of native an biodiverse mix whip planting clusters at intervals, the intervening ground to be seeded with a species rich low maintenance wildflower sward area.*
>
> *For the southern boundary of the site a new hedgerow will be planted along the full length, to consist of a mixed native hedge as per the northern boundary which offers visual separation with from the adjoining link road while also facilitating a biodiversity corridor. This is supplemented with more formal interval street tree planting to the link road margin. The embankment of the site will be planted with a combination of native mixed whip planting drifts, lower level shrubbery mixed planting and linking areas to be seeded with a species rich low maintenance wildflower sward.*
>
> *Hedges will be also continue along the western roadside boundary of the site. These will be more managed and formal. In addition, the eastern boundary adjacent the southern open space will be supplemented with drifts of native informal whip planting facilitating a biodiversity corridor.*
>
> *The proposed hedgerow removal mitigation measures were discussed with the team ecologist, and the extent of new planted hedgerows and supplementary native / naturalized planting will outweigh the extent of hedgerow removal, as outlined in the accompanying Ecologist's report."*

We note the following provision from the Ecological Impact Assessment prepared by DNV accompanying this planning application:

> *"The retention of existing hedgerows across the site has been prioritised wherever feasible; however, the central east–west hedgerow must be removed due to significant level changes required to deliver the proposed layout, infrastructure, and densities. Its position on the steeply sloping section of the site means that its retention would prevent the necessary regrading and render the design unworkable. A short section of hedgerow in the southeast, as well as the north–south hedgerow along Southgreen Road, also cannot be retained due to required alterations in site levels and the integration of essential pathways and cycle tracks. All other boundary hedgerows are preserved. To ensure the maintenance*

and enhancement of ecological connectivity, substantial compensatory planting is proposed, including the reinstatement of a continuous mixed-native hedgerow along the full northern boundary to re-establish a strong east–west corridor for bats, birds and small mammals. This will be supplemented with biodiverse tree planting, whip planting clusters, and species-rich wildflower margins to strengthen habitat structure and foraging opportunities. Additional new hedgerows are also proposed along the southern boundary and retained along the western roadside boundary, ***ensuring that overall hedgerow cover and ecological function are significantly enhanced compared to baseline conditions****."*

The Ecology report also includes a range of enhancement measures including, native hedgerow, wildflower meadow, tree planting, hedgerow management, habitat management plans, hedgehog highways, bird boxes and bat boxes which offset any imperceptible net effect on habitats.

We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable. We further direct the Planning Authority to the accompanying Landscape Drawings and Ecology Reports which show the same.

4. The landscape plans and related documentation have not provided adequate information regarding the detention basin to the north of the site. Further detail is required on this feature. Outline information is also required for adjoining field to the north, together with an indicative plan for that area.

Applicant Response:

We direct the Planning Authority to the Cover Letter prepared by Hayes Ryan Landscape Architecture submitted as part of this Planning Application. The cover letter details the response to the LRD Opinion items. For the benefit of the Planning Authority, we include the response from Hayes Ryan Landscape Architecture below:

"As mentioned in item 2 above, the detention basins have been adjusted, with emphasis on sculpted forms and earthmodelling of the surrounds for integration, taking on board suds guidelines and requirements for a fully integrated scheme of earthmodelling, natural play provision and access through open spaces. This is challenging with the northern basin given the sloping site and variation of site levels between east and west, the detention basin level has been modified to accommodate a more gently integrated form. The detentions basin is shaped and gently integrated into the topography.

The northern basin is designed in a similar style to the southern basin, and is shown on landscape sheet n. 3. Please also refer to the northern open space section drawings with revised levels as shown on sheet nos. 10 and 11.

The northern open space is more challenging in terms of levels, to tie as gently as possible with the upper and lower levels, sloping side roads to the north, south and east and the higher level units to the west, and to achieve required bottom basin levels also pathway links to min 1 : 21+ falls. The accompanying landscape sheet no. 8 shows the proposed open space levels in detail for the northern open space.

Regarding the outline information also requested for adjoining field (F1 Zoned lands) to the north and an indicative plan for that area, this was discussed with the design team and as per client instruction, outline proposals are shown for this area (outside the site application boundary). The content for the F1 lands is largely aspirational and indicative, but intended to help illustrate the potential uses, the various potential elements such as the entrance area, east-west linkage, car parking zone, pavilion, pitch zones, looped circulation walks, hedgerow retention etc, the content that can be adapted to future requirements, further development of the plans would require a full review and understanding of KCC's plans and preferences for this area within the wider community. A soft native mixed hedge boundary is shown as the interface of the development and the northern lands."

We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable. We further direct the Planning Authority to the accompanying Landscape Drawings which show the same.

5. All proposed paths within public open spaces must be of a bound surface finish, and seating should be specified as composite timber. The standard requirements document issued by the Parks Section should be reviewed in full, as should the Council's Taking in Charge Policy, prior to submission of any revised documentation.

Applicant Response:

We direct the Planning Authority to the Cover Letter prepared by Hayes Ryan Landscape Architecture submitted as part of this Planning Application. The cover letter details the response to the LRD Opinion items. For the benefit of the Planning Authority, we include the response from Hayes Ryan Landscape Architecture below:

"As requested all proposed paths within open space areas are bound surface finishes, either concrete finish or tarmac with pencil concrete flush edging. Seating is specified as composite timber as requested."

We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable. We further direct the Planning Authority to the accompanying Landscape Drawings which show the same.

6. The following amendments would be required:

- Revision of the drainage system in line with comments from water services and development control.

- Retention of hedgerows across the site.

- Revision of play provision.

- Detail of detention basins on drawings.

- No reliance on tree species detailed above.

Applicant Response:

As outlined above, we submit that the Planning Application now submitted has fully addressed the issues raised by the Planning Authority at LRD Opinion Stage. We direct the Planning Authority to the accompanying Landscape Architecture pack for more information.

3.5 Response to Bicycle Storage

KCC Request:

The Applicant is requested to modify the Type D bicycle storage proposed for the H-Type Residential Units. Ideally the bicycle storage should be integrated with the residential units as it may pose a landscape/maintenance problem if the development was taken in charge in the future.

Applicant Response:

The Planning Authority will note that Resident cycle parking is proposed in the form of secure bicycle store enclosures to the front of terraced units; on curtilage spaces to the rear of units with side access; and a bicycle store for apartment units located within Block A. Visitor parking is proposed in the form of Sheffield stands.

Within the context of proposed Block A, we note that ground level delivers a secure bicycle parking in a store that provides for a 2 tier stacked system for apartments and a wall rack for the creche facility.

This proposal ensures that the bicycle storage is integrated within the main building envelope.

We trust that this proposal is now accepted by the Planning Authority in review.

3.6 Response to Transportation

KCC Request:

1. ***It is noted by the applicant that the figure of 0.339 trip rate departures is being used in the morning peak. The KCC Transportation report notes that the experience with residential developments in County Kildare is that a figure should be at least 1 should be used for the peak a.m flow; as the underestimation of the trip rate will result in an underestimation of the assigned traffic flows on the network and residual handling capacities of junctions prior to saturation. Further details would be required in a future application.***

   Applicant Response:

   We direct the Planning Authority to the LRD Opinion Response prepared by Waterman Moylan submitted as part of this Planning Application. For the benefit of the Planning Authority, we include the response from Waterman Moylan below:

   "As indicated in Response 2.1 above; in order to understand the existing traffic flow rates during peak hours, traffic surveys were carried out at three junctions providing access to existing residential areas within Kildare Town, in close proximity to the subject site and for which the number of dwellings served is known. The results of the inbound and outbound traffic flows were recorded. Based on the survey results and the number of existing housing units, real arrival and departure trip rates for the AM and PM peak hours were derived."

   Further information regarding the survey results and the rationale behind the surveys is presented in the LRD Opinion Response prepared by Waterman Moylan. We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

2. ***Please note that the KCC Transportation Department consider that the internal development is not yet fully in keeping with the objectives of the Design Manual for Urban Roads and Streets (DMURS). The straight sections of road, particularly on the main distributor, will increase the need for ramps in a new development. One of the purposes of the DMURS strategy was, at the design layout stage, to provide alternatives to placing ramps in new housing estates. This problem should be avoided in a realigned or reconfigured access arrangement. A concern is also raised that the roads with no footpaths will give rise to traffic hazard as it will be possible for vehicles to travel at speed. The hazard is increased by the lack of intervisibility between pedestrians emerging from between cars parked perpendicular to kerb and passing traffic.***

   The layout should be revised to include a footpath on both sides of the 5.5 metre carriageway. It should be noted that without a circulation aisle of 6 metres it may not be possible for drivers to access the perpendicular kerb bays. It is important for carriageways and footpaths to be of adequate width to accommodate services and utilities, such as lamp standards. At the same time a sufficiently side carriageway, to accommodate services without the need to encroach on private properties, should also have a kerb protected footpath which should ideally be 2 metres wide but an absolute minimum of 1.8 metres wide on both sides of the carriageway. Roads Layout and sight lines should be in accordance with DMURS.

   Applicant Response:

   We direct the Planning Authority to the LRD Opinion Response prepared by Waterman Moylan submitted as part of this Planning Application. For the benefit of the Planning Authority, we include the response from Waterman Moylan below:

   "We note the Department's observations regarding the internal road layout in relation to the objectives of the Design Manual for Urban Roads and Streets (DMURS). In response, the proposed internal road network has been revised as follows:

   a. The main internal distributor road has been realigned to introduce gentle horizontal curvature in place of a long straight alignment. This approach reduces the potential requirement for additional

speed control measures such as ramps or raised tables and is consistent with DMURS principles, which promote speed management through geometric design rather than reliance on vertical traffic calming alone.

b. *However, the two raised tables at the entrance junctions have been retained, as they provide an appropriate traffic-calming measure at points of entry to the development. Should it be the Council's preference to omit one or both of these raised tables, this can be accommodated.*

c. *Homezones and Raised Tables: Localised homezones have been incorporated within the internal layout. Increased / enhanced pedestrian facilities are provided at these locations. Raised tables are provided at key junctions and pedestrian crossing points to enhance safety, improve visibility, and encourage low vehicle speeds consistent with DMURS guidance.*

d. *Footpaths and Carriageway Widths: The design ensures adequate provision for pedestrians. Footpaths of a minimum width of 2 m are provided along both sides of the 5.5 m and 6 m carriageways, with sufficient carriageway and circulation aisles to allow safe access to perpendicular parking bays. The layout accommodates utilities, lamp standards, and other services without encroaching on private property.*

e. *Sightlines and Visibility: The combination of curvilinear alignment, homezones, and raised tables ensures appropriate intervisibility between vehicles and pedestrians, including those emerging from between perpendicular parking spaces. This addresses the previously noted traffic hazard concerns.*

We believe these revisions bring the internal layout fully in line with the objectives of DMURS, providing a safe, pedestrian-friendly, and visually coherent road network. Refer to Waterman Moylan Drawing No. SOU-WMC-PH2-XX-DR-C-P0100 - Proposed Site Layout for details of the updated roads network."

We further direct the Planning Authority to the Engineering Drawings submitted as part of this Planning Application. We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

3. ***The applicant is requested to avoid "home zones" that do not have at least a dedicated 1.8-metre-wide kerb protected footpath to all of the residential units, on road safety grounds.***

Applicant Response:

We direct the Planning Authority to the LRD Opinion Response prepared by Waterman Moylan submitted as part of this Planning Application. For the benefit of the Planning Authority, we include the response from Waterman Moylan below:

"All side street "home zones" include a dedicated 2m wide kerb protected footpath to all residential units on both sides of the road. Refer to Waterman Moylan Drawing no. SOU-WMC-PH2-XX-DR-C-P0110 - Proposed Road Levels and Kerbing Layout for details of the updated road network and proposed kerbs throughout."

We further direct the Planning Authority to the Engineering Drawings submitted as part of this Planning Application. We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

4. ***The applicant is requested to engage with third parties and provide a design for a 2-metre-wide concrete footpath on the Old Road. The footpath should be on the development side of the carriageway, and the applicant is requested to provide a drawing at a scale of 1:500 for review. The applicant was requested at pre-planning stage to include lamp standards at the back of the footpaths along the route. If the applicant is unable to carry out these works; the applicant will be requested to confirm that they are willing to make a special contribution to provide the footpath in***

accordance with the Development Contribution Scheme adopted by Kildare County Council on 19th December 2022 and in accordance with Section 48(2)(c) of the Planning and Development Act 2000 as amended.

Applicant Response:

We direct the Planning Authority to the LRD Opinion Response prepared by Waterman Moylan submitted as part of this Planning Application. For the benefit of the Planning Authority, we include the response from Waterman Moylan below:

"A setback to facilitate 2m wide concrete footpath on the eastern edge of the Old Road has been provided along the subject site frontage."

The Planning Authority will note that the application site meets Old Road at 3 key locations. This planning application has ensured that all built elements of the development are sufficiently removed from the carriageway at this location with a clear and appropriate set back included within the design to enable any future works considered necessary by the Planning Authority to be delivered by the Planning Authority at this location. The proposal comes forward in this context and ensures that the development proposal now before the Planning Authority does not preclude any future works deemed appropriate by the Planning Authority along Old Road.

We further direct the Planning Authority to the Architectural Drawings prepared by MCORM and the Engineering Drawings prepared by Waterman Moylan submitted as part of this Planning Application for further detail. We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

5. ***In relation to cycle track design, the KCC Transportation Report notes that the Sustainable and Active Travel Team in Kildare County Council would have a preference of a unidirectional cycle track, on each side of the main Southgreen carriageway, rather than a bidirectional cycle track, which will connect to a Bidirectional Cycle Track south of the roundabout. It would be possible to match desire lines for future educational and community lands. However, it is not clear from the map of the land in the ownership of the applicant on the opposite side of the carriageway. One possible mechanism is to request a special development levy contribution to complete the work on the opposite side of the road. The alternative would be for the applicant to construct a bi-directional track on the development side of the road.***

Applicant Response:

We direct the Planning Authority to the LRD Opinion Response prepared by Waterman Moylan submitted as part of this Planning Application. For the benefit of the Planning Authority, we include the response from Waterman Moylan below:

"The recommendation for unidirectional cycle tracks on both sides of the Southgreen carriageway has been incorporated into the design"

The majority of the lands subject of this application within the red line boundary are within the control of the applicant Pousterle Limited. To meet a number of the requests subject of this opinion, the applicant has also sought consent for a small portion of lands within the control of Kildare County Council to be included in the planning application. These lands are located along the south west of the main development site and are identified in orange on the enclosed Site Ownership map enclosed with this planning application. The relevant letter of consent to make this planning application is also included with the plans and particulars associated with this planning application.

We further direct the Planning Authority to the Engineering Drawings submitted as part of this Planning Application. We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

6. ***It is noted that there are a number of problems that would need to be corrected in any future application, including:***

- The cycle lane drawing provided does not show the full extent of the proposed cycle track of the proposed development. 60mm kerb should be bevelled.

- NTA spec, red SMA should be used for cycle track surface.

- Proposed crossings of main road and side roads would need further details and improvements to be acceptable.

- Existing cycle track towards the south of the site extents should be upgraded to provide segregation and colour contrast.

- No details on permeability accesses to cycle track provided.

- No details on tactiles provided.

Applicant Response:

We direct the Planning Authority to the LRD Opinion Response prepared by Waterman Moylan submitted as part of this Planning Application. For the benefit of the Planning Authority, we include the response from Waterman Moylan below:

"Waterman Moylan Drawing No. SOU-WMC-PH2-XX-DR-C-P0110 – Proposed Road Levels and Kerbing Layout includes the full extent of the proposed cycle track of the proposed development and illustrates the proposed 60mm kerb along the cycle track.

The applicant confirms that the proposed cycle track surface will be designed in accordance with NTA specifications. It is noted that red SMA should be used for the cycle track surface, this detail will be included in the relevant engineering and landscape architect details.

Details of proposed crossings of the main and side roads such as surfacing details and signage can be found in Waterman Moylan Drawing No.'s SOU-WMC-PH2-XX-DR-C-P0111 - Typical Road Cross-Sections, SOU-WMC-PH2-XX-DR-C-P0110 – Proposed Road Levels and Kerbing Layout, and SOU-WMC-PH2-XX-DR-C-P0130 - Proposed Road Markings & Signage.

While the applicant acknowledges the comment regarding the upgrading of the existing cycle track to the south of the site, it is noted that this infrastructure lies outside the applicant's ownership and red line boundary.

All tactile paving, crossings, and interface treatments will be designed in accordance with DMURS and TII/NTA standards. Details of tactile paving proposed can be found on Waterman Moylan Drawing No. SOU-WMC-PH2-XX-DR-C-P0112 – Proposed Typical Road Construction Details."

We note also that proposals for all pedestrian and cycle tracks are outlined in drawings co-ordinated and included with the plans and particulars of this application.

We further direct the Planning Authority to the Engineering Drawings submitted as part of this Planning Application. We submit that this Response addresses the concerns of the Planning Authority of Kildare County Council and is considered acceptable.

3.7 Response to Environment

KCC Request:

The KCC Environment Section makes the following comments on the submitted documents:

1. As part of the planning application the applicant shall submit an outline Construction and Demolition Resource Waste Management Plan (RWMP) in accordance with Appendix C of the "EPA Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)" including demonstration of proposals to adhere to best practice and protocols. Draft to be submitted at application stage.

2. Please submit an operational waste management plan outlining the overall waste management strategy including that of the Duplex Units in accordance with the Kildare County Council Waste Presentation byelaws, and in accordance with policies IN O42 and IN O47 of the Kildare County Development Plan 2023-2029, including the following:

- Brief outline of the proposed waste management strategy, including calculations of the waste management requirements of the occupants.

- Clear details of the proposed waste storage facilities for the Duplex unit blocks, including plans and elevations.

- Details of how it is proposed to secure the waste management facilities against fly-tipping and vermin.

Applicant Response:

We submit to the Planning Authority that the comments raised above have been addressed within the submitted Planning Application. A Resource Waste Management Plan and Operational Waste Management Plan have been prepared by AWN Consulting and are submitted as part of the Planning Application.

With regard, to the **Demolition Resource Waste Management Plan (RWMP),** page 2 of the document confirms that the plan has been completed in line with '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects (November 2021*'). It is set out that these guidelines have been followed in the preparation of the RWMP and include the following elements specifically:

► Predicted C&D wastes and procedures to prevent, minimise, recycle and reuse wastes;

► Design teams roles and approach;

► Relevant EU, national and local waste policy, legislation and guidelines;

► Waste disposal/recycling of C&D wastes at the site;

► Provision of training for Resource Waste Manager (RM) and site crew;

► Details of proposed record keeping system;

► Details of waste audit procedures and plan; and

► Details of consultation with relevant bodies i.e. waste recycling companies, Local Authority, etc.

Section 3 of the Guidelines identifies thresholds above which there is a requirement for the preparation of a bespoke RWMP for developments. The new guidance classifies developments on a two-tiered system.

Developments which do not exceed any of the following thresholds may be classed as Tier 1 development, which require a simplified RWMP:

► New residential development of less than 10 dwellings.

► Retrofit of 20 dwellings or less.

► New commercial, industrial, infrastructural, institutional, educational, health and other developments with an aggregate floor area less than 1,250m2 .

► Retrofit of commercial, industrial, infrastructural, institutional, educational, health and other developments with an aggregate floor area less than 2,000m2 ; and

► Demolition projects generating in total less than 100m3 in volume of C&D waste.

A development which exceeds one or more of these thresholds is classed as Tier-2 development.

This development requires a RWMP as a Tier 2 development as it is above following criterion:

► New residential development of less than 10 dwelling

We direct the Planning Authority to RWMP for further details.

With regard to the **Operational Waste Management Plan (OWMP),** the report has been prepared to outline the overall waste management strategy for the development including all house and apartment units and the creche facility. The request from the Planning Authority seeks compliance with IN O42 and IN O47 as follows:

INO 42 - Require the appropriate provision for the sustainable management of waste within developments (particularly apartment buildings), including the provision of facilities for storage, separation, and collection of waste.

INO 47 - Support and facilitate the separation of waste at source into organic and non-organic streams or other waste management systems that divert waste from landfill and maximise the potential for each waste type to be re-used, recycled or composted.

The report has considered these particular objectives and has delivered on the relevant requirements of the opinion as follows:

- Brief outline of the proposed waste management strategy, including calculations of the waste management requirements of the occupants.

The report sets out the Estimated Waste arising from the residential units and creche facility based on the predicted occupancy of the units and floor areas. Section 5 of the document sets out the waste storage and collection arrangements for the proposal with provision made for organic waste, DMR, Glass and MNR for both the residential units and creche facility.

- Clear details of the proposed waste storage facilities for the Duplex unit blocks, including plans and elevations.

The proposed duplex block delivers on 10 no. apartment/duplex units and a creche facility. The drawings enclosed from MCORM Architects outline the plans and elevations for this building, which clearly identify 2 no. bin stores (1 no. for the creche and 1 no. for the apartment duplex units).

- Details of how it is proposed to secure the waste management facilities against fly-tipping and vermin.

The OWMP submitted includes Section 5.7 – Pest Management, which sets out that a pest control operator will be appointed as required to manage pests on site during the operational phase of the proposed development. All waste generated within the proposed will be stored in closed waste receptacles both within the units and within the WSAs. Any waste will be carefully managed to prevent leaks, odours and pest problems. The WSAs will have access for potential control of vermin, if required, be supplied with hot or cold water, drainage point and will be regularly inspected by facilities management to deter pests.

The OWMP submitted includes Section 5.8 –To prevent fly-tipping, all WSAs will be fully enclosed and accessible only to authorised users via controlled access (e.g., key or electronic fob). Public access will not be permitted. The WSAs will be subject to regular inspections by facilities management and will benefit from passive surveillance and CCTV coverage. Bins will only be presented for collection immediately prior to the scheduled pick-ups and promptly returned thereafter, ensuring no opportunity for unauthorised waste disposal. These measures will effectively minimise the potential for fly-tipping and ensure compliance with the *KCC Waste Bye-Laws.*

3.8 Response to Kildare Fire Service

KCC Request:

Please be advised that the KCC Chief Fire Officer recommends that a minimum of 25 litres per second of water is to be available in the mains at 2 bar pressure for firefighting. The applicant will also be required to obtain Fire Safety Certificates in accordance with the requirements of the Building Control Act.

Applicant Response:

The water supply network will be designed in accordance with Uisce Eireann requirements with adequately sized watermains provided to each fire hydrant location (min. 100mm diameter) in such as a manner to ensure the required firefighting flows are achieved, with any required mitigation (balancing tanks etc.) provided as required. Fire Safety Certificates will be obtained, where required, in accordance with the Building Control Act.

3.9 Response to Appropriate Assessment

KCC Request:

Please submit an Appropriate Assessment Screening Report for any future LRD application.

Applicant Response:

This planning application is accompanied by an Appropriate Assessment Screening Report prepared by DNV. The report concludes as follows:

> *"On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process."*

We direct the Planning Authority to this report for more information.

3.10 Response to 3D Images / Photomontages

KCC Request:

The applicant is requested/advised to submit detailed photomontages and 3D visualisations of the proposed development from the surrounding viewpoints for the overall development in any future LRD.

Applicant Response:

This planning application is accompanied by 3 no. Photomontage views and 5 no. CGI views and prepared by Big Lolly. We note specifically that there are 3 no. photomontage views taken from Old Road, Southgreen Road and the new Southern Internal Link Road towards the proposal, which deliver an accurate visual of how the proposal will be viewed from these locations. In addition, there are 5 no. CGIs prepared, the locations of which have been chosen to ensure all key elements of the proposal are represented.

We direct the Planning Authority to the accompanying booklet enclosed with the planning application particulars for more information.

4 CONCLUSION

This report, read in conjunction with the Design Team's accompanying reports and drawings, addresses in full the issues raised by the Planning Authority in the LRD Opinion dated 12th September 2025.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of this area, and we trust that the above report and enclosed documentation fully address the issues raised in KCC's LRD Opinion.

All relevant details are further addressed in the revised design, now proposed and we ask the Planning Authority to refer to the complete application package for full details of the proposal now put forward.

5 APPENDIX A - LRD OPINION – MAIN DOCUMENT

Comhairle Contae Chill Dara
Kildare County Council

Date: 12th September 2025.
Ref.: LRD2025005.

By email to Laura@brockmcclure.ie

Pousterle Limited,
c/o Laura Brock,
Brock McClure Planning and Development Consultants,
63 York Road,
Dun Laoghaire,
Co. Dublin.

Planning & Development Act 2000 (as amended).
Notice of LRD Opinion: Large-scale Residential Development.

Reference Number:	LRD2025005.
Application Received Date:	16/7/2025.
Meeting Date:	12/8/2025.
LRD Opinion:	12/9/2025.

The Proposed Development will consist of 153 residential units at South Green Road and Old Road, Kildare, Co. Kildare.

The Planning Authority refers to the prospective applicant's request pursuant to section 32 of the Planning and Development (Large Scale Residential Developments) Act 2021. Section 32D of the Act provides that the planning authority shall provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Following consideration of the issues raised during the LRD meeting, the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act **would not constitute a reasonable basis for an application for Large-scale Residential Development for the following reasons:**

1. The subject lands are zoned **C- New Residential Phase 2** in the Kildare Town Local Area Plan 2023-2029 where it is an objective;
"To protect future development lands from inappropriate forms of development which would impede the sequential expansion and consolidation of the town in terms of providing for new residential development for future plans[75]. The inclusion of these lands will not in any way infer a prior commitment regarding the nature of any future zoning. Such a decision will be considered within

Comhairle Contae Chill Dara
Kildare County Council

the framework of the need for additional zoned lands and the proper planning and sustainable development of the area".

> *Footnote 75 states the following:*
> *The land identified as Phase 2 could be brought forward for New Residential through a statutory amendment under Section 20 of the Planning and Development Act 2000 (as amended) to align the local area plan with any future revised population growth contained in any possible variation to the Core Strategy of the Kildare County Development Plan 2023-2029.*

Please note that the proposed residential development is considered to be premature until such time as the local area plan aligns with any future revised population growth contained in any possible variation to the Core Strategy of the Kildare County Development Plan 2023-2029.

2. Please note that there are concerns that there is inadequate bridge infrastructure to accommodate the scale of the development, without an investment in transport infrastructure to connect the development with the town centre. The increased amount of development is likely to lead to obstruction of the carriageways at junctions crossing the railway line where there is currently no two-way bridge over the railway line. The proposed development would therefore be premature pending proposals to upgrade the railway bridge in accordance with RD1 of the Kildare Town Local Area Plan 2023-2029. *(RD1: Closure of Old Road Bridge to vehicular traffic and the replacement/upgrade of Southgreen Bridge to facilitate two-way traffic with improvements to approach roads (the upgrade must be delivered prior to the closure*).

Notwithstanding the above, the following information should be submitted/included/considered in any future LRD application:

Zoning.
Please ensure that the entirety of the residential development, including internal access roads are fully contained within the C Residential Land Use Zoning and that there is no encroachment onto adjoining amenity lands apart from services etc.

Access/Amenity Lands to the north- F1.
It is noted that discussions are taking place with Kildare County Council regarding the transfer/sale of the F1 zoned lands to the north of the subject site and this has been shown on submitted drawings. From discussions with the Community Department of KCC, it is considered that an additional access road to the north of the subject site would be beneficial to provide vehicular access to the adjoining parklands/playing pitches. It is suggested that further discussion take place regarding the layout of the northern portion of the proposed development to accommodate additional access.

Comhairle Contae Chill Dara
Kildare County Council

Social Infrastructure.
Notwithstanding the information contained with the SIA, it is noted that construction/operation of extant childcare facilities has yet to take place in Kildare Town. It is considered that the proposed development should cater for a childcare facility in accordance with the S28 Childcare Guidelines. Please also note Section 11.2 South Green Key Development Area of the Kildare Town Local Area Plan 2023-2029 which states the following: *"Should any housing scheme be brought forward on the 'Phase 2' zoned lands (in accordance with footnote 74 of Table 11-4 of this Plan), a crèche, where required, and a community room/space should be included to front onto the Southgreen Road (north of 'U: 'Utility' zoned land) to cluster with the Neighbourhood Centre and Education site".* Please submit revised proposals to address the above.

Landscaping/Parks.
The KCC Parks Section has reviewed the documents and submitted drawings and notes the following:

1. The proposed water network and site drainage indicate that public water is directed into tree pits/rain gardens located within private curtilage. These pits would not be accessible for future maintenance, which is not acceptable. Water from public space cannot drain into private space. Revisions are required.

2. The proposed play equipment includes movable elements, which will require revision. Additional clarification is required regarding the calisthenics unit, associated surfacing, and access arrangements. Further detail is needed on the construction of street tree pits, including how proposed trees will interact with proposed underground services.

3. Any proposed planting should not be over reliant on Malus, Pyrus, Prunus, and Sorbus species. Tree species that produce fruit should not be located along streets. The current proposal involves significant hedgerow removal, with no evidence of efforts to retain hedgerows through the site or elsewhere. Greater consideration must be given to accommodating existing hedgerows.

4. The landscape plans and related documentation have not provided adequate information regarding the detention basin to the north of the site. Further detail is required on this feature. Outline information is also required for the adjoining field to the north, together with an indicative plan for that area.

5. All proposed paths within public open spaces must be of a bound surface finish, and seating should be specified as composite timber. The standard requirements document issued by the Parks Section should be reviewed in full, as should the Council's Taking in Charge Policy, prior to submission of any revised documentation.

Comhairle Contae Chill Dara, Áras Chill Dara, Páirc Uí Dhubhuí, An Nás, Co. Chill Dara, W91 X77F
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Cláraigh d'fholáirimh téacs ag
Register for text alerts at

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Kildare County Council

6. The following amendments would be required:
   - Revision of the drainage system in line with comments from water services and development control.
   - Retention of hedgerows across the site.
   - Revision of play provision.
   - Detail of detention basins on drawings.
   - No reliance on tree species detailed above.

Bicycle Storage.
The Applicant is requested to modify the Type D bicycle storage proposed for the H-Type Residential Units. Ideally the bicycle storage should be integrated with the residential units as it may pose a landscape/maintenance problem if the development was taken in charge in the future.

Transportation.

1. It is noted by the applicant that the figure of 0.339 trip rate departures is being used in the morning peak. The KCC Transportation report notes that the experience with residential developments in County Kildare is that a figure should be at least 1 should be used for the peak a.m. flow; as the underestimation of the trip rate will result in an underestimation of the assigned traffic flows on the network and residual handling capacities of junctions prior to saturation. Further details would be required in a future application.

2. Please note that the KCC Transportation Department consider that the internal development is not yet fully in keeping with the objectives of the Design Manual for Urban Roads and Streets (DMURS). The straight sections of road, particularly on the main distributor, will increase the need for ramps in a new development. One of the purposes of the DMURS strategy was, at the design layout stage, to provide alternatives to placing ramps in new housing estates. This problem should be avoided in a realigned or reconfigured access arrangement. A concern is also raised that the roads with no footpaths will give rise to traffic hazard as it will be possible for vehicles to travel at speed. The hazard is increased by the lack of intervisibility between pedestrians emerging from between cars parked perpendicular to kerb and passing traffic.

   The layout should be revised to include a footpath on both sides of the 5.5 metre carriageway. It should be noted that without a circulation aisle of 6 metres it may not be possible for drivers to access the perpendicular to kerb bays. It is important for carriageways and footpaths to be of adequate width to accommodate services and utilities, such as lamp standards. At the same time a sufficiently wide carriageway, to accommodate services without the need to encroach on private properties, should also have a kerb protected footpath which should ideally be 2 metres wide but an absolute minimum of 1.8 metres wide on both sides of the carriageway. Roads Layouts and sight lines should be in accordance with DMURS.

3. The applicant is requested to avoid "home zones" that do not have at least a dedicated 1.8-metre-wide kerb protected footpath to all of the residential units, on road safety grounds.

Comhairle Contae Chill Dara
Kildare County Council

4. The applicant is requested to engage with third parties and provide a design for a 2-metre-wide concrete footpath on the Old Road. The footpath should be on the development side of the carriageway, and the applicant is requested to provide a drawing at a scale of 1:500 for review. The applicant was requested at pre-planning stage to include lamp standards at the back of the footpaths along the route. If the applicant is unable to carry out these works; the applicant will be requested to confirm that they are willing to make a special contribution to provide the footpath in accordance with the Development Contribution Scheme adopted by Kildare County Council on 19th December 2022 and in accordance with Section 48(2)(c) of the Planning and Development Act 2000 as amended.

5. In relation to cycle track design, the KCC Transportation Report notes that the Sustainable and Active Travel team in Kildare County Council would have a preference of a unidirectional cycle track, on each side of the main Southgreen carriageway, rather than a bidirectional cycle track, which will connect to a Bidirectional Cycle Track south of the roundabout. It would be possible to match desire lines for future educational and community lands. However, it is not clear from the map of the land in the ownership of the applicant on the opposite side of the carriageway. One possible mechanism is to request a special development levy contribution to complete the work on the opposite side of the road. The alternative would be for the applicant to construct a bi-directional track on the development side of the road.

6. It is noted that there are a number of problems that would need to be corrected in any future application, including:
   - The cycle lane drawing provided does not show the full extent of the proposed cycle track of the proposed development. 60mm kerb should be bevelled.
   - NTA spec. red SMA should be used for cycle track surface.
   - Proposed crossings of main road and side roads would need further details and improvements to be acceptable.
   - Existing cycle track towards the south of the site extents should be upgraded to provide segregation and colour contrast.
   - No details on permeability accesses to cycle track provided.
   - No details on tactiles proposed.

Environmental.
The KCC Environment Section makes the following comments on the submitted documents:

1. As part of the planning application the applicant shall submit an outline Construction and Demolition Resource Waste Management Plan (RWMP) in accordance with Appendix C of the "EPA Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)" including demonstration of proposals to adhere to best practice and protocols. Draft to be submitted at application Stage.

Comhairle Contae Chill Dara
Kildare County Council

2. Please submit an operational waste management plan outlining the overall waste management strategy including that of the Duplex Units in accordance with the Kildare County Council Waste Presentation byelaws, and in accordance with policies IN O42 and IN 047 of the Kildare County Development Plan 2023-2029, including the following:
   - Brief outline of the proposed waste management strategy, including calculations of the waste management requirements of the occupants,
   - Clear details of the proposed waste storage facilities for the Duplex unit blocks, including plans and elevations, and
   - Details of how it is proposed to secure the waste management facilities against fly-tipping and vermin.

Kildare Fire Service.
Please be advised that the KCC Chief Fire Officer recommends that a minimum of 25 litres per second of water is to be available in the mains at 2 bar pressure for fire fighting. The applicant will also be required to obtain Fire Safety Certificates in accordance with the requirements of the Building Control Act.

Appropriate Assessment (AA).
Please submit an Appropriate Assessment Screening Report for any future LRD application.

3D Images/Photomontages.
The applicant is requested/advised to submit detailed photomontages and 3D visualisations of the proposed development from surrounding viewpoints for the overall development in any future LRD.

12th September 2025.

Ger Maher SEO,
Planning Department,
Kildare County Council.

Note 1:
Under section 32E of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021, neither the taking place of an LRD meeting nor the provision of an LRD opinion shall prejudice the performance by the Planning Authority of its functions under this Act or any regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Note 2:
The LRD Opinion will be valid for 6 months from the date of this letter. A planning application must be submitted within 6 months of receipt of the LRD Opinion or the Applicant must re-commence the pre-application consultation process.

6 APPENDIX B - MINISTERS LETTER

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

To: Mayor of Limerick,

Chief Executives, City and County Councils

Director General, Limerick City and County Council

Directors of Services, Planning, City and County Councils

Cc: Cathaoirligh, City and County Councils

Chief Executive, Office of the Planning Regulator

Deputy Regulator, Office of the Planning Regulator

20 February 2026

A Chara,

National Planning Framework (NPF) Implementation – Housing Growth Requirements

Further to the issuing of the Housing Growth Requirements Guidelines under Section 28 of the Planning and Development Act (2000) (as amended) in July 2025, all local authorities were requested to commence the process of revising and varying development plans as quickly as possible, to ensure that the new housing growth requirements are incorporated.

We wrote to you again in December 2025, reiterating the critical need for development plans to be updated to reflect the increased housing requirements arising from the Revised National Planning Framework (NPF), given the urgency of the housing crisis. The objective of this specific exercise has always been to support the accelerated delivery of homes.

Department of Housing, Local Government and Heritage, Custom House Quay, Dublin 1, D01 W6X0

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Now, more than seven months after the original request, and subsequent to our further requests it is a matter of serious concern to the Government that your local authority has not demonstrated the necessary progress on the implementation of the Guidelines. Where some local authorities have commenced a variation process, the pace at which these matters are being progressed is not sufficient given the urgency of the situation, apart from in very limited circumstances. Of even greater concern, a significant number of local authorities have not yet commenced a variation process.

Accordingly, we write on behalf of the Cabinet Committee on Housing, to remind you of the need for collective responsibility to address the urgent housing requirements of the Country, having regard to your obligations under the Planning and Development Act to ensure that sufficient and suitable land is zoned to accommodate the allocated population and housing growth targets, and with an instruction to address these matters immediately. Where a variation process to incorporate the new housing growth requirements has already commenced, it should be completed no later than 30th April 2026, and where a variation process has not commenced, it should be commenced no later than 13th March 2026 and completed no later than 30th June 2026.

It is important to note that, in identifying lands that are suitable for residential development, deliverability in the near term i.e. the variation period, must be a key consideration. This means that:-

- lands that are serviced or readily serviceable should be prioritised for zoning and activation;
- realistic and deliverable residential density assumptions should be applied in accordance with the Guidelines for Sustainable Residential Development and Compact Settlements (2024), with net densities generally comprising 65-80% of the gross area required for zoning purposes, i.e. the difference between lower gross zoned and higher net planning application densities should be accounted for; and,
- the phasing and sequencing of zoned lands should not be a constraint that cannot be readily addressed within the variation period, i.e. should not operate to preclude planning applications that may otherwise be permissible.

Given the critical importance of the plan variation process to enabling the Government's objective to increase housing supply, the Cabinet Committee on Housing will continue to

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

monitor progress and to consider other actions that the Government may take to address the urgent need to deliver housing. In this regard, the Department of the Taoiseach may contact you with a suitable date to invite you to update the Taoiseach, Tánaiste and other members of the Committee.

Le meas,

James Browne T.D.
Minister for Housing, Local Government and Heritage

John Cummins T.D.
Minister of State for Local Government and Planning