Planning Report & Statement of Consistency

For a Large - Scale Residential Development

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

On behalf of

Pousterle Limited

March 2026

Brock McClure
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1 EXECUTIVE SUMMARY



A brief summary of the key points of this report is set out below:

- **Agent and Applicant Details** - Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin have been instructed by the applicant **Pousterle Limited, 12 Torrent Business Park, Donaghmore, Co. Tyrone, BT703BF**, to prepare and submit this planning report to accompany a proposal for Large Scale Residential Development on lands at Southgreen Road and Old Road in the north west quadrant of Kildare Town.
- **Red Line Boundary** - The subject site is in the ownership of the applicant, Pousterle Ltd. The application red line boundary measures approx. 6.13 ha.

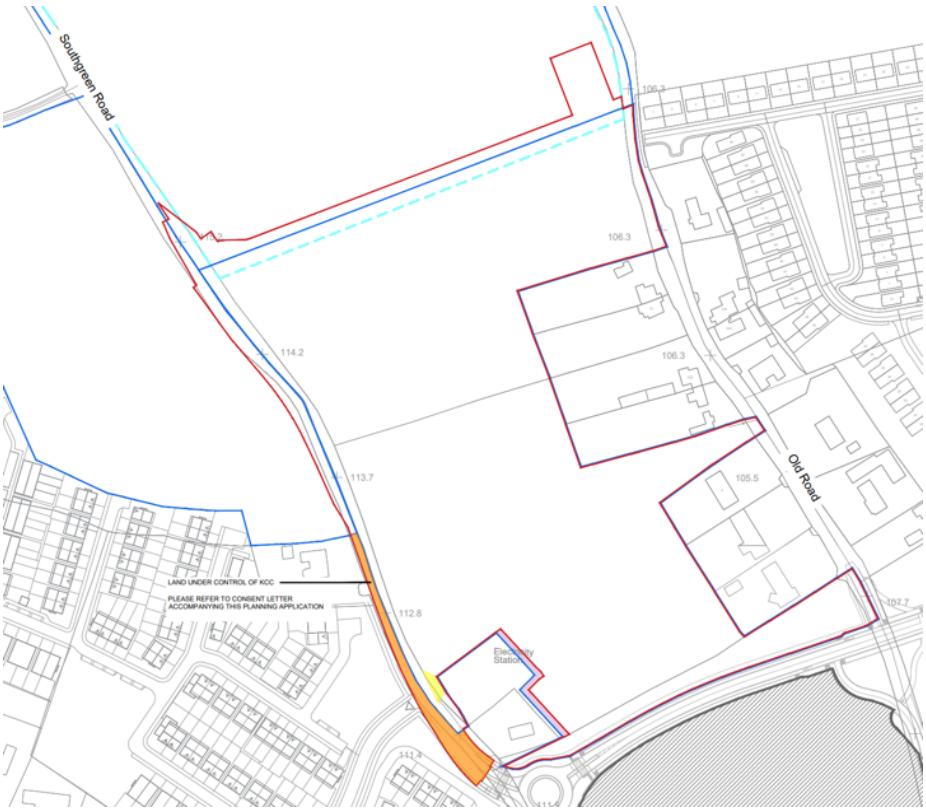


Figure 1 - Subject Site and Lands under Ownership of Applicant

- **Planning Application Context** - This Planning Application is made in accordance with details set out in the Planning & Development (Large Scale Residential Development) Regulations 2021 which stipulates that a Planning Application will be accompanied by the LRD Form 19. A copy of form 19 is submitted with this Planning Application along with a full pack of deliverables for this scheme. It is submitted that both Stage 1 (S. 247 Meeting) and Stage 2 (S. 32B) have been completed prior to the submission of this full Planning Application

- **Report Objectives** - This report is intended to identify consistency with the relevant national planning policy guidelines under section 28 of the Planning and Development Act, 2000 (as amended), and with local statutory planning policy in the form of the Kildare County Development Plan 2023-2029 and the Kildare Local Area Plan 2023-2029.

- **Site Context** - The site subject of this proposal is greenfield in nature and is located in the northwest quadrant of Kidlare Town. The site (measuring approx. 6.13 ha) addresses Southgreen Road to the west, the Southern Internal Link Road to the south, Old Road and existing residential development to the east, and a greenfield site to the north under the ownership of the applicant.

- **Site Gradient** - As set out in material enclosed from Waterman Moylan, the existing topography of this site consists of naturally high ground elevations along the western boundary of the site with levels ranging from 111.19m OD Malin to 113.79m OD Malin. The site falls to the east where the lowest ground elevations are distributed, these levels range from 106.85, OD Malin to 104.3m OD Malin. The local high point on the site (113.79m OD Malin) is located in the northwest portion of the lands and the local low point (104.03m OD Malin) is located in the central far east area of the lands.

  The site layout and overall design strategy has been reflective of this topography and level difference. Notably, the current proposal has given careful consideration to where the most appropriate locations are to achieve vehicular access given site levels; the location and layout of housing and gardens; and the design of public open space areas within the constraints offered by the topography presenting. We ask that the Planning Authority is mindful of the nature of the site and this design approach in their consideration of proposals.

- **Public Transport –** The subject site is proximate to transport connections, located approximately 1km (14-minute walk) from Kildare train station and approximately 1.2km (16-minute walk) from the nearest bus stop. The M7 motorway passes Kildare Town, providing a connection to both Dublin and Portlaoise. Kildare Town centre is located approximately 1km (14-minute walk) from the subject site and offers a wide variety of retail outlets, Tesco Superstore, ALDI, and Lidl. Kildare Village is also located within the town, which boasts a wide variety of boutique stores. The area is well provisioned with retail, medical, and other services. The town is also served by a number of bus services.

- **S247 Consultation –** The evolution of the scheme has been brought about by engagement with the Planning Authority of Kildare County Council. The Applicant and Design Team formally engaged in preliminary discussions with the Planning Authority presenting a draft outline of the proposed development under Reference PP6026 and a meeting was held on 13th of February 2025. All feedback from Kildare County Council has been closely considered and addressed, where possible, in the design of the proposal.

- **S32(B) Consultation –** A Section 32(B) application was submitted on 16th of July 2025 and subsequently, the meeting took place on 12th of August 2025. The Planning Authority issued their LRD Opinion (LRD Reference no. LRD2025005) on 12th of September 2025. The proposal was deemed that it 'would not constitute a reasonable basis for an application for Large-scale Residential Development'. We submit that this Planning Application addresses the issues and feedback provided as part of the LRD opinion. We direct the Planning Authority to the accompanying LRD Opinion Response document which outlines how each issue and piece of feedback was responded to and addressed in this application.

- **The Proposal –** The proposed development, which has been revised as per the LRD opinion, will consist of the construction of a new residential scheme of 146 no. dwelling units in a mixture of houses, duplex and apartment units with overall heights of 1-2 no. storeys in height. The breakdown of units includes 5 no. 1 beds, 10 no. 2 beds, 104 no. 3 beds and 27 no. 4 beds in a mix of houses, apartments and duplex units ranging in height from 1-3 storeys as follows:

- 136 no. houses (7 no. 2 bed units; 102 no. 3 bed units; and 27 no. 4 bed units) in a mixture of bungalow, detached, semi-detached, and terrace style units ranging in height from 1 – 2 storeys.
- 8 no. apartment units and 2 no. duplex units (5 no. 1 beds, 3 no. 2 beds, and 2 no. 3 beds) in new Block A ranging in height from 2-3 storeys

- The Duplex and Apartment units are located in 1 no. block in the north-west quadrant of the site with 82 sqm of communal open space provided. A creche facility that can cater for 39 no. children is also proposed at ground floor level in Block A, with its own accompanying open space of 60 sq m. 2 no. large areas of Public Open Space areas are proposed. The proposed development includes all associated car parking, bicycle parking, public and communal open spaces and all ancillary works.
- **Proposed Parking, Access & Connectivity –** The proposal provides for 2 no. primary vehicular access points from the Southgreen Road. There is an additional private vehicular access point via Old Road to serve a proposal for a single bungalow house unit. The proposal also allows for the delivery of a vehicular access point to serve the future open space and amenity zoned lands to the north. The proposal includes the provision of 321 no. car parking spaces across the site. This is split between the provision for residents of the houses, duplexes, apartments, and visitors. Pedestrian access and movements are prioritised within and through the site with significant upgrade works proposed along Southgreen road with unidirectional cycle tracks and a new pedestrian / cyclist route along the northern boundary of the site. Several cyclist and pedestrian routes are proposed throughout, connecting to the surrounding roads. A total of 527 no. cycle parking spaces are proposed between on houses, apartments, duplex units and visitors.
- **Proposed Density & Mix –** The proposed density (31.5 dph (net)) and the mix of residential units (1, 2 and 3 bed Duplex Apartments, and 2, 3, and 4 bed houses) align with the requirements set by the Kildare County Development Plan 2023-2029 and the Sustainable Residential Developments and Compact Settlements Guidelines, 2024.
- **Residential Zoning –** The majority of the subject site is zoned ***'C: Phase 2 New Residential'*** with 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".* Residential Development is permitted in principle under this zoning.

  This report sets out a robust justification for the principle of a residential development within the context of the Phase 2 residential zoning. We note specifically that Appendix 1 of this report addresses S247 Planning Authority consultation commentary in relation to the relevant site zoning which sought a request for a robust analysis of all C1 zoned lands for their consideration. Specifically, this appendix provides an analysis of appropriately sized C1 zoned lands to show that their capacity has been utilised for developments of scale.
- **Open Space and Amenity Zoning** - It should also be noted that a portion of land to in the portion of the site is zoned ***'F: Open Space and Amenity'.*** We note that due to the undulating topography of the site, an attenuation area is proposed on this portion of land. Proposals also include for a new greenway or pedestrian/cycle route at this location. This portion of lands are kept free from residential built elements. The Planning Authority is requested to review proposals currently submitted within the context of this zoning designation.
- **Variation No. 3** - We also wish to note the coming forward of a new variation to the Development Plan, currently at material alterations stage, the relevance of which is considered herein and particularly within the context of the residential site zoning. In summary, the current population targets set out in the Core Strategy of the Kildare County Development Plan 2023-2029 are subject to review by way of the current variation to the Development Plan and require significant upward revision and particularly on the back of the new population targets set by the First Revision of the National Planning Framework in April 2025. This in turn requires the release of appropriately located lands for residential development and at locations which promote '10 – minute' compact settlement developments. The application site is one such site. The coming forward of Variation No. 3 therefore supports the release of this site for development.
- **Southgreen Key Development Area** - It is further submitted that the lands subject of this planning application form part of *the 'Southgreen Key Development Area'* which provides for the orderly and sequential development of what has been identified as a strategic growth area to the north west of

Kildare Town. Aside from Magee Barracks, this is the only other Key Development Area in the Local Area Plan, which further emphasises the appropriate nature of the lands subject of this application for residential development.

All considered, the lands are considered appropriate for residential development the Planning Authority is requested to favourably consider this proposal in this context.

This matter is further considered under Section 9.2 of this report.

- **National Policy Mandate and Housing Targets** - The revised population and housing demand figures published by Census 2022; the ESRI in July 2024; and the revised National Planning Framework in April 2025 provide a strong foundation for the development of the subject lands on Phase 2 lands. Nationally, it is identified that there has been a significant under estimation in population growth and housing demand.

  Moreover, the first revision to the National Planning Framework identifies that Irelands population is expected to reach 6.1-6.3 million by 2024, well in excess of the initial 2018 projections, which anticipated a population of 5.7 million. This miscalculation reinforces the need for proactive planning measures, including the delivery of housing at appropriate locations, to better accommodate the growing demand for housing and increasing population pressures.

  To support this population growth, the National Planning Framework is calling for the delivery of 50,000 homes annually with this expected to increase to 60,000 by 2030. Urgent action is now required at Local Authority level to address the national, regional and local population deficits in the form of additional appropriately zoned lands. The recent publication of the proposed variation (No. 3) to the Development Plan responds to new housing targets set out in the NPF Implementation Guidelines 2025 and we note that the variation has endorsed the release of Phase 2 zoned lands across Kildare within this context.

- **Part V** - It is proposed that 15 no. units will be allocated as Part V units in the following breakdown; 3 no. 1-bed units, 6 no. 2-bed units, 5 no. 3-bed units and 1 no. 4 bed. This is over 10% of the overall units proposed.

- **Key Opportunity Site** - As set out above, this site forms part of the wider Southgreen Key Development Area. This greenfield site offers a significant opportunity to continue the sequential development of the Southgreen area and indeed with the wider Kildare town in line with the Southgreen Key Development Area Framework outlined in the Kildare Town LAP 2023-2029.

2 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have been instructed to submit this Planning Application on behalf of **Pousterle Limited, 12 Torrent Business Park, Donaghmore, Co. Tyrone, BT703BF,** for a proposed Large-Scale residential development on lands at Southgreen Road in the north west quadrant of Kildare Town. For clarity, the site is located within the administrative boundary of Kildare County Council.

This report is intended to specify the rationale behind the subject proposal; to identify compliance with relevant statutory documentation; and to provide a detailed description of the proposal for the benefit of Kildare County Council.

The overall request relates to a Large-scale Residential Development (LRD) of 146 no. residential units, and a creche facility, with associated communal open space, public open space, and car and bicycle parking. We note at this point that the site is located within Kildare Town, near high quality public transport. Kildare train station is within close proximity to the south-east of the site and offers rail services to Dublin.

We wish to highlight from the outset, that our client is committed to working with the Planning Authority and to deliver on a proposal that is appropriate to the site and the surrounding context in Kildare Town. The Planning Authority is aware of the applicant's commitment to delivering a high-quality residential development as evidenced in the pre planning meetings. The applicant has previously delivered an LRD on lands to the south of the subject site, for more information please see KCC Reg Ref. 23/416 (ABP Ref. 318401-23). This development is generally referred to as the Phase 1 proposal in various documents enclosed with the current proposal brought forward as a natural Phase 2 development.

The Planning Authority is now invited to review the contents of this submission and accompanying documentation to consider the proposal on its merits and in line with the relevant statutory policy context. We trust that this proposal will be viewed as a positive move towards the delivery of much needed residential development at an opportunely located site.

We look forward to a formal meeting with the Planning Authority to discuss this proposal.

2.1 Context for the lodgement of this Submission

Kildare County Council's Opinion states that following consideration of the issues raised during the LRD Meeting that 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'. We submit that this Planning Application addresses the issues and feedback provided as part of the LRD opinion. We direct the Planning Authority to the accompanying LRD Opinion Response document which outlines how each issue and piece of feedback was responded to and addressed in this application.

2.2 Digital Copies

In addition, we confirm specifically that:

- 1 digital copy of all material has been issued to the Planning Authority of Kildare County Council.

2.3 LRD Website

The planning application is also available for public viewing at the following website: www.southgreenroadlrd2.ie.

3 DESIGN TEAM

Our client has appointed an experienced design team to prepare a residential planning application, which will be lodged under the Large-Scale Residential Development process to Kildare County Council. The design team currently comprises the consultants listed below:

- Pousterle Limited – Applicant
- McCrossan O Rourke Manning (MCORM) – Design Architects
- Brock McClure (BMC) – Planning & Development Consultants
- Waterman Moylan – Design Engineers
- Hayes Ryan – Landscape Architects
- DNV – Ecologists
- Wave Dynamics – Acoustical Consultants
- Charles McCorkell – Arboricultural Consultancy
- AWN Consulting – Waste Consultant
- Fallon Design – M&E Engineer
- ACSU – Archaeological Consultant
- Big Lolly – CGI/Photomontage Consultant

4 SITE LOCATION AND CONTEXT

4.1 Site Context

The subject site, measuring approx. 6.13 ha, is located on the north edge of Kildare Town, Co. Kildare. Located 45km west of Dublin, Kildare Town maintains strong economic & social links to the capital. The site area below is depicted by the red line boundary.



Figure 2 - Site Aerial (outlined in Red)

The subject site is located on lands zoned "C: Phase 2 New Residential" which has the following 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."*

A portion of lands on the northern boundary of the site are zoned "F: Open Space and Amenity". An attenuation area is proposed for these lands.

As set out in material enclosed from Waterman Moylan, the existing topography of this site consists of naturally high ground elevations along the western boundary of the site with levels ranging from 111.19m OD Malin to 113.79m OD Malin. The site falls to the east where the lowest ground elevations are distributed, these levels range from 106.85, OD Malin to 104.3m OD Malin. The local high point on the site (113.79m OD Malin) is located in the northwest portion of the lands and the local low point (104.03m OD Malin) is located in the central far east area of the lands. The site layout and overall design strategy has been reflective of this topography and level difference. Notably, the current proposal has given careful consideration to vehicular access; the location and layout of housing and gardens; and areas of open space in the most suitable areas within the constraints offered by the topography presenting. We ask that the Planning Authority is mindful of this in their consideration of proposals.

The application lands at Southgreen Road offer an exceptional opportunity to meet the objectives of Kildare Town Local Area Plan by providing an exemplary residential development at an appropriately zoned location. The proposal provides a mix of unit types to cater for a variety of needs. A generous provision of quality open space is proposed to meet the needs of the development.

It is submitted that the development of the subject site marks the next sequential step in the residential development of the area.

4.2 Surrounding Context

The main development site is generally bounded to the north by agricultural fields; to the south by the recently constructed Southern Internal Link Road; to the west by Southgreen Road and an existing Electricity Station; and to the east by Old Road and existing residential properties.

Within the wider context, the subject site is located in the north-west quadrant of Kildare Town in an areas under significant change. Notably, the development permitted under (Reg. Ref. 23/416 (ABP-318401-23)) located to the south (now under construction), the Walker's Gate residential development (Reg. Ref. 17/764 (ABP Ref. ABP-302145-18)) to the west, and the Oak Church development (Reg. Ref. 18/1028 ((ABP-305529-19)) to the east.

4.3 Public Transport and Accessibility

The subject site is proximate to transport connections, located approximately 1km (14-minute walk) from Kildare train station and approximately 1.2km (16-minute walk) from the nearest bus stop. The M7 motorway passes Kildare Town, providing a connection to both Dublin and Portlaoise. Kildare Town centre is located approximately 1km (13-minute walk) from the subject site and offers a wide variety of retail outlets, Tesco Superstore, ALDI, and Lidl. Kildare Village is also located within the town, which boasts a wide variety of boutique stores. The area is well provisioned with medical centres and dentist clinics. The town is also served by a number of bus services.

The bus services serving the subject site are listed below for the benefit of the Planning Authority:

Bus No.	Bus Route	Frequency
Kildare Station, Stop 11972 (c. 1km from subject site)		
883	Athy – Newbridge	Varies – 2 hours 45 mins at peak
Station Road, Stop 12037 (c. 1.1km from subject site)		
883	Athy – Newbridge	Varies – 2 hours 45 mins at peak
Kildare Square, Stop 11956 (c. 1.2 km from subject site)		
883	Athy – Newbridge	Varies – 2 hours 45 mins at peak
Kildare, Stop 104001 (c. 1.3km from subject site)		
IW02	Carlow IT – Curragh	Daily (operated by JJ Kavanagh)
UM14	Laois Shopping Centre – University Campus	Daily (operated by JJ Kavanagh)
726	Portlaoise – Dublin Airport	24 hours – 30 min frequency at peak
126	Rathangan – Dublin	8 times Daily (weekdays)
126A	Kildare – Dublin	Daily
126B	Rathangan – Dublin	Daily
126D	Dublin – Kildare	Daily
126T	Dublin – Kildare	Daily
126U	Kildare – Dublin UCD	Daily

Table 1 - Bus Routes and Frequency in proximity to Subject Site

Rail Services

The subject site is located approximately 1km from the Kildare Town Train Station (c. 14 minute-walk) which is located just off Station Road. This station is serviced by high-frequency InterCity and Commuter train services which support routes to and from Dublin, Carlow, Portlaoise, Waterford, Limerick, Galway, and Athlone.



Figure 3 - Public Transport Context Map with Subject Site outlined in Red

We refer to the Mobility Management Plan prepared by Waterman Moylan Engineering Consultants, which is included as part of this application, for more detail regarding the subject site and its accessibility to public transport.

5 PLANNING HISTORY

A brief synopsis of the planning history pertaining to the subject site and relevant planning history of adjoining sites is set out below.

5.1 Subject Site

There is no planning history pertaining to the subject site.

5.2 Surrounding Sites

The following applications pertaining to sites surrounding and adjoining the subject site are of note:

East of Subject Site	
KCC Reg. Ref.	**Description**
Reg. Ref. 071449	Pensar Ltd lodged a planning application in June 2007 for a mixed use development consisting of 245 no. dwelling units and a local services centre. The residential element consists of 219 no. two storey houses of varying types, 12 no. three storey end of terrace houses, and 14 no. apartments. The 3 storey local centre consists of 5 no ground floor retail units, a creche, and apartments. A total of 460 no. car parking spaces are provided at surface level. 7 no. new vehicular access points. The application was subject to a further information request and was subsequently granted by Kildare County Council on the 14th of April 2008. The conditions of the grant were subject to a first-party appeal to An Bord Pleanala. The appeal was withdrawn and a final grant was issued by Kildare County Council on the 8th of August 2008.
Reg. Ref. 13154	Pensar Ltd lodged an Extension of Duration for Application Ref. 071449 in March 2013. The EOD was subject to a further information request and was subsequently granted by Kildare County Council on the 17th of June 2013.
Reg. Ref. 181026	This application lodged by Eurkon (Kildare) Ltd was the first of three applications concurrently lodged to the east of the subject site in August 2018. The application comprised a residential scheme of 99 no. dwelling units in a mixture of 2 storey houses, 2 storey plus dormer houses, and 3 storey duplex apartment buildings, and the provision of a 1-2 storey childcare facility. The application was subject to a further information request which significantly altered the scheme including details of the site layout and boundary, unit mix, and the relocation of childcare facility. Subsequently, Kildare County Council decided to grant permission for the proposed development on the 4th of September 2019. The conditions of the grant were subject to a first-party appeal to An Bord Pleanála. The grant was also subject to a third-party appeal. On the 14th of February 2020 the final grant was issued by Kildare County Council after both appeals were withdrawn.
Reg. Ref. 181027	This application lodged by Eurkon (Kildare) Ltd was the second of three applications concurrently lodged to the east of the subject site in August 2018. The application comprised a residential scheme of 50 no. dwelling units in a mixture of 2 storey, 2 storey plus dormer houses, and a 3-storey duplex apartment building. The application was subject to a further information request which significantly altered the scheme including an increase in unit numbers, details regarding unit mix, car parking, and the provision of a childcare facility. Subsequently, Kildare County Council decided to grant permission for the proposed development on the 4th of

	September 2019. The conditions of the grant were subject to a first-party appeal to An Bord Pleanala. The grant was also subject to a third-party appeal. On the 17th of February 2020 the final grant was issued by Kildare County Council after both appeals were withdrawn.
Reg. Ref. 181028	This application lodged by Eurkon (Kildare) Ltd was the third of three applications concurrently lodged to the east of the subject site in August 2018. The application comprised a residential scheme of 96 no. dwelling units in a mixture of 2 storey, 2 storey plus dormer houses, and a 3 storey duplex apartment building, and the provision of a 1-2 storey childcare facility. The application was subject to a further information request which significantly altered the scheme including an increase in unit numbers, details regarding unit mix, car parking, site layout and boundary, and the relocation of a childcare facility. Subsequently, Kildare County Council decided to grant permission for the proposed development on the 4th of September 2019. The conditions of the grant were subject to a first-party appeal to An Bord Pleanala. The grant was also subject to a third-party appeal. On the 17th of February 2020 the final grant was issued by Kildare County Council after both appeals were withdrawn.
Reg. Ref. 221528	Elmendorf Ltd lodged a planning application in December 2022 for modifications to the previously permitted residential development permitted under ref. 181028, and associated refs. 181026 and 181027. The permission sought amendments to the site layout, design changes to house types, and changes to the housing mix. The proposed changes are within the subject area of ref. 181028 but should be assessed in conjunction with the permitted refs. 181026 and 181027. The application was refused on the 23rd of February 2023 for poor design and layout, impact on the visual and residential amenity of existing dwellings, safety and security concerns, and insufficient detail regarding septic tank management.
Reg. Ref. 2460145	Eurkon (Kildare) Ltd lodged a planning application in February 2024 for the construction of 44 no. apartments in 4 no. three storey duplex blocks. The development also includes all associated ancillary site works, car parking, bin and bicycle stores, and public / communal open space on the previously approved site under ref. 181027. The application was subject to a further information request which significant altered the scheme including amendments to the site layout and the reduction of car parking provision. The application was refused on the 21st of October 2024 for lack of proper above ground SUDs techniques, and the failure to provide a high quality and responsive built form and failure to deliver an appropriate sense of streetscape and public realm.
Reg. Ref. 255	Eurkon (Kildare) Ltd lodged an Extension of Duration request in January 2025 for planning permission ref. 181027. The request was refused as the planning authority were not satisfied that substantial works had been carried out.
Reg. Ref. 2521	Elmendorf Ltd lodged an Extension of Duration request in February 2025 for planning permissions ref. 181026, 181027, and 181028. The request was granted on the 1st of April 2025.
Reg. Ref. 2560535	Eurkon (Kildare) Ltd lodged a planning application in May 2025 for the construction of 48 no. apartments in 3 no. three storey duplex blocks on site previously approved under ref. 181027. The request was granted on the 15th of July 2025.

Reg. Ref. 2560740	Elmendorf Ltd. lodged a planning application in July 2025 for the construction of 11 no. houses at Oak Church, Kildare. The houses proposed are a mixture of 3 and 4 bedroom, 2 storey and 2 storey plus dormer, in a mix of semi-detached and terraced arrangements, with on-curtilage parking. Permission was previously granted for these houses under plan ref. 18/1027 but has since expired. The application was granted subject to conditions on the 6th of October 2025.
Reg. Ref. 2561208	This Application lodged by the private household of the O'Shea family on the 10th of October 2025. It consists of the subdivision of the existing site and six-bedroom dwelling into two separate dwellings, consisting of 1 no. single storey three-bedroom bungalow to include conversion of garage to a bedroom & 1 no. two-bedroom 2 storey dwelling with internal alterations. The application was subject to a further information request on the 10th of December 2025 with FI response due on the 9th of June 2026 and remains the current status of the application at the time of writing this report.

South of Subject Site	
KCC Reg. Ref.	**Description**
Reg. Ref. 23416	Pousterle Limited lodged a planning application in April 2023 for a Large Scale Residential Development. The proposed development consisted of the construction of 168 no. residential units in a mixture of houses, apartments and duplex units together with a childcare facility. The application was subject to a further information request and was subsequently refused by Kildare County Council due to drainage reasons. A first party appeal was submitted to An Bord Pleanala and subsequently, the scheme was granted on the 26th of February 2024.
Reg. Ref. 2560453	Lagan Homes Kildare Limited lodged a planning application in May 2025 to modify a permitted Large-scale Residential Development permission (Ref. 23416) by way of planning application for an LRD at Ard na Pairce Theas, Southgreen. The development will consist of amendments to the two-storey creche building. The application decision type was decided as conditional on the 25th of June 2025.

West of Subject Site	
KCC Reg. Ref.	**Description**
Reg. Ref. 071450	Makros Limited lodged a planning application in June 2007 for a residential development consisting of 212 no. dwellings of varying types. The application was subject to further information requests and was subsequently granted by Kildare County Council. The conditions of the grant were subject of a first party appeal. This appeal was withdrawn, and the application received a final grant on the 8th of August 2008.

Reg. Ref. 13155	Makros Limited lodged an Extension of Duration request in March 2013 for planning permission ref. 071450. The extension was granted on the 28th of April 2013.
Reg. Ref. 17764	Makros Limited lodged a planning application in June 2017 for modifications to development permitted under ref. 071450. The modifications included the construction of a 2 storey scheme comprising 191 residential units. The permission was granted on the 26th of June 2018 after being subject of a first party appeal.
Reg. Ref. 2560729	Gymdog Limited lodged a retention application on the 1st of July consisting of small alterations to elevations including new windows and doors and installation of new roof, retention for construction of detached single storey store room to rear of main hospital building. Decision is ongoing with further information requested on the 22nd of August 2025 leading to the application placed on hold with the FI response due on the 21st of February 2026.

Table 2 - Planning History of Surrounding Area



Figure 4 - Planning History Map

5.3 Conclusion

The planning history of sites in the surrounding vicinity show a clear precedent for residential development at this scale. The efficient use of sites ideally located in proximity to the town centre, public transport and local amenities is encouraged.

The subject proposal will complement the granted developments that are proximate to the west, east, and south of the subject site.

6 STAGE 1 – SECTION 247 MEETING (PRE-PLANNING)

The evolution of the scheme has been brought about by engagement with the Planning Authority Kildare County Council. The applicant and design team formally engaged in preliminary discussions with the Planning Authority presenting a draft outline of the proposed development by consultation via 1 no. formal S.247 pre-planning meeting (Ref. PP6026) held on 13.02.2025.

Comments from the Kildare County Council Planning and other Departments present at this meeting were considered and the design team prepared a revised proposal to present to Kildare County Council for comment.

All matters raised by the Planning Authority have, where possible, been addressed in the proposal now submitted. Where the applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale in support of the proposal in terms of adherence to national policy.

6.1 Stage 1 Proposal Summary

The initial proposal presented to Kildare County Council at Pre-Planning, proposed the following in summary:



Figure 5 - Original Scheme Site Layout presented to KCC

- The scheme was presented on 'C: Phase 2 New Residential' zoned lands.
- The proposed scheme offered 157 units across 4 no. different housing unit types on a site of approx. 5.3 ha. This delivered a density of 30 dwellings per hectare.
- The proposed units were proposed as the following typologies; 18 no. 4-bed deep, 91 no. 3-bed deep, 34 no. 3-bed wide, and 14 no. back-to-back units.
- The development proposed 2 no. vehicular entrances on the Southgreen Road, and 1 no. vehicular entrance onto the Old Road.

- A green link was proposed through the development connecting to the residential development immediately to the south.
- 2 no. large areas of public open space were provided within the development.

It should be noted that the scheme presented at S.247 stage was a preliminary design. Many of the finer details regarding car parking, services, drainage, etc were not addressed at this stage. These have been comprehensively addressed within the submitted Stage 2 pack.

6.2 Pre-Planning Feedback

Kildare County Council provided feedback during the consultation on the scheme outlined above. Please see below a summary of the feedback and how the proposed development submitted at Stage 2 responded to it, and how the now proposed development responds to it.

Planning Authority Comments	**Applicant Response**
Planning Department	
Any application zoned C2 would need to analyse the C1 zoned lands to ensure that they all either having planning permission or are under construction.	We refer the Planning Authority to Appendix 1 of this Planning Report which provides an analysis of all C – New Residential zoned lands. It concludes that all sites of scale zoned C New Residential with potential for significant residential development benefit from a granted planning permission or an application in the system at the time of writing this report. Therefore, it is submitted that capacity can move to lands zoned C New Residential Phase 2 in accordance with a sequential approach.
In terms of the site layout, the large area of open space to the south of the site is not overlooked.	We refer the Planning Authority to the Architectural Drawing Pack prepared by MCORM Architects. The Site Layout Plan has been revised from the Stage 1 submission to ensure this area of public open space is overlooked.
Examples and justification of the proposed back-to-back units would be beneficial.	The back to back type units have now been removed from the development. Proposals submitted by MCORM set out a revised development option for house, duplex and apartment style units with a revised design now submitted for New Block A.
Client will need to justify provision mix of unit types – justify only having 3 and 4 bed homes in the suggested application.	We confirm to the Planning Authority that the applicant has given attention to the unit mix feedback from Stage 1 and has revised proposed development to provide the following unit mix in the form of both houses, duplexes and apartments (5 no. 1 beds, 10 no. 2 beds, 104 no. 3 beds and 27 no. 4 beds). We refer the Planning Authority to the Schedule of Accommodation prepared by MCORM Architects for a more detailed breakdown of the proposed unit mix and to Appendix 2 of this report which includes a statement on housing mix. As the survey of existing housing stock within a 10 minute walk of the proposed development has

	indicated, Kildare town is experiencing a moderate increase in the existing housing typology (low density housing), that defined the more historic and traditional development style in the area. Notably, the mix of housing to apartment units is currently broadly on par in this study area standing at over 50%. This upward shift in apartment development is reflective of local, regional and national polices for locations served by high capacity public transport and is broadly supported by Planning Authorities.
An analysis of permissions since the County Development Plan was adopted should be undertaken, including units under construction.	We refer the Planning Authority to Appendix 1 of this Planning Report which includes analysis of permissions since the adoption of the County Development Plan.
The Transport Department request a Traffic and Transport Assessment and a Noise Report.	We refer the Planning Authority to the Traffic and Transport Assessment prepared by Waterman Moylan which provides an extensive analysis of potential trips arising from the proposed development and their impact on the surrounding area. The report concludes that all junctions and the Shuttle Link would operate within their respective capacities for all years and scenarios analysed. We refer the Planning Authority to the Acoustic Design Statement prepared by Wave Dynamics which concludes that the site is characterised as low risk and therefore, mitigation measures are not required to control the onset noise levels.
A footpath should be provided along the Old Road. The South Green Road would need 2m wide cycle lanes on each side.	The refer the Planning Authority to the Engineering Drawing Pack prepared by Waterman Moylan. The applicant proposes a dual lane cycle track on the South Green Road along the boundary of the proposed development. The dual lane track is proposed to split onto both sides of the road towards the south of the site. Appropriate set back of the built element from the roadside is delivered along Old Road to allow for any future footpath upgrade proposals that may come forward.
More detail should be provided regarding the proposed Open Space.	We refer the Planning Authority to the Landscape Drawing Pack prepared by Hayes Ryan Landscape Architects. Both public open space areas are proposed to be landscaped to provide high quality amenity areas for the public.
A Social Infrastructure Audit should be provided.	We refer the Planning Authority to the Social Infrastructure Audit prepared by Brock McClure.

Table 3 – Pre-Planning Feedback and Responses

6.3 Pre-Planning Conclusion

The above demonstrates that comments from Kildare County Council Planning and related Departments made during the pre-planning discussions have been carefully considered and incorporated into the design proposal now put forward. All feedback from Kildare County Councill has been closely considered in the design of the proposal. We trust that the proposal now submitted addresses concerns raised by the Planning Authority at the initial pre planning stages. An outline of the proposed development is now provided for Kildare County Council.

7 STAGE 2 – SECTION 32(B) CONSULTATION

As outlined in Section 6, the scheme evolved on the back of Stage 1 pre-planning feedback provided by Kildare County Council and subsequently proceeded to Stage 2 of the LRD process. The applicant and design team formally engaged in the pre-application process, with a Section 32B consultation meeting held on the 12th of August 2025. Following consideration of the issues raised during the meeting, in correspondence dated 12th of September 2025 (LRD Ref no. LRD20250005), the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act would not constitute reasonable basis for an application for a Large-scale Residential Development (LRD).

All matters raised by the Planning Authority have, where possible, been addressed in the proposal now submitted. Where the applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale in support of the proposal in terms of adherence to national policy.

7.1 Stage 2 Proposal Summary



Figure 6 - Site Layout Plan (Stage 2)

The proposed development will consist of the following on a site of approx. 5.74 ha:

- The construction of a new residential scheme of 153 no. house type units ranging in height from 1-2 storeys as follows:
    - 141 no. houses (4 no. 2 bed units; 107 no. 3 bed units; and 30 no. 4 bed units) in a mixture of bungalow, detached, semi-detached, and terrace style units.
    - 12 no. duplex apartment units (4 no. 1 beds and 8 no. 2 beds)

- Each residential unit will be afforded with private open space in the form of a front/rear/side garden.
- Public open space (approx. 7,214 sq m) is proposed in the form of 2 no. new large public open space areas within the site (approx. 3,401 sq m and 3,813 sq m respectively).
- A total of 332 no. car parking spaces (303 no. for residents and 29 no. for visitors). This provision includes 1 no. accessible visitor space and 29 no. standard visitor spaces. All residential spaces will be provided with EV charging on curtilage. Residential spaces off curtilage will also be provided with EV charging facilities. 4 no. EV visitor spaces will be provided.
- A total of 331 no. cycle parking spaces (260 no. for residents and 71 no. for visitors) are provided. 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 duplex units. Visitor parking is proposed in the form of Sheffield stands.
- The development shall be served via a new vehicular access point from Southgreen Road. An additional private vehicular access point is proposed via Old Road to service 1 no. new bungalow 4 bed residential unit.
- Pedestrian and Cyclist access is also proposed via Southgreen Road and via a new secondary access point from the Southern Internal Link Road to the south of the site and Old Road to the east of the site.
- A double-lane cycle track and footpath are also proposed along Southgreen Road adjacent to the proposed scheme.
- The associated site and infrastructural works include provision for an ESB Sub Station; water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas, all electrical services and all associated site development works.

7.2 LRD Opinion Response

It is submitted that the now proposed development address in full the issues raised by the Planning Authority in the LRD Opinion dated 12th September 2025. We direct the Planning Authority to the accompanying LRD Opinion Response document, prepared by Brock McClure Planning and Development Consultants, for a full overview of how the proposed development responds to the reasons and information sought.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of the area, and we trust that the enclosed documentation fully addresses the issues raised in the LRD Opinion issued by KCC.

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 more details.

8 PROPOSED DEVELOPMENT (STAGE 3)

8.1 Summary of Proposed Development



Figure 7 - Proposed Site Layout Plan prepared by MCORM

The proposed development will consist of the construction of a new residential scheme of 146 no. dwelling units in a mixture of houses, duplexes and apartment units ranging from 1 - 3 no. storeys in height. The breakdown of units is as follows

The breakdown of units includes 5 no. 1 beds, 10 no. 2 beds, 104 no. 3 beds and 27 no. 4 beds in a mix of houses, apartments and duplex units ranging in height from 1-3 storeys as follows:

- 136 no. houses (7 no. 2 bed units; 102 no. 3 bed units; and 27 no. 4 bed units) in a mixture of bungalow, detached, semi-detached, and terrace style units ranging in height from 1 – 2 storeys.
- 8 no. apartment units and 2 no. duplex units (5 no. 1 beds, 3 no. 2 beds, and 2 no. 3 beds) in new Block A ranging in height from 2-3 storeys

The Duplex and Apartment units are located in 1 no. block (A) in the north-west quadrant of the site.

A creche facility, measuring at approx. 161 sqm GFA, is also proposed in Block A, along with approx. 60 sqm of associated external open space. The creche will be able to cater for up to 39 no. children.

The scheme proposes a total of 6,992 sqm of public open space across 2 no. green areas. These areas are proposed to be landscaped to provide a high level of amenity for users and include; large play areas,

outdoor seating and planting, and pedestrian and cycle links. The landscape proposals have been developed in conjunction with the engineering SuDS strategy.

Each residential unit will be afforded with private open space in the form of a terrace or balcony for Duplex style units and a front/side/rear garden in the case of the housing units. A communal open space area (approx. 82 sqm) is also proposed adjacent to Block A, for the use of the residents of the Duplex Apartments.

A total of 321 no. car parking spaces are provided at surface level; including 305 no. for residential units and 16 no. for the creche facility. The provision also includes 2 no. accessible spaces and 17 no. visitor spaces. A total of 527 no. bicycle spaces are provided; including 517 no. for residential units and 10 no. for the creche facility. The provision also includes 75 no. visitor spaces. Resident cycle parking spaces are 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 secure bicycle store for apartment units located in Block A. Sheffield stands are proposed at various locations throughout the development for visitor parking.

The development shall be served via 2 no. vehicular access points from the Southgreen Road. An additional private vehicular access point is proposed via Old Road to service 1 no. new bungalow 4 bed residential unit. Provision has also been made for vehicular access via Southgreen Road to serve the future open space and amenity zoned lands to the north of the main development site. New pedestrian/cyclist access points are proposed onto the Southgreen Road, Old Road, and the new Southern Link Road from the site. A new pedestrian/cycle link is also proposed to the north of the main development site, connecting Southgreen Road to the Old Road.

Works are also proposed to the Southgreen Road to provide for upgrades and widening including the provision of 2 no. directional single lane cycle tracks and pedestrian footpaths on either side of the Southgreen Road.

The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; waste storage areas and electrical services and all associated site development works.

It should be noted that the undulating topography of the subject site has been reflected in the design proposal. The design put forth responses to the topography of the site accordingly. We submit to the Planning Authority that the topography of the site should accordingly be taken into consideration when assessing this development proposal.

8.2 Development Description

The proposed development will consist of:

- The construction of a new residential scheme of 146 no. residential units (5 no. 1 beds, 10 no. 2 beds, 104 no. 3 beds and 27 no. 4 beds) in a mix of houses, apartments and duplex units ranging in height from 1-3 storeys as follows:
    - 136 no. houses (7 no. 2 bed units; 102 no. 3 bed units; and 27 no. 4 bed units) in a mixture of bungalow, detached, semi-detached, and terrace style units ranging in height from 1 – 2 storeys.
    - 8 no. apartment units and 2 no. duplex units (5 no. 1 beds, 3 no. 2 beds, and 2 no. 3 beds) in new Block A ranging in height from 2-3 storeys

  Each residential unit will be afforded with private open space in the form of a front/rear/side garden for houses or terrace / balconies for apartment and duplex style units.
- The provision of a new creche facility (approx. 161 sq m GFA) and associated areas of external open space (approx. 60 sq m) located in Block A.
- Public open space (approx. 6,992 sq m) is proposed in the form of 2 no. new large public open space areas within the site (approx. 3,046 sq m and 3,946 sq m respectively).
- Communal open space (approx. 82 sq m) is proposed adjacent to Block A.

- A total of 321 no. car parking spaces (305 no. for residential units and 16 no. for the creche facility) are proposed. This provision includes 2 no. accessible spaces and 17 no. visitor spaces.
- A total of 527 no. cycle parking spaces (517 no. for residential units and 10 no. for the creche facility) are provided. This provision includes 75 no. visitor spaces. 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.
- The development shall be served via 2 no. new vehicular access points from Southgreen Road. An additional private vehicular access point is proposed via Old Road to service 1 no. new bungalow (4 no. bed residential unit). Provision is also made for vehicular access via Southgreen Road to serve the future open space and amenity zoned lands to the north of the main development site.
- Pedestrian and Cyclist access is also proposed via Southgreen Road; via a new secondary access point from the Southern Internal Link Road to the south of the site; and via Old Road to the east of the site.
- Upgrades/widening to Southgreen Road including the provision of 2 no. directional single lane cycle tracks and pedestrian footpaths on either side of the Southgreen Road, together with amendments to the existing cycle tracks and footpaths on Southgreen Road north of Southern Internal Link Road are proposed.
- A new pedestrian/cycle link is also delivered to the north of the main development site connecting South Green Road to Old Road.
- The associated site and infrastructural works include provision for an ESB Sub Station; water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; PV/Solar Panels; internal roads and footpaths; waste storage areas, all electrical services and all associated site development works.

8.3 Key Development Statistics

The key development statistics associated with the proposed development are as follows:

Key Proposed Development Statistics	
Application Red Line Boundary Area	6.13 ha
Developable Area	4.64 ha
Net Residential Density	31.5 dwelling per hectare
Height	1-3 no. storeys
Residential Mix	• 5 no. 1-bed Duplex Apartments • 3 no. 2-bed Duplex Apartments • 2 no. 3-bed Duplex Apartments • 7 no. 2-bed houses • 102 no. 3-bed houses • 27 no. 4-bed houses Total: 146 no. residential units
Residential Tenure Mix	15 no. units are being provided for Part V Allocation in the following breakdown: • 3 no. 1-bed units • 6 no. 2-bed units • 5 no. 3-bed units • 1 no. 4-bed unit

	Total: 15 no. units (10.27% of overall total)
Dual Aspect	All units are dual aspect as a minimum.
Private Open Space	Private Open Space is provided in the form of a front/rear/side garden for houses or terraces/balconies for apartment and duplex style units. • Housing Units – minimum of 30 sqm • Duplex and Apartment Units – minimum of 5 sqm
Communal Open Space	Communal open space of approx. 82 sqm is provided adjacent to Block A for the use of the residents of the Duplex Apartment block.
Public Open Space	• Public Open Space 1 – 3,072 sqm • Public Open Space 2 – 3,946 sqm Total: 7,018 sqm (15.1% of Site Area)
Creche Facility	A creche facility of approx. 161 is provided which can cater for up to 39 no. children. The proposed unit is also provided with 60 sqm of external open space.
Car Parking	Houses: • 252 no. surface curtilage parking spaces • 20 no. surface off curtilage parking spaces Duplex Apartments: • 19 no. surface parking spaces Visitor: • 14 no. surface, taken-in-charge spaces Creche: • 16 no. surface parking spaces Total: 321 no. spaces All residential spaces, on curtilage and off curtilage, will be provided with EV charging. EV Visitor Spaces will also be provided.
Bicycle Parking	Houses: • 428 no. spaces secure within curtilage Apartments and Duplex Apartments: • 17 no. spaces secure within sheltered communal facility Visitor: • 72 no. spaces provided as Sheffield stands throughout development Crèche: 10 no. spaces Total: 527 no. spaces
Net Plot Ratio	0.42
Gross Site Coverage	18.67%

Table 4 - Development Statistics

8.4 Detailed Description

Unit Mix

The development provides 146 no. residential units. The proposed development offers a mix of unit types and sizes, which cater for a wide demographic and is needed to accommodate the growing and diverse population of Kildare Town and its environs.

The development provides the following typologies in the below breakdown;

- 7 no. 2-Bed Houses (two storey)
- 102 no. 3-Bed Houses (two storey)
- 27 no. 4-Bed Houses (two storey incl. 1 storey + dormer, standalone bungalow)

136 no. total Houses

- 5 no. 1-Bed Apartments
- 3 no. 2-Bed Apartments
- 2 no. 3-Bed Apartments

10 no. total Duplex and Apartment Units

146 no. total units

The percentage breakdown by bed space is as follows;

- 1-bed units – 3.4%
- 2-bed units – 6.8%
- 3-bed units – 71.2%
- 4-bed units – 18.5%

The proposal provides an appropriate response to the constraints and opportunities of the site and maximises its development potential, providing 31.5 dwellings per hectare in Kildare Town.

We refer the Planning Authority to the Schedule of Accommodation prepared by MCORM Architecture submitted as part of this application.

Density

The proposed scheme offers 146 no. dwelling units on a net site area of approx. 4.64ha. This equates to approximately 31.5 units per hectare. It is our submission that this residential density is supported by national policy which aims to deliver increased densities at appropriate locations. The site can accommodate this density given the size of the site and its proximity to a range of services and public transport.

Height

The maximum height of the proposed development will be 3 no. storeys. The tallest building in the development is proposed to measure at 10.525m, the tallest part of Block A. All proposed house units are to be 2 no. storeys in height, apart from Housing Type G, 1 no. standalone bungalow, which is proposed to be 1 storey in height.

We refer the Planning Authority to Elevations prepared by MCORM Architecture submitted part of this application. A selection of these elevations are shown below for the benefit of the Planning Authority.



Figure 8 - Typology Elevations – Terraced Example

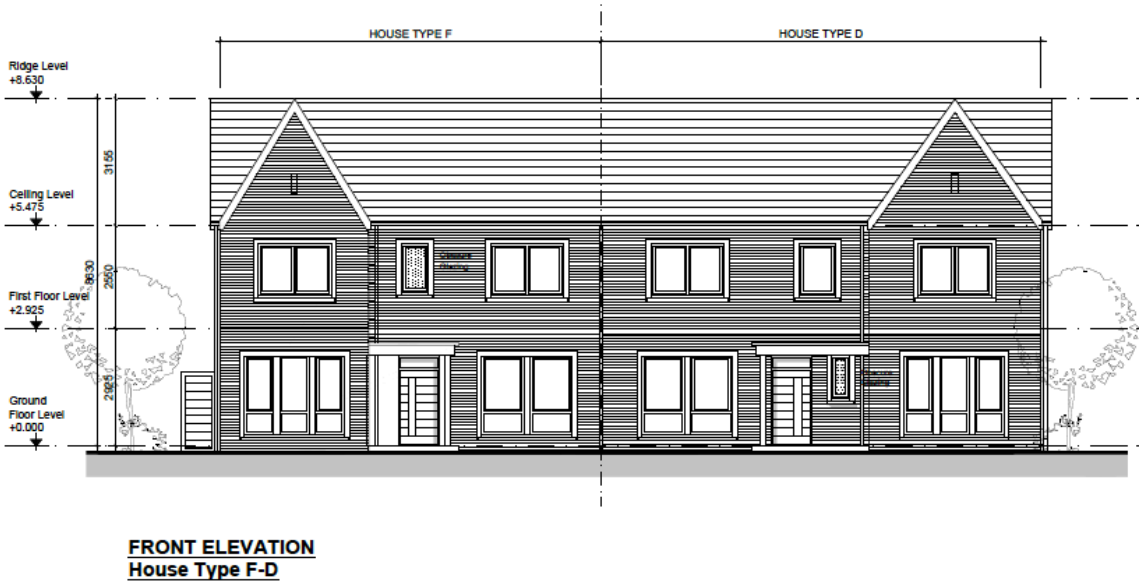


Figure 9 - Typology Elevations – Semi-Detached Example



Figure 10 - Typology Elevations – Detached Example

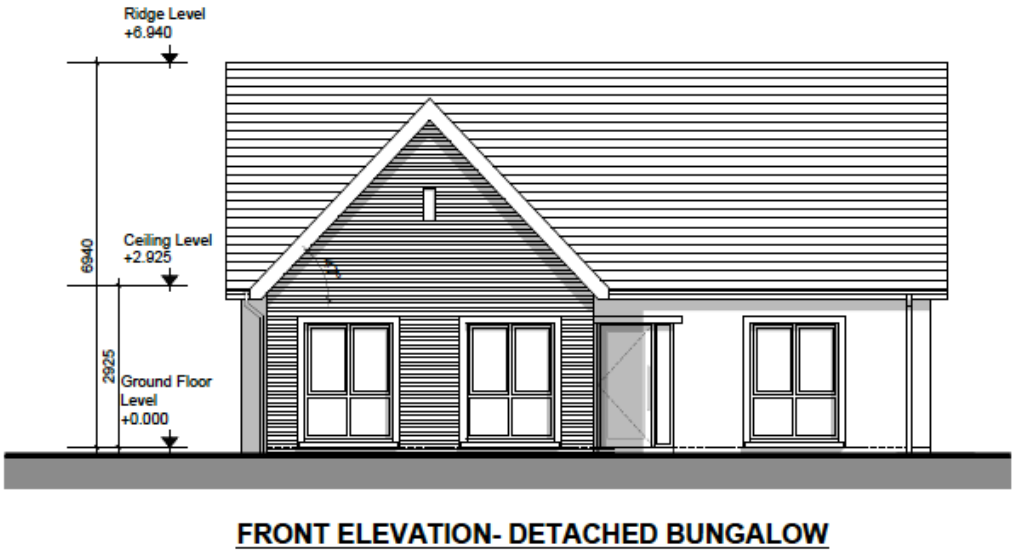


Figure 11 - Typology Elevations – Detached Bungalow



Figure 12 - Typology Elevations – Duplex Apartment Units (incl. Creche)

Access

The development will be served via 2 no. new vehicular access and egress points on the Southgreen Road. An additional private vehicular access point is proposed via Old Road to service 1 no. new bungalow 4 bed residential unit. There are also 2 no. proposed pedestrian and cycle access points, one to the south of the site onto the new Southern Link Road, and one to the south-east of the site onto the Old Road. A pedestrian and cycle link is proposed to the north of the main development site. Provisions have also been made for an access road onto the adjoining open space and amenity lands to the north.

We refer the Planning Authority to the Site Layout plan below, prepared by MCORM Architecture, which indicates the proposed locations of the access points.



Figure 13 - Site Layout Plan indicating Access Points

Communal Facilities

The following communal facilities are proposed for the benefit of the residents and the wider community of Kildare Town:

- Outdoor Play Spaces for Children.
- Landscaped areas of public open space with seating areas and green areas.
- Pedestrian and cycle linkages running throughout the development, linking to the existing residential developments to the west, south, and east.

We refer the Planning Authority to the Landscaping drawings, prepared by Hayes Ryan Landscape Architecture, submitted as part of this application.

Landscaping and Public Open Space

The delivery of attractive public open spaces and a quality landscape plan has been a key objective from the outset of the design of the proposed development. The design team have recognised the importance of meaningful public open space areas. Landscape drawings have been prepared by Hayes Ryan Landscape Architecture. There are 2 no. public open spaces proposed across the site, totalling 7,018 sqm (15.1% of the net site area). The landscape proposals have been developed in conjunction with the engineering required SuDS strategy.

Public Open Space 1 is located centrally in the subject site. The open space is proposed to be landscaped and designed to include play structures, seating areas, and a large green area for play. The landscaping design of the open space makes it suitable for both resting and play. The space totals 3,072 sqm. A sweeping footpath network ensures that the primary level shallow basin area is free for informal active recreation, such as kickabouts. Seating is placed strategically throughout the open space to provide passive supervision of the play areas. Natural play areas are proposed to the north of the open space. Adult callisthenic exercise equipment is provided along the footpath network. It is submitted that the proposed open space provides an attractive and interesting area for members of the public and residents to enjoy.

We refer the Planning Authority to the Landscape drawings, prepared by Hayes Ryan Landscape Architecture, submitted as part of this application. For the benefit of the Planning Authority, an extract of Public Open Space 1 is shown below.

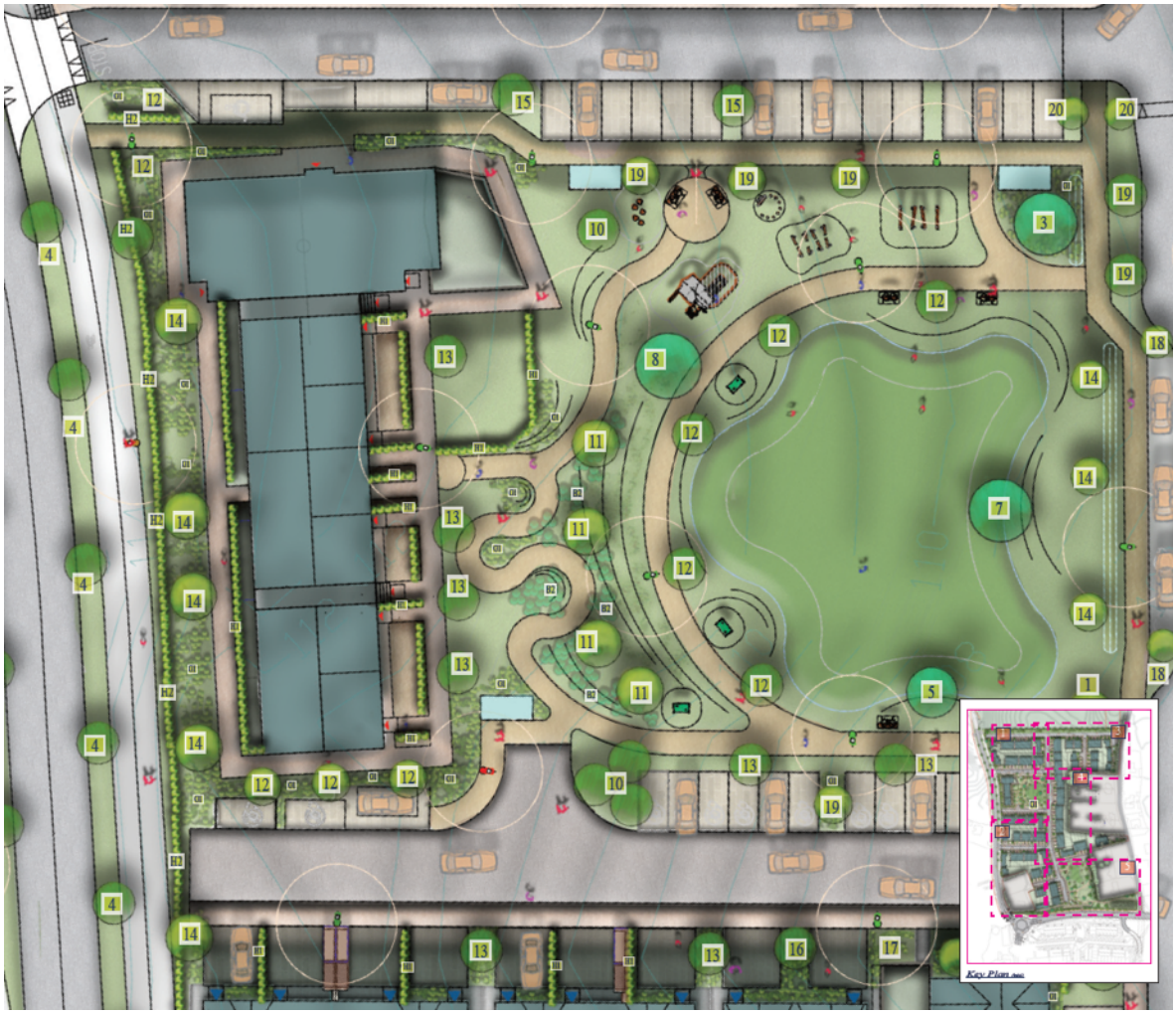


Figure 14 - Public Open Space 1

Public Open Space 2 is located southernly in the subject site. The open space has been landscaped and designed to include play structures, seating areas, a large green area for play, and pedestrian and cycle links to the south and east boundaries of the development. The landscaping design of the open space makes it suitable for both resting and play. The space totals 3,946 sqm. A sweeping footpath network ensures the primary level shallow basin area is free for informal active recreation. Seating is placed strategically throughout the open space to provide passive supervision of the play areas. Natural play areas are proposed to the north of the open space. Adult callisthenic exercise equipment is provided along the footpath network. Planting is provided surround to the eastern side of the open space to soften the sloped areas. A key natural play piece is proposed as a primary focal point within the space to the south. Shallow areas in the south will be raised to create a practical kickout space. The topography of the area allows for offset zones and natura play to be incorporated into the earth modelling. It is submitted that the proposed open space provides an attractive and interesting area for members of the public and residents to enjoy.

We refer the Planning Authority to the Landscape drawings, prepared by Hayes Ryan Landscape Architecture, submitted as part of this application. For the benefit of the Planning Authority, an extract of Public Open Space 2 is shown below.



Figure 15 - Public Open Space 2

Car Parking

The proposal includes the provision of 321 no. car parking spaces across the site. This is split between provision for residents of the houses, Duplex Apartments, and visitors.

Unit Type	Rate of Provision	No. of Spaces	Type of Parking
Houses	2 no. per unit	252 no. spaces	Surface Curtilage Parking
		20 no. spaces	Surface Off Curtilage Parking
Duplex Apartments	1.5 no. per unit	18 no. spaces (incl. 1 no. disabled space and 3 no. visitor spaces)	Surface
Creche	1 no. per 2 Staff 1 no. per 4 children	16 no. spaces (incl. 1 no. Universal space)	Surface
Additional Visitor Parking	1 per 10 units	15 no. spaces	Surface, taken-in-charge

Table 5 - Car Parking Provision

This provision is deemed appropriate due to the subject sites proximity to Kildare Town and Kildare Railway station.

The majority of houses will be provided with parking within the curtilage of the subject house. Where this isn't possible, due to the restraints of the subject site, parking has been provided off-curtilage within a short walking distance of the subject dwelling unit. All residential spaces will be provided with EV charging, including off curtilage residential spaces and EV spaces.

We refer the Planning Authority to the Site Layout Plan, prepared by MCORM Architecture, submitted as part of this application for the locations of car parking spaces.

Bicycle Parking

The proposal includes the provision of 527 no. bicycle parking spaces across the site. This is split between provision for residents of the houses, Duplex Apartments, creche, and visitors.

Unit Type	Rate of Provision	No. of Spaces	Type of Parking
Houses	1 no. space per bed for residents	428 no. spaces	Secure within curtilage
Duplex Apartments	1 no. per bed for residents	17 no. spaces	Secure in sheltered communal facility
Duplex Apartment Visitor Parking	1 no. per 2 units for visitors	5 no. spaces	Surface (Sheffield Stands)
Creche	1 per 5 Staff 1 per 10 Children	10 no. spaces	Surface (Sheffield Stands)
Additional Visitor Parking	1 no. per 2 units for visitors	67 no. spaces	Surface (Sheffield Stands) – Provided across development in

			public open space areas

Table 6 - Bicycle Parking Provision

This provision is deemed appropriate due to the subject sites proximity to Kildare Town and Kildare Railway station. Cycle links are provided throughout the development to adjoining routes. It is submitted that the applicant has provided sufficient cycle parking and infrastructure.

We refer the Planning Authority to the Site Layout Plan, prepared by MCORM Architecture, submitted as part of this application for the locations of cycle parking spaces.

Part V Provision

We confirm that the Applicant is committed to the delivery of their Part V obligations as part of any future planning application lodged. As part of the proposed development, the applicant provides a total of 15 no. Part V units (10% of overall total); 3 no. 1-bed units, 6 no. 2-bed units, 5 no. 3-bed units and 1 no. 4 bed. This is over 10% of the overall units proposed.

We refer the Planning Authority to the Part V Provision drawings, prepared by MCORM Architecture, submitted as part of this application. The provision of Part V units is shown below for the benefit of the Planning Authority.



Figure 16 - Part V Units

Boundary Treatment

The Planning Authority highlighted in the s.247 pre-planning meeting that the retention of hedgerows on this greenfield site would strengthen the development proposal. A detailed landscape masterplan has been prepared by Hayes Ryan Landscape Architecture accompanied by an Arboricultural Report prepared by Charles McCorkell. These inputs together provide an informed and strong boundary treatment plan which aims to retain existing hedgerow and provide for the proposed residential development.

The boundary treatment fronting onto Southgreen Road is proposed to be 1.2m high evergreen hedge planting. The northern and southern boundaries, facing onto greenfield lands and the Southern Link Road respectively, are proposed to consist of a mid-sized mixed native biodiverse hedgerow division. Key mature hedgerows are retained throughout the site where possible, particularly the sites eastern boundary, while others will be removed primarily necessitated by required level changes on the subject site.

We refer the Planning Authority to both the Landscape Drawing Pack and the Arboricultural Report, prepared by Hayes Ryan Landscape Architecture and Charles McCorkell respectively, for more detail regarding the proposed boundary treatments and retention of existing mature hedgerow.

Flood Risk Assessment

A Flood Risk Assessment has been prepared by Waterman Moylan Engineering Consultants to assess the potential flood risk on the subject site. It is deemed that the subject site is located within Flood Zone C and thus is low risk. The risk of pluvial flooding is considered low and flood risk mitigation measures have been recommended and applied to the subject site. It is concluded that surface water runoff from the subject site does not impact developments upstream or downstream of the subject site.

We refer the Planning Authority to the Flood Risk Assessment, prepared by Waterman Moylan Engineering Consultants, for more detail regarding mitigation measures applied.

Traffic and Transport Assessment

A Traffic and Transport Assessment has been prepared by Waterman Moylan Engineering Consultants to assess the potential impacts of the proposed development on the traffic and transportation system in the area. Traffic surveys were conducted as part of this assessment to provide the most accurate information for the assessment to be carried out. The report concluded that results of the analysis demonstrated that all junctions surveyed and the Shuttle Link would operate within their respective capacities for all years and scenarios analysed.

We refer the Planning Authority to the Traffic and Transport Assessment, prepared by Waterman Moylan Engineering Consultants, for more detail regarding the analysis of the different scenarios and years.

Visual Impact and CGIs

The high quality design and considered layout that retains and is sympathetic to the characteristics of the surrounding landscape, will ensure a moderate and positive visual impact that is consistent with emerging trends of the existing developments to the surrounding the subject site.

Although the character of the environment shall change, it is in line with emerging patterns of development in the locality. The proposal is, however, sympathetic to the surrounding landscape and shall present a moderate visual impact in the long term.

Please see below Photomontages/CGIs prepared by BigLolly:


CGI - View 1


CGI - View 2


CGI - View 3


Photomontage - View 1
(Proposed)



Figure 17 – CGIs and Photomontages of Proposed Development

8.5 F1 - Open Space and Amenity Zoned Lands

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 Southrgeen 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.

9 STATEMENT OF CONSISTENCY

9.1 Strategic Planning Policy and Section 28 Ministerial Guideline Documents

It is our considered opinion that the key policy documents for consideration as part of this Statement of Consistency are identified as follows:

- National Planning Framework – Project Ireland 2040
- Housing for All – A New Housing Plan for Ireland (2021)
- Housing for All Progress Report Q2 2024
- Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031
- Greater Dublin Area Transport Strategy 2022-2042
- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Streets 2019
- Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025

Please see Appendix 3 for a full review of the aforementioned documents with respect to the proposed development.

10 STATUTORY PLANNING CONTEXT

The Kildare County Development Plan 2023-2029 and the Kildare Local Area Plan 2023-2029 provide the relevant statutory planning context for the subject site. Both plans will remain valid for 4 more years, subject to any review, variations, extensions, or alterations made during the lifetime of the permission.

The consistency of the proposed development with the key policies, objectives and standards of the County Development Plan and Local Area Plan is set out below.

10.1 Kildare County Development Plan 2023-2029



10.1.1 Core Strategy

Kildare has been cited as one of the fastest growing counties in Ireland. As such, Chapter 2 of the County Development Plan 'Core Strategy' highlights the goals the country aims to fulfil over the life span of the Plan as to manage appropriately development and growth. The Act requires Development Plans to provide:

'a Core Strategy to include a settlement hierarchy; evidence based population and housing targets for all towns, villages and the open countryside; to demonstrate how future development supports public transport and services;'

As part of the development plan, chapter 2 of the Development Plan outlines the core strategy for Kildare County until 2029. The following core strategy objectives listed in section 2.14 are relevant to the proposed development in this instance:

Objective CS O1 - *Ensure that the future growth and spatial development of County Kildare is in accordance with the population and housing allocations contained in the Core Strategy which aligns with the regional*

growth strategy as set out in the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midland Region and further specified in the 'Housing Supply Target Methodology for Development Planning'.

Objective CS O4 - *Ensure that sufficient zoned and adequately serviced lands are available to meet the planned population and housing growth of settlements throughout the county in line with the Core Strategy and the Settlement Hierarchy.*

Objective CS O7 - *Promote and facilitate the development of sustainable and socially integrated communities through, a plan-led approach that is informed by settlement capacity audits and social infrastructure audits by providing for land use zoning designations capable of accommodating employment, environmental education, community, leisure, education campuses, childcare, recreational and cultural facilities having regard to the quality of the receiving environment, and any landscape character, archaeological and architectural heritage sensitivities.*

Objective CS O13 - *Require that the design of future development complies with the 10- minute settlement principle through the creation of a safe, attractive, permeable, and universally accessible environment for all, including permeability to existing estates to require public consultation which maximises the potential for active modes of travel along with accessibility to both present and planned public transport options and to advocate for increased public transport options to meet this goal where none are in place.*

We submit that the design of the proposed development will provide:

- a range of quality homes and associated facilities as well as communal open space areas which will create a sustainable neighbourhood at this location,
- a mixture of tenures, detailed on the area schedule prepared by MCORM,
- private and public open spaces of a high standard,
- excellent means of movements for vehicles,
- extensive pedestrian and cyclist pathways to adjoining lands to secure linkages to existing areas/facilities/services (including transport services at Kildare Rail Station) and future linkages to land to the north of the development site.

10.1.2 Housing Policies and Objectives

Objective HO O1 - *To secure the implementation of the Kildare County Housing Strategy in accordance with the provisions of national legislation and relevant policies and standards.*

Policy HO P4 - *Ensure that sufficient zoned land continues to be available at appropriate locations to fulfil the housing requirements of the county.*

Objective HO O2 - *Ensure that sufficient land is zoned at appropriate locations in compliance with the Core Strategy and Settlement Strategy of the Development Plan, in order to meet the likely future housing demands identified in the Housing Strategy and HNDA.*

Policy HO P5 - *Promote residential densities appropriate to its location and surrounding context.*

Objective HO O4 - *Ensure appropriate densities are achieved in accordance with the Core Strategy in Chapter 2 of this Plan, and in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Urban Development (Cities, Towns and Villages), DEHLG, 2009, Urban Design Manual: A Best Practice Guide, DEHLG, 2009; Urban Development and Building Height Guidelines for Planning Authorities (2018); and with reference to Circular Letter NRUP 02/2021 (April 2021).*

Objective HO O5 - *Encourage increased densities that contribute to the enhancement of a town or village by reinforcing street patterns or assisting in redevelopment of backlands and centrally located brownfield sites.*

Objective HO O6 - *Ensure a balance between the protection of existing residential amenities, the established character of the area and the need to provide for sustainable residential development is achieved in all new developments.*

Objective HO O7 - *Promote, where appropriate and sensitive to the characteristics of the receiving environment, increased residential density as part of the Council's development management function and in accordance with the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities and the accompanying Urban Design Manual, DEHLG, May 2009.*

Policy HO P7 - *Encourage the establishment of sustainable residential communities by ensuring a wide variety of housing typologies and tenures is provided throughout the county.*

Objective HO O15 - *a) Require that new residential developments provide for a wide variety of housing types, sizes and tenures. b) Specify target housing mixes, as appropriate, for certain sites and settlements as part of the Local Area Plan process. c) Require the submission of a 'Statement of Housing Mix' with all applications for 10 or more residential units. d) Require that all new residential developments in excess of 5 residential units provide for a minimum of 20% universally designed units in accordance with the requirements of 'Building for Everyone: A Universal Design Approach' published by the National Disability Centre for Excellence in Universal Design. Further detail in respect of unit mix is set out in Chapter 15: Development Management Standards*

In accordance with the Housing Objectives set out above, the applicant can confirm that there are a total of 4 different housing types proposed within this scheme of 146 no. residential units.

An appropriate mix of 1, 2, 3 and 4 bed accommodation is provided in the form of houses and Duplex Apartments. This range of residences will cater for social housing, the needs of the older population, young couples and families, and will promote the creation of a vibrant local residential community at the subject site. A 10% provision is also made for social and affordable housing.

Again, the proposed residential density of 31.5 units per ha aligns with the requirements of the Sustainable Residential Development and Compact Settlement Guidelines (2024).

10.1.3 Residential Development Standards

The Key Development Standards from Chapter 15 of the Kildare County Development Plan 2023-2029 are examined below in the context of the proposed development:

Design Statements

The Plan sets out that proposals of more than 10 units, should have a design statement included with any planning application that may progress.

We refer to the Design Statement included as part of this planning application pack prepared by MCORM.

Density

Table 3.1 of the Development Plan sets out the guidance for residential density appropriate to new development sites.

We note that a general residential density of 30-50 units per hectare is envisaged for outer suburban/ greenfield sites within the development plan.

Regarding this we submit that the proposed development provides a density of approximately 31.5 no. units per hectare. This level of density is considered appropriate.

Housing Mix

It is an objective of the Council to ensure an appropriate mix of house types and sizes. The Development Plan requires a Housing Mix Statement to be submitted with applications for 10 units or more to ensure an appropriate mix of house types and sizes within individual residential development schemes.

MCORM have included a Housing Quality Assessment as part of the material submitted with this planning application.

The following Housing Mix is proposed for the subject proposal:

- 5 no. 1 bedroom units
- 10 no. 2 bedroom units
- 104 no. 3 bedroom units
- 27 no. 4 bedroom units

The above proposal delivers variety in terms of housing offer.

Public Open Space

We note that the Development Plan generally requires public open space at a rate of 15% of the total site area, on greenfield sites.

MCORM can confirm that a total of 15.1% of the net site area (7,018 sq.m) will be delivered as public open space. This is in excess of the Development Plan standards. This is set out in the enclosed Design Statement prepared by MCORM submitted as part of this planning application.

The public open space lands are spread throughout the site and will be easily accessible by all residents, providing landscaped features, seating areas and play spaces for children. In line with the development plan, the open spaces provide for both formal and informal play areas through an imaginative approach using natural features in tandem with the topography and landscaping of the area. All play features are located strategically so that they are accessible and supervised. We refer the Planning Authority to the Landscaping Masterplan, prepared by Hayes Ryan Landscape Architecture, submitted as part of this planning application.

Private Open Space

Table 15.2 of the Development Plan sets out the minimum private open space requirements for dwelling houses as depicted below:

Unit Type (House)	Floor Area	Storage Area	Minimum Private Open Space
One bedroom	55m²	3m²	48m²
Two bedroom	85m²	6m²	55m²
Three bedroom	100m²	9m²	60m²
Four bedroom	110m²	10m²	75m²

We confirm that all houses meet the requirements of minimum private open space set out in the Compact Settlement Guidelines. Please refer to Appendix 3 for more detail regarding compliance with SPPR 2 of the Guidelines.

Car Parking Provision

Section 15.7.8 of the Development Plan sets out the relevant standards for car parking. It is noted that the following car parking standards apply to the subject site:

- *Residential: 1 space each for units up to and including 3 bed units and 1 space +0.5 visitor spaces for units of 4 bedrooms or greater.*
- *Creche: 0.5 per staff member plus 1 per 4 children*

321 no. car parking spaces are proposed for the proposed development in the following breakdown:

Unit Type	Rate of Provision	No. of Spaces	Type of Parking
Houses	2 no. per unit	252 no. spaces	Surface Curtilage Parking

		20 no. spaces	Surface Off Curtilage Parking
Duplex Apartments	1.5 no. per unit	18 no. spaces (incl. 1 no. disabled space and 3 no. visitor spaces)	Surface
Creche	1 no. per 2 Staff 1 no. per 4 children	16 no. spaces (incl. 1 no. Universal space)	Surface
Additional Visitor Parking	1 per 10 units	15 no. spaces	Surface, taken-in-charge

Table 7 - Car Parking Provision

We also refer to the enclosed Traffic Impact Assessment report prepared by Waterman Moylan for further details in relation to car parking which accompanies this planning application

It is considered that the proposed level of car parking is appropriate in this case and represents an appropriate balance between the requirements of the Planning Authority, the provisions of the Development Plan and National Policy.

Bicycle Parking

The Development Plan does not require bicycle parking provision for housing units as it is assumed that house units with rear gardens can cater for storage of bicycles. The proposed development provides for 527 no. cycle parking spaces in the following breakdown:

Unit Type	Rate of Provision	No. of Spaces	Type of Parking
Houses	1 no. space per bed for residents	428 no. spaces	Secure within curtilage
Duplex Apartments	1 no. per bed for residents	17 no. spaces	Secure in sheltered communal facility
Duplex Apartment Visitor Parking	1 no. per 2 units for visitors	5 no. spaces	Surface (Sheffield Stands)
Creche	1 per 5 Staff 1 per 10 Children	10 no. spaces	Surface (Sheffield Stands)
Additional Visitor Parking	1 no. per 2 units for visitors	67 no. spaces	Surface (Sheffield Stands) – Provided across development in public open space areas

Table 8 - Cycle Parking Provision

We refer to the enclosed Traffic and Transport Assessment report prepared by Waterman Moylan for further details in relation to bicycle parking which accompanies this planning application.

It is considered that the proposed quantum of cycle parking is appropriate in this case and shows the applicants commitment to active and sustainable modes of transport.

Development Capacity

Section 15.4.1 outlines the standards for Development Capacity in Kildare and states the following:

'The need for new residential development to achieve sustainable densities at appropriate locations should also be balanced with the following considerations:'

- *The existing and future (planned) capacity of the physical and social infrastructure to appropriately cater for the envisaged population.*

  The existing and future capacity of physical and social infrastructure has been appropriately assessed as part of this application. We refer the Planning Authority to the accompanying Social Infrastructure Audit prepared by Brock McClure which assesses the social infrastructure, including schools, in the general area. We also refer the Planning Authority to the Traffic and Transport Assessment prepared by Waterman Moylan which assesses the capacity of the transport networks surrounding the subject site. Appendix 1 of this report provides an analysis of zoned lands and planning applications, which in turn, informs the overall capacity of Kildare Town.

- *Achieving adequate privacy and residential amenities for individual residential units within the proposed development.*

  All residential units as part of the proposed development are provided with private open space in line with the minimum standards set out in the Compact Settlement Guidelines. Privacy is achieved through generous separation distances and suitable boundary treatments. 2 no. large areas of open space provide residential amenity through landscaped areas which allow for play areas for children, adult exercise equipment, and areas for rest.

- *Retaining adequate privacy and residential amenities for existing/adjoining residential areas.*

  Care has been taken when designing the proposed development with regard to the existing residential dwellings to the east. We can confirm that there is no loss of residential amenity as part of this proposal.

- *Retaining and integrating the existing green infrastructure features & enhanced biodiversity features (for example bird boxes, hedgehog streets etc.) into the layout and design of the open space.*

  Attention has been paid to existing mature hedgerows on the subject site and the best effort has been made to retain these where possible. Please refer to the Landscape Masterplan prepared by Hayes Ryan Landscape Architecture for more detail.

- *An assessment of the sites ability to appropriately accommodate development having regard to its environmental sensitives and physical topography.*

  The proposed development has been informed by an AA Screening and EIA Screening Report prepared by DNV which conclude that the site is low impact and won't have any ill-effect on any environmental sites. The topography of the site has been assessed by the design team and the proposed design responds successfully to the topography of the site.

- *The safety and appropriateness of the proposed layout and access arrangements to the development.*

  The proposed development is accessed via 2 no. vehicular entrances from Southgreen Road. There are 2 no. proposed pedestrian/cyclist access points to the Southern Link Road and the Old Road. The proposed layout provides overlooking onto public open spaces and is designed to foster community engagement and social interaction.

10.2 Kildare Town Local Area Plan 2023-2029



The Kildare Town Local Area Plan 2023-2029 is the relevant statutory planning context for the subject site. The key provisions of this Plan and the compliance of the proposal against these are below.

10.2.1 Zoning

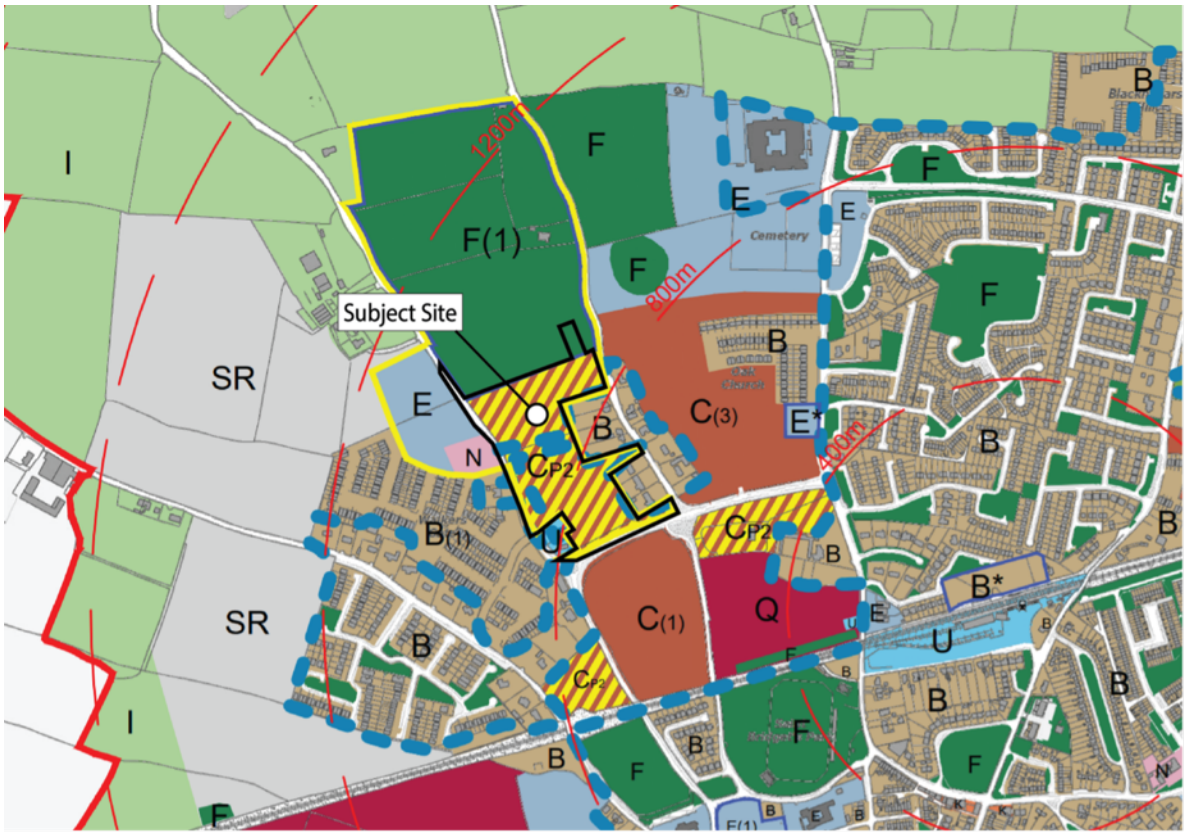


Figure 18 - Kildare Town LAP 2023-2029 Land Use Zoning Map (Site Labelled)

C – New Residential Phase 2 Zoning

The majority of the site is located on lands zoned "C: New Residential Phase 2" which has the following 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."*

It should be noted that a footnote is attached to the objective of the zoning stating:

> *"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. In the event that there is a significant unmet social housing demand in the Kildare Town area, proposals for social housing schemes on Phase 2 may be considered during the plan period subject to all other assessments"*

We also note The Kildare Town LAP 2023-2029 Core Strategy Objective 1.10 which applies to areas zoned 'C: Phase 2 New Residential':

> *"Preserve the lands identified as 'Phase 2 New Residential' and 'Strategic Reserve' on Map 11.1 Land Use Zoning Objectives from inappropriate forms of development, thereby controlling the level of piecemeal and haphazard development on these lands and safeguarding their strategic value in accommodating the orderly sequential expansion of the urban settlement beyond the current Plan period."*

Uses permitted in principle under this zoning include 'dwelling' and 'creche', which confirms that the application lands are appropriately zoned to allow this site come forward for development.

We note that the opinion response enclosed with the plans and particulars for this application set out a detailed justification on how the current application can come forward within the context of this residential zoning. In terms of the phase 2 designation, we note that there has been significant recent change given to the local planning context for Kildare, with this particular site now proposed for immediate release for development under proposed Variation No. 3.

In terms of context, the NPF Ministerial guidelines published in July 2025 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:

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,

Land zoned 'New Residential – Phase 2' in the Newbridge Settlement Plan, and

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 no change to the planning context outlined above under the material alterations with Objective CS 029 remaining firmly 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**.

We wish to reiterate that 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. Appendix 1 of this report 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, Variation No. 3 of the Development Plan now allows for the release of Phase 2 New Residential Zoned lands at this location paving the way for the future development of this site.

F Open Space and Amenity Zoning

It should be noted that a portion of the lands included within the redline boundary are zoned "F: Open Space and Amenity" which has the following objective:

> *"To protect and provide for open space, amenity and recreation provision."*

Furthermore, this site has a Specific Objective (F1) which notes the following:

> *"F(1) These lands are designated for the provision of a community sports campus. A detailed design framework is required for the entire area which shall include:*

[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.**

- *Phasing details whereby the site is developed sequentially from the south in tandem with new housing.*
- *Active travel links (walking and cycling) connecting with neighbouring (existing and planned) residential areas, neighbourhood centre, school campuses and community uses.*
- *A vehicular access point from the Southgreen Road, proximate to the built-up area.*
- *Retention of mature trees and hedgerows in accordance with Map 9.1 Natural Heritage and Green Infrastructure."*

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 are coming forward as part of planned integrated approach of the development of the Southrgeen 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.

10.2.2 Southgreen Key Development Area



Figure 19 - Southgreen Key Development Area

The LAP provides an indicative Southgreen Key Development Area Design Framework as a response to the increasing pressure from development on the area in recent years. The framework's purpose is to provide for the orderly and sequential development of this strategic growth area of Kildare Town by way of a 10-minute settlement principle. The intention is to deliver a range of complementary land uses (residential, open space and employment) within walkable distances of a centrally located neighbourhood centre and adjacent primary school site.

Alongside housing, a critical component of the design framework incorporates the provision of a large quantum of strategic open space. This will not only provide for the long-term sporting and recreational needs of the growing community in Southgreen but will also cater for the wider settlement. The design framework illustrates an indicative layout of playing fields, five aside pitches and a playground. A northwestern greenway is also delivered. It is the intention of the LAP that the strategic open space shall be developed sequentially from the south. Vehicular access to the lands shall be with from the south or from the west via Southgreen Road. The rural character of Old Road shall be retained with only pedestrian/cyclist access to the lands to be provided.

Where housing is brought forward on Phase 2 zoned lands, a creche, where required and a community room/space should be included to front onto the Southgreen Road (north of the U Utility zoned lands).

The subject site has been identified by the Design Team as the appropriate next sequential step in the development of the area. The proposal has been designed in accordance with the indicative Southgreen Key Development Area and any deviations have been deemed necessary for the integrity and design response of the proposal to the immediate constraints and opportunities. We wish to set out he following key points of the proposal as they relate to the Key Development Area requirements vis a vis the subject proposal.

- The residential element of this proposal comes forward to align with the requirements of the Key Development Area.

- The proposal includes the provision of local routes, pedestrian and cycle connections, and future green routes envisioned by the Key Development Area.

- The proposal provides an appropriate level of public open space in a different configuration to that of the Framework. It is submitted that site constraints have driven this design response. The drawings show a proposal for public open space to be located where the Framework Plan indicates a Residential block might be placed. When more detailed design was undertaken it was considered that this area was required as part of the overall SUDS infrastructure to ensure adequate drainage of the site. This detail is noted in the Engineering Planning Pack prepared by Waterman Moylan.
- The Framework identifies a local pedestrian route running from east to west across the site centrally. This has been excluded from the proposal due to the site constraints in terms of unsuitable topography that exist and a concern regarding the ability to passively supervise this link.

- The Framework indicates a greenway in the northern portion of the subject site. The development proposal includes provision for this pedestrian and cycle route.

- This application delivers a creche facility of 161 sq m at the required location.

- The previous section of this report has addressed the requirements for the F1 open space and amenity zoned lands. Within the context of the Southgreen Key Development Area requirements, we note that the applicant is committed 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.

10.2.3 Active Travel – Walking and Cycling

The LAP notes the very limited cycle infrastructure within the Kildare Town area. It is submitted that the proposal provides for the upgrading and widening of the Southgreen Road including the provision of 2 no. directional single land cycle tracks and pedestrian footpaths on either side of the Southgreen Road. Upgrade works are also delivered along Southgreen Road. The proposal also delivers a new pedestrian/cycle path to the north of the site.

These proposals contribute to the following permeability measures required by the LAP and MTO1.1:

- *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;*
- *PERM 6 - Extend footpaths along Southgreen Road north of the train line to connecting with the Greenway proposed under PERM 5*
- *PERM 14 – 'New pedestrian cycle link connecting Green Road with Southgreen Road and the newly constructed Southgreen Link Road'. It also contributes to 'Cycle 28 – Southgreen Road Upgrade' by providing a cycle and pedestrian infrastructure on the Southgreen Road.*
- *CYCLE 7 - Northwestern Greenway*
- *Cyle 28 - Southgreen Road Upgrade*

***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.*

10.2.4 Energy and Communications Objectives

IO 4.7 of the Local Area Plan identifies the following:

> *"Work in conjunction with ESB Ireland to facilitate enhancements to the boundary treatment and screening surrounding the existing 38Kv substation on Southgreen Road."*

The Planning Authority will note that the proposed development is set back from the boundary with the ESB station to allow any future proposals for boundary treatment and screening surrounding the existing ESB substation. These lands will be ceded to the ESB as required. Full details in relation to the proposed boundary treatment serving the currently proposed LRD are included in plans and particulars from Hayes Ryan.

10.2.5 Green infrastructure Objectives

It is an objective of the Council under NHO 2.2. to:

***NHO 2.2** - Ensure that all development proposals on sites where hedgerows and treelines are located are retained and integrated into the development in the first instance, or in exceptional circumstances, where they are required to be removed, ensure development proposals are accompanied by a planting scheme of similar quantity and species mix to ensure no net biodiversity loss.*

As part of the opinion that issued the design team were asked to give greater consideration to retaining hedgerows. The following was set out by Hayes Ryan in response:

> *"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 also 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.

10.2.6 Residential Objectives

The LAP includes the following residential objectives which apply to the subject site and development proposal:

- ***HCO 2.1 –*** *Require that a good mix of housing types and sizes is provided in all new residential areas and in appropriate brownfield/infill areas, to meet the needs of the population of Kildare Town, including the provision of appropriate supported housing and longer-term residential care solutions designed for older people and/or people with disabilities.*

  The proposed development offers a diverse mix of residential unit typologies and sizes. The unit mix of the development is broken down below:

  - 5 no. 1 bedroom units
  - 10 no. 2 bedroom units
  - 104 no. 3 bedroom units
  - 27 no. 4 bedroom units

  It is submitted that the proposed development provides a good mix of housing types and sizes. We refer the Planning Authority to the Housing Quality Assessment, prepared by MCORM Architecture, for more detail regarding typologies and unit sizes.

- ***HCO 2.3*** *– Require that residential schemes in close proximity to heavily trafficked roads or the rail line are designed and constructed to minimise noise disturbance. A suitably qualified acoustic specialist shall be engaged in the development design process, paying particular attention to the Kildare Noise Action Plan 2019-2023 (or any subsequent plan) and the EPA 'Environment and Wellbeing' Maps. An Acoustic Design Statement, including proposals for postconstruction noise monitoring, clearly demonstrating that significant adverse noise impacts will be avoided shall be submitted with development applications.*

  It is submitted that an Acoustic Design Statement has been prepared by Wave Dynamics as part of this planning application. The report concludes that both external amenity noise levels and façade noise levels are predicted to achieve the targeted noise levels in line with guidance.

10.2.7 Flood Risk Management Objectives

The LAP includes the following Flood Risk Management Objective which applies to the subject site:

- ***IO 3.1*** *– Require a site-specific Flood Risk Assessment, appropriate to the scale and nature of the development and the risks arising, to be carried out for developments located within the Pluvial Flood Risk Area as outlined on Map 10.2 Strategic Flood Risk Assessment Map.*

  The below extract from Map 10.2 of the LAP shows that the subject site is located partially in the Pluvial Flood Risk Assessment Zone.

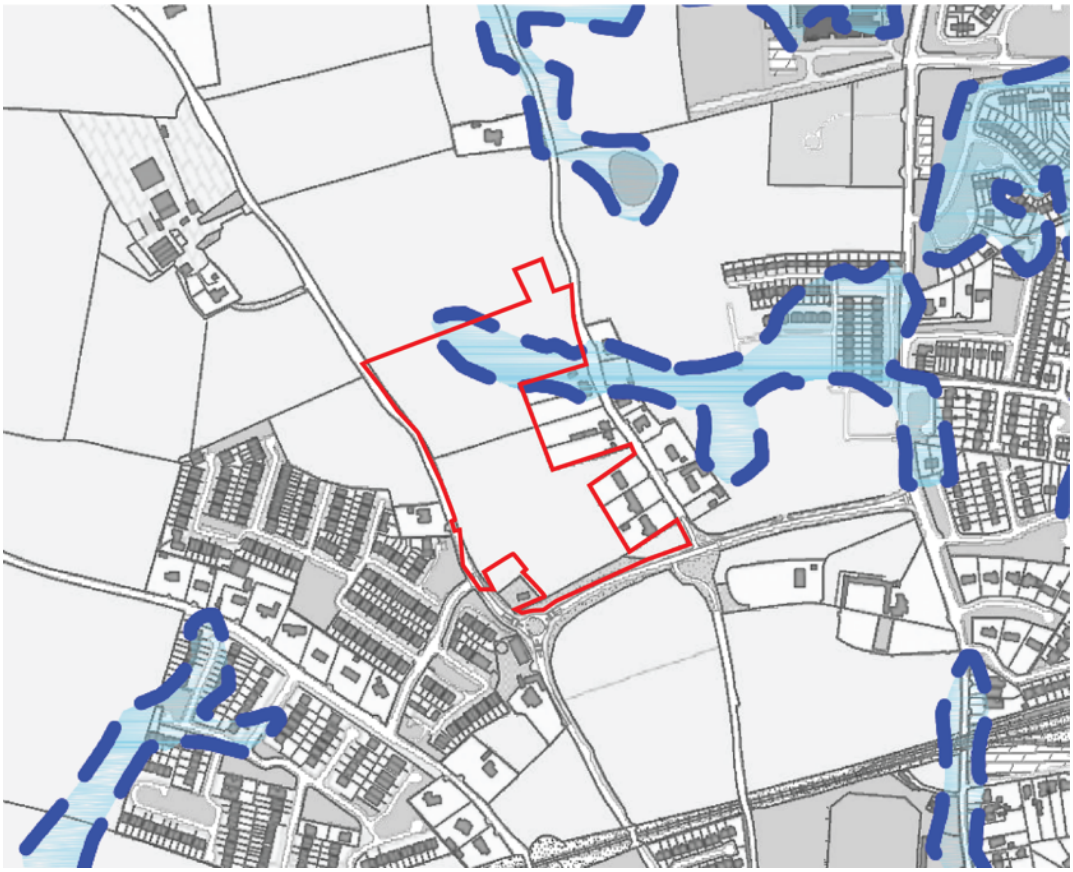


Figure 20 - Flood Risk Assessment Map – Extract showing Subject Site (red line)

In accordance with the objective of the LAP, a Flood Risk Assessment has been conducted by Waterman Moylan to address flood risk concerns on the subject site. It was concluded that the risk of pluvial flooding is considered low and flood risk mitigation measures have been recommended and applied to the subject site. It is concluded that surface water runoff from the subject site does not impact developments upstream or downstream of the subject site.

11 Proposed Variation to the Kildare County Development Plan 2023-2029

Variation No. 3 has been proposed to align the Kildare County Development Plan 2023-2029 with the following Section 28 Ministerial Guidelines published after the adoption of the Plan:

- NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities (2025), which were published to give effect to the National Planning Framework – First Revision (2025).
- Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024).

The variation proposes changes to the following chapters of the Plan; Chapter 1 Introduction & Strategic Context, Chapter 2 Core Strategy & Settlement Strategy, Chapter 3 Housing, and Chapter 15 Development Management Standards. There is a total of 31 no. amendments included in this variation, numbered 1 to 31 inclusive.

Variation No. 3 initially went on display between October and November 205. The variation is currently at Material Alterations stage with the current period of public consultation due to conclude on Monday 9 March 2026.

The proposed variation makes changes to the following chapters of the Plan:

- Chapter 1 Introduction & Strategic Context,
- Chapter 2 Core Strategy & Settlement Strategy,
- Chapter 3 Housing, and
- Chapter 15 Development Management Standards.

All proposals have been considered in the making of this application and the current proposal coming forward as part of this LRD remain consistent with the spirit and intent of changes coming forward to the Development Plan.

11.1 Chapter 2 - Core Strategy & Settlement Strategy

We wish to acknowledge that Variation No. 3 proposes changes to Chapter 2 – Core Strategy & Settlement Strategy of the Kildare County Development Plan. These changes align the chapter with the *'National Planning Framework – First Revision'*, *'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities (2025)'*, *'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024)'* and the *'Census 2022'*. They key changes are as follows:

- The County Development Plan now must provide for an additional 16,970 housing units, this is a significant increase from the existing plans stated 9,144 housing units.

- The Variation states a new annual housing growth requirement to 2034 (2025 to 2034) of 2,755 no. housing units, to reflect *'NPF Implementation Guidelines'*. Taking into account the 50% additional provision that the guidelines provide an objective for an additional 7,826 no. housing units should be provided for from 2026-2028 in addition to the Core Strategy requirement.

- The Variation proposes delivery mechanisms by which additional housing growth will be facilitated, one of these is *'the release of lands zoned Phase 2 in Local Area Plans by way of a Core Strategy to allow planning applications to be considered in the short term'*. This is inclusive of the Kildare Town LAP, in which the subject site is zoned *'Phase 2: New Residential'*.

- An updated *'Core Strategy Table'* is proposed, in which Kildare Town is subject to a Residential Density range of 30-100 dwellings per hectare.

- The subject site at Southgreen is specifically referred to in the Variation. Referred to as *'Southgreen'*, the table identifies the site as partially within a built-up area and Tier 2. 5 no. sites, inclusive of the subject site, are identified within Kildare Town, the plan suggests that 886 no.

potential dwellings could be provided between these sites at an approx. net dwelling density of 37 no. units per hectare.

- The Variation provides the Core Strategy Objective *'CS O29'* which states the following:

  '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) Lands 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) Lands zoned 'New Residential – Phase 2' in the Newbridge Settlement Plan, and

  (iii) Lands zoned 'Phase 2: New Residential in the Kildare Town Local Area Plan 2023-2029 at Southgreen, Ruanbeg, Dunmurrary Road, Green Road South, and An Talamh Ban identified in Map V3-2.2.'

Proposed Release of Phase 2 Zoned Lands

In response to the introduction of Core Strategy Objective *'CS O29'* above, 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 subject of this application can now come forward for development with an appropriate zoning context in place.

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. Appendix 1 of this report 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[2] of these guidelines is particularly relevant.

[2] **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.**

11.2 Chapter 3 - Housing

Variation No. 3 proposes changes to Chapter 3 – Housing of the Kildare County Development Plan. These changes align the chapter with the *'National Planning Framework – First Revision'*, *'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities (2025)'*, *'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024)'* and the *'Census 2022'*. They key changes in relation to the subject site are as follows:

- The Variation provides *'Table 3.1'* which outlines the appropriate density ranges as per the *'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024)* for each settlement category. Kildare Town, categorised as a Key/Large Town, has two applicable density ranges of 40-100 dph at Central and Urban Neighbourhood areas, and 30-50 dph (up to 80 dph at accessible locations) at Suburban/Urban Extension areas.

The current proposal comes forward with a proposal for 31.5 units per ha to align with the above requirement.

11.3 Chapter 15 – Development Management Standards

Variation No. 3 proposes changes to Chapter 3 – Housing of the Kildare County Development Plan. These changes align the chapter with the *'Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024)'*. Thes include separation distances, overshadowing, requirements for design statements, residential development, design, layout and boundary treatment, house design, public open space, private open space and car and cycle parking. Proposals included as part of this application have come forward within this context and meet the releveant requirements.

12 Conclusion

We invite the Planning Authority to consider the proposal now put forward in the application documents attached herewith. We note the following key summary points:

- The subject site is located at the edge of the built footprint of Kildare Town on a greenfield site bound by Southgreen Road, the Southern Link Road, and the Old Road.
- The site is opportunely located, in terms of proximity to public transport and local amenities/services, to deliver much needed residential accommodation.
- A total of 146 no. residential units are proposed, which are broken down as; 5 no. 1-bed duplex apartments, 3 no. 2-bed duplex apartments, 2 no. 3-bed duplex apartments, 7 no. 2-bed houses, 102 no. 3-bed houses, and 27 no. 4-bed houses with associated public open space in 2 no. separate green spaces (7,018 sqm).
- The residential units proposed are of exceptional quality, with high amenity layouts. Careful attention has been given to the protection of the existing levels of amenity afforded to the properties bounding the site to the east.
- It is our considered view that the proposal now submitted delivers on the ambitions of relevant National Guidelines (e.g. Housing for All, NPF, Rebuilding Ireland and RSES) and we ask that that is considered in the review of this proposal.
- We confirm that we have addressed insofar as possible all feedback received from Kildare County Council across Stage 1 and Stage 2 of the LRD process.

From our review of the proposed LRD scheme, we can confirm that the proposal is in accordance with relevant statutory documents governing the site and that there is an appropriate planning context for this proposal. We note specifically that this new LRD proposal has had specific regard to new policy, objectives and standards for residential mix, height, density, parking and separation distances and we are of the considered view that the current proposal is consistent with the provisions of the Kildare County Development Plan 2023 – 2029 and the Kildare Local Area Plan 2023-2029.

All considered, the current proposal represents a significant development opportunity for the immediate locality in that it delivers a suitable residential scheme on zoned and serviced lands. This accords with the national policy mandate for the delivery of housing and services at appropriate locations.

We ask that these points are considered in the review of the proposal, and we trust that this planning submission will be viewed as a more positive move towards the delivery of sustainable development on suitably zoned lands.

13 Appendix 1 – Zoning Analysis

This Appendix addresses S247 consultation commentary in relation to the relevant site zoning with a request for a robust analysis of all C1 zoned lands for consideration by the Planning Authority. Specifically, this appendix provides an analysis of **appropriately sized** C1 zoned lands to show that their capacity has been utilised for developments of scale.

This Appendix provides an analysis of:

- Planning history of lands zoned for significant residential developments;
- A detailed analysis of extant permissions and a potential for further residential development in compliance with the statutory planning framework.
- Furthermore, the suitability of the subject lands at Southgreen Road and Old Road, subject of this submission is demonstrated in this Appendix.

13.1 'C: New Residential Phase 2' Zoning

The subject lands at Southgreen Road, Kildare are zoned ***'C: New Residential Phase 2'*** in the Kildare Town Local Area Plan. The relevant zoning is outlined below.

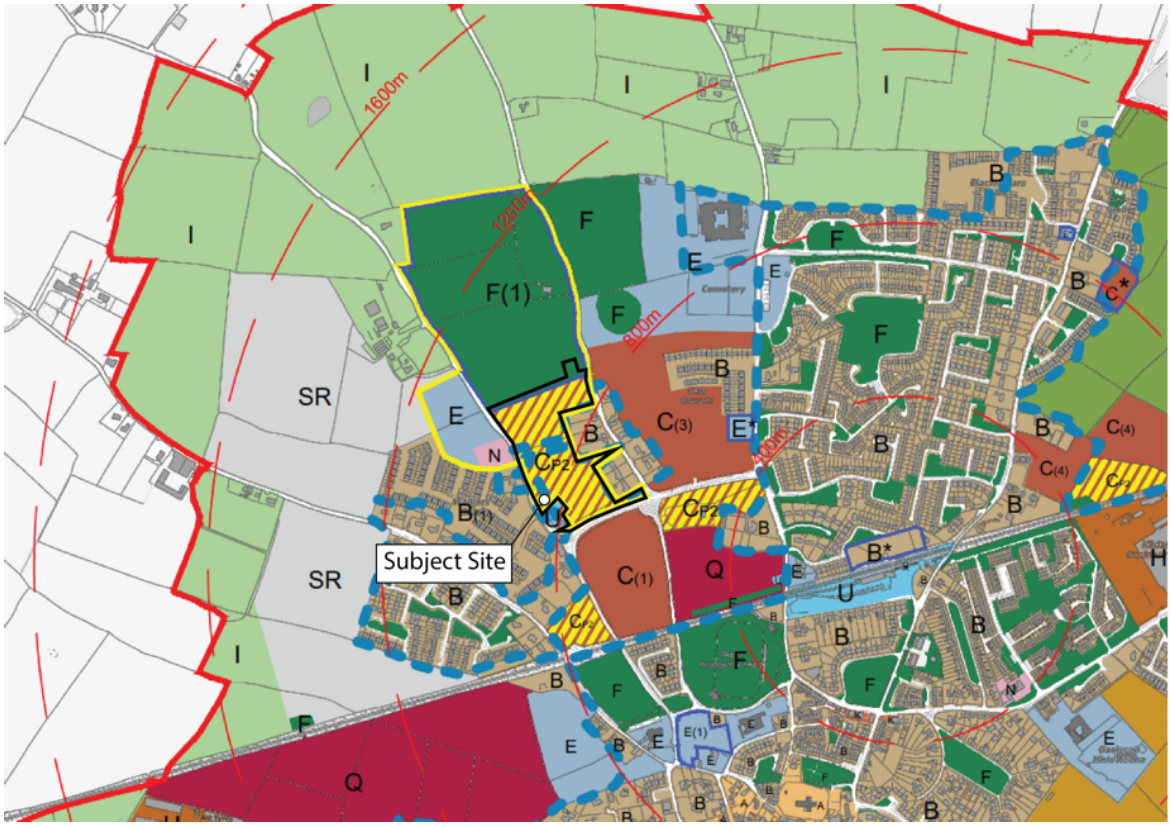


Figure 1 – Zoning Map (subject site outlined in black)

C: New Residential Phase 2:

"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.

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."

Residential Development is permitted in principle under this zoning.

There is a footnote to the zoning objective included in the LAP as follows:

"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. In the event that there is a significant unmet social housing demand in the Kildare Town area, proposals for social housing schemes on Phase 2 may be considered during the plan period subject to all other assessments."

Relevant Objectives

CSO 1.10 *"Preserve the lands identified as 'Phase 2 New Residential' and 'Strategic Reserve' on Map 11.1 Land Use Zoning Objectives from inappropriate forms of development, thereby controlling the level of piecemeal and haphazard development on these lands and safeguarding their strategic value in accommodating the orderly sequential expansion of the urban settlement beyond the current Plan period."*

It is clear that these lands are earmarked for significant future residential development.

13.2 Analysis of Lands Zoned for Residential Development

An analysis of C zoned sites is outlined below to ascertain the extent these lands that are subject to construction of residential development or a relevant permission. It is our view that this analysis can assist the Planning Authority in forming their opinion on the coming forward of a Large Scale Residential Development on Phase 2 lands.

This analysis is broken down into 2 parts:

- A review of sites that were earmarked for development at the time the Kildare Local Area Plan was made
- A review of all other C zoned sites

Sites earmarked for development by the LAP

As stated in the Kildare Local Area Plan 2023-2029, during site survey in April 2022 there were five active construction sites within the town which were also active in November 2022 (highlighted in blue in Table 1 below). The current status of these sites is outlined below:

No.	Site Ref. (LAP)	Location	Planning Reg. Ref.	No. units as granted	Status**/ Comment
1	T	Former Magee* Barracks	ABP-305007-19 extended by 24290	375	Commenced
2	B(1)	Walker's Gate*	07/1450 and 13/155 Amendments 17/764	187 (granted in total)	Occupied
3	C(2)	Greyabbey View*	17/523 extended by 23301	207	Occupied
4	C(3)	Oak Church*	18/1026 18/1027 18/1028 2521 – Extension of Duration of above applications. 88 no. apartments not included in the EoD	296 (granted in total)	Commenced
			2560535 (live application)	48 no. units on previously approved site for 88 no. apartments	The subject application will potentially decrease overall

				Reg. Ref.18/1027 known as Sector 3 and overall site approved under reg. ref. 18/1026 (Sector 1) & reg. ref. 18/1028 (Sector 2)	number of units in Oak Church by 40
5	C(4)	Whitesland East (marked as Rathbride Road in the LAP)	21/1033, ABP-313008-22 (28/06/2023) Modifications without any change to a number of units: 2460604 (02/10/2024), 2461023 (15/01/2025), 2461323 (25/03/25)	87	Granted

Table 1 - Significant granted planning permissions- extant residential units prior the LAP adoption

Other C Zoned Sites

Furthermore, the LAP sets out the following lands for residential development in 2023-2029 and the current status of these lands are now set out below:

No.	Site Ref. (LAP)	Location	Planning Reg. Ref.	No. units as granted	Status**/ Comment
6	C(1)	West of Old Road	23/416, ABP 318401	166	Commenced
7	C*	Rathbride Road*	N/A	-	No planning application lodged
8	C*	Greyabbey	N/A	-	No planning application lodged
9	C*	South of Grey Abbey Road	2560177	-	Planning application lodged for site layout and development works and outline permission for 5 individual serviced residential site – Further Information
10	C(5)	Whitesland East Phase 2	2560274	-	Live application for 66 no. units – Further

					Information sought in May 2025

**Objective HCO 2.6 applies: Support the provision of appropriately designed 'self-build' houses on the sites zoned as New Residential* (C*) at a low residential density.*

Table 2 - Overview of potential residential yield on zoned lands within 2023 - 2029

Part 8 application for social housing on C2 zoned lands in Coolaghknock Glebe is noted.

No.	Site Ref. (LAP)	Location	Planning Reg. Ref.	No. units as granted	Status**/ Comment
11	C2	Coolaghknock Glebe	P82024.06	131	Part 8 application for social housing. Granted

Table 3 - Overview of potential residential yield on lands zoned as C: New Residential Phase 2 – lands with a granted planning permission

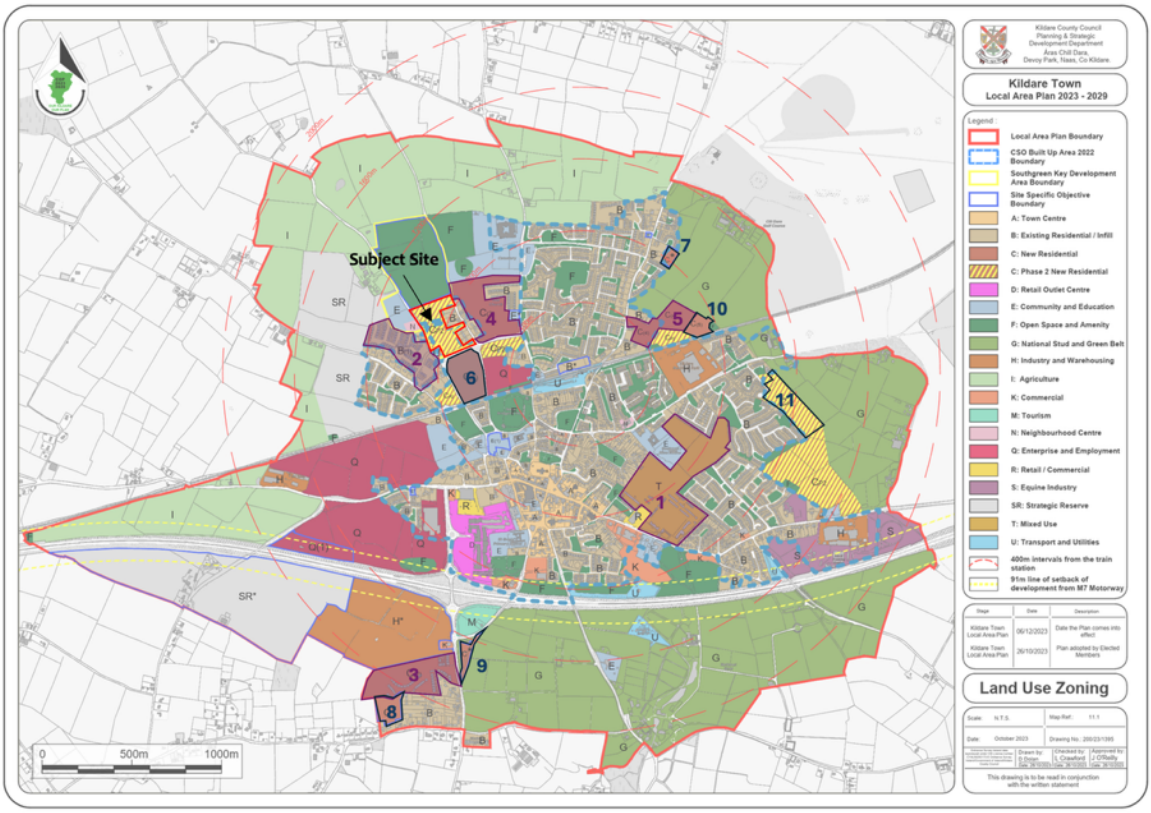


Figure 2 - Sites with a potential to deliver a significant number of residential units as per the LAP

13.3 Key Points of the Analysis

As shown in **Table 1** there were multiple sites with extant planning permissions at the time of the preparation of the LAP. Development on these sites have either came forward or they have been the subject of a further application or the extension of duration of an existing permission. Therefore, it is reasonable to expect these sites to be developed in a live span of the LAP.

Table 2 provides an overview of lands zoned 'C: New Residential' which did not benefit of an extant planning permission in the time of preparation of the LAP. There are 2 no. sites with potential to deliver more than 5 no. residential units:

- Site 6 - 166 no. units granted under Reg. Ref. 23/416, ABP 318401 since 2022 on lands zoned 'C: New Residential'.
- Site 10 - 66 no. units with a live planning application Reg. Ref. 2560274 on lands zoned 'C: New Residential'. There was no extant planning application for these lands at the time of preparation of the LAP.

It is also worth highlighting that Site 11 has come forward for the development of social housing as part of a Part 8 application.

All lands zoned 'C: New Residential' with a potential to deliver more than 5 no. individually built units now benefit from a valid planning application. All other sites support low residential development.

Therefore, it is submitted that there is no further capacity on lands zoned 'C: New Residential' to deliver significant large scale residential development to meet any population increase afforded to Kildare on the back of the recent National Planning Framework update.

13.4 Suitability of the Subject Site

Development to the north of the railway has been a long term vision of the Local Authority supported by both, the Kildare LAP 2012-2018 and Kildare LAP 2023-2029, because of its sustainable infill location. A residential development on the subject site promotes the principle of a 15 min settlement; the subject site is within walk proximity to the town centre (1 km – 12 min) and Kildare Train Station (900 m - 11 min).

There have been multiple developments granted and/or constructed within the north west development axis:

- Walker's Gate (marked as no. 2 on the Figure below)
- Oak Church (marked as no. 4 on the Figure below)
- West of Old Road (marked as no. 6 on the Figure below)

For more details we refer to Table 2 and 3 of this report.

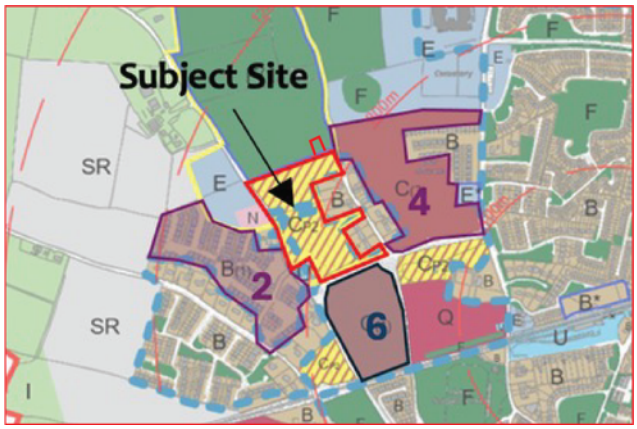


Figure 3 – Wider context the subject site

There was a significant investment into critical infrastructure unlocking the north western development axis of Kildare. This investment includes but is not limited to:

- The recently constructed Southern Internal Access Road.
- The provision of upgraded wastewater treatment facilities in Kildare Town.
- The upgrade of South Green Road along the western boundary of the 'West of Old Road' site (to the south of the subject site) which was granted as part of Reg. Ref. No. 23416

The subject site benefits from the listed investments into infrastructure and therefore, it can be considered serviceable and without any significant site constraints.

Furthermore, the overall concept of development of the wider Southgreen area forms a part of the LAP and is set out in Section 11.2 Southgreen Key Development Area stating as follows:

> *"Accordingly, the purpose of this Key Development Area is to provide for the orderly and sequential development of this strategic growth area of Kildare Town. The design strategy seeks to implement the '10-minute settlement' principle by providing for a range of complementary land uses (residential, open space and employment) within walkable distance of a centrally located neighbourhood centre and adjacent primary school site."*

Aside from Magee Barracks, this is the only other Key Development Area in the Local Area Plan, which further emphasises the appropriate nature of the lands subject of this application for residential development.

Therefore, the subject lands should be prioritised among lands zoned 'C: New Residential Development Phase 2'.

13.5 Conclusions

- The subject site is zoned 'C: New Residential Phase 2'.
- As shown in this Appendix, all sites zoned 'C: New Residential' with a potential for a significant residential development either benefit from a granted planning permission; have an application in the system; or are limited to low density development of a self build nature.
- Therefore, it is submitted that capacity can move to lands zoned 'C: New Residential Phase 2' in accordance with a sequential approach.
- It has been demonstrated that the subject site is a strategically located infill site with a potential to facilitate a 10- min settlement concept with an easy access to social infrastructure, sport and recreational facilities and employment. Furthermore, the subject site is serviceable and without any significant site constraints.
- There was a significant investment into critical infrastructure unlocking the north western development axis of Kildare. The site forms part of the Southgreen Key Development Area in the Local Area Plan, which further emphasises the appropriate nature of the lands subject of this application for residential development.
- Therefore, the subject lands should be prioritised among lands zoned C: New Residential Development Phase 2.

14 Appendix 2 – Statement of Housing Mix

The Kildare County Development Plan 2022-2028 sets out the following requirement in Section 15.4.4 in relation to Residential Size and Mix.

15.4.4 Housing Mix

'In accordance with Objective HO O15 a 'Statement of Housing Mix' will be required to accompany applications for 10 or more units in order to ensure an appropriate mix of house types and sizes within individual residential development schemes and that they are adaptable, designed to meet the needs of an aging population and cater for people with disabilities. Accordingly, this statement shall set out how the proposed housing mix, including type, size and tenure has been determined, having regard to local supply and demand.

A cumulative approach to the assessment of housing mix will be applied. A Housing Mix Statement may be required for sub-threshold application where, when taken in conjunction with another application/development, the above threshold is reached. In determining an appropriate mix, a Housing Mix Statement will be required to consider other applications/previous developments in the same location in its assessment.

A desktop assessment of existing and permitted developments within a 1km/10min walking radius of the application lands was carried out in order to uncover the breakdown of the existing residential mix in the area.

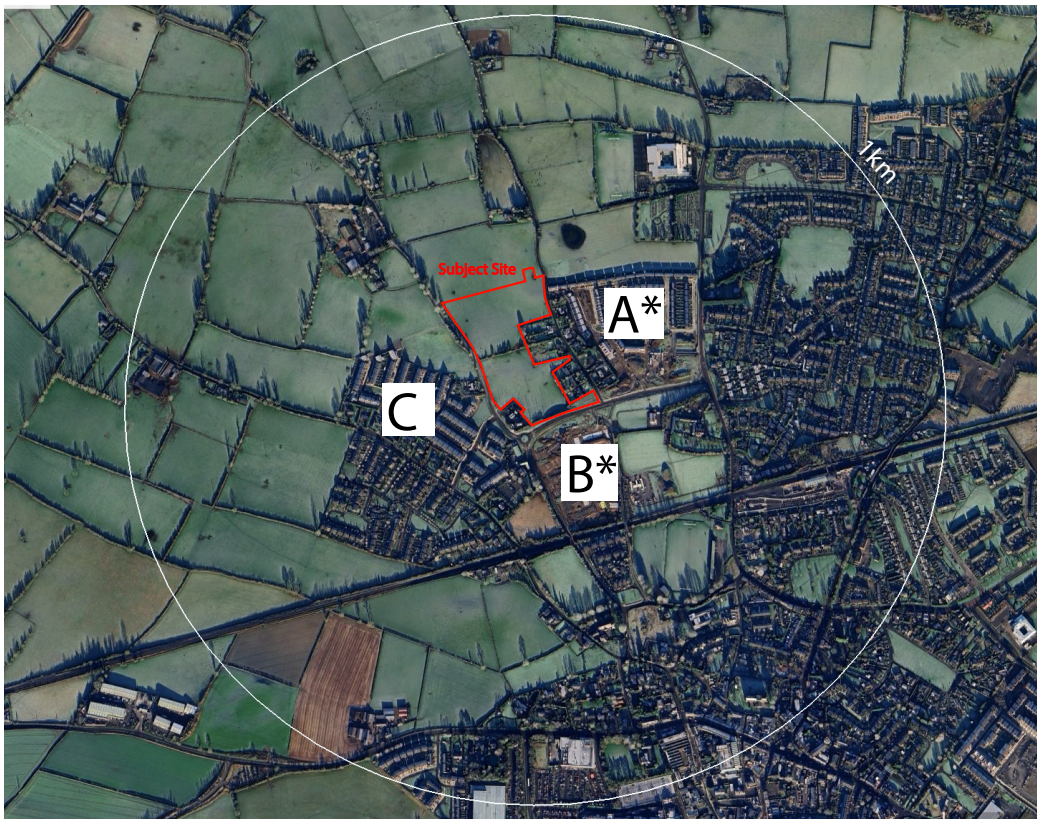


Figure 1 - Residential Mix Assessment within 10min walking distance, subject site is demarcated in red.

**Development currently under construction*

Map Ref	KCC Ref	Development Name/Adress	Housing Type		Unit Type				
			Apartment	House	1 bed	2 bed	3 bed	4 bed	5 bed
A*	18/1026 18/1027 18/1028 Extension of Duration -2521 Revised -221528	Oak Church	104	195	50	67	124	58	-
B*	23416	Southgreen Road & Old Road	60	108	24	53	77	15	-
C	07/1450 and 13/155 Amendments 17/764	Walkers Gate Hill Road, Southgreen	-	187	-	12	123	52	-
Total			**164**	**490**	**74 (11.31%)**	**132 (20.18%)**	**324 (49.54%)**	**125 (19.11%)**	-

Table 1 - Residential Mix with Kildare Town 10 minute walking distance from site.

Housing Typology

As the survey of existing housing stock within a 10 minute walk of the proposed development indicated, Kildare town is experiencing a moderate increase in the existing housing typology (low density housing), that defined the more historic and traditional development style in the area.

Notably, the mix of housing to apartment units is currently broadly on par in this study area standing at over 50%. This upward shift in apartment development is reflective of local, reginal and national polices for locations served by high capacity public transport and is broadly supported by Planning Authorities.

It is concluded that the subject site proposal lends itself to a higher quantum of houses compared to apartments.

Unit Mix

Despite recent development proposals for Kildare Town, it is noted that 3 bedroom units accommodation dominates, at 33%. The proposed development will consist of:

The construction of a new residential scheme of 146 no. units (136 no. houses and 10 no. Duplex Apartments) ranging in height from 1-2 storeys as follows:

- 136 no. houses (7 no. 2 bed units; 102 no. 3 bed units; and 27 no. 4 bed units) in a mixture of bungalow, detached, semi-detached, and terrace style units ranging in height from 1 – 2 storeys.
- 8 no. apartment units and 2 no. duplex units (5 no. 1 beds, 3 no. 2 beds, and 2 no. 3 beds) in new Block A ranging in height from 2-3 storeys

15 Appendix 3 – Statement of Consistency

15.1 National Planning Framework – Project Ireland 2040

Project Ireland 2040

National Planning Framework First Revision

April 2025

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The NPF was originally published in 2018, and replaced the National Spatial Strategy as the overall spatial planning and development strategy for Ireland. Planning legislation provides for the Government to revise or replace the NPF every six years. Following a decision of Government in June 2023, the preparation of a revised National Planning Framework commenced, with a draft revision being displayed in July 2024. Based on feedback from the consultation, an updated version of the draft revised NPF was then published in November 2024.

Following such, on the 8th of April 2025, the Government approved the Revised National Planning Framework which, subject to the approval of both Houses of the Oireachtas, signals the conclusion of the NPF revision process, which has been underway since June 2023 and is detailed below.
The NPF has been updated to address evolving challenges and needs, including population growth, housing demands, infrastructure requirements, and climate change for example.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building stronger regions – accessible centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated compact, smart and sustainable growth.

The key high - level objectives of the Plan are:

- To continue a path of economic prosperity, environmental sustainability, and climate action across all regions to compete international and be drivers of national and regional growth.
- To ensure that Irelands many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodate and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

Overall, the Framework caters for:

- The extra one million people that will be living in Ireland by 2040.
- The need for approximately 50,000 additional households per annum to 2040.
- The demand for additional school places, special education provision, and third-level education places.

The sites zoning allows for residential development and is considered the next sequential step in the residential development of Kildare Town.

It is submitted the current proposal for 146 no. new residential units and a creche facility will deliver on the below objectives of the NPF. We note specifically that the addition of 1, 2, 3, and 4 bed units typologies is appropriate at this accessible site within Kildare Town, catering to a wide demographic of potential future residents.

The following policies are considered key in the context of this site:

National Policy Objective 3 –
Eastern and Midland Region: 470,000 additional people between 2022-2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million.

National Policy Objective 4 –
A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

National Policy Objective 7 –
Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

National Policy Objective 9 –
Deliver at least 30% of all new homes that are targeted in settlements other than the give Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.

National Policy Objective 14 –
Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.

National Policy Objective 20 –
In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 22 –
In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

National Policy Objective 42 –
To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.

National Policy Objective 43 –
Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 44 –
Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

National Policy Objective 45 –
Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.

It is submitted that the current proposal for 146 no. new residential units will deliver on the above objectives of the NPF. We note specifically that the addition of a wide range of unit typologies and social housing options is appropriate at this accessible site, will be available to a wide demographic of potential future residents.

15.2 Housing For All – A New Housing Plan for Ireland



The Housing for All (HFA) plan has been introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure. It caters for:

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Over 300,000 new homes to be built by 2020, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State led building programme in our history and is financed by the biggest State funding commitment ever. The HFA also has the largest ever housing budget in the history of the State to transform our housing system, with an excess of €20 bn in funding through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years.

It is also apparent from the HFA plan that high-density housing is to be supported. Within the plan, a new fund the Croí Cónaithe (Cities) Fund has been introduced to further the implementation of planning permissions for apartments. Housing policy objective 15, no. 15.1 states that the HFA plan will *"Introduce the Croí Cónaithe (Cities) Fund to ensure that planning permissions for apartments in high density areas already secured by 2021 are activated by the end of 2025 for build to sell."*

In addition to this, the new fund will focus on *"activating housing supply through enhanced viability measures targeted at developing properties for individual household purchasers, including first-time buyers and right-sizers."* The fund will *"stimulate activation of existing planning permissions for build-to-sell apartment developments of four floors or more, above a certain density threshold, and this will be complemented by the sanction of a tax to activate vacant lands for residential purposes."*

Moreover, housing policy objective 11, no. 11.2 supports high-density housing: *"Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities."*

Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management: *"Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework."*

Furthermore, the HFA plan will drive economic sustainability and reduce constructions costs. Objective 23, 23.11 states that the HFA plan will *"Reduce C&D waste and associated costs by working with the construction industry on demonstration projects to show how best practice (specifically in relation to urban high-rise apartment developments) waste segregation and other waste management measures, can reduce overall C&D disposal costs."*

The subject proposal provides 146 no. new residential units which will contribute towards the government's target deliverance of 33,000 new residential units per year between 2021 and 2030.

We submit that the proposal is consistent with Housing for All – A New Housing plan for Ireland

15.3 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly* (RSES) was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:

The document consists of the following:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The RSES supports continued population and economic growth with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport, active travel and the development of strategic amenities to provide for sustainable communities.

The proposed development offers a variety of unit types and sizes to cater for a wide demographic. The proposal provides a density of c. 31.5 units per hectare which is appropriate to aid towards the goal of higher density for new developments.

We submit that the proposal is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

15.4 Smarter Travel - A New Transport Policy for Ireland 2009-2020



The Government has committed in 'Smarter Travel - A Sustainable Transport Future: A New Transport Policy for Ireland 2009 - 2020' to reducing the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase.

The key goals of the Guidelines are as follows:

- Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services.
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%.
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work.
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels.
- A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.

Achieving sustainable transport will require a suite of actions that will have complementary impacts in terms of travel demand and emissions. These are as follows:

- Actions to reduce the distance travelled by private car and encourage smarter travel.
- Actions aimed at ensuring that alternatives to the car are more widely available.
- Actions aimed at improving the fuel efficiency of motorised transport.
- Actions aimed at strengthening institutional arrangements to deliver the targets.

Smarter Travel acknowledges that good progress is being made in meeting the above targets and actions by providing better guidance on planning and development through the delivery of Planning Guidelines.

A Traffic & Transportation Assessment Report prepared by Waterman Moylan is submitted as part of this Planning application pack which ensures that, in-so-far-as-possible, the impacts of traffic are reduced and minimised where practical.

We submit that the proposal for a residential development at this accessible location is supportive of the objectives of Smarter Travel - A New Transport Policy for Ireland (2009-2020).

15.5 Transport Strategy for the Greater Dublin Area 2022-2042



The Transport Strategy for the Greater Dublin Area 2022- 2042 (Transport Strategy) replaces the previous framework, titled the Transport Strategy for the Greater Dublin Area 2016- 2035, which was approved by the then Minister for Transport, Tourism and Sport in 2016.

The overall aim of the Transport Strategy is:

> *"To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy"*

Four overall objectives have been developed to support the delivery of the overall aim of the strategy. These objectives are:

- *"To create a better environment and meet our environmental obligations by transitioning to a clean, low emission transport system, increasing walking, cycling and public transport use, and reducing car dependency."*
- *"To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling."*
- *"To support sustainable economic activity and growth by improving the opportunity for people to travel for work or business where and when they need to, and facilitating the efficient movement of goods."*
- *"To deliver a high quality, equitable and accessible transport system, which caters for the needs of all members of society."*

The Strategy approach is based on the Avoid-Shift-Improve principle which is summarised as; avoid – reduce the frequency and distance of trips; shift – move towards more environmentally friendly modes of transport, such as walking, cycling or using public transport; and improve – promoting efficient fuel and vehicle technologies.

We wish to highlight that the proposal is within proximity to a high-frequency rail line and is within walking distance to Kildare Town, which is serviced by several high-frequency bus routes. The proposed development provides pedestrian and cycle connections throughout, promoting the use of these sustainable modes of transport.

We submit that the proposal for a residential development at this accessible location is supportive of the objectives of the Greater Dublin Area Transport Strategy 2022-2042.

15.6 Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)



The *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)* set out policy and guidance in relation to the planning and development of urban and rural settlements with a focus on residential development and the creation of compact sustainable settlements.

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009 and provide updated guidance to take account of current policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth.

Given the NPF priorities for compact growth and reflecting the variety of settlements and settlement contexts where residential development takes place. The Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines to ensure that densities are efficient while, at the same time, tailored to the settlement context.

Section 3 identifies settlements, area types and density ranges for a variety of defined areas. The following sets out the key parameters as they relate to the subject site in Kildare Town:

Policy and Objectives 3.1 (Building Density Guidelines)

> *"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4."*

Policy Objective 3.1. of the Guidelines adopts a 2-step approach to density, that being Step 1 - the application of an appropriate range followed by Step 2 - a requirement to refine the density in terms of site's accessibility and considerations in relation to local character amenity and the natural environment.

Step 1

It is of our opinion that the subject site falls under the category **'Key Town/Large Town – Suburban/Urban Extension'** which is defined as:

> *'Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range **30 dph to 50 dph (net)** shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of **up to 80 dph (net)** shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).'*

As set out in Table 3.5 of the Guidelines, a density range of **30 dph to 50 dph (net)** shall generally be applied, with up to **80 dph (net)** open for consideration at 'accessible' locations.

Step 2

Section 3.4 of the Guidelines relates to refining density which must consider **site accessibility** and considerations in relation to **local character, amenity and the natural environment**.

The density range for the subject site, 30 – 50 dph, shall be then further considered and refined based on the consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment as per Table 3.8 of the Guidelines.

It is our considered view that the subject site at Southgreen Road can be classified as a '*Peripheral*' location as per Table 3.8 in terms of car parking provision. This location is defined as:

> *'Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small or Medium Sized Towns and in Rural Towns and Villages.'*

Waterman Moylan have set out the rationale for this in their mobility management plan and have considered proximity of the site to rail and bus services.

Secondly, in terms of considerations of character, amenity and the natural environment, we note that the guidelines seek to refine density within the context of:

- the prevailing scale, and mass of buildings, urban grain and architectural language for the area with a responsive site design required.
- the historic environment
- the impact on the environment and on protected habitats and species
- the amenities of local residential properties in close proximity to the site
- the capacity of water and waste water networks

In consideration of the above, the site is located at the edge of Kildare Town in a medium density residential area. As such, the subject design is response and mindful of the existing context. It is of our opinion that due to the context of the area and the transitional nature of the proposal, from green space into residential, that a lower density range of 30 – 50 dph is warranted at this location. We note the densities of the permitted schemes surrounding the subject site. The development to the south, permitted under Reg. Ref. 23/416 (ABP-318401-23) was permitted at 38 dwellings per hectare. The development to the east, Oak Church, permitted under Reg. Ref. 18/1028 (ABP-305529-19), was permitted at 35 dwellings per hectare.

Therefore, it is of our professional planning opinion that the proposed density of **31.5 dwellings per hectare** is most appropriate for the subject site.

DEVELOPMENT STANDARDS FOR HOUSING

The Guidelines also include several Specific Planning Policy Requirements (SPPRs) that should be considered in the context of the future development of the Southgreen Road site. SPPRs 1, 2, 3, 4, and 5 are considered relevant for the current site and the key requirements for same are set out below:

SPPR 1 (Separation Distances) –

"It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces…"

Separation Distances above 16m are maintained throughout the development.

SPPR 2 (Minimum Private Open Space Standards for Houses)

"It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- ***1 bed house – 20sqm***
- ***2 bed house – 30 sqm***

- *3 bed house – 40sqm*
- *4 bed+ house – 50 sqm*

"A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semiprivate open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity."

In accordance with SPPR 2, the proposed private open space provision for each housing unit meets the minimum standard. All private open space forms part of the curtilage of the residential unit and is designed to provide a high standard of external amenity space in one or more usable areas.

We refer the Planning Authority to the Housing Quality Assessment prepared by MCORM Architecture for more detail regarding the provision of Private Open Space.

SPPR 3 (Car Parking)

"It is a specific planning policy requirement of these Guidelines that:

(ii) In accessible locations, defined in Chapter 3 (Table 3.8) car-parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking."

The development proposal provides 321 no. car parking spaces across the development in the following breakdown:

Unit Type	Rate of Provision	No. of Spaces	Type of Parking
Houses	2 no. per unit	252 no. spaces	Surface Curtilage Parking
		20 no. spaces	Surface Off Curtilage Parking
Duplex Apartments	1.5 no. per unit	18 no. spaces (incl. 1 no. disabled space and 3 no. visitor spaces)	Surface
Creche	1 no. per 2 Staff 1 no. per 4 children	16 no. spaces (incl. 1 no. Universal space)	Surface

Additional Visitor Parking	1 per 10 units	15 no. spaces	Surface, taken-in-charge

Table 1 - Car Parking Provision

The proposed quantum of car parking spaces is above the standard set out by the Guidelines. We note that the Planning Authority stated at the s.247 pre-planning meeting, with respect to car parking, that a higher quantum may be justified at this location. The subject site is deemed 'Peripheral' by the guidelines, it should be considered that the subject site is located at the edge of the built-up footprint of Kildare Town. Kildare Town is deemed a car driven town and therefore, it was thought appropriate to apply a higher rate of car parking provision at this site.

It is also noted that all car parking aligns with DMURS standards, as further outlined in the DMURS Statement of Consistency prepared by Waterman Moylan, which accompanies this application.

SPPR 4 (Cycle Parking)

"It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

(i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.

(ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.

In accordance with SPPR 4, the proposed development includes safe and secure cycle storage facilities to meet both the needs of residents, and the needs of visitors.

- Quantity: The proposed development will provide a total of 527 no. bicycle parking spaces ensuring appropriate provision for all potential users.
    - A total of no. bicycle parking spaces is proposed for as secure, within curtilage parking spaces for residents of the houses, and as a secure, sheltered communal facility for residents of the Duplex Apartments. This meets the standard pf 1 no. space per bedroom for residents.
    - 77 no. bicycle parking spaces are designated for visitors as Sheffield stands, located strategically throughout the development.
- Design: To meet the requirements for secure and accessible parking, the design of cycle storage facilities will be as follows:
    - Parking for the houses will be located as a secure storage in either the front or rear garden, within curtilage.
    - Parking for the Apartments and Duplex Apartments will be located in a sheltered and secure communal facility located beside the Duplex Apartment blocks.
    - Visitor parking will be located across the development in public open space areas.

Policy and Objective 5.1 (Public Open Space) –

"It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element).The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations…"

The proposed development provides a total of approx. 7,018 sqm of Public Open Space across 2 no. separate areas. This equates to 15.1% of the net site which is above minimum requirements.

The proposed development is entirely consistent with the overall principles and provisions of the Sustainable Residential Developments and Compact Settlement Guidelines (2024).

15.7 Guidelines for Planning Authorities on Childcare Facilities (2001)



The Childcare Guidelines provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines state: "*Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities*."

The Guidelines identify several appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments
- The vicinity and concentrations of workplaces, such as industrial estates, business parks and any other locations where there are significant numbers working
- In the vicinity of schools
- Neighbourhood, District and Town Centres
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes, and dedicated cycle ways

Notwithstanding the locations identified above, the Guidelines state that proposals should have regard to the following:

- Childcare (Pre-School Services) Regulations, 1996.
- Suitability of the site for the type and size of facility proposed.
- Availability of outdoor play area and details of management of same.
- Convenient to public transport nodes.
- Safe access and convenient parking for customers and staff.
- Local traffic conditions.
- Number of such facilities in the area; and

- Intended hours of operation.

Assessment

From above the uppermost requirements proposed development will require approx. 37.6 no. childcare spaces. It is submitted that there will be sufficient capacity in the existing and extant planning permission for the projected demand derived from the proposed development. Following from the feedback received at phase 2 of the LRD process, it is submitted that a 161 sqm GFA creche is proposed as part of this LRD proposal. This creche will have the capacity to cater for 39 no. childcare spaces, exceeding the maximum demand generated by the proposed development and offering capacity to the wider area.

In addition is considered that the childcare needs requirements generated by the proposed development can also be accommodated in the vicinity of the subject site where there is 6 no. existing and operational childcare facilities within a 2km radius with a maximum capacity of 287 and given the 6 extant permission for childcare facilities has the capacity of 315 childcare spaces, indicates that the childcare infrastructure has the capacity to accommodate the needs of the development without placing undue strain on existing services.

The SIA conducted by Kildare County Council identifies six existing childcare facilities within the Plan Area, which were operating at near 100% capacity However, it should be noted that there are four extant permissions for 6 new childcare facilities as part of permitted new residential schemes. These have the potential to accommodate an additional 315 childcare places. If all permissions are implemented, it is considered that these childcare facilities would provide sufficient revision for the unmet demand during the lifetime of the local area plan (2029).

Existing childcare facilities are well-distributed around the town with a significant proportion of residential units within a 20-minute walking distance form the subject site.

We trust that this will be satisfactory to Kildare County Council.

The development proposal is therefore in compliance with the key objectives of the Guidelines for Planning Authorities on Childcare Facilities (2001) as amended by the Apartment Guidelines of 2023.

15.8 The Planning System and Flood Risk Management (2009)



The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended).

The purpose of the Guidelines is that Planning Authorities must implement the Guidelines in ensuring that where relevant, flood risk is a key consideration in the assessment of planning applications.

We refer to the enclosed Flood Risk Assessment prepared Waterman Moylan for full details on the assessment carried out in line with the above guidelines. It is deemed that the subject site is located within Flood Zone C and thus is low risk. The risk of pluvial flooding is considered low and flood risk mitigation measures have been recommended and applied to the subject site. It is concluded that surface water runoff from the subject site does not impact developments upstream or downstream of the subject site. We refer the Planning Authority to the Flood Risk Assessment, prepared by Waterman Moylan Engineering Consultants, for more detail regarding mitigation measures applied.

15.9 Guidance on Appropriate Assessment for Planning Authorities (2009)

Under Article 6(3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 "European Communities (Natural Habitats) Regulations (1997)" any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e., SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 - 2010).

Following an examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by DNV that the possibility may be excluded that the Proposed Development will have a significant effect on any of the following European sites: Pollardstown Fen SAC (000396), Mouds Bog SAC (002331), and River Nore and River Barrow SAC (002162).

15.10 Design Manual for Urban Roads and Streets 2019



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

Consideration of DMURS and its contents has been a key objective for this project. The four key design principles have been incorporated as follows:

- Connected networks: To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.

  The development proposes 2 no. new site entrances for vehicular access and egress in the west of the development site. This entrance provides access to the entirety of the development site via a network of internal roads. There is 1 no. private site entrance proposed to the east of the site for access 1 no. standalone dwelling.

- Multi-functions streets: The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.

  There is limited scope for encouraging multi-functional streets within the development site given the singular nature of the proposal as a residential development. However, the proposal promotes multi-functional use for pedestrians and cyclists through multiple pedestrian access points located along Southgreen Road, Old Road and the Southern Link Road and internal pedestrian and cycle routes joining up to the internal vehicular roadway.

- Pedestrian focus: The quality of the street is measured by the quality of the pedestrian environment.

  Pedestrians are considered throughout the development with improved connectivity throughout the site and along the site perimeter.

  Traffic calming measures have been included central to the site to provide a development which is safe for pedestrians.

- Multidisciplinary approach: Greater communication and co-operation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.

  The multi-disciplinary approach is reflected in the chosen design which arose from bi-weekly meetings with the design team. This has ensured a holistic and considered approach to designing the development has been maintained.

We refer the Planning Authority to the DMURS Statement of Consistency, prepared by Waterman Moylan Engineering Consultants, submitted as part of this planning application pack.

We submit that the proposal for a residential, mixed tenure development at this accessible location is supportive of the objectives of Design Manual for Urban Roads and Streets (2019).

15.11 Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025

The Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025 were published on the 8th of July 2025, replacing the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023.

The Guidelines are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

The current proposal provides for 146 no. residential units, 8 of which are proposed as Own-door Apartment units and 2 as Own-door Duplex units. This statement of consistency sets out the compliance of the proposal with the key policy requirements and standards as they relate to the proposed apartment units within the scheme as follows:

Specific Planning Policy Requirement 1

(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.

Applicant Response to SPPR1:

The proposed unit mix provides the following breakdown of Apartment units:

- 5 no. 1 bed units
- 3 no. 2 bed units
- 2 no. 3 bed units

Total: 10 no. Apartment units

We submit the proposal is in compliance with the above SPPR. Further, we refer the Planning Authority to the accompanying Statement of Housing Mix (Appendix 2) which provides a detailed overview and examination of the demographic profile of the area in which the subject site is located, with a view to establishing a justification for the proposed mix of units

Specific Planning Policy Requirement 2

Minimum Apartment Floor Areas (Studio apartment (1 person) 32 sq.m; 1-bedroom apartment (2 persons) 45 sq.m; 2-bedroom apartment (3 persons) 63 sq.m; 2-bedroom apartment (4 persons) 73 sq.m; 3-bedroom apartment (4 persons) 63 sq.m) and 3-bedroom apartment (5 persons) 90 sq.m).

Applicant Response to SPPR2

The proposed development complies with the minimum apartment floor areas as follows:

- *1-bedroom apartment (2 persons) – 49 sqm*

- *2-bedroom apartment (4 persons) – 90.5 sqm*
- *3-bedroom apartment (6 persons) – 115.4 sqm*

We refer the Planning Authority to the accompanying Housing Quality Assessment prepared by MCORM Architecture which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

Specific Planning Policy Requirement 3

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

(i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.

Applicant Response to SPPR3

All units proposed are dual aspect at minimum.

Given this, the proposed development complies with the dual aspect ratio required of the Apartment Guidelines.

Specific Planning Policy Requirements 4

"Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality."

Applicant Response to SPPR4

We can confirm that the ground floor of the proposed scheme provides floor to ceiling heights of 3.450 m.

In addition to the Specific Planning Policy Requirements noted above the 'Guidelines' sets out additional requirement for the following items:

Internal Storage

Unit Type	Min. Storage Requirements	Proposed
1-bed	3 sqm	4.2 sqm + Attic
2-bed (4 persons)	6 sqm	6.0 sqm + Attic

Table 2 - Storage Requirement and Provision

We submit that compliance with the minimum required areas for internal storage space is achieved in all units. We refer the Planning Authority to the accompanying Housing Quality Assessment prepared by MCORM Architecture for further information in this regard.

Private Amenity Space

The proposed development complies with the requirements set down in respect of private amenity open space in the guidelines. All of the units are provided with private open space comfortably in excess of the minimum, as shown in the Housing Quality Assessment prepared by MCORM Architects.

A communal open space is also provided for the residents of the block.

Unit Type	Min. Private Open Space Req.	Proposed
1-bed	5 sqm	20 sqm
2-bed (4 persons)	7 sqm	30 sqm

Table 3 - Private Amenity Space Requirement and Provision

We submit that compliance with the minimum required areas for private amenity space is achieved in all units. We submit this is consistent with the design standards and is acceptable in this instance given the overall design quality put forward. All private amenity spaces are proposed in the form of gardens.