



Chief Executive's Report on Submissions/Observations Received to the Proposed Material Alterations to Proposed Variation No. 3 of the Kildare County Development Plan 2023 – 2029 (as varied)

27th March 2026





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This report has been prepared by
the Forward Planning Team of
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Appendix A: Technical Responses Prepared by Arup of SEA / AA Screening of PMAs

Appendix B: Summaries of the Submissions/Observations Received

GLOSSARY OF ACRONYMS

AA	Appropriate Assessment
BUA	Built-Up Area
BIRR	Blessington Inner Relief Road
CDP	Kildare County Development Plan 2023 – 2029 (as varied)
CFRAM	Catchment-based Flood Risk Assessment and Management
CSO	Central Statistics Office
EMRA	Eastern and Midlands Regional Assembly
EPA	Environmental Protection Agency
GDA	Greater Dublin Area
KCC	Kildare County Council
KDA	Key Development Area
LAP	Local Area Plan
NPF	National Planning Framework
NTA	National Transport Authority
NWQ	Northwest Quadrant
OPR	Office of the Planning Regulator
OPW	Office of Public Works
PE	Population Equivalent
PFRA	Preliminary Flood Risk Assessment
RSES	Regional Spatial and Economic Strategy
SCA	Settlement Capacity Audit
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SSFRA	Site-Specific Flood Risk Assessment
SIA	Social Infrastructure Audit
SuDS	Sustainable Drainage Systems
TFI	Transport for Ireland
TII	Transport Infrastructure Ireland
TOD	Transport-Oriented Development
UDZ	Urban Development Zone
UE	Uisce Éireann

1 Introduction

Proposed Variation No. 3 has been primarily prepared to align the Kildare County Development Plan 2023-2029 (as varied) (hereafter referred to as the Plan, County Development Plan or CDP) with certain Section 28 Ministerial Guidelines published after the adoption of the Plan (i.e. after 9th December 2022), namely:

1. The NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities (2025), hereafter referred in the Chief Executive's Responses as the Housing Growth Requirement Guidelines, and
2. The Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024), hereafter referred in the Chief Executive's Responses as the Compact Settlements Guidelines.

At a Special Meeting of Kildare County Council on Monday 26th January 2026, it was resolved to alter Proposed Variation No. 3 of the Kildare County Development Plan 2023–2029 (as varied) and that these alterations constitute a material alteration to the Proposed Variation.

This report relates to the issues raised in submissions and observations received from members of the public, prescribed authorities and key stakeholders following the publication of the Proposed Material Alterations (numbered 1 – 30). The Proposed Material Alterations (PMAs) were published pursuant to Section 13(6) of the Planning and Development Act 2000 (as amended).

1.1 Legislative Requirements

In accordance with Section 13 of the Planning and Development Act 2000 (as amended), written submissions or observations with respect to the Proposed Material Alterations shall be taken into account before the variation of the development plan is made.

This report should:

- List the persons who made submissions or observations,
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR),
- Summarise the issues raised in all submissions or observations made by any other persons,
- Give the response of the Chief Executive's to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of the local authority and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

1.2 Public Consultation

The Proposed Material Alterations to Proposed Variation No. 3 of the Kildare County Development Plan 2023 - 2029 (as varied) were placed on public display from Friday 6th February 2026 until Monday 9th March 2026.

A public notice was published in the Irish Independent on Friday 6th February 2026 notifying members of the public that the Proposed Material Alterations were on public display from Friday 6th February to Monday 9th of March 2026.

The following documents were placed on display:

- Proposed Material Alterations Report to Proposed Variation No. 3 of the Kildare County Development Plan 2023 - 2029 (as varied)
- Strategic Environmental Assessment Addendum Report pursuant to the SEA Directive and Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011 containing an assessment of the Proposed Material Alterations.
- Screening for Appropriate Assessment (AA) Report pursuant to the EU Habitats Directive (92/43/EEC) and Planning and Development Act 2000 (as amended) containing an assessment of the Proposed Material Alterations.
- Strategic Flood Risk Assessment (SFRA) Report pursuant to Section 28 of the Planning and Development Act 2000 (as amended) containing an assessment of the Proposed Material Alterations.

Documents for the Proposed Material Alterations to Proposed Variation No. 3 were displayed at the following locations:

- Online public consultation portal <https://consult.kildarecoco.ie/en>
- Planning Department, Kildare County Council, Áras Chill Dara, Devoy Park, Naas, County Kildare W91 X77F

A total of 58 submissions/observations were received during the public consultation period, which can be viewed at:

<https://consult.kildarecoco.ie/en/consultation/proposed-material-alterations-proposed-variation-no-3-kildare-county-development-plan-2023-2029>

1.3 How to Read this Report

The Proposed Amendments to the Kildare County Development Plan, as originally contained in Variation No. 3 published on 29th October 2025, comprised of:

- The existing text of the Kildare County Development Plan in black;
- Deletions in ~~striketrough red~~; and,
- Proposed amendments or new text in *italics green*.

The Proposed Material Alterations comprise of deletions shown in ~~italics striketrough blue~~ and recommended new text shown in *italics purple*.

Where further minor changes are being recommended in this Report, these consist of deletions in ~~striketrough brown~~ and additional text is shown in *italics amber*.

The contents of the Chief Executive's Report are set out, as follows:

Section 1:	Introduction to the Chief Executive's Report.
Section 2:	List of persons or bodies who made submissions or observations.
Section 3:	Submission from the Office of the Planning Regulator (OPR)
Section 4:	Submissions from prescribed authorities or public bodies
Section 5:	Submissions themed by Proposed Material Alteration
Section 6:	Submissions relating to environmental assessments
Section 7:	Submissions received relating to miscellaneous issues (including land use zoning requests)
Section 8:	Overview of Chief Executive's Recommendations
Appendix A:	Technical Responses Prepared by Arup of SEA / AA Screening of Proposed Material Alterations
Appendix B:	Summaries of the submissions and observations received

1.4 The Next Steps

Within six weeks of receiving the Chief Executive's Report, the Elected Members of the Kildare County Council must consider all Proposed Material Alterations (Numbered 1 – 30) to Proposed Variation No. 3 of the Kildare County Development Plan 2023 - 2029 (as varied), the Chief Executive's Report and associated environmental reports.

Following consideration of the above, the Elected Members must decide by resolution, to make the Proposed Variation No. 3 of the Kildare County Development Plan 2023 - 2029 (as varied) with all, some or none of the Proposed Material Alterations as published.

In accordance with Section 13 of the Planning and Development Act 2000 (as amended) a further modification to the variation may be made where it is **minor** in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site. A further modification shall **not be made** where it refers to an increase in the area of land zoned for any purpose, or an addition to or deletion from the record of protected structures.

Section 13(7) of the Planning and Development Act 2000 (as amended) states that the Members of the Council shall be restricted to considering:

- The proper planning and sustainable development of the area,
- The statutory obligations of any local authority in the area; and
- Any relevant policies or objectives for the time being of the Government or any Minister of the Government.

In addition, the Elected Members, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the '*Code of Conduct for Councillors*' (July 2019) prepared under the *Local Government Act 2001* (as amended), carry out their duties in a transparent manner, must follow due process and must make their decisions based on relevant considerations.

Note: Should any of the Proposed Material Alteration Nos. 1-30 be adopted by the Elected Members consequential changes may occur in various sections throughout the Kildare County Development Plan 2023 –2029 (as varied) as a result.

2 List of Persons/Bodies Who Made Submissions

During the public consultation period a total of 58 valid submissions or observations were received. The list of persons, prescribed authorities and stakeholders who made valid submissions/observations are listed in Table 2.1 below.

Kildare County Council would like to take the opportunity to thank those who made written submissions/observations on the Proposed Material Alterations.

Table 2.1: Persons/Organisations Who Made Submissions or Observations

Sub No.¹	Name / Organisation	Categorisation of submission by Proposed Material Alteration (PMA) No. or relating to environmental assessments or miscellaneous issues
001	Conor Morgan	Environmental assessments
002	Paul Barry	PMA No. 11
003	Stewart McCarthy	PMA No. 3
004	Community Campaigner David Barton	Miscellaneous issues
005	Neville Homes Limited	PMA No. 5
006	Environmental Protection Agency	Environmental assessments
007	Marese Hickey	PMA No. 11
008	HSE National Environmental Health Service	General overview of PMAs
009	Meath County Council	No comment
010	Transport Infrastructure Ireland	General overview of PMAs
011	National Transport Authority	No further comment
012	Millennium Falcon Holdings Ltd	PMA No. 3
013	Timothy Dunny	Miscellaneous issues
014	Castledermot GAA	PMA No. 12
015	An Taisce	PMA No. 11
016	John Kehoe	Miscellaneous issues
017	Leo and Mary Mather	Miscellaneous issues
018	Naas Town Strategy Group	Miscellaneous issues

¹ Each reference number associated with a submission or observation starts with 'KCC-C455' and is followed by a unique reference which is reflected in the submission numbers referred to in Table 2.1.

Chief Executive's Report on Submissions/Observations Received to the Proposed Material Alterations to Proposed Variation No. 3 of the Kildare County Development Plan 2023 – 2029 (as varied)

Sub No.¹	Name / Organisation	Categorisation of submission by Proposed Material Alteration (PMA) No. or relating to environmental assessments or miscellaneous issues
019	Leo and Mary Mather	Miscellaneous issues
020	Lullymore Heritage and Discovery Park	PMA No. 11
021	Summix NKK Developments Limited	PMA No. 29
022	Uisce Éireann	PMA Nos. 9, 19 and 21
023	Kildare Bat Group	PMA No. 11
024	Department of Education and Youth	PMA Nos. 1, 2, 3, 5, 14, 17 and 18
025	Rathangan Tidy Towns	PMA No. 11
026	David Fraser	PMA No. 22
027	Margaret Stapleton	PMA No. 11
028	Janet Buckley	PMA No. 11
029	Karen Tyrrell	PMA No. 11
030	Kildare Bat Group	PMA No. 11
031	Office of Public Works	PMA Nos. 12, 20, 21 and 23
032	Birdwatch Ireland Kildare Branch	PMA No. 11
033	Ad Meliora Management Ltd	PMA Nos. 1 and 5
034	Kildare Green Party	PMA No. 11
035	T.D Housing Limited	PMA Nos. 1, 3, 5, 6 and Non-Material Change No. 1
036	Celbridge Community Council	PMA No. 5
037	Pousterle Limited	PMA No. 5
038	Friends of the Irish Environment	PMA No. 11 and environmental assessments
039	Land Development Agency	PMA Nos. 1 and 5
040	Kelland Homes Ltd	PMA No. 3
041	Cairn Homes Properties Ltd	PMA Nos. 1, 2, 3, 5, 12 – 30
042	McGreevy Construction/Enterprises	Miscellaneous issues
043	Cllr Pádraig McEvoy	PMA No. 11

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Sub No.¹	Name / Organisation	Categorisation of submission by Proposed Material Alteration (PMA) No. or relating to environmental assessments or miscellaneous issues
044	Ballymore Group	PMA Nos. 1, 3, 5, 8 and environmental assessments
045	Cllr Mark Leigh and Labour Party colleagues	PMA No. 11
046	Lorraine Benson	PMA No. 11
047	Ballymore Beef Ltd	Miscellaneous issues
048	Helen O'Brien, Elizabeth Donovan and Hugh Donovan	Miscellaneous issues
049	Aravonian Ltd	PMA Nos. 1, 3 and 5
050	Glenveagh Homes Ltd	PMA Nos. 1, 2, 3, 5 and 12 – 30
051	Pat Toolan	Miscellaneous issues
052	Bridget Loughlin	PMA No. 11
053	Office of the Planning Regulator	Overview of all PMAs and PMA Nos. 3, 4, 5, 6, 7, 9, 12, 19, 20, 21
054	Maynooth Tidy Towns	PMA No. 11
055	Brian McElvaney	PMA No. 11
056	Evonne Boland	PMA No. 11
057	Green Project Management	Miscellaneous issues
058	Vanessa Mack	PMA No. 11

3 Submission from the Office of the Planning Regulator

This section summarises the issues raised in the submission received from the Office of the Planning Regulator (OPR) in respect of the Proposed Material Alterations to Proposed Variation No. 3 of the Kildare County Development Plan 2023-2029 (as varied). The Chief Executive's response and recommendation is also provided.

3.1 Office of the Planning Regulator – Submission No. 053

Issues Raised

The submission states that its comments have been prepared under the relevant provisions of the Planning and Development Act 2000 as amended (the 2000 Act); noting that the Variation process commenced, and is to continue, under the relevant provisions of the 2000 Act. The submission outlines that:

- Recommendations relate to clear breaches of relevant legislative provisions, national or regional policy frameworks and/ or Government policy set out in Section 28 Ministerial Guidelines. Planning authorities are requested to implement or address recommendations to ensure consistency with relevant policy and legislative provisions. Where a planning authority decides not to comply with the recommendations or makes the plan in a manner that is inconsistent with the recommendations, the Chief Executive shall inform the Office and give reasons for its decision.
- Observations relate to requests for further information, justification of a matter or clarification of particular provisions to ensure alignment with policy and legislative provisions. Planning authorities are advised to action observations. The Office also requests that full consideration be given to any other advice contained in the submission.

The submission acknowledges and welcomes the work undertaken by KCC in addressing the issues raised in the original OPR submission to Proposed Variation No. 3 and the Chief Executive's report. In this regard, The Office outlines the following:

- Minor modifications are required for Table 2.8A following the PMAs to include additional zoned lands.
- Notes the rezoning of Phase 1a lands at Leixlip (Confey) to facilitate the immediate development of 450 homes in advance of the UDZ process.
- Considers that the change of the title of Table 2.8B to *Short to Long Term Strategic Development Sites* is an anomaly, given that the Northwest Quadrant and parts of Confey (Phases 1a and 2) are not available for release as part of the proposed Variation.
- Notes that CS O31 in PMA No. 5 indicates that a Settlement Plan for Celbridge is to be prepared in 2026. The Office remains of the view that additional residential zoning will be required as part of this process. The Office considers that it is essential for a clear and accelerated timeline be prepared for a Settlement Plan for Celbridge, noting the commitments for Settlement Plans for Monasterevin, Kilcock and Sallins.
- With the exception of the issues regarding flood risk at Kildangan (Proposed Material Alteration No. 21), the Office has no objections to the approach to

providing new residential zonings in Villages and settlement expansion areas in Rural Settlements. It is stated that circa 35 ha of land has been identified with the potential to deliver over 1,000 units.

- Considers that the additional flexibility provided regarding housing densities and housing mix in PMA 6 may be misinterpreted and undermine the Compact Settlement Guidelines, noting that the Guidelines provide for local site circumstances and exceptions. States that no clear justification has been provided as to why due account has not been taken of the Compact Settlement Guidelines.
- The Office has identified matters regarding flood risk management that should be addressed prior to the adoption of the Variation:
 - National datasets do not cover Kildangan and the indicative mapping of the County Development Plan SFRA has only been used. It is stated that in the absence of a Stage 3 detailed flood risk assessment, the residential sites are located in Flood Zones A and B and are potentially at a risk of flooding. A Stage 3 flood risk assessment is therefore required and any lands identified as at a high or moderate risk of flooding should not be zoned for vulnerable uses.
 - The submission refers to NPO 78 of the NPF which requires planning authorities to apply an evidence-based approach to flood risk management to ensure identification, avoidance and mitigation of flood risk in accordance with the Flood Risk Management Guidelines. NPO 78 also requires planning authorities to take account of the potential impact of climate change on flooding / flood risk. The Office has identified an overlap of the CFRAM mid-range and high-end future scenarios flood mapping extents with the proposed zonings in Castledermot, Johnstown and Kildangan.

Considering the above, the OPR provides 2 no. recommendations detailed below:

PMA Recommendation 1 – Implementation of the Housing Growth Requirements

Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, and in particular to:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans; and
- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024),

the Planning Authority is recommended to:

- i. make minor a modification to MA 5 Objective CS O31 to provide a clear and accelerated timeline for the completion of the Celbridge settlement plan / Variation to the Kildare County Development Plan 2023-2029;

- ii. make a minor modification to the title of table 2.8b from 'Short to long term' to 'Medium to long term' in order to provide clarity regarding the timeframes for housing delivery on zoned lands;
- iii. make minor modifications to clarify MA 3 table 2.8A Core Strategy Supplementary Table for revised Housing Growth Requirements (2025) and amend housing provision of 480 units from Strategic Reserve to New Residential for Athy and update the overall additional housing provision to 7,722 units and include the estimated additional 1000 residential units to lower tier settlements as part of this Variation;
- iv. make a minor modification to MA 2 table 2.8 Core Strategy Table or MA 3 2.8A Core Strategy Supplementary Table for revised Housing Growth Requirements (2025) to include additional lands for New Residential zonings in Village and Rural settlements in the county; and
- v. make a minor modification to MA 6 to amend wording to omit the text in red and include the text in green below:

*Where it can be demonstrated that an imbalance of housing typologies exists within a settlement, lower densities **within the density ranges set out in the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024, 3.3.3 - 3.3.6** may be considered. ~~on a case-by-case basis~~*

PMA Recommendation 2 – Flood Risk Management

Having regard to:

- NPO 78 of the NPF to avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test;
- RPO 7.12 of the RSES to seek to avoid inappropriate land use zonings and development in areas at risk of flooding in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- i. reviews flood extent mapping in Strategic Flood Risk Assessment (SFRA) including undertaking a stage 3 detailed flood risk assessment for New Residential lands for MA 21 at Kildangan. Following this review, if the lands are identified as being located within Flood Zone A or B then the proposed Variation should be made without MA 21 in respect of the residential zoning objectives; and
- ii. reviews the future flood extents for proposed residential zonings at MA 12 in Castledermot, MA 21 at Kildangan and proposed residential and serviced sites at MA 19 and MA 20 in Johnstown and set out a strategy in the SFRA for how the effects of climate change will be managed in these areas.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

In addition, the submission outlines the following in relation to other material alterations proposed:

- The Office seeks further consideration or clarification of text/policy/objectives regarding rural/serviced site local needs criteria, stating that it is unclear if the

new definition of a person who has lived in a rural area in PMA No. 7 includes or excludes persons who presently live in designated Towns, Villages and Rural Settlements. The Office recommends a review of this policy objective and criteria alongside the wider suite of rural policy objectives in the upcoming Development Plan review.

- The Office seeks the rationale for the redesignation of Newtown from a Rural Node to a Rural Settlement. The submission states that no specific justification has been provided for the reclassification and is considered somewhat premature considering that PMA 4 provides that the planning authority will undertake an evidence-based audit of rural nodes as part of the forthcoming Development Plan review, where such matters can be assessed in a consistent and systematic manner.

Considering the above, the OPR provides 1 no. observation detailed below:

PMA Observation 1 – Rural Housing and Settlement Hierarchy

Having regard to:

- NPO 28 of the NPF; and
- Section 4.5.1 of the Development Plans, Guidelines for Planning Authorities (2022),

the Planning Authority is advised to:

- i. Clarify the position with regard to additional text relating to inclusion of 'persons living in the designated Towns, Villages and Rural Settlements' at MA 7 under the footnote which defines a 'rural resident', that those living in these settlements are considered applicable to this category at table 3.4 (a);
- ii. Carry out a detailed review of Serviced Sites Local Need Criteria policy as part of a wider review of the effectiveness of rural policies in the upcoming review of the Kildare County Development Plan 2023-2029 (County Development Plan); and
- iii. Review and postpone the reclassification of Newtown at MA 9 and give further consideration to this matter as part of the wider strategic review of the settlement hierarchy of all settlements in the forthcoming review of the County Development Plan.

Chief Executive's Response

The contents of the submission are noted. Proposed Variation No. 3 proactively seeks amends the current County Development Plan to integrate the new housing growth requirements from the Housing Growth Guidelines as expeditiously as possible, while maintaining KCC's recognised commitment to ensuring that growth occurs in a sustainable and plan-led manner which accords with best practice, the Development Plans – Guidelines for Planning Authorities (2022), the NPF and the Housing Growth Guidelines.

The approach adopted by KCC to integrate the new housing growth requirements has been explicitly tailored to accord with Policy and Objective No. 3 of the Housing Growth Guidelines, which states that *'planning authorities should use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current*

adopted development plan. Accordingly, Proposed Variation No. 3 amends the Core Strategy of the County Development Plan in a manner that leverages on:

- The work previously undertaken in identifying/zoning appropriate lands for growth in existing Settlement Plans/Local Area Plans;
- The work currently underway to replace Local Area Plans with integrated Settlement Plans;
- The work currently underway to prepare/integrate masterplans for significant strategic landbanks in Kildare; and
- The recognised need for a renewed a focus on achieving equitable, balanced and proportionate housing delivery across the entirety of the county.

Considering the above, responses to the 2 no. recommendations and 1 no. observation are detailed below.

Recommendation 1(i) seeks to modify Objective CS O31 in PMA No. 5 to provide a timeline for the completion of the Celbridge Settlement Plan. In response, delivery mechanism no. 3 (as detailed in PMA No. 1) notes that Settlement Plans for Celbridge and Athy are envisaged to be provided in 2026/2027.

It is unclear from the OPR submission how the work programme of the Council and the choreography and sequencing of the publication of variations as outlined in Variation No. 3 and in the relevant Proposed Material Alterations represents a clear breach of legislative provisions, government policy or relevant Guidelines.

Kildare County Council progress settlement plans for towns as resources allow.

Notwithstanding, the following recent updates are considered relevant in response:

- Work has commenced on the background and preparatory work to inform the Celbridge Settlement Plan and additional land use zonings will be examined as part of this separate statutory process, informed by supporting environmental reports and assessments regarding transportation, settlement capacity and social infrastructure.
- Variations to incorporate Settlement Plans for Kilcock, Sallins and Monasterevin, together with the masterplan (including land use zonings) for the Naas Northwest Quadrant are at an advanced stage. These variations are anticipated to be published over the coming months following the completion of Proposed Variation No. 3.
- The preparation of a variation regarding Confey (to reflect its potential UDZ designation) may commence following the resolution of Proposed Variation No. 3, noting that the lifetime of the Leixlip Local Area Plan has been recently further extended.

It is considered that the content of the Variation, in addition to the relevant Proposed Material Alterations, provides sufficient clarity regarding the delivery of Settlement Plans and other variations over the lifetime of the County Development Plan. This ambitious delivery programme, together with the quantum of additional housing and range of delivery mechanisms provided by Proposed Variation No. 3 sufficiently demonstrates KCC's proactive integration of the First Revision of the NPF and due regard to the Housing Growth Guidelines.

Recommendation 1 (iii) and 1 (iv) seek minor alterations to Table 2.8A, as follows:

- Item 1(iii) seeks to change the additional 480-unit housing requirement for Athy from Strategic Reserve lands to New Residential and to update the overall additional housing provision to 7,722 units – reflecting the estimated 1,000 units to lower tier settlements in Variation No. 3.
- Item 1(iv) seeks to include additional lands for New Residential zonings in Villages and Rural Settlements in the county.

In addition, the submission notes the 'rezoning' of Phase 1a lands at Leixlip (Confey) in Table 2.8A to facilitate the immediate development of 450 homes in advance of the UDZ process.

Considering the above, it should be noted that Table 2.8A, as per PMA No. 3, is intended to achieve distinct but inter-related elements:

1. Distribute the additional housing growth to identified settlements to facilitate short – medium term housing delivery on:
 - a. All lands appropriately zoned for residential development in such settlements. It is noted that land use zoning maps for Kildare are contained in Local Area Plans or in Volume 2 of the Kildare County Development Plan;
 - b. Lands currently zoned Phase 2 (New Residential) for release through Objective CS O29; and
 - c. Lands of an identified strategic nature which may be zoned for residential development in the near future through separate variation processes to integrate settlement plans into the County Development Plan;
2. Identify strategic sites in higher order settlements in Kildare that can deliver housing at scale and provide a policy context to ensure that future settlement plans incorporate such sites (Objective CS O30). Such strategic sites are already identified for growth in respective Local Area Plans and are either already zoned (Confey Phase 1a and Simmonstown and Ballyoulster, Celbridge) or identified as strategic reserve lands (Chanterlands, Athy).

Accordingly, in response to the OPR request, minor alterations to PMA No. 1 (housing delivery mechanisms) and PMA No. 3 (Table 2.8A) have been included in the Chief Executive's recommendation to:

- Clarify that the housing allocation in Table 2.8A applies to all appropriately zoned lands in identified settlements, including New Residential zoned lands in Athy, and
- Incorporate the estimated 1,000-unit capacity of undeveloped lands in towns and villages noted in PMA No. 1, increasing the total number of units in Table 2.8A to 7,722 units. In response to Item 1 (iv), reference has been made to both New Residential land use zonings and Settlement Expansion designations for Villages and Rural Settlements respectively in Table 2.8A.

Regarding the OPR comments on Phase 1a masterplan lands at Leixlip (Confey), all of the masterplan lands are zoned in the Leixlip Local Area Plan 2020 – 2023 (as extended) and are not rezoned as part of this variation process. For clarity, the movement of Confey Phase 1a from Table 2.8B to Table 2.8A (PMA No. 3) is to

enable the allocation of 450 units to be utilised for development on all remaining appropriately zoned lands in Leixlip and not exclusively for Phase 1a. Whilst the limited quantum of remaining 'New Residential' zoned lands in other areas of Leixlip is noted, KCC acknowledges the capability of existing undeveloped town centre and infill lands to also contribute to housing growth in accordance with the NSO's and NPO's of the NPF.

Recommendation 1 (ii) seeks a minor alteration to the title of Table 2.8B from 'Short to long term' to 'Medium to long term'. This alteration is sought to provide clarity regarding the timeframes for housing delivery, as the OPR submission states that Phases 1b and 2 of Confey, together with the Naas Northwest Quadrant Masterplan are not available for release as part of the proposed Variation. In response, the intent of Table 2.8B is to:

- Provide a policy and housing growth context that recognises the importance of both Confey and the Naas Northwest Quadrant as large strategically located landbanks that can deliver significant housing in Kildare in a sustainable manner, in accordance with the NPF and the Housing Growth Guidelines.
- Provide sufficient initial allocation to enable the facilitate the commencement of development on the Naas Northwest Quadrant in the short – medium term, noting the content of submissions received from relevant landowners and the programmed publication of the masterplan together with associated land use zonings in the short term. The masterplan and associated variation process may incorporate an allocation to the lands (c.4000 units) which would represent the entire buildout over a longer timeframe to provide policy surety regarding the development of these lands, however, localised phasing requirements may be applied. Accordingly, Proposed Variation No. 3 provides the Core Strategy structure to enable the timely integration of the lands into the housing growth requirements for the County
- Provide sufficient allocation to enable the continual development of the Confey masterplan lands in the short – long term, noting that the allocation for Leixlip in Table 2.8A may be utilised for development on any appropriately zoned lands in Leixlip and the potential for applications for housing on the Confey lands beyond the Phase 1a allocation in the short -medium term.
- Recognise that full buildout of these masterplan landholdings may encompass a timeframe beyond the current County Development Plan. The process to designate these lands as candidate Urban Development Zones (UDZs) is to acknowledge their substantial development potential over a longer term and this process will occur after the masterplans have been incorporated into the County Development Plan.

Recommendation 1 (v) seeks to alter PMA No. 6 to incorporate reference to the Compact Settlement Guidelines to ensure that the additional policy flexibility provided regarding housing mix and density does not undermine the Guidelines, noting that they provide for local site circumstances and exceptions. In response, the Chief Executive's Recommendation below provides minor alterations to incorporate appropriate reference to the Compact Settlement Guidelines in PMA No. 6.

Recommendation 2 (i) and 2 (ii) relate to potential flood risk on lands proposed to be zoned in Castledermot (PMA No. 12), Johnstown (PMA Nos. 19 and 20) and

Kildangan (PMA No. 21). The OPR recommendations reflect in part the submission by the Office of Public Works (OPW) regarding flood risk – addressed in Section 4.9 below.

The OPR submission recommends that the future flood extents for the proposed residential zonings in Castledermot and Johnstown (including the serviced site zoning) be reviewed, and that a strategy be set out in the SFRA for managing the effects of climate change in these areas. It is noted that each of the proposed zoning in the PMAs were examined in the accompanying SFRA in accordance with the Planning System and Flood Risk Guidelines for Planning Authorities (2009). Accordingly, objectives have been included for each land use zoning which require development proposals on such lands be accompanied by site specific flood risk assessments (where relevant). In addition, following a review of the CFRAM mid-range and high-end future scenarios (where available), these objectives also included reference to available mapping for climate change scenarios. In response to the OPR and OPW submissions, the Chief Executive's recommendation incorporates a minor alteration of the text to the flood risk objectives for Castledermot and Johnstown to further address flood risk climate change scenarios.

Regarding the proposed residential land use zonings in Kildangan, the OPR recommends that the flood extent mapping for these sites in the accompanying SFRA and the future flood extent scenarios are reviewed.

It is noted that Kildangan is outside of the national datasets for flood risk, including mid-range and high-end future scenarios for climate change. Indicative flood zone mapping for Kildangan was produced as part of the SFRA for the Kildare County Development Plan prior to its publication. Such previous indicative mapping in the County SFRA does not include more recent climate change scenarios and considerations as currently utilised for national flood risk mapping. Furthermore, the OPW submission to the PMAs notes that the Kildangan lands proposed for residential zoning may be at risk of flooding and would only be confirmed through updated mapping (including for climate change scenarios).

In response to the submissions from both OPR and OPW, the Chief Executive's recommendation is to **not adopt** PMA No. 12 considering the uncertainty and unknown extent of potential flood risk on the lands and applying the tenants of the precautionary principle, as outlined in the Planning System and Flood Risk Guidelines for Planning Authorities (2009).

Observation 1 (i)

It is intended that rural residents include those living in designated Towns, Villages and Rural Settlements. For clarity, minor alterations are proposed in the Chief Executive's recommendation below.

Observation 1 (ii)

This request is noted and is intended to be carried out as part of the upcoming County Development Plan review.

Observation 1 (iii)

A desktop and on-site review of Newtown was undertaken to establish the appropriateness of reclassifying Newtown as a Rural Settlement. It is the prerogative of Kildare County Council through its CDP process to designate settlements below Key Towns as designated in the RSES.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 21 should not be adopted** by the members considering flood risk related issues as detailed above.

It is recommended that **Proposed Material Alteration Nos. 1, 3, 6, 7, 12, 19 and 20 should be adopted** by the elected members with the following minor modifications.

Incorporate minor modifications to additional housing growth delivery mechanism nos. 1 and 4 in **Proposed Material Alteration (PMA) No. 1**, as follows:

The delivery mechanisms by which additional housing growth will be facilitated are as follows:

1. The allocation of additional housing growth to certain the settlements of (Naas, Newbridge, and Kildare Town, Leixlip, Clane and the Blessington Environs), through together with the release of lands zoned Phase 2 in Local Area Plans (LAP) / Settlement Plans for Naas (New Residential Phase 2), Newbridge (New Residential – Phase 2) and Kildare Town (Phase 2 New Residential) by way of a Core Strategy objective to allow planning applications to be considered in the short term.
4. The allocation of additional housing growth to enable the progression of strategic sites in the short term to medium, which given their scale, also form long-term Urban Development Zones (UDZ) as provided for in the Planning and Development Act 2024, at two locations as follows:
 - o Northwest Quadrant, Naas. A variation to integrate the completed Masterplan (in progress) and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process.
 - o Confey, Leixlip. A variation to integrate the masterplan and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process.

Incorporate the following minor modifications to Table 2.8A in **PMA No. 3** as follows:

Table 2.8A - Core Strategy Supplementary Table for revised National Housing Growth Requirements (2025) [to be read in conjunction with Table 2.8 and Table 2.8B]

Settlement Type	Settlement Name	Potential Additional Dwellings for Settlements*	Delivery Mechanism	Location / Site Name	Within Built Up Area (BUA)	Zoning Status	Tier 1 / 2	Approx. Gross Residential Area in hectares	Approx. Net Dwelling Density per Hectare		
Key Town	Naas Map V3-2.1	455	Allocation to be read in conjunction with Table 2.8 Objective CS O29	Appropriately zoned and serviced/serviceable lands in Naas together with lands identified below:						Total 16.0 ha	35
				Kilcullen Road. (Map V3-2.1)	No	'New Residential Phase 2' in Naas LAP 2021-2027	Tier 1	5.2 ha			
				Blessington / Tipper Road (Map V3-2.1)	Yes		Tier 2	10.8 ha			
Self-Sustaining Growth Town	Newbridge	850	Allocation to be read in conjunction with Table 2.8 Objective CS O29 ²	Appropriately zoned and serviced/serviceable lands in Newbridge together with lands identified below:						TBD**	TBD**
				TBD**	TBD**	'New Residential – Phase 2' in Newbridge Settlement Plan	Tier 1 / 2**				
	Kildare Town Map V3-2.2	886	Allocation to be read in conjunction with Table 2.8 Objective CS O29	Appropriately zoned and serviced/serviceable lands in Kildare Town together with lands identified below:						Total 26.5 ha	37
				Ruanbeg (Map V3-2.2)	No	'Phase 2 New Residential' in Kildare Town LAP 2023-2029	Tier 2 ³	16.9 ha			
				Southgreen (Map V3-2.2)	Partial		Tier 2	5.16 ha			
				Dunmurry Road (Map V3-2.2)	No		Tier 2	1.8 ha			
				Green Road South (Map V3-2.2)	No		Tier 2	1.14 ha			
				An Talamh Bán (Map V3-2.2)	No		Tier 2	1.5 ha			
	Leixlip Map V3-2.6	450	Allocation to be read in conjunction with Table 2.8 Leixlip LAP, County	Appropriately zoned and serviced/serviceable lands in Leixlip together with lands identified below:						46.5 ha	As per the Confey Masterplan - Leixlip LAP 2020-
				Phase 1a as per Confey Masterplan (Map V3-2.6) - Leixlip LAP	No	'New Residential' and 'Mixed Use' in Leixlip LAP 2020-2023	Tier 2				

² It is noted that the Draft Newbridge Settlement Plan was published for public consultation on the 17th September 2025 as part of Proposed Variation No. 2 of the Kildare County Development Plan 2023-2029. Objective CS O29 provides for the release of lands zoned 'New Residential – Phase 2' in the adopted Newbridge Settlement Plan.

³ Refer to the Settlement and Site Capacity Audit prepared as a supporting document to proposed Variation No. 3 of the Kildare County Development Plan 2023-2029 (as varied) in relation to Ruanbeg, Southgreen, Chanterlands, Simmonstown and Ballyoulster.

			Development Plan Variation and Urban Development Zone	2020-2023 (as extended)		(as extended)			2023 (as extended)	
	Athy Map V3-2.3	480	Allocation to be read in conjunction with Table 2.8 Objectives CS O30 and CS O31	Appropriately zoned and serviced/serviceable lands in Athy together with lands identified below:						
				Athy including Chanterlands (Map V3-2.3)	Partial	'Strategic Reserve' in Athy LAP 2021-2027	Tier 2 ¹⁵	18.25 ha	31	
Self-Sustaining Town	Celbridge Map V3-2.4	2,000	Allocation to be read in conjunction with Table 2.8 Objectives CS O30 and CS O31	Appropriately zoned and serviced/serviceable lands in Celbridge together with lands identified below:						
				Celbridge including Simmonstown (Map V3-2.4) and Ballyoulster (Map V3-2.4)	No	'New Residential' in Celbridge LAP 2017-2023	Tier 2 ¹⁵	73 ha approx. – to be confirmed at Settlement Plan level.	37	
	Kilcock	250 500	Allocation to be read in conjunction with Table 2.8 Objective CS O31	Appropriately zoned and serviced/serviceable lands in Kilcock together with lands identified below:						
				TBD**	TBD**	TBD**	Tier 1 / 2**	TBD**	As per Compact Settlement Guidelines (2024)	
	Monasterevin	250	Allocation to be read in conjunction with Table 2.8 Objective CS O31	Appropriately zoned and serviced/serviceable lands in Monasterevin together with lands identified below:						
			TBD**	TBD**	TBD**	Tier 1 / 2**	TBD**	As per Compact Settlement Guidelines (2024)		
	Clane	251 (to be delivered in tandem with the phased development of the town park (Zoning Map 13.1 and footnote 2 page 73 of the Clane LAP refers).	Allocation to be read in conjunction with Table 2.8 Objective CS O31	Lands zoned 'C: New Residential / Infill' in the Clane LAP 2017 – 2023.	Varies	'New Residential / Infill in the Clane LAP 2017 – 2023.	Tier 1 / Tier 2	As per the Clane LAP 2017 – 2023.	As per Compact Settlement Guidelines (2024)	
Towns	Sallins	250 500	Allocation to be read in conjunction with Table 2.8 Objective CS O31	Appropriately zoned and serviced/serviceable lands in Sallins together with lands identified below:						
				TBD**	TBD**	TBD**	Tier 1 / 2**	TBD**	As per Compact Settlement Guidelines (2024)	
Environs	Blessington Environs	100	Allocation to be read in conjunction with Table 2.8	Lands zoned 'C: New Residential' as per Volume 2 of the County Development Plan.	No	'C: New Residential'	Tier 1 / Tier 2	As per Volume 2 of County Development Plan.	As per Compact Settlement Guidelines (2024)	
Villages and Rural Settlements	Villages and Rural Settlements	c.1000 – refer to Section 2.11 above.	CS O33	Lands zoned 'C: New Residential and designated 'Settlement Expansion' as per Volume 2 of the County Development Plan	Varies	'C: New Residential and designated 'Settlement Expansion'	Tier 1 / Tier 2	As per Volume 2 of County Development Plan	As per Compact Settlement Guidelines (2024) and the guidance of this Plan	
Total:		5,421 6,722 c. 7,722								

*For clarity and in accordance with Section 2.11 above, the 'Additional Housing Growth for Settlements' contained in Table 2.8A may be delivered on all appropriately zoned/designated and serviced/serviceable lands in respective settlements, together with the lands explicitly identified in Table 2.8A.

**To be determined through Settlement Plans for Newbridge, Kilcock, Monasterevin and Sallins.

Incorporate the following minor modifications to the last sentence in **PMA No. 6**, as follows:

Where it can be demonstrated that an imbalance of housing typologies exists within a settlement, lower densities may be considered on a case-by-case basis in accordance with the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024).

Incorporate the following minor modifications to Table 3.4 (a) in **PMA No. 7** as follows:

Applicant Category	Serviced Sites Local Need Criteria
<p>Category C – Rural Resident as part of a Serviced Site development.</p>	<p>On designated ‘Serviced Sites’ provided for in Volume 2 of the County Development Plan only</p>
<p>A person who has resided in a rural area in County Kildare*</p> <p>* For the purposes of this category, these persons are defined as those being from outside of the defined boundaries of the Key Towns, Self-Sustaining Growth Towns, Self Sustaining Towns and the Blessington Environs higher order settlements in the County Settlement Hierarchy (i.e. Key Towns, Self-Sustaining Growth Towns and Self-Sustaining Towns) as defined by Kildare County Council in respective Local Area Plans, or Settlement Plans in Volume 2 of the County Development Plan.</p> <p>For clarity, these persons who have resided in a rural area also include those persons living within the designated Towns, Villages and Rural Settlements in the County Settlement Hierarchy.</p>	<p>The Applicant must demonstrate:</p> <ol style="list-style-type: none"> 1. They have resided in a rural area of County Kildare for a period of at least 10 (consecutive) years, and 2. The dwelling(s) applicant's home, in which they have resided for 10 years, is / are within 10km of the designated serviced site, and 3. That the proposed house will be the principal private residence of the applicant (applications will be subject to a standard occupancy condition).

Incorporate the following clarification and minor modifications to proposed Objective ST CX in **PMA No. 12**, as follows:

ST CX Ensure that development proposals for lands identified as C and F* in Castledermot on Map V2-1.1A shall be subject to a site-specific flood risk assessment appropriate to the type and scale of development being proposed. Such assessment(s) for C* lands will be required to include consideration of climate change, associated flood extents and set out further requirements for the mitigation** of the impact of climate change.*

***Including, but not limited to, the siting of development, freeboard and assessment of impact on flood risk elsewhere.*

Incorporate the following clarification and minor modifications to proposed Objective V JTX in **PMA No. 19**, as follows:

V JTX It is an objective of the Council to ensure that development proposals for lands identified as C and F* to the north of Johnstown on Map V2-3.8 shall be subject to a site-specific flood risk assessment appropriate to the type and scale of development being proposed. Such site-specific flood risk assessment(s) are to include consideration of climate change, ~~including available data showing climate change flood extents in the vicinity of the lands~~ associated flood extents and set out further requirements for the mitigation** of the impact of climate change.*

***Including, but not limited to, the siting of development, freeboard and assessment of impact on flood risk elsewhere.*

Incorporate the following clarification and minor modifications to proposed Objective V JTY in **PMA No. 20**, as follows:

V JTY It is an objective of the Council to ensure that development proposals for lands identified as SS and F* to the south of Johnstown on Map V2-3.8 shall be subject to a site-specific flood risk assessment appropriate to the type and scale of development being proposed. Such site-specific flood risk assessment(s) are to include consideration of climate change, ~~including available data showing climate change flood extents in the vicinity of the lands~~ associated flood extents and set out further requirements for the mitigation** of the impact of climate change.*

***Including, but not limited to, the siting of development, freeboard and assessment of impact on flood risk elsewhere.*

4 Submissions from Prescribed Authorities and Public Bodies

This section of the report summarises the issues raised in the 10 submissions or observations received in respect of the Proposed Material Alterations to the Proposed Variation No. 3.

The relevant submissions are as follows:

Submission No. 006	Environmental Protection Agency
Submission No. 008	HSE National Environmental Health Service
Submission No. 009	Meath County Council
Submission No. 010	Transport Infrastructure Ireland
Submission No. 011	National Transport Authority
Submission No. 015	An Taisce – The National Trust for Ireland
Submission No. 022	Uisce Éireann
Submission No. 024	Department of Education and Youth
Submission No. 031	Office of Public Works
Submission No. 039	Land Development Agency

The response and recommendations of the Chief Executive in relation to the issues raised are set out under each submission summary.

4.1 Environmental Protection Agency – Submission No. 006

Issues Raised

The submission notes the organisation's role under the Strategic Environmental Assessment (SEA) regulations and also notes that the criteria for determining if the plan would be likely to have significant effects on the environment are contained in Schedule 1 or Schedule 2 of these Regulations. It is recommended that available guidance be considered in the proposed SEA determination for the plan or programme. The submission further outlines the range of guidance documents, tools, important reports and websites available to those carrying out SEA and AA and preparing the plan or project.

The submission states that prior consultation should also be undertaken with the listed environmental authorities and with adjoining planning authorities (where relevant) prior to making an SEA determination.

Further states that a copy of the SEA determination decision should be sent to the environmental authorities listed, adjoining planning authorities (where relevant) and be made available for public inspection at the Council's office and website.

The submission outlines that the NPF First Revision requires all consequential plans, projects and activities requiring consent be subject to relevant environmental assessments. It is stated that consideration should be given to relevant environmental assessments for additional zoning/rezoning of lands that have potential for significant environmental effects where existing zoning in the County Development Plan:

- Has not been previously assessed at an appropriate level under SEA, AA and SFRA and
- Does not accommodate the proposed increase in housing targets as set out in the NPF for the county

In this regard, the submission highlights the potential for effects on a range of environmental factors, noting that climactic factors should also be considered in reference to the most up to date Climate Action Plan and Flood Risk Management Plan. The availability and capacity of existing critical infrastructure including water and wastewater should be considered in the context of likely population increases associated with revised housing targets. The submission also refers to the environmental monitoring in the NPF SEA Statement, which should be reflected where relevant and appropriate in the context of future environmental monitoring and reporting.

Chief Executive's Response

The contents of the submission received from the Environmental Protection Agency are noted.

Chief Executive's Recommendation

No further change is recommended.

4.2 HSE National Environmental Health Service – Submission No. 008

Issues Raised

The submission notes previous reports issued by the National Environmental Health Service (NEHS) for other public consultations and summarises elements of the Proposed Variation No. 3 and the associated Proposed Material Alterations.

Outlines that the NEHS has considered the Strategic Flood Risk Assessment for the Proposed Material Alterations and has no further comments.

Chief Executive's Response

The contents of the submission are noted.

Chief Executive's Recommendation

No further change is recommended.

4.3 Meath County Council – Submission No. 009

Issues Raised

The submission states that the Meath County Council Planning Department has no comment to make in relation to the Proposed Material Alterations on Proposed Variation No. 3.

Chief Executive's Response

The submission from Meath County Council is noted.

Chief Executive's Recommendation

No further change is recommended.

4.4 Transport Infrastructure Ireland – Submission No. 010

Issues Raised

The submission notes that Transport Infrastructure Ireland (TII) has reviewed the Proposed Material Alterations, noting that these alterations do not alter policies or objectives that require developments to demonstrate compatibility with the operation of the national road network in accordance with relevant guidelines.

Chief Executive's Response

The contents of the submission from TII are noted.

Chief Executive's Recommendation

No further change is recommended.

4.5 National Transport Authority – Submission No. 011

Issues Raised

The submission states that further to previous comments on Proposed Variation No. 3, the National Transport Authority (NTA) has no further comments.

Chief Executive's Response

The contents of the submission from the NTA are noted.

Chief Executive's Recommendation

No further change is recommended.

4.6 An Taisce – The National Trust for Ireland – Submission No. 015

Issues Raised

The submission considers that Proposed Material Alteration No. 11 represents a significant weakening of the language in Objective BI O26 regarding the prevention of hedgerow and tree removal to facilitate development. An Taisce recommends the retention and strengthening of the current wording of Objective BI O26, and the rejection of the proposed revised wording.

The submission notes that hedgerows and trees are essential repositories of natural/cultural heritage and biodiversity value, providing ecosystem services such

as carbon sequestration, flood attenuation, pollinator sustenance, soil health and wildlife habitat. The submission outlines that the housing crisis should not justify the rolling back of environmental safeguards. In addition, guidance and objectives for compact settlements and the prioritisation of brownfield over greenfield development, in tandem with the need to reverse biodiversity loss under international, EU, national and local biodiversity objectives need to be considered in assessing the Proposed Material Alterations.

The submission raises the following points regarding the proposed revised wording to BI O26:

- The omission of the requirement for hedgerow removals to be “*clearly and satisfactorily demonstrated to the Planning Authority*” is a significant weakening of the objective. The revised text removes the need to provide evidence and a clear rationale for the removal of hedgerows, and to show that alternatives to facilitate hedgerow retention are not possible.
- The omission of the requirement for hedgerow removals to be “*kept to an absolute minimum*” raises serious concerns about facilitating removals far beyond a minimum threshold.
- The revised wording waters down of the requirements for mitigation planting from “*a hedge of similar length and species composition*” to “*a hedge of similar length, established as close as is practicable to the original*”. In this regard, species diversity is essential to the ecological functioning and biodiversity value of hedgerows. This is an essential need in a biodiversity emergency and the urbanisation of society, where replacement/offsetting measures may be of questionable biodiversity value. The proposed revised wording suggests that attempting to replicate the diversity of a hedgerow is optional rather than mandatory.
- The omission of the statement that hedgerow and tree removals “*may result in an outright refusal*” weakens the objective and leaves a greater opportunity for planning permissions to be granted despite removals having taken place.

Alternatively, the submission contends that strengthening the wording of BI O26 would acknowledge that replacement planting should be lower on the mitigation hierarchy than full retention due to the length of time for biodiversity re-establishment, the potential for the use of lower quality tree / planting stock, the potential for a lack of post-planting monitoring.

Chief Executive's Response

The contents of the submission from An Taisce concerning Proposed Material Alteration No. 11 are noted. The submission raises the same issues as those outlined in Section 5 regarding Proposed Material Alteration No. 11. Please refer to this section for the Chief Executive's response to the issues raised in relation to the PMA.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 11 should not be adopted** by the Elected Members.

4.7 Uisce Éireann – Submission No. 022

Issues Raised

The submission has no objections to the Proposed Material Alterations, with a few high-level comments, as follows:

- **Material Alteration No. 9** (Newtown): No comment on the change in settlement designation for Newtown; however, attention is drawn to the limited capacity in the wastewater treatment plant.
- **Material Alteration No. 19** (Johnstown New Residential Zoning): Depending on the size of development in the area, some downstream upgrades may be required and can be developer driven if the need arises.
- **Material Alteration No. 21** (Kildangan New Residential Zoning): Current headroom at the Kildangan WWTP is somewhat limited. Should constraints occur in the near future, connections will be on a first come, first served basis.

The submission also reiterates the following comments from the original Uisce Éireann submission to the public consultation for Proposed Variation No. 3 in relation to all proposed new zonings PMAs and/or areas with additional housing targets:

- The GDA water supply zone RAG status remains Amber.
- Watermain, sewer and / or pumping station upgrades may be required in some areas. If there are no Uisce Éireann projects in the area, upgrades shall be developer funded.

Chief Executive's Response

The contents of the submission from Uisce Éireann are noted.

Chief Executive's Recommendation

No further change is recommended.

4.8 Department of Education and Youth – Submission No. 024

Issues Raised

The submission notes the content of Proposed Material Alteration Nos. 1, 2, 3, 5, 14, 17 and 18. The submission acknowledges the crucial importance of ongoing work of the Council to ensure appropriate and sufficient land is zoned for educational needs.

Regarding Proposed Material Alteration No. 3, the submission states that the additional dwellings for Leixlip, Kilcock, Clane, Sallins and Blessington Environs in Table 2.8A could increase demand for primary and post primary places. Accordingly, additional school provision may be required for these settlements.

Chief Executive's Response

The contents of the submission from the Department of Education and Youth are noted. Kildare County Council commits to continue working with the Department to ensure the delivery of new school places across the county, including for Special Education Needs (SEN), as per the provisions of Objective CS O27 of Proposed Material Alteration No. 5.

Chief Executive's Recommendation

No further change is recommended.

4.9 Office of Public Works – Submission No. 031

Issues Raised

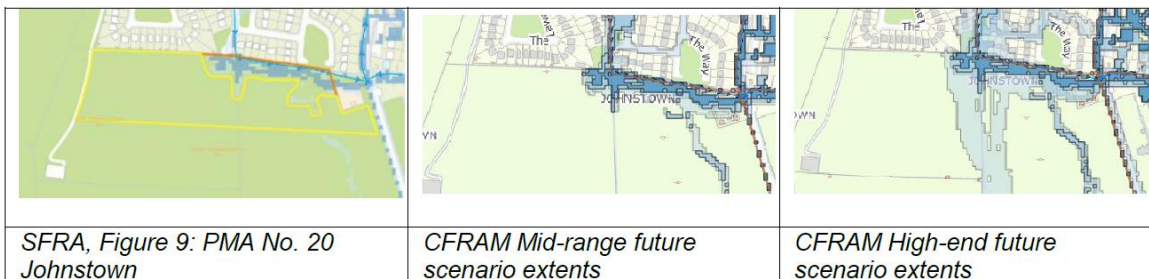
The submission notes the content of Proposed Non-Material Change No. 2 relating to Section 5.1 of the Settlement and Site Capacity Audit document and the continuing reference to pluvial flood risk. In this regard, the OPW states that if the Council consider pluvial flood risk to be a significant issue, then it is a matter for the Council to carry out appropriate assessments and mapping as pluvial flooding cannot be identified through the newest OPW national datasets.

The submission also outlines the following in relation to Proposed Material Alteration (PMA) Nos. 12, 20, 21 and 23:

PMA No. 12 – Castledermot: Notes that while the lands proposed to be rezoned to C: New Residential are not within present day flood extents, the lands could potentially be at risk of flooding in the future, noting that there is a small overlap of the CFRAM mid-range and high-end future scenarios illustrated below. In this regard, Kildare County Council should set out how the effects of climate change will be managed.



PMA No. 20 – Johnstown: Notes that while the lands proposed to be zoned SS: Serviced Sites are not within present day flood extents, the lands could potentially be at risk of flooding in the future. CFRAM mid-range and high-end future scenarios overlap with the lands as illustrated below. Kildare County Council should set out how the effects of climate change will be managed.



PMA No. 21 – Kildangan: States that both sites proposed to be zoned C: New Residential are in the vicinity of a watercourse that are outside of the indicative flood zones produced as part of the SFRA for the County Development Plan, noting that OPW national datasets do not cover watercourses in Kildangan. Accordingly, it is

unknown if these lands could potentially be at risk of flooding in the future as no future scenario mapping due to climate change has been provided.

PMA No. 23 – Robertstown: The lands proposed to be rezoned from SS: Serviced Sites to C: New Residential are within the benefitting area of the Drainage District maintained by Kildare County Council. The submission refers to the new objective requiring a SSFRA for the development of these lands due to proximity to the Grand Canal. The submission notes that development on benefitting lands may also require SSFRAs as they may be prone to flooding.

Chief Executive's Response

The content of the OPW submission is noted. Please refer to the Chief Executive's response to the OPR and the associated recommendations in Section 3.1 of this report in relation to flood risk and PMA Nos. 12, 20 and 21. With respect to PMA No. 21 it is recommended that **Proposed Material Alteration No. 21 should not be adopted** by the Elected Members considering flood risk related issues as detailed above.

Regarding PMA No. 23 (Robertstown), the Chief Executive's recommendation below ensures that benefitting lands are considered in the preparation of site-specific flood risk assessment(s) for development on these lands.

Regarding Section 5.1 of the Settlement and Site Capacity Audit document, the Chief Executive's recommendation below incorporates minor modifications to this section of the Settlement and Site Capacity Audit in line with the OPW submission.

Chief Executive's Recommendation

The Chief Executive's recommendations regarding Proposed Material Alteration Nos. 12, 20 and 21 are detailed in Section 3.1 of this report. In addition, it is recommended that **Proposed Material Alteration No. 23 should be adopted** by the elected members with the following minor modifications.

Incorporate the following minor modifications to proposed Objective V RX in **PMA No. 23** as follows:

V RX It is an objective of the Council to ensure that development proposals for C zoned lands to the south of the Grand Canal shall be subject to a site-specific flood risk assessment appropriate to the type and scale of development being proposed, with consideration given to the benefitting area of the Drainage District maintained by Kildare County Council and the Canal in the vicinity of the lands.

It is also recommended that the following minor modifications be incorporated into proposed **Non-Material Change No. 2** as follows:

In addition, ~~both pluvial and groundwater~~ *potential* flood risks to individual sites were considered under the surface water drainage assessment criteria, through a review of CFRAM and ~~PFRA flood maps~~ *national indicative fluvial (NIFM), coastal (NCFHM) and groundwater flood mapping (2016 – 2019 GW Flood Project by Geological Survey Ireland).*

4.10 Land Development Agency – Submission No. 039

Issues Raised

The submission from the Land Development Agency (LDA) welcomes the opportunity to engage with KCC on Proposed Variation No. 3. Submission notes that provisions of Objective HO O42 of the County Development Plan (CDP) relating to supporting the work of the LDA and notes that the LDA has active residential sites in Leixlip and Naas and states that the submission has been prepared having regard to the LDA's ownership of residential zoned lands at Ballyoulster, Celbridge.

Proposed Material Alteration No. 1 – Revision of Proposed Amendment No. 12

Submission considers revision of Proposed Amendment No. 12 to be broadly positive due to the reference to '*additional housing growth*'. Noting the LDA's ownership of lands at Ballyoulster, the submission requests that a more specific timeframe is given for the delivery of the new Settlement Plans.

Proposed Material Alteration No. 5 - Policy Objective CS O31

Notes and welcomes the updated wording of Policy Objective CS O31. Respectfully requests that greater clarity be provided regarding the timeframe for the preparation of the draft settlement plans for Celbridge and Clane.

Further requests that a statement be included confirming that the provisions of the expired Celbridge and Clane Local Area Plans 2017–2023 remain applicable, including in relation to zoning, until the Draft Settlement Plans for the towns are prepared and adopted. Suggests a revised wording (additional text in *blue italics*, timeframes are indicative) for Objective CS O31 that may be incorporated is, as follows:

Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared and integrated into the County Development Plan by way of a statutory variation (or variations), which shall be published in Q3/Q4 2026, including the additional housing growth requirement included in Table 2.8 and 2.8A on serviced lands to be informed by infrastructural and environmental assessments. Regard shall be had to the content of the expired Celbridge and Clane Local Area Plans 2017-2023 until a new Settlement Plan for the towns are adopted.

Chief Executive's Response

The contents of the submission are acknowledged. The request for the Proposed Variation to provide a more specific timeframe for the preparation of Settlement Plans for Clane and in particular, for Celbridge is not accepted. Proposed Material Alteration No. 5 incorporates additional text in Objective CS O31 which provides for the publication of Settlement Plans for Monasterevin, Sallins and Kilcock in 'Q1/Q2 2026'. Proposed Material Alteration No. 1 provides for new Settlement Plans to be prepared for Athy and Celbridge in '2026/2027'. In this regard, the Chief Executive's response to the OPR submission provides updates in relation to this ambitious delivery programme, summarised below:

- Settlement Plans and variations for Kilcock, Sallins, Monasterevin and the Naas Northwest Quadrant are at an advanced stage and are to be published in the coming months.
- Work has commenced on the Celbridge Settlement Plan, including supporting environmental reports and assessments regarding transportation, settlement capacity and social infrastructure however a specific timeframe for same cannot be provided.

The planning authority considers that the PMAs provide sufficient clarity and commitment to the delivery of an ambitious programme for Settlement Plans (during a period of significant legislative change) and variations over the lifetime of the County Development Plan.

Regarding the request that a statement be included confirming that the provisions (including zoning objectives) of the expired Celbridge and Clane Local Area Plans remain applicable until the Draft Settlement Plans are prepared and adopted, it should be noted additional text included as part of Proposed Material Alteration No. 1 provides for the following:

Kildare County Council will have regard to the provisions of any expired Local Area Plan when considering proposals for new development until such time as that plan is replaced, revoked or integrated into the County Development Plan.*

** 'Provisions' refers to all aspects of the plan including Land Use Zoning objectives but excluding Core Strategy allocation which is contained in the County Development Plan.*

Chief Executive's Recommendation

No further change is recommended.

5 Submissions Themed by Proposed Material Alteration

This section of the report groups the submissions or observations that were received which specifically relate to Proposed Material Alteration (PMA) Nos. 1, 2, 3, 5, 8, 11, 12, 22 and 29. The Chief Executive’s response and recommendation is provided below in respect of the issues raised pertaining to the aforementioned PMAs.

It is noted that 2 no. submissions (Submission No. 041 and Submission No. 050) refer specifically to Proposed Material Alterations Nos. 12-30, however this is in the context of their respective submissions relating to PMA No. 1. Accordingly, they have been included as part of the issues raised to PMA No. 1.

Proposed Material Alteration No. 1

Sub Ref No:	035
Name:	T.D Housing Limited
Summary of Issues Raised:	
<p>The submission by The Planning Partnership on behalf of T.D Housing Limited relates in particular but not limited to, the Proposed Material Alterations (PMAs) which interact with sequentially appropriate and serviced lands (1.17 ha) at Church Avenue, Sallins. The submission states that the housing target for Sallins remains insufficient and that the status of the forthcoming draft settlement plan requires clarification (so as not to be overruled by a lapsed LAP in the transition period) and to bridge a potential delivery gap regarding the release of lands as early as possible and to prevent procedure being a barrier. As such, ancillary modifications are appropriate and necessary, including the following:</p> <p>PMA No. 1: To include the following additional text (in <i>italics amber</i>) to proposed additional housing delivery mechanism no. 6:</p> <p><i>Include additional Core Strategy objectives in Chapter 2 to address continuity in housing supply across all settlements. In this regard, the objectives will, notwithstanding the housing growth allocated to that settlement, make provision for the release of any lands which have the benefit of a residential zoning (“B” or “C” in relevant land use zoning maps), or had the benefit of a lapsed zoning (residential or otherwise), where it can be demonstrated to the satisfaction of the Planning Authority that the lands are readily serviced or serviceable through upgrades to infrastructure as part of any application on the lands and where the proposal addresses any identified social infrastructure deficit in the respective settlement.</i></p> <p>Noting settlements with expired zoning plans (such as Sallins), the effect of this additional text would be to give consideration principally to formerly zoned lands, including those lands previously identified for purposes other than purely residential. Pending the adoption of settlement plans, this interim measure would be a proportionate response and in keeping with the spirit of Proposed Material Alteration No. 1.</p>	

PMA No. 1: To include the following additional text (in *italics amber*) to the last and second last paragraph in PMA No. 1:

Kildare County Council will have regard to the provisions of any expired Local Area Plan alongside the current context prevailing when considering proposals for new development until such time as that plan is replaced, revoked or integrated into the County Development Plan and/or a draft settlement plan is published, at which point primary regard shall be had to any draft settlement plan.*

** 'Provisions' refers to all aspects of the plan including Land Use Zoning objectives but excluding Core Strategy allocation which is contained in the County Development Plan.*

The additional text seeks to address unintended consequences that may arise from the last paragraphs of PMA No. 1, including:

- Expired zonings are no longer relevant or reflective of current circumstances, such as at the 1.17 ha site at Church Avenue. These lands include a community zoning and an objective for school expansion which are now surplus to requirements, with ongoing regard to the outdated reasoning for these designations being a disproportionate constraint to development. Further detail is provided in Appendix A of the submission.
- Regard to an expired LAP should not take precedence over an emerging Draft Variations incorporating Settlement Plans, particularly in relation to Sallins. Expired zoning plans should be generalised, with regard had to the suitability of lands within expired LAP boundaries for the delivery of residential development, irrespective of the existing zoning objective.

Sub Ref No:	041
Name:	Cairn Homes Properties Ltd.
Summary of Issues Raised:	
<p>The submission considers that the Proposed Variation and Proposed Material Alterations (PMA) are a lost opportunity to provide for the sustainable development of Kildare due to the lack of sufficient serviced sites in higher order settlements, particularly Celbridge, Leixlip, Maynooth and Naas. Accordingly, the submission considers that PMA Nos. 12 – 30 relating to new/revised land use zonings and designations in Villages and Rural Settlements should be omitted.</p> <p>The submission includes an appendix which contains the original Cairn Homes Properties Ltd submission (Sub Ref. 125) to Proposed Variation No. 3. A summary of this is provided in Appendix B of this report.</p> <p>The submission references Heading 7 of the General Scheme of the Planning and Development (Amendment) (No. 2) Bill 2025, in which planning authorities may extend the lifetime of current Development Plans by 30 months under Section 68 of the Planning and Development Act 2024 (as amended). It is considered that this inferred deferral of upcoming Development Plan reviews would be detrimental to housing delivery in the future. Accordingly, it is considered imperative that a more ambitious approach to the zoning of land be taken in this variation.</p>	

The submission notes the “Call for Sites” public consultation process initiated by other local authorities as part of or in parallel with variation processes. The submission advocates that KCC initiate a similar process to identify sites which may deliver residential development at scale, within a timeframe earlier than sites currently zoned / proposed for zoning under this variation. It is outlined that the Housing Growth Requirements Guidelines 2025 are clear in requiring local authorities to assess if identified lands can deliver housing in the lifetime of the Plan, and that alternative lands should be zoned where this is not the case. This is supported by the OPR submission to Proposed Variation No. 3.

In this regard, the submission states that the sites identified in Table 2.8A will not deliver housing within the remaining lifetime of the plan and that alternative sites should be included, such as Cairn’s holdings at Black Avenue (Leixlip), South Ring Road (Naas) and Newtown (Maynooth) – as detailed in the original submission to the public consultation to Proposed Variation No. 3 (attached to the submission as Appendix A). In this regard, it is requested that Kildare County Council (KCC) reconsider Table 2.8A and include additional provision, particularly for Leixlip, Naas and Celbridge.

The submission supports additional housing mechanism point 6 and the final paragraph (regarding the status of expired LAPs) in PMA No. 1.

However, the submission seeks the removal of the additional housing delivery mechanism point 5 in PMA No. 1. It is outlined that growth should be allocated to sites in higher order settlements proximate to services, public transport, and employment opportunities. The submission questions the provision of additional dwellings in lower order settlements, stating that the approach is without justification, strategic policy support or evidence regarding the ability of such settlements to deliver housing. The submission states that no analysis has been undertaken regarding the capacity of these settlements in terms of access, water supply, foul drainage, surface drainage and social / community infrastructure to accommodate such urban generated housing in wide areas of rural Kildare. This approach is stated as being inconsistent with the Development Plan Guidelines 2022 and incongruous with the objectives of sustainable development. In this regard, the original Cairn submission to Proposed Variation No. 3 is noted, in which 3 no. sites were assessed for development suitability in line with the Development Plan Guidelines 2022. This assessment demonstrated that the 3 no. sites were suitable in terms of accessibility, water and wastewater connections and proximity to the necessary social and community infrastructure to support residential development at scale.

It is stated that the approach in the PMAs will result in the baking in of long-term unsustainable travel patterns and car dependency, increasing commuter traffic and urban sprawl at unsuitable locations that are unable to deliver at scale. The inability to deliver at these locations due to a lack of due diligence regarding services and capacity in such settlements may have the opposite intended effect and exacerbate short term housing delivery. It is stated that the focus should be supporting short term housing delivery at scale, on sites with supporting infrastructure in sustainable locations. The submission notes that the 3 no. sites identified in the submission, within higher order settlements, have the potential to

deliver sustainable residential development at scale and are better placed to absorb housing growth than small scale villages and rural settlements. In this regard, the submission urges KCC to reconsider the allocations to redirect growth to higher order settlements including Leixlip, Celbridge, Naas and Maynooth.

The submission seeks the following amendments (additional text in **bold underlined purple**, deleted text in ~~strikethrough blue~~) to the additional housing delivery mechanism point 3 in PMA No. 1 for clarity and consistency regarding the preparation of a settlement plan for Celbridge:

*The allocation of additional housing growth to Athy and Celbridge, together with the identification of strategic sites in Athy and Celbridge for future housing delivery to be integrated into inform new settlement plans in 2026 **for Celbridge and subsequently 2027 for Athy**, ~~t.~~ The zoning ~~for which~~ of the strategic sites will be determined during the plan making process having regard to strategic flood risk assessment and other environmental assessments.*

Sub Ref No:	044
Name:	Ballymore Group
Summary of Issues Raised:	
<p>The submission states that Part 3 of the Planning and Development Act 2024 (2024 Act) commenced on 31st December 2025, with Section 81 of the 2024 Act now in effect. It is stated that Section 81(1) ensures that active LAPs continue to have effect for the Plan period and that Section 81(6) provides that:</p> <p><i>“A planning authority may, during the period that a local area plan made by it remains in force by virtue of subsection (1), amend that plan.”</i></p> <p>Accordingly, the submission suggests that the Naas LAP 2021 – 2027 be amended under Section 81(6) of the 2024 Act to integrate the Northwest Quadrant Masterplan for the avoidance of doubt and ambiguity, rather than amending the County Development Plan as provided in PMA No. 1.</p> <p>The submission also requests that the planning authority extend the Naas LAP 2021 – 2027 and the Leixlip LAP 2020 – 2026 (incorporating the Confey Masterplan) to coincide with the expiry of the County Development Plan in 2029 under Section 81(2) of the 2024 Act, which states the following:</p> <p><i>“The members of a planning authority may, by resolution for the purposes of ensuring the effective operation of this Part, extend for such period as they consider appropriate, the period for which a local area plan continued in force under subsection (1) is to remain in force provided that a new development plan has not been made under Chapter 5 in respect of the functional area to which the plan relates.”</i></p> <p>Accordingly, the Confey Masterplan could also be amended through the Leixlip LAP under Section 81(6) of the 2024 Act, following the extension of its lifetime, should the Planning Authority consider it necessary.</p>	

Considering the above, the following text amendments (deletions in ~~strikethrough red~~ and additions in *italics red*) to the additional housing delivery mechanism no. 4 in PMA No. 1 are proposed:

- Northwest Quadrant, Naas. A variation to integrate the completed Masterplan (in progress) and related zoning provisions and objectives into the **County Development Plan Naas Local Area Plan** will be published in 2026, prior to the commencement of the UDZ process.
- Confey, Leixlip. *A variation to integrate the masterplan and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process. The period for which the Leixlip LAP will continue to be in force will be extended under S81(2) of the Act until a new County Development Plan is made.*

In addition, the submission suggests that the final paragraph in PMA No. 1, contained in the box below is rephrased.

Kildare County Council will have regard to the provisions of any expired Local Area Plan when considering proposals for new development until such time as that plan is replaced, revoked or integrated into the County Development Plan.*

** 'Provisions' refers to all aspects of the plan including Land Use Zoning objectives but excluding Core Strategy allocation which is contained in the County Development Plan.*

Suggested rephrasing (in *italics red*):

As of 31st December 2025, Part 3 of the Planning and Development Act 2024 commenced. On that date, the local area plans for Maynooth and Environs, Kildare Town, Naas, Athy and Leixlip were in force. Accordingly, under S81(1) of the Act, these local area plans continue to be in force. The Planning Authority will extend the period for which these plans remain in force under S81(2), and amend the plans under S81(6), as appropriate.

Settlement plans for Kilcullen and Newbridge were adopted under Variation Nos 1 and 2 of the County Development Plan respectively and these settlement plans also remain in force.

The Planning Authority has commenced the preparation of settlement plans for Kilcock, Monasterevin and Sallins and these will be brought forward for incorporation into the County Development Plan later in 2026 by way of proposed Variations. Settlement plans for Celbridge and Clane will follow. In the interim, when determining planning applications in these towns, the Planning Authority will have regard to;

- *the previously adopted local area plans for these settlements, including the land use zonings contained therein, and*
- *the population target for that settlement contained in the Core Strategy Table of the County Development Plan.*

Sub Ref No:	049
Name:	Aravonian Limited
<p>Summary of Issues Raised:</p> <p>This submission has been prepared by John Spain Associates on behalf of landowner Aravonian Limited in respect of lands at Oldtown (Northwest Quadrant), Naas.</p> <p>The submission refers to a previous submission (Ref. No. KCC-C418-65a) to the public consultation process for Proposed Variation No. 3 (dated 26th November 2025) which is appended (Appendix 1) to this submission. A summary of this is provided in Appendix B of this report.</p> <p>The highlights the following key points of the original submission and initial rezoning request:</p> <ul style="list-style-type: none"> • Proposed Variation No.3 and revised housing targets are welcomed, including the continued recognition of the Northwest Quadrant (NWQ) for housing delivery. • It notes that all sites/locations identified in Table 2.8A and Table 2.8B of Proposed Variation No.3 are brought forward for development in the short term to ensure the revised target of 7,826 additional dwellings are delivered within the lifetime of the plan. • It welcomes CS O32 and the designation of NWQ as a future Urban Development Zone (UDZ), but requests that the NWQ Masterplan be brought forward and adopted as a variation as soon as practicable. • It requests that planning applications may be brought forward on the subject lands when the NWQ Masterplan is adopted, and not contingent upon the UDZ designation. • It requests that an updated zoning map for the Naas LAP 2021-2027 is incorporated to reflect the adopted NWQ Masterplan and amended land use zoning objectives to allow housing brought forward in the short term. • It states the subject lands are currently serviced with connections to existing roads and necessary utility infrastructure, including the ability to provide new pedestrian and cycle infrastructure and new connections whilst conforming to the sequential development of the town. <p>The submission supports and welcomes the proposed change to Table 2.8B which identifies the subject site as a Short to Long Term Strategic Development Site which indicates planning applications can be brought forward in the NWQ subject to the adoption of the Masterplan. The submission also supports the proposed changes to Item No.4 under the Delivery Mechanisms which confirms the NWQ Masterplan will be published in 2026 and adopted by way of variation to the County Development Plan. The submission requests that the masterplan is integrated as soon as practicable, whilst identifying the subject lands as a suitable location for development in the short term. The submission requests further clarity and textual changes to the caveat/footnote under Revised Proposed Amendment No.12, stating the NWQ Masterplan and zonings when adopted will supersede the Naas LAP whether active or expired, and that the caveat outlined in relation to expired LAP's will not apply to the NWQ lands.</p>	

Sub Ref No:	050
Name:	Glenveagh Homes Ltd.
<p>Summary of Issues Raised:</p> <p>This submission has been prepared by John Spain Associates on behalf of landowner Glenveagh Homes Ltd. in respect of lands at Millennium Park, Northwest Quadrant (NWQ), Naas and Kiladoon, Celbridge.</p> <p>The submission questions the decision of allocating additional housing growth to lower order rural settlements creating unsustainable travel patterns, rather than focusing growth at locations where social and economic opportunities exist. The submission agrees with comments from the Office of the Planning Regulator (OPR) which recommends options for short term housing delivery, including the zoning of additional lands and the release of all Phase 2 lands in certain settlements is actioned and delivered. The submission welcomes the increased core strategy numbers; however, it requests that a further additional provision is allocated in Table 2.8A which includes Celbridge, Naas and Sallins.</p> <p>The submission notes the following key points for consideration:</p> <ul style="list-style-type: none"> • The strategy of dispersing 1,000 units to smaller settlements is unsustainable as growth should be allocated to higher order settlements proximate to services, employment and public transport. • Requests the reinstatement of unit allocation in the NWQ from 543 to the original 1,294, considering the subject lands can deliver housing in the short term and are not constrained by any infrastructural deficits. • Recommends that the Celbridge LAP is reviewed and published in 2026. <p>The submission recommends that in light of the above proposed changes and additional housing growth allocated to the relevant rural settlements outlined in PMA No.12 to PMA No. 30 (inclusive) should be omitted from the final variation.</p> <p>Proposed Material Alteration No. 1</p> <p>The submission requests that the timeframe (point no.3) for the preparation of the Settlement Plan for Celbridge and Athy is clarified as being within 2026 with further amendments to the proposed text which removes reference to 2027 (alterations to the text <i>in bold, underlined blue strikethrough</i>), as follows;</p> <p><i>The allocation of additional housing growth to Athy and Celbridge, together with the identification of strategic sites in Athy and Celbridge for future housing delivery to be integrated into inform new settlement plans in 2026/2027, t . The zoning for which of the strategic sites will be determined during the plan making process having regard to strategic flood risk assessment and other environmental assessments.</i></p> <p>The submission states the proposed sites included in Table 2.8A will not deliver housing in the lifetime of the plan and therefore alternative sites such as the subject lands in Celbridge should be included as a feasible solution with the potential to deliver 366 units. The submission includes a supporting table which includes a list of suitability criteria illustrating the sites serviceability, stating the lands are considered to be 'Tier 1 – Serviced Lands'.</p>	

The submission recommends a number of textual changes to point no.4 (PMA No.1) which emphasises the importance of integrating the NWQ Masterplan into the County Development Plan as soon as practicable, including the reinstatement of the original 1,294 units proposed for the masterplan area and zoning of serviceable 'Tier 1' land to support short term delivery.

In order to provide further clarity and certainty in respect of the above text, the submission requests the following additional text in **bold underlined purple**:

4. The progression of strategic sites in the short term to medium, which given their scale, also form long-term Urban Development Zones (UDZ), as provided for in the Planning and Development Act 2024, at two locations as follows:

- Northwest Quadrant, Naas. A variation to integrate the completed Masterplan (in progress) and related zoning provisions and objectives into the County Development Plan will be published in 2026, **as soon as practicable**, prior to the commencement of the UDZ process. **“In order to facilitate the development of 1,294 dwellings within the NWQ in the lifetime of the current County Development Plan the Naas Local Area Plan 2021 – 2027 should be amended immediately following the passing of the Proposed Variation to designate lands Tier 1 and zone ‘New Residential’ lands within the NWQ.”***
- Confey, Leixlip. A variation to integrate the masterplan and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process.*

The submission seeks the removal of point No.5 (PMA No.1) stating no supporting assessment has been carried out in each of the settlements to understand the available capacity and necessary servicing requirements which is inconsistent with the methodology outlined in 'Development Plans Guidelines for Planning Authorities'. It further states that the proposed allocation to smaller rural settlements may not have the ability to cater such growth which contradicts the overarching objective of sustainable development. It strongly urges that this proposed allocation is re-directed to higher order settlements such as Naas, Celbridge and Sallins and the subject lands identified which have the capacity to cater such growth.

The submission supports point No.6 (PMA No.1) and the pro-active approach taken by the Council which will allow for sufficient flexibility. The submission also supports the additional text (caveat) included in PMA No.1 which provides clarity in respect of provisions (land use zoning objectives) contained in expired LAP's when considering proposals for new development until such time as that plan is replaced, revoked or integrated into the CDP.

The submission includes an appendix which contains the submission (Ref. No. KCC-C418-88a, dated November 27th, 2025) to the original Proposed Variation No. 3. A summary of this is provided in Appendix B of this report.

Chief Executive's Response

The contents of the submissions are noted.

Submission No. 035 seeks to incorporate minor alterations to additional housing delivery mechanism no. 6, together with the final paragraphs of PMA 1. It is noted that this request arises in a context where the submission considers that the Sallins LAP land use zoning on a landholding (E: Community and Educational) and associated provisions are no longer necessary due to revised circumstances. Consequently, these proposals are not accepted as it is likely to result in a range of unintended consequences, including:

- Significant changes to land use and development patterns in a manner counter to the envisaged proper planning and sustainable development of the towns of Kildare. It is considered that instances where land use zonings are no longer contextually appropriate are generally limited. In addition, land use zoning provisions do not automatically preclude consideration of applications for certain types of development alone, noting the ability to utilise material contravention procedures in exceptional circumstances.
- Prejudice the plan making process for all future Settlement Plans, including public participation and the role of the elected members.

Regarding Sallins, it is noted that a new Settlement Plan and its accompanying zoning map is at a significantly advanced stage and is anticipated to be published in Q2 2026, in accordance with proposed Objective CS O31.

Submission 044 seeks to amend the text in additional housing delivery mechanism no. 4 and the final paragraphs in PMA No. 1 to refer to the recently commenced provisions of Section 81 of the Planning and Development Act 2024 (as amended), particularly in relation to Confey and the Northwest Quadrant.

The content of Section 81 is noted and may be utilised where considered appropriate by the Planning Authority. In this regard, the lifetime of the Leixlip LAP was recently further extended from 2026 for a further three-year period to 2029. This extension has been provided to ensure clarity regarding the short-term development of the Confey Masterplan lands. The masterplan for the Northwest Quadrant is at an advanced stage and is anticipated to be published in Q2 2026. The above actions are considered to form part of the preparatory stages to designating these sites as candidate Urban Development Zones under Part 22 of the Planning and Development Act 2024 (as amended). In addition, it is considered that the final paragraphs of PMA No. 1 provide clarity in relation to the consideration of the provisions (including land use zonings) of expired LAPs in the interim, pending the adoption of replacement Settlement Plans.

Accordingly, no change is recommended for the considerations detailed above, notwithstanding that the alterations sought may not constitute minor modifications for this stage of the Variation process.

Submission Nos. 041 and 050 request clarity on the exact year when new Settlement Plans for Celbridge and Clane will be commenced. In response to this, it should be noted that the background preparatory work to inform the Celbridge Settlement Plan has commenced.

Submission No. 041 asserts that the Variation and PMAs, including the mechanisms in PMA No. 1, represent a lost opportunity to provide for the sustainable

development of Kildare due to the lack of sufficient serviced sites and housing growth allocation in higher order settlements. The submission also requests that KCC consider additional allocation and associated zoning of lands in Leixlip, Naas and Maynooth, including for a 'Call for Sites' consultation process to operate in tandem with the variation. Similarly, Submission No. 050 also requests that additional allocation be provided for Celbridge, Naas and Sallins. These assertions and requests are not accepted having regard to the following:

- The development capacity of remaining undeveloped zoned lands (c.329 hectares) in such settlements (potentially accommodating circa 11,097 units) contained in the Chief Executive's Report on the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025) - published in September 2025.
- Table 2.8A has been amended through the PMAs and in response to the OPR submission above (Section 3.1 refers) to clarify that the additional housing requirements for the identified settlements can be accommodated on all remaining zoned and serviced/serviceable lands in identified settlements.
- Of the additional housing growth provided in Table 2.8A and 2.8B, over 80% is provided to the higher order settlements (i.e. in Key, Self Sustaining Growth and Self Sustaining Towns) of the county.
- Residential development at all scales positively contributes to the delivery of housing and sustainable communities across County Kildare, noting that that focus should not exclusively be on higher order settlements or larger landholdings - requiring a balanced approach which seeks equitable and proportionate delivery across the county.
- As KCC embarks on a series of additional variations to address land use plans, it is not considered necessary to engage in a call for sites, particularly not for Maynooth given that the LAP is only recently adopted.

Both submissions seek the removal of the additional housing delivery mechanism no. 5 relating to Villages and Rural Settlements in PMA No. 1. The associated request to omit PMA Nos 12 – 30, regarding additional land use zonings / designations in such settlements, is not accepted.

The reference to Heading 7 of the General Scheme of the Planning and Development (Amendment) (No. 2) Bill 2025 in Submission No. 041 is noted. For clarity, Section 68(3) of the Planning and Development Act 2024 (as amended) provides that *"The Minister may, by order, for the purposes of ensuring the effective operation of this Part, vary for such period as he or she considers appropriate, the period for which a development plan continued in force under subsection (1) is to remain in force."* In this regard, Proposed Variation No. 3 (as altered) provides for the delivery of 8,926 dwellings through Tables 2.8A and 2.8B. This is significantly beyond the additional housing growth requirement for the remaining Plan period of 3,693 units derived from Appendix A of Housing Growth Guidelines. It is considered that Proposed Variation No. 3 demonstrates KCC's commitment to ensuring continued housing growth in Kildare for the Plan period and beyond. Should an order be provided by the Minister under Section 68(3) of the 2024 Act, KCC will actively seek to ensure ongoing adherence to the Housing Growth Requirements Guidelines and may, if necessary, consider the publication of further Variations.

Submission No. 049 requests that the final paragraphs of PMA No. 1 as they relate to the status of LAPs be amended to ensure that the land use zonings and provisions of the Northwest Quadrant masterplan will supersede the Naas LAP whether active or expired. In response, the provisions in the County Development Plan supersede any conflicting provisions (including zoning) of existing or expired Local Area Plans. However, it is considered reasonable that minor modifications be made to the last paragraphs of PMA No. 1 for clarity.

Submission 050 also requests that the allocation for the Northwest Quadrant in Table 2.8B revert back to the originally proposed allocation of 1,294 in conjunction with amendments to additional housing delivery mechanism no. 4 of PMA 1. The requested alteration is considered to be unnecessary and potentially prejudicial to the masterplan and associated variation, considering its imminent publication. Variation No. 3 explicitly affords the masterplan variation the opportunity to allocate the full appropriate amount of housing envisaged to be delivered over the short – long term (estimated circa 4,000 units). Further consideration of this request in relation to Table 2.8B is provided in the Chief Executive's response to PMA No. 3 below.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 1 should be adopted** by the elected members with the following minor modifications.

Incorporate the following minor modifications to the last and second to last paragraphs of PMA No. 1 as follows:

Kildare County Council will have regard to the provisions of any expired or existing Local Area Plan when considering proposals for new development until such time as that plan (or parts / provisions thereof) is replaced, revoked or integrated into the County Development Plan.*

** 'Provisions' refers to all aspects of the plan including Land Use Zoning objectives. However, this excludes but excluding Core Strategy allocations within expired Local Area Plans, as relevant allocations are which is contained in the County Development Plan.*

Proposed Material Alteration No. 2

Sub Ref No:	041
Name:	Cairn Homes Properties Ltd.
Summary of Issues Raised:	
<p>The submission notes that PMA No. 2 provides for the reallocation of housing growth to lower order settlements (Villages and Rural Settlements) to the order of an estimated 1,000 units on undeveloped lands. The submission reiterates that this is inherently unsustainable, restating the points made in seeking the removal of the additional housing delivery mechanism point 5 in PMA No. 1. Submissions consider that Celbridge should be prioritised in the short term as there are lands that can deliver much needed housing.</p>	

Sub Ref No:	050
Name:	Glenveagh Homes Ltd.
Summary of Issues Raised:	
<p>The submission refers to the proposed re-allocation of 1,000 units (Table 2.8) to lower order rural settlements which it states is unsustainable. The submission refers to Appendix 1: Submission to Proposed Variation No. 3 of the Kildare County Development Plan 2023-2029 (Submission KCC-C418-88a) which identifies two sites in Naas and Celbridge that have the potential to deliver high density housing of scale. The submission states the subject sites have been assessed and demonstrate appropriate access to existing social and community infrastructure, including access to water and wastewater connections. The submission refers to Sallins and lands which can be made available to support a further increase in unit allocation and which can assist in the delivery of a significant Transport Oriented Development (TOD). The submission strongly recommends that the identified sites and higher order settlements are put forward as alternative options for delivery under Table 2.8, rather than allocating this growth to rural settlements.</p>	

Chief Executive's Response

The contents of the submissions are noted.

Both submissions consider that the mechanism to enable the delivery of an estimated 1,000 units in lower order settlements (Villages and Rural Settlements) is unsustainable and unjustified in relation to capacity and servicing requirements for such settlements.

The County Development Plan identifies 38 no. Villages and Rural Settlements (including Newtown) of varying scales and contexts which are dispersed throughout the county. These settlements represent an essential element of the built environment and fabric of County Kildare, directly supporting local communities and wider rural catchments with housing, employment opportunities and supporting services – including *inter alia* convenience retail, hospitality, social/community infrastructure, sporting facilities, educational facilities and places of worship. The sustainable growth of these settlements is critical to ensuring their ongoing viability as areas for essential services, maintaining established communities and in providing more sustainable alternatives to continuing one-off dwellings in the countryside in conjunction with serviced sites.

The mechanism to enable the development of lower order settlements in PMA Nos. 1 and 2 follows from a review of the development potential of such settlements. This included the review contained Chief Executive's Report published in September 2025 on the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities (2025). This report indicates that there are approximately 30 hectares of undeveloped, zoned and serviced/serviceable lands in the Villages. Combined with the estimated quantum of lands designated for Settlement Expansion (circa 49 hectares) and the further zoned/designated lands provided in PMA Nos. 12 – 30, there is more than sufficient land to accommodate the estimated 1,000 units.

It is noted that that this allocation equates to approximately 26 units per settlement or circa 0.3% of the overall additional housing provision in Proposed Variation No. 3 per Village and Rural Settlement. In addition, the County Development Plan, as proposed to be varied, incorporates a policy and objective framework to enable the proper planning and development of such lower order settlements, providing that due consideration is given to the context, scale and function of the settlement together with the infrastructural capacity of same and the delivery of social and community infrastructure.

Chief Executive's Recommendation

No further change is recommended.

Proposed Material Alteration No. 3

Sub Ref No:	012
Name:	Millenium Falcon Holdings Ltd
Summary of Issues Raised:	
<p>The submission seeks to ensure that the statutory planning policy framework guiding development in the Naas Northwest Quadrant (NWQ) provides for the early delivery of new housing, noting the content of their previous submission (Ref. No. KCC-C418-104) to the public consultation process for Proposed Variation No. 3 (dated 26 November 2025) and appended to this submission. A summary of this is provided in Appendix B of this report.</p> <p>The submission supports the overall objective in the Proposed Variation and the Proposed Material Alterations (PMA) for increasing housing supply. However, the submission proposes further detailed recommendations for inclusion in the Variation. These recommendations are provided with regard to lands in the NWQ which are under the ownership and management of the submitter, in order to provide for the delivery of urgently needed new housing in the NWQ.</p> <p>The submission outlines the following points with regard to the subject lands:</p> <ul style="list-style-type: none"> • The overarching national policy support for increased housing provision, • The strategic location of the above lands in relation to public transport and services, • That all necessary major infrastructure for growth is in place for development on the lands. The submission considers that the lands qualify as Tier 1 – Serviced Lands. • That the landowner is eager to deliver housing (500 – 600 units) at the earliest opportunity, together with requisite social, community and retail provisions during the lifetime of the current County Development Plan. <p>The submission recommends the following:</p> <ul style="list-style-type: none"> • That the additional dwelling provision for the NWQ in Table 2.8 is maintained at 1,294 no. units, as originally set out in the Proposed Variation. • That the variation ensures that the NWQ Masterplan be rigorously reviewed to ensure it provides a clear policy and land use zoning support for: 	

- The delivery of housing in the NWQ (1,294 units in the short – medium term and 4,000 in the longer term) and
- The provision of a public transport route to link the town centre, the NWQ and the Sallins / Naas Train Station via Junction 9a.
- That the variation ensures that formal public consultation for the draft Masterplan stage is undertaken, in addition to engagement with key stakeholders (including landowners) prior to finalisation.

The submission summarises the Proposed Material Alterations relating to housing delivery for the NWQ and outlines the following:

- That the reasoning for the reduction from 1,294 units to 543 no. units for the NWQ in Table 2.8B is unclear. It is stated that this reduction may (a) restrict housing delivery in the NWQ in the short – medium term, (b) generate uncertainty and confusion regarding residential development in the NWQ and (c) make the securing funding more difficult.

Accordingly, the submission recommends that the additional dwelling provision for the NWQ in Table 2.8 is maintained at 1,294 no. units, as originally set out in the Proposed Variation.

- While a footnote to Table 2.8B outlines that longer term additional housing growth for the NWQ (circa 4,000 units) will be provided through the next County Development Plan and future Urban Development Zone (UDZ), it is considered that the lack of certainty makes it difficult to plan for housing delivery in the area.

Accordingly, the submission recommends that that the NWQ Masterplan be rigorously reviewed to ensure it provides a clear policy and land use zoning support for the delivery of housing in the NWQ (1,294 units in the short – medium term and 4,000 in the longer term).

- That the NWQ masterplan process has been lengthy and that the landowner has only had limited consultation thus far. The submission notes that a masterplan has yet to be published, noting that KCC's website indicates that a "Final Masterplan" would be available in Q4 2025.

Accordingly, the submission recommends that formal public consultation for the draft Masterplan stage is undertaken, in addition to engagement with key stakeholders (including landowners) prior to finalisation.

- That the masterplan may not adequately provide for the needed public transport infrastructure and that there will be no opportunity to revise the masterplan as part of the variation process. The submission considers that a public transport link which connects Junction 9a, Sallins and Naas train station is critical for future development. It is noted that this link was identified in the Naas Integrated Framework Plan for Land Use and Transportation (2003) (IFPLUT) and previous masterplans.

Accordingly, the submission recommends that the NWQ Masterplan be rigorously reviewed to ensure it provides a clear policy and land use zoning

support for the provision of a public transport route link the town centre, the NWQ and the Sallins / Naas train station via Junction 9a.

Sub Ref No:	035
Name:	T.D Housing Limited
Summary of Issues Raised:	
<p>The submission reiterates the content of a previous public consultation submission made to Proposed Variation No. 3, outlining that there is a need to project housing targets to a horizon of 2038 and to incorporate appropriate headroom under the Housing Growth Guidelines. In this regard, it is stated that there is an estimated need for between 836 units (without 50% headroom) and 1,255 units (with 50% headroom) in Sallins. Accordingly, the 500-unit allocation to Sallins remain significantly below intended targets (by more than half) when applied to Sallins on a pro-rata basis. It is considered that the following issues arise:</p> <ul style="list-style-type: none"> • The Chief Executive's Report on the submissions/observations to Proposed Variation No. 3 suggests that the inclusion of a horizon to 2038 is unnecessary. Notwithstanding, it is submitted that the Guidelines are explicit that the current variation process should include for this 'arc of development' at this stage as an immediate priority and not as part of the next development plan cycle. • The preference for achievement of a 50% headroom is clear in the Guidelines and deviation from this target should be avoided to the greatest extent possible. • The Chief Executive's Report on the submissions/observations to Proposed Variation No. 3 considers that there is no stipulation in the guidelines requiring local authorities to apply headroom proportionally to each settlement. The submission considers that if headroom is not proportionally distributed, this would indirectly and materially alter the settlement hierarchy and core strategy for the county. Such a change should be well-flagged and publicised and only intentionally adopted rather than as an indirect/unintended consequence. Accordingly, the distribution provided by the existing plan should be followed as the default benchmark. 	

Sub Ref No:	041
Name:	Cairn Homes Properties Ltd.
Summary of Issues Raised:	
<p>The submission notes the proposed changes to Tables 2.8A and 2.8B and reiterates that the focus should be on supporting sites which can deliver housing in the short term, at sustainable locations in tandem with the necessary supporting infrastructure. The submission states that the approach in the Proposed Material Alterations redistributes housing growth and delivery away from higher order settlements to lower order settlements and disagrees with this approach. The submission reiterates the points made in seeking the removal of housing delivery mechanism point 5 in PMA No. 1 and states that they see no justification or support to assert that these settlements have the ability to deliver housing and would exacerbate the housing need in Kildare due to the lack of services and infrastructure to enable development in such settlements. They are practical alternatives to accommodate growth. The submission again notes the 3 no. Cairn</p>	

sites are shovel ready to provide high density development of scale in higher order settlements in the short term; and that additional allocation should be provided for Leixlip, Maynooth and Naas in the supplementary tables.

The submission supports continued reference to Simmonstown and Ballyoulster in Table 2.8A and notes the concerns of the OPR regarding potential transport infrastructure constraints. It is stated that, subject to grants from An Coimisiún Pleanála in May 2026, these concerns regarding transport will have been addressed.

Sub Ref No:	044
Name:	Ballymore Group
Summary of Issues Raised:	
The submission requests that footnote 16 be amended to accord with the proposed recommended alterations to PMA No. 1.	

Sub Ref No:	049
Name:	Aravonian Limited
Summary of Issues Raised:	
<p>The submission expresses concern with the proposed amendment associated with Table 2.8A and Table 2.8B which has reduced the additional housing growth allocation in the NWQ from 1,294 to 543 units for the remaining plan period. The submission notes if multiple landowners bring forward applications within the NWQ in the short term, dwelling numbers could exceed the 543 allocation which will result in a further period of time for an additional allocation and planning framework to be realised and applied. The submission requests that the original housing allocation of 1,294 units remains, and if the prescribed number is adopted, that it is not treated as a ceiling by the Planning Authority.</p> <p>The submission refers to 'The General Scheme of the Planning and Development (Amendment) (No.2) Bill 2025', which includes a provision for Planning Authorities to postpone the review of the Development Plan by up to 30 months to allow for Regional Spatial Economic Strategies to be updated. It notes that any delay in the preparation of the County Development Plan review may result in a delay of additional allocation to the NWQ, emphasising the importance of ensuring the allocation of units in Table 2.8B are not treated as a maximum, which will hamper housing delivery. Furthermore, the submission requests that a provision is included in Table 2.8B which states the housing allocation for the NWQ will not be interpreted as a ceiling by the Planning Authority.</p>	

Sub Ref No:	050
Name:	Glenveagh Homes Ltd.
Summary of Issues Raised:	
<p>The submission questions the reduction in the proposed allocation within the NWQ from 1,294 to 543. It requests that the subject lands could be fast tracked for development in for short term development in Table 2.8B, noting the precedent set in 2021 where development at Finley Park was allowed to come forward in advance of the preparation of the NWQ Masterplan. It states the development of</p>	

these lands in the short term have the capacity to deliver 450-500 units and not prejudice the key principles and public transport/movement objectives of the NWQ. The submission does not agree with the revised approach of the Council to re-direct growth towards lower order settlements which does not support national or strategic policy. It further states that without allocating additional growth to Celbridge, Salins and Naas (NWQ), housing growth and delivery will be significantly constrained for the remainder of the plan period. The submission concludes that the Supplementary Table 2.8A should be revised to reflect the above settlements, including the reinstatement of the original 1,294-unit allocation identified for the NWQ.

Chief Executive's Response

The contents of the submissions are noted.

The requested amendments relating to the Naas Northwest Quadrant (NWQ) in **Submission Nos. 012, 049 and 050** are generally not accepted for the reasons detailed below, in conjunction with the Chief Executive's response to items raised regarding PMA No. 1 above:

- The masterplan and associated variation for the NWQ is anticipated to be published in Q2 2026, will be subject to a public consultation process and is considered to be the appropriate mechanism to ensure that public transport and strategic infrastructure provisions are adequately catered for.
- Table 2.8B expressly provides that the masterplan and variation process for the Northwest Quadrant will incorporate a housing allocation to reflect the short to long term housing delivery of the masterplan lands. However, it is considered that minor further modification to an associated footnotes in Table 2.8B is warranted in this regard for clarity.

In relation to the reference to the General Scheme of the Planning and Development (Amendment) (No.2) Bill 2025 in Submission No. 049, it is noted that a comprehensive response to this issue is addressed in the Chief Executive's response to PMA No. 1 above.

Submission Nos. 041 and 050 seek additional allocation for the higher order settlements of Leixlip, Maynooth, Naas and Sallins. These submissions consider that additional growth should be assigned to the higher order settlements in lieu of Villages and Rural Settlements. These matters have been comprehensively addressed in the Chief Executive's Responses to PMA No. 1 and PMA No. 2 above.

Submission No. 35 seeks to extend the additional housing provision horizon from the end of the Plan period to 2038 and incorporate an associated housing allocation for Sallins for this period using the proportional distribution of Table 2.8 of the County Development Plan. In response, such a material alteration cannot be considered at this stage of the variation process. In addition, the Planning Authority remains firmly of the view that the distribution of longer-term housing growth to settlements (other than identified strategic sites), significantly beyond the Plan period is most appropriately addressed in the upcoming County Development Plan review. This allows for a holistic and multifaceted examination of all settlements in the county to enable the creation of a development and growth strategy over a much longer

timeframe. The assertion that the additional growth allocations provided by Variation No. 3 would materially alter the settlement hierarchy is not accepted. The distribution of additional growth maintains the primacy of higher order settlements to appropriately address settlement consolidation and sustainable transport, while seeking to ensure continuation of housing supply on strategic sites together with existing and anticipated future zoned lands. It is considered that the distribution of the additional housing requirement throughout the settlements of Kildare accords with the preferred development strategy and hierarchy of the CDP, providing for significant additional growth to the Key and Self-Sustaining Growth Towns of the County, together with appropriate levels of growth to other settlement categories.

The request in **Submission 044** to amend footnote 16 of Table 2.8B in order to accord with the submissions recommended alterations to PMA No. 1 is not accepted considering the Chief Executive's response to PMA No. 1 above.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 3 should be adopted by the elected members with the following minor modifications.

Incorporate the following minor modifications to the footnotes of Table 2.8B as follows:

¹⁷Whilst ~~1,294~~ 543 residential units are allocated to the Northwest Quadrant in Naas in this Variation, it is indicatively estimated that approximately 4,000 new homes will be delivered at full build out of the Masterplan lands. Further additional units will be allocated through a further variation process to integrate the Masterplan into the CDP, and if required also ~~or~~ through the next County Development Plan and potentially detailed through the Urban Development Zone (UDZ) process under the Planning and Development Act 2024.

¹⁸This allocation of ~~1,111~~ 611 units equates to the combined delivery of Phases 1A, 1B and 2 of the indicative phasing of the Confey Masterplan, as per Variation No. 1 of the Leixlip LAP 2020-2023 (as extended). In addition to Tables 2.8, 2.8A and 2.8B, further housing may be allocated to Confey through a further variation process and/or through the UDZ process in due course subject to the delivery of DART + West and Transport Orientated Development.

Proposed Material Alteration No. 5

Sub Ref No:	005
Name:	Neville Homes Limited
Summary of Issues Raised:	
<p>The submission supports the plan-led response to revised national housing growth requirements, the allocation of additional growth to key towns (including Sallins), the inclusion of Objective CS O33 and the stated objective of continuity in housing supply. The submission notes that the measures in the Variation are consistent with national policy direction and Housing for All objectives.</p> <p>However, the submission requests the following clarifications regarding Sallins:</p> <ul style="list-style-type: none"> • That statutory spatial clarity be provided through the insertion of a zoning map into Volume 2 or the provision of transitional guidance confirming the planning status of lands within the settlement boundary pending the adoption of the Settlement Plan. States that the absence of an adopted zoning map should not operate as a barrier to housing delivery • The Proposed Material Alterations (PMAs) confirm that serviced and serviceable lands within the defined settlement boundary may proceed notwithstanding Settlement Plan preparation. <p>Submits that without the clarifications requested regarding Sallins, there is a material risk that the absence of zoning clarity and the pending Settlement Plan could result in an unintended delay in housing delivery during 2026 until the Settlement Plan is adopted and in force. States that this would be inconsistent with Housing for All objectives, the Housing Supply Target Methodology, the Compact Settlement Guidelines and the stated purpose of the PMAs.</p> <p>In this regard, the submission states that such further refinement would ensure policy clarity and alignment with national housing activation objectives, noting the following:</p> <ul style="list-style-type: none"> • The focus of the Proposed Material Alterations should be to enable the delivery of the 500 dwellings for Sallins (Table 2.8A refers), noting that no lands are spatially identified as capable of delivering the allocation, the zoning status is TBD (with no zoning map in the Development Plan) and a settlement plan is proposed under Objective CS O31 for the town. While planning applications may continue to be made and determined, additional spatial clarity within the PMAs would assist in supporting the effective implementation and timely delivery of the 500-unit allocation. • Section 10A of the Planning and Development Act 2000 requires the Core Strategy to demonstrate consistency between housing growth and land use planning. States that further spatial expression in the PMAs would provide clarity as to how growth is to be accommodated, align infrastructure planning with housing delivery and support consistent decision making through development management. The refinements would enhance the practical operation of the PMAs while maintaining commitment to housing delivery in Sallins. • The national policy direction under Housing for All and the updated Housing Supply Target Methodology emphasises accelerated housing delivery, the 	

activation of serviced/serviceable lands and the avoidance of artificial phasing constraints. The Sustainable Residential Development and Compact Settlement Guidelines (2024) reinforce that development within established settlements should be facilitated, the efficient use of lands within built-up footprints and that artificial barriers to delivery should be avoided where infrastructure capacity exists. In addition, the Guidelines emphasise deliverability and compact consolidation rather than sequencing delay.

Having regard to the provisions of Objective CS O34, the submission states that it is important that this objective operates proportionately, remains impact based and does not unduly restrict housing delivery. Accordingly, the submission requests that CS O34 clarify that:

- Infrastructure requirements must be proportionate to the scale and impact of the development
- Development shall not be required to remedy historic or strategic infrastructure deficits unrelated to the scheme
- Statutory Section 48 and 49 contribution schemes remain the primary mechanisms for funding wider infrastructure
- The objective should not operate to defer housing delivery where infrastructure capacity exists.

The submission considers that there is a risk that CS O34 could undermine the housing delivery objectives of the Proposed Material Alterations without the above clarifications.

Sub Ref No:	035
Name:	T.D Housing Limited
Summary of Issues Raised:	
<p>The submission reiterates that the forthcoming Settlement Plan for Sallins should be formulated based on a higher housing target for the settlement and that regard should be had to the Draft Settlement Plan as soon as it is published, rather than an expired LAP taking precedence. The submission also seeks that additional text (in <i>italics amber</i>) be included in CS O33 to be consistent with the additional text sought for PMA 1, as follows:</p> <p><i>‘Ensure continuity and facilitate housing delivery across all settlements through the favourable consideration of proposals for housing on lands which have the benefit of a residential zoning (“B” or “C” in relevant land use zoning maps and Settlement Expansion lands), or had the benefit of a lapsed zoning (residential or otherwise), where it can be demonstrated to the satisfaction of the Planning Authority that the lands are readily serviced or serviceable through existing infrastructure or upgrades to infrastructure as part of any application on the lands and where the proposal addresses the delivery of affordable housing and any identified social infrastructure deficit in the respective settlement in accordance with Objectives SC O15 and SC O17 of this Plan.’</i></p> <p>Noting settlements with expired zoning plans (such as Sallins), the effect of this additional text would be to give consideration principally to formerly zoned lands, including those lands previously identified for purposes other than purely residential. Pending the adoption of settlement plans, this interim measure would be a proportionate response.</p>	

Related to the above, the submission states that the substantial change in housing target from 9,144 to 16,970 as outlined in Proposed Non-Material Change No. 1 must be supported by the requisite updates elsewhere as set out in the submission in terms of settlement targets and releasing lands where possible pending the adoption of settlement plans.

Sub Ref No:	036
Name:	Celbridge Community Council
Summary of Issues Raised:	
<p>This submission on behalf of the Celbridge Community Council notes the role of the organisation as a voluntary community group. It welcomes the Council's commitment to include a Social Infrastructure Audit in the upcoming Celbridge Settlement Plan and proposes that this commitment is more explicitly called out in the proposed material changes to Objective CS O31.</p> <p>The submission notes ambiguity in the County Development Plan (Objective TM A2) around the methodology for formulating a transport plan for Celbridge as there is no mention of self-sustaining towns, which Celbridge is designated as. The submission acknowledges that TM A2 falls outside the scope of this consultation but notes an opportunity to address the gap in CS O31. The submission recommends adding additional text to Objective CS O31, as shown in bold orange font:</p> <p><i>Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared and integrated into the County Development Plan by way of statutory variation, including the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced lands to be informed by infrastructural and environmental assessments, including, but not limited to, a Social Infrastructure Audit and an Area-Based Transport Assessment.</i></p> <p>The submission welcomes that the proposed material alterations did not include any additional sites beyond Ballyoulster and Simmonstown and no further increase beyond target of 37 dwellings per hectare.</p>	

Sub Ref No:	041
Name:	Cairn Homes Properties Ltd.
Summary of Issues Raised:	
<p>The submission seeks the following additional text (shown in bold underlined purple) for CS O31 in PMA No. 5 for clarity and consistency regarding the preparation of a settlement plan for Celbridge:</p> <p><i>CS O31 Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to</i></p>	

the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared in 2026 for Celbridge and subsequently 2027 for Clane (with timelines regarding their preparation to be issued publicly by the planning authority as soon as practicable), and integrated into the County Development Plan by way of a statutory variation, including the additional housing growth requirement included in Table 2.8 and 2.8A on serviced lands to be informed by infrastructural and environmental assessments.

The submission considers that Celbridge should be prioritised in the short term as there are lands that can deliver much needed housing.

Sub Ref No:	044
Name:	Ballymore Group
Summary of Issues Raised:	
The submission requests that CS O32 be amended as follows (with new text in <i>red italics</i>):	
Initiate the process for the designation of candidate Urban Development Zones (UDZ), in accordance with the provisions of the Planning and Development Act 2024 (once commenced), at the following locations as included in Table 2.8B:	
<ul style="list-style-type: none"> i. Northwest Quadrant, Naas as identified in Map V3-2.5, and ii. Confey, Leixlip as identified in Map V3-2.6. 	
Prior to the initiation of the UDZ process a <i>Variation of the Naas LAP will be brought forward to integrate the Northwest Quadrant Masterplan into the plan under S81(6) of the Act and the period for which the Leixlip LAP will continue in force will be extended under S81(2) of the Act.</i>	

Sub Ref No:	049
Name:	Aravonian Limited
Summary of Issues Raised:	
The submission supports the proposed changes to CS O32 as they clarify that the NWQ Masterplan will be brought forward prior to the UDZ process, allowing planning applications to come forward which are not contingent on the UDZ designation.	

Sub Ref No:	050
Name:	Glenveagh Homes Ltd.
Summary of Issues Raised:	
The submission requests the inclusion of additional text to Objective CS O31 which clarifies that settlement plans will be prepared for Celbridge in 2026, Clane in 2027 and integrated into the CDP by way of statutory variation, as follows (additional text in <i><u>bold underlined purple</u></i>):	
<i>CS O31 Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to</i>	

the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared in 2026 for Celbridge and subsequently 2027 for Clane, and integrated into the County Development Plan by way of a statutory variation, including the additional housing growth requirement included in Table 2.8 and 2.8A on serviced lands to be informed by infrastructural and environmental assessments.

It further states that Celbridge should be prioritised in the short term, specifically the subject lands at Kiladoon which can deliver much needed housing.

The submission also requests the inclusion of additional text to Objective CS O32 to provide more certainty that the NWQ Masterplan be incorporated into the current Kildare CDP by variation as a matter of priority (additional text in **bold underlined purple**), as follows:

CS O32: Initiate the process for the designation of candidate Urban Development Zones (UDZ), in accordance with the provisions of the Planning and Development Act 2024 (once commenced), at the following locations as included in Table 2.8B:

- 1. Northwest Quadrant, Naas as identified in Map V3-2.5, and*
- 2. Confey, Leixlip as identified in Map V3-2.6.*

~~Prior to the initiation of the UDZ process, On completion of the Northwest Quadrant Masterplan, a County Development Plan Variation may will be brought forward to integrate the Northwest Quadrant Masterplan, related zoning provisions and objectives into Volume 2 the County Development Plan in 2026, as soon as practicable, prior to the commencement of the UDZ process.~~

~~A subsequent Prior to the initiation of the UDZ process, a County Development Plan Variation will be brought forward to integrate the Confey Masterplan, related zoning provisions and objectives into Volume 2 of the County Development Plan in 2026 to safeguard the planning framework for Confey providing continuity between the current Local Area Plan and the future UDZ process.~~

Chief Executive's Response

The contents of the submissions are noted.

Submission Nos. 41 and 50 request minor modifications to proposed Objective CS O31, seeking clarification that settlement plans for Clane and Celbridge will be prepared in 2026 and 2027 respectively. In this regard, the Chief Executive's response to the OPR and LDA submissions (Section 3.1 and Section 4.10 refer) provide updates in relation to the Council's ambitious delivery programme for Settlement Plans and other variations. The PMAs provide sufficient clarity and commitment to the delivery of settlement plans and variations over the lifetime of the County Development Plan (CDP). It would be remiss of the Council to provide any further undertakings regarding Settlement Plans or commit to more specific time schedules given the ambitious nature of the stated work programme, its delivery commitments and the limited available resources of the Planning Department.

The request in **Submission 036** for a more explicit commitment in Objective CS O31 to prepare Social Infrastructure Audits and Area Based Transport Assessments for a

number of settlement plans (including Celbridge) in 2026/2027 is accepted. Whilst it is noted that Objective CS O20 of the CDP provides for the preparation of at Local Transport Plan, Settlement Capacity Audit and Social Infrastructure Audit for each local area plan (i.e. Settlement Plans), it is considered appropriate that Objective CS O31 be amended to include the requirement to prepare the evidence-based supporting documentation deemed necessary by the Planning Authority, noting that these are undertaken as a matter of course as part of the preparation of Settlement Plans for the county.

While **Submission No. 049** is supportive of the current wording of CS O32, **Submission No. 044** seeks to change the text of the objective to refer to the recently commenced provisions of Section 81 of the Planning and Development Act 2024 (as amended) and:

- Extend the lifetime of the Leixlip LAP (including with its current Confey masterplan provisions) to coincide with the County Development Plan and
- Provide for a variation to the Naas LAP to integrate the Northwest Quadrant as opposed to integrating it into the CDP.

Regarding the Leixlip LAP, it has been previously noted that the lifetime of this LAP was recently extended to coincide with the lifetime of the CDP. This extension has been provided to ensure clarity for the short-term development of the Confey Masterplan lands. Regarding the Naas Northwest Quadrant, it is noted that the masterplan and associated variation is at an advanced stage of preparation and is anticipated to be published in Q2 2026. These actions are considered to form part of the preparatory stages to designating both Confey and the NWQ as candidate Urban Development Zones under Part 22 of the Planning and Development Act 2024 (as amended). Notwithstanding that the requested alterations may not constitute minor modifications for this stage of the Variation process; no change is recommended for the considerations detailed above.

Having regard to the anticipated publication of the Northwest Quadrant Masterplan in the immediate term, the request in **Submission No. 050** to amend proposed Objective CS O32 to provide for the publication of the masterplan is not considered necessary.

The assertion in **Submission No. 005** that there is an absence of zoning clarity regarding the status of LAPs (including existing Land Use Zoning provisions) and pending Settlement Plans which could result in an unintended delay in housing delivery during 2026 is not accepted. The PMAs, together with minor modifications provided in response to the OPR submission (refer to Section 3.1 above), ensure that the additional housing allocations contained in Table 2.8A are applicable to the development of all remaining appropriately zoned and serviced/serviceable lands in the identified settlements in Kildare. PMA No. 1 also definitively outlines that development proposals will have regard to all relevant provisions (including land use zoning but excluding Core Strategy allocations contained therein) of expired Local Area Plans, until such a time as they are replaced, revoked or integrated into the County Development Plan. National and regional policy regarding housing delivery and growth does not obviate the need to ensure that development occurs in a planned and sustainable manner, underpinned by public consultation and settlement specific considerations. Regarding Sallins, the preparation of a new Settlement Plan

and its accompanying zoning map is at an advanced stage and is anticipated to be published in Q2 2026, in accordance with proposed Objective CS O31. Accordingly, the request to insert a zoning map into Proposed Variation No. 3 is not accepted, notwithstanding that such an insertion would not constitute a minor modification to a PMA.

In consideration of the above, the request by **Submission No. 035** for minor alterations to proposed Objective CS O33 to enable consideration of residential development proposals on non-residential zoned lands (such as educational / community use zonings) in expired LAPs such as Sallins is also not accepted.

The contention in **Submission No. 035** that the substantial change in housing target from 9,144 to 16,970 must be supported by the requisite updates elsewhere are noted. It is considered that the provisions of Proposed Variation No. 3 and the relevant Proposed Material Alterations addresses this fully.

Submission No. 005 also requests that Objective CS O34 be amended to clarify that the social infrastructure requirements for residential development:

- Will be proportionate to the scale and impact of the residential development;
- Will not be required to remedy historic or strategic infrastructure deficits that are unrelated in the scheme;
- Will not operate to defer housing delivery where infrastructure capacity exists, with Section 48 and 49 contributions as the primary mechanism for funding wider infrastructure.

For clarity, proposed Objective CS O34 refers to and reinforces certain existing objectives (SC O15 and SC O17) and supersedes Objective CS O16 of the County Development Plan regarding the provision of social/community infrastructure in tandem with residential development by requiring that:

- A Social Infrastructure Audit (prepared in accordance with SC O17) accompany planning applications for residential development on appropriately zoned lands in all instances (as opposed to developments for 20 or more units referred to in CS O16 in the current CDP).
- That commensurate and pro-rata social infrastructure is proposed and delivered in tandem with the provision of new housing, with SC O15 requiring the provision of community facilities in new communities in tandem with new housing on a phased basis. SC O15 also provides that:
 - The frontloading of certain community infrastructure may be required where deficiencies are identified in Social Infrastructure Audits accompanying the application.
 - Applications for new housing developments may not be favourably considered where inadequate measures are proposed in a scheme to address identified shortfalls in social infrastructure.

Proposed Objective CS O34 also references Section 86(7) of the Planning and Development Act 2024 (as amended), which states that:

“Neither a planning authority nor the Commission shall refuse permission for proposed development for the reason only that the housing growth target

included in the housing development strategy in respect of the settlement (within the meaning of Part 3) concerned has already been reached.”

Accordingly, this new objective supplements existing County Development Plan objectives for addressing community/social infrastructure deficiencies (historic or other), in part, through measures contained in housing development proposals. This framework, in addition to contribution schemes, was provided in the County Development Plan in recognition of the critical role of social/community infrastructure in the creation of successful, sustainable and integrated communities. In addition, the requirement for commensurate and pro-rata social infrastructure delivery ensures proportionality in relation to the scale and impact of new development.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 5 should be adopted** by the elected members with the following minor modifications.

Incorporate further minor modifications to Objective CS O31, as follows:

Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared and integrated into the County Development Plan by way of a statutory variation, including the additional housing growth requirement included in Table 2.8 and 2.8A on serviced lands to be informed by infrastructural and environmental assessments, together with other supporting documents (including a Social Infrastructure Audit and an Area-Based Transport Assessment / Local Transport Plan) as appropriate.

Proposed Material Alteration No. 6

Sub Ref No:	035
Name:	T.D Housing Limited
Summary of Issues Raised: Welcomes the contents of the PMA noting that it could be easily applicable to the subject site at Church Avenue, Sallins.	

Chief Executive's Response

The contents of the submission are noted.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 6 should be adopted** by the elected members, subject to minor modifications detailed in the Chief Executive's recommendation to the OPR submission (Section 3.1 above).

Proposed Material Alteration No. 8

Sub Ref No:	044
Name:	Ballymore Group
Summary of Issues Raised:	
The submission requests that the bullet point regarding SuDS in Proposed Material Alteration No. 8 be replaced with the following text (in <i>red italics</i>) to reflect policy set out in the Council's guidance document published in December 2024:	
<ul style="list-style-type: none"><i>Sustainable Urban Drainage Systems (SuDS) are recognised for their potential to contribute in a significant and positive way to the design and quality of open space. They provide a holistic approach to surface water management, offering significant environmental, social, and economic benefits beyond simple flood control. The Council will encourage all open space to have a role in surface water management and the promotion of biodiversity, from a single tree pit to large kickabout spaces and open parkland. High quality landscaping that integrates surface water management with active and passive recreation and maximises biodiversity through the creation of a range of habitats will be encouraged. The Planning Authority will have regard to Kildare Council's Sustainable Urban Drainage Systems Guidance Document (December 2024) and DMURS Advice Note 5: Roads and Streets Drainage using Nature Based Solutions (June 2023) in assessing planning applications.</i>	

Chief Executive's Response

The contents of the submission are noted. Having regard to the content of relevant national policy and guidance regarding nature-based solutions together with the Kildare County Council Sustainable Urban Drainage Systems Guidance Document (December 2024), it is considered necessary to incorporate minor modifications and clarifications to PMA No. 8 as per the Chief Executive's recommendation below. The minor modifications ensure that sufficient consideration will be given to developments which incorporate high quality proposals to integrate appropriate nature-based solutions in a sustainable manner.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 8 should be adopted** by the elected members with the following minor modifications.

- SuDS are ~~not generally acceptable as a form of public open space provision, except where they recognised for their potential to~~ contribute in a significant and positive way to the design and quality of open spaces. *In applications where the Council considers that this is the case, in-general a maximum of generally 10% of the open space provision shall may be taken up by SuDS, subject to agreement with the planning authority and in consideration of Where proposals include an excess of 10%, the planning authority may consider same where it is clearly demonstrated that the proposals have regard to the relevant Council guidance document(s) having regard to the*

characteristics of the development and surrounding area; and the overall quality, quantum and multi-functionality of the open space proposed.

Proposed Material Alteration No. 11

21 submissions were received in relation to Proposed Material Alteration No. 11, all of which oppose the amendment of the existing text of Objective BI O26 on the protection of hedgerows with the alternative wording as proposed in the Material Alteration. The submissions received to PMA No. 11 come from a wide range of stakeholders including community organisations, Elected Members, political parties, environmental groups and charities, in addition to private individuals.

Sub. No.	Name
002	Paul Barry
007	Marese Hickey
015	An Taisce – The National Trust for Ireland (Section 4.6 also refers)
020	Lullymore Heritage and Discovery Park
023	Kildare Bat Group
025	Rathangan Tidy Towns
027	Margaret Stapleton
028	Janet Buckley
029	Karen Tyrrell
030	Kildare Bat Group
032	Birdwatch Ireland (Kildare Branch)

Sub. No.	Name
034	Kildare Green Party
038	Friends of the Irish Environment
043	Cllr Pádraig McEvoy
045	Cllr Mark Leigh and Labour Party colleagues
046	Lorraine Benson
052	Bridget Loughlin
054	Maynooth Tidy Towns
055	Brian McElvaney
056	Evonne Boland
058	Vanessa Mack

A summary of each submission is included in Appendix B for reference.

The issues raised in the submissions received opposed to the Proposed Material Alteration are, as follows:

- Diminution and Weakening of Hedgerow Protection:** The submissions highlight that the proposed changes in wording of the objective will result in the material weakening of hedgerow conservation policy in Kildare, diluting protection and lowering standards; making it easier to justify hedgerow removals without strong evidence. Notes the adverse consequences this will have for wildlife that depends on hedgerows for shelter, nests/roosts, food and connectivity. Further notes that the new objective will give rise to many small scale removals which is the principal mechanism through which hedgerow networks typically decline. Many submissions contend that the wording of the current objective is stronger and clearer. The proposed change from '*Prevent*' to '*Avoid*' in the objective is concerning as '*prevent*' is clear and '*avoid*' is open to interpretation. Submissions also note that the omission of the requirement for hedgerow removal to be '*kept to an absolute minimum*' raises further concerns about the scale of removal that

could be facilitated, weakening Council's ability to resist cumulative incremental loss. Submissions also note that the removal of wording '*may result in an outright refusal*' will further weaken the protections in place for hedgerows during the planning process. States change also removes a deterrent against hedgerow clearance prior to application stage and reduces the ability of the planning authority to properly evaluate the ecological value of hedgerows on a site and wider landscape level.

- **Provisions on Replacement Hedgerows:** The proposed revised wording lowers the standard for replacement planting. Several submissions note that the current wording requires replacement hedges of similar length and composition, which helps maintain the ecological value of what was lost. Notes it weakens biodiversity mitigation standards and the ecological function of mature hedgerows in particular. The wording of the proposed objective where replacement/offsetting measures suggests that attempting to replicate the diversity of a hedgerow is optional rather than mandatory and will result in a net loss of biodiversity. Many state that the proposed revised wording drops the reference to species of a local provenance, which could lead to poorer-quality replacements. States this is not in line with best practise for farmers participating in the ACRES and Teagasc's BISS schemes. Also notes the lack of provision for post-planting monitoring.
- **Biodiversity and Climate Change:** Proposal is shortsighted and irresponsible given the current biodiversity and climate emergency and outlines the vital role of hedgerows play in protecting biodiversity (ecosystem services, pollinator sustenance, soil health, pollution absorption and wildlife habitat), sequestering carbon and providing climate resilience (flood protection). Notes that international research shows biodiversity loss is a material risk the consequences of which are practical, cumulative and costly rather than abstract or sentimental. Outlines the outsized function of hedgerows in Ireland compared to European countries due to the low level of tree cover. Notes their importance for species including bats, bees and birds as both habitats and critical wildlife corridors connecting SACs, SPAs and NHAs. States that 63% of regularly occurring Irish birds are now of conservation concern with 26% red listed. Notes that some bat species will not cross hedgerow gaps greater than 10-50 metres and accordingly, hedgerow removal can be fatal to some species.
- **Status of Kildare's Hedgerows:** Many submissions refer to the County Kildare Hedgerow Appraisal Survey (2022) which found that 9.6 km of hedgerow has been removed over a 16-year period since 2006, representing an annual removal rate of 0.5% which is almost 5 times the national average and much higher than the EPA estimate of between 0.16% and 0.3%. Also notes that 19.2% of hedgerow in the county no longer link to other semi-natural habitats.
- **Landscape Character and Heritage:** Submissions note the unique and prominent contribution that hedgerows play in defining the landscape, heritage and character of rural County Kildare.
- **International Conventions and European, National, Regional, County and Local Policy:** Contends that proposed objective runs contrary to international, EU, and national commitments on nature protection/restoration and climate action. States that it is also contrary to national legislation, policy frameworks (including the Revised NPF and Ireland's 4th National Biodiversity Action Plan 2023-2030) and provisions at all levels of the plan hierarchy (including the RSES) which have moved towards stronger biodiversity protection and climate action in recent years. Submissions reference Article 10 of the Habitats Directive which

recognises hedgerows as important for migration and dispersal of species across the wider countryside. Further references are made to Kildare County Council's decision to declare a Climate and Biodiversity Emergency in 2019, highlighting the Council's decision to join the EU Covenant of Mayors for Climate and Energy in September 2019. A number of submissions reference the provisions of various sections, policies and objectives of the County Development Plan (CDP) which note the importance of hedgerows as an environmental asset and a key stepping-stone habitat.

- **Strategic Environmental Assessment (SEA):** Outlines concerns with the proposal in terms of SEA. Notes the SEA Screening Addendum Report for the PMAs concludes that this alteration does not significantly alter the meaning or context of the objective. The basis for this conclusion is not clearly explained having regard to the nature of the proposed changes. States an SEA requires consideration of the cumulative and indirect environmental effects which occur incrementally over time through plan-led policy decisions rather than single development proposals. States that for hedgerows, such implications may arise through the removal of a deterrence against pre-application clearance, cumulative incremental removal/loss due to individual development proposals, progressive fragmentation of the hedgerow network which weakens ecological connectivity and coherence. As survey evidence in Kildare demonstrates measurable loss, simplification and fragmentation, the strength of the existing objective forms an important component in the plan-led framework for which such pressures are managed. Considers that the amendment would alter the operative decision-making framework governing hedgerow removal. States that clarification on how the environmental implications of the weakening of Objective BI O26 were considered and evaluated would assist in demonstrating the robustness of the SEA screening process and the conclusion that the alteration is not likely to give rise to significant environmental effects. Submissions contend that changes to environmental policy are normally considered at the development plan review stage supported by comprehensive environmental assessment.
- **Rationale for the Proposed Amendment:** Highlights that the proposed amendment is discretionary in nature, not required by national policy and not related to Proposed Variation No. 3, the central purpose of which seeks to implement the Housing Growth Requirements Guidelines. One submission questions why public representatives are not making every effort to protect biodiversity and natural habitats, rather than proposing to further erode them. Reference in another submission made to the current housing crisis. States that housing delivery and biodiversity should not be competing priorities with conflicting agendas. Contends that removal of mature hedgerows in housing developments can create long term environmental issues including flood risk, reduced amenity, poor environmental quality and infrastructure costs.
- **Importance of Existing Objective GI O26:** Notes that there is currently a gap in protection of Ireland's hedgerows (other than for large scale removal which requires an Environmental Impact Assessment) noting the importance of the current wording of Objective BI O26 in the CDP which provides for a retention first policy to manage the continuing loss and fragmentation of the hedgerow network in the county.
- **Request for Stronger Hedgerow Protection Policy:** Many submissions request that the wording of current Objective GI O26 should be at the very least retained, and strong consideration be given to strengthen hedgerow protection in the

county, including for private and large-scale housing development schemes. This is in light of biodiversity indicators continuing to trend downwards since the publication of the CDP. A number of submissions suggest a range of targeted policy measures that could be implemented.

Chief Executive's Response

Ireland has been denuded of virtually all native woodland (with just ~2% coverage remaining) over recent decades. In comparison to other European Countries, Ireland has a very small proportion of land under forestry (the average land cover under forestry in the EU is 35%) at approximately 11%. The majority of this is comprised of monoculture coniferous plantations. The hedgerow network in Ireland goes some way to counter for the historical loss and absence of woodland however, native hedgerows are of vital importance to the ecological health and special character of our landscape.

Established hedgerows are uniquely important as many are derived from old and ancient plant stock. These lineages evolved over time, adapted to the local soils, and the regional climatic and environmental conditions that prevail in northwest Europe. These old relics of woodland and ancient assemblages of plants are irreplaceable with respect to any measure of biodiversity; be it a genetic, a species or a community level. It is scientifically impossible to remove long established hedgerows and not lose biodiversity. There is no biological substitute for the removal of long-established trees (e.g. through substitute planting); the soil, fungal, primitive and vascular plant communities, and associated invertebrates, bird, reptile, amphibian and mammal communities, that have evolved over eons and survive along, in and around these linear habitats are complex and rich in variety and would take decades to re-establish (*if they can at all*).

From a biodiversity perspective native hedgerows thus need to receive a comprehensive level of protection. Furthermore, the delivery of much needed new housing and the retention of our county's finite network of hedgerows are not considered to be mutually exclusive objectives. The protection and integration of hedgerows into new residential development has been shown to be possible in Kildare through good and responsive design, layout and planning (e.g. within newer developments along Nancy's Lane in Clane, and at Mariavilla, Maynooth).

In addition to the issues outlined above, it is considered that Proposed Material Alteration No. 11, if adopted, would militate against the provisions of both existing and proposed planning policy of the county. For example, inconsistencies are evident between the wording of the PMA and a range of other policies and objectives of the County Development Plan (CDP) relating to hedgerow protection, including HO P32, BI P6, HO O51, HO O52, HO O53 and TM O102.

Having regard to the above, it is considered that if the PMA was adopted it would result in a situation where there would be a fundamental lack of clarity relating to its implementation vis-à-vis competing policy provisions of the CDP. This would cause confusion for the applicant/developer.

In relation to Strategic Environmental Assessment and the proposed amendment to Objective BI O26, please refer to the Arup response to submission No. 044 contained in Appendix A of this Report. This response highlights that while the revised objective softens the wording of certain elements of the objective, it is not considered that these changes would give rise to likely significant negative environmental effects within the meaning of the SEA Regulations.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 11 should not be adopted** by the Elected Members.

Proposed Material Alteration No. 12

Sub Ref No:	014
Name:	Castledermot GAA Club
Summary of Issues Raised:	
The submission by Dooley Cummins Architects + Engineers on behalf of Castledermot GAA seeks to extend the proposed new residential land use zoning (C*) in Castledermot provided by Map Ref. V2_PMA 12 in Proposed Material Alteration No. 12, requesting that the C* map be amended to correspond to the folio (KE4318) for the Castledermot GAA Club outlined in red below.	
The submission outlines that the area proposed to be rezoned to C* in yellow outline on Map Ref. V2_PMA 12 does not correspond exactly to the folio of the existing site of the Castledermot GAA Club, noting that the yellow line bisects the exiting GAA Club building on the western side of the site and with the northeastern corner chamfered. The submission states that the reasoning for this proposed boundary between the 'C*' and 'F' land use zonings is not apparent.	

Chief Executive's Response

The contents of the submission are acknowledged. It should be noted that the rationale behind the proposed land use zoning designations of C*: New Residential and F: Open Space for the lands comprising the existing site of Castledermot GAA Club is based on the results of a Strategic Flood Risk Assessment (SFRA) which was carried out on the lands as part of the Proposed Material Alterations stage of the Variation process.

The SFRA which was published alongside the Proposed Material Alterations document found that a small portion of the subject site lay within Flood Zone A (CFRAM Fluvial 1% AEP Current) and Flood Zone B (CFRAM Fluvial 0.1% AEP Current). Under the Planning System and Flood Risk Management Guidelines (2009) such lands cannot accommodate a highly vulnerable use such as residential development. Accordingly, an F: Open Space and Amenity land use zoning designation was applied to the areas of the site which were located within Flood Zones A and B. For further information please refer to pages 5-6 of the Strategic Flood Risk Assessment for Proposed Variation No. 3 on the Council's public consultation website (<https://consult.kildarecoco.ie/>).

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 12 should be adopted** by the Elected Members subject to minor modifications, as outlined in the Chief Executive's recommendation to the submission by the Office of the Planning Regulator in Section 3.1 above.

Proposed Material Alteration No. 22

Sub Ref No:	026
Name:	David Fraser
Summary of Issues Raised:	
This submission is on behalf of the Fraser family, who own lands in Kilmeague village. The submission is in favour of the proposal to amend the Kilmeague Land Use Zoning Map (Map Ref. V2-3.11) to insert a new C: New Residential zoning on lands outlined in solid yellow line on map and denoted by "C" in red text on map.	

Chief Executive's Response

The contents of the submission are noted.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 22 should be adopted** by the Elected Members.

Proposed Material Alteration No. 29

Sub Ref No:	021
Name:	Summix NK Developments Limited
Summary of Issues Raised:	
The submission by Thornton O'Connor Town Planning on behalf of landowners Summix NKK Developments Limited relates to Proposed Material Alteration No. 29 relating to the rezoning of lands at Nicholastown, Kilcullen from 'SR: Strategic Reserve' to 'C: New Residential'.	
The submission welcomes the zoning change and requests that it is adopted by the Council. The submission outlines multiple benefits associated with the zoning change, including:	
<ul style="list-style-type: none"> • the creation of a single bank of 'ready to go land' for residential development which can deliver housing in an expeditious manner due to its coherent shape and single-party ownership. • Increased residential population will generate enhanced critical mass to sustain existing businesses/services and to encourage the establishment of new additions in the settlement. • The zoning will facilitate the extended delivery of the existing road objective along the southern and eastern sides of Kilcullen. 	
The submission highlights that the intention to secure residential zoning and delivery of housing on site is evidenced by their submission at initial consultation stage of Variation No. 3, the appointment of a design team, the preparation of a	

preliminary site masterplan and their request for Section 247 pre-planning consultation with the Council.

Chief Executive's Response

The contents of the submission are noted.

Chief Executive's Recommendation

It is recommended that **Proposed Material Alteration No. 29 should be adopted** by the Elected Members.

6 Submissions Relating to Environmental Assessments

This section of the report groups the submissions or observations received in respect of the environmental reports which accompanied the Proposed Material Alterations. The Chief Executive's response and recommendation are provided in respect of the issues raised.

Issue: Strategic Environmental Assessment and Appropriate Assessment Screening Reports

Sub Ref No:	001
Name:	Conor Morgan
Summary of Issues Raised:	
<p>The submission asserts that the conclusions reached in the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening reports and associated determinations for the Proposed Material Alterations to Proposed Variation No. 3 are flawed in law and planning practice for the following reasons:</p>	
<ol style="list-style-type: none"> 1. The alterations are not minor textual changes but material changes to development capacity, introducing: <ol style="list-style-type: none"> a. New residential and serviced site zonings, b. Changes to lands from open space / strategic reserve / non-development status to residential or settlement expansion lands, c. Amendments to settlement boundaries, d. Alterations to the settlement hierarchy (movement of locations from a rural node to a rural settlement), e. Introduction of additional lands into development frameworks across multiple settlements. 2. Failure to properly consider Indirect and In-combination effects (AA Screening). It is stated that the AA Screening Determination heavily relies on the assertion that no direct pathway for impact exists to any Natura 2000 site and that future development will be assessed at project stage. This approach is considered to be inconsistent with EU case law. Where a plan itself enables additional development capacity, the potential effects on water bodies, wastewater loading, surface water runoff, river catchments and downstream European sites must be assessed at plan stage and cannot be deferred to individual planning applications. <p>The alterations increase the population and development potential in multiple settlements. This necessarily increases pressure on water services and receiving water bodies, which ultimately connect to European sites. This represents a clear indirect pathway for impact. Furthermore, the screening does not adequately consider in-combination effects of multiple alterations across the county when assessed cumulatively.</p> 3. Interaction with flood risk and watercourses. Several alterations explicitly reference the need for site-specific flood risk assessments and the consideration of climate change flood extents. This indicates that lands being 	

brought into development frameworks interact with floodplains and watercourses, which represent established pathways to European sites. The acknowledgement of flood risk interaction undermines the conclusion that no pathway for impact exists.

4. SEA Screening – Likely Significant Environmental Effects. The SEA Addendum concludes that the alterations are not likely to have significant environmental effects. However, the alterations:
 - a. Expand development areas,
 - b. Increase residential zoning,
 - c. Affect greenfield lands,
 - d. Alter settlement structures,
 - e. Interact with flood risk areas,
 - f. Increase potential traffic, wastewater and surface water runoff.
 These are the type of plan changes that SEA is designed to assess, and it is difficult to reconcile these changes with a conclusion of “no likely significant environmental effects”.
5. Reliance on project stage assessment is not sufficient. Both screenings rely on the argument that impacts can be dealt with at project stage. This is not legally sufficient where the plan itself creates the development potential that gives rise to those impacts.

The submission concludes that the Proposed Material Alterations materially increase development capacity, create clear indirect pathways for environmental impact, fail to properly assess in-combination effects, interact with flood risk lands and watercourses, and meet the low legal threshold for both SEA and AA.

It is submitted that the determinations that full SEA and AA are not required are unsound, and that full SEA and AA should be undertaken prior to the adoption of these alterations.

Sub Ref No:	038
Name:	Friends of the Irish Environment
Summary of Issues Raised:	
<p>The submission notes that SEA provides a framework for evaluating the likely significant environmental effects of implementing plans and programmes before they are adopted, and that the objective of Directive 2001/42/EC is to ensure a high level of environmental protection and to integrate environmental considerations into the preparation and adoption of plans and programmes. It is considered that clear documentation of the reasoning underlying SEA screening documentation is necessary to:</p> <ul style="list-style-type: none"> • Demonstrate how environmental considerations have informed plan making and how the statutory environmental assessment framework has been applied during the preparation of the Proposed Material Alterations. • Assist in ensuring that the environmental implications of plan-making decisions can be understood by the public during the consultation process. 	

The submission outlines that having considered Proposed Variation No. 3 and the accompanying SEA Screening Report, the SEA Screening Addendum for the PMAs and the Members' Meeting Report, it is unclear how the screening determination demonstrates compliance with the requirements of Directive 2001/42/EC and Schedule 2A of the Planning and Development (Strategic Environmental Assessment) Regulations. It is considered that the documentation does not clearly demonstrate how the Schedule 2A criteria were applied to:

- The specific additional housing growth quantum in the variation,
- The spatial distribution of additional housing growth across the settlement hierarchy in the variation and
- The housing delivery/development mechanisms in the variation, including phase 2 land release, revised housing allocations in the settlement hierarchy, designation of strategic sites, Urban Development Zone pathways and Settlement Plan mechanisms.

The submission states that the screening documentation relies in part on the previous SEA of the adopted County Development Plan and considers that the existence of earlier environmental assessment at the Development Plan stage does not in itself demonstrate how the environmental implications of subsequent amendments or variations have been evaluated. In particular, it is outlined that the screening documentation does not clearly explain how the environmental implications associated with the following were assessed/evaluated in determining that the PMAs are not likely to give rise to significant environmental effects:

- The scale of the 2026 – 2028 housing uplift;
- The provisions for the release of Phase 2 residential lands;
- Settlement Plan mechanisms;
- Urban Development Zone pathways; and
- Changes to individual settlement allocations.

It is outlined that Article 4 of the SEA Directive requires that environmental assessment be undertaken during plan preparation and before its adoption. In this regard, it is stated that the SEA screening addendum appears to confirm the conclusions of the earlier SEA screening undertaken for the variation without clearly demonstrating how environmental implications of the PMAs were evaluated - having regard to the final form of the variation. In addition, it is stated that the Members' Meeting Report does not document how environmental implications (beyond reference to flood risk) informed the discussion of amendments and were considered prior to the finalisation of amendments.

Accordingly, to support transparency, it would assist if the screening record including concise explanations addressing:

- How the housing uplift and growth distribution were evaluated against Schedule 2A - including magnitude, spatial extent, likelihood and cumulative effects. It is considered that the integration of approximately 7,826 additional units distributed through various mechanisms is a significant adjustment to the housing framework for the remaining period of the Development Plan and has the potential to influence/affect the spatial distribution and timing of development across the settlement hierarchy, settlement growth patterns, transport demand, infrastructure demands and cumulative environmental effects. The screening documentation does not clearly explain how the

environmental implications associated with scale and distribution of additional housing growth were evaluated.

- How the additional housing growth allocation was considered in terms of potential transport related environmental effects across rail and non-rail served settlements.

The proposed material alterations introduce changes which may influence the spatial distribution of development across the county. SEA guidance recognises that spatial planning decisions may influence environmental outcomes through effects on transport demand, energy use and greenhouse gas emissions. In addition, Annex 1 of the SEA Directive identifies environmental receptors to be considered in environmental assessment including population, human health, air and climatic factors. Additional housing growth to settlements with differing levels of transport accessibility may also influence commuting patterns, transport volumes and transport emissions. It is considered that the screening documentation does not clearly demonstrate how spatial and transport related environmental pathways were evaluated in reaching the screening determination.

In addition, the submission notes the PMAs introduce provisions which may facilitate additional housing delivery in villages and rural settlements. Development Plans typically regulate the scale and pace of development in such settlements through growth thresholds, targets and development management criteria. Where these constraints are relaxed, development may occur primarily based on site availability rather than growth allocations and at locations not originally identified for growth in the Core Strategy framework. It is considered that the SEA screening documentation does not clearly explain how the environmental implications of relaxing these settlement growth constraints were evaluated.

- How the interaction between the revised housing allocations, Phase 2 land release provisions, Settlement Plan triggers, strategic site allocations and Urban Development Zone pathway mechanisms were considered collectively/cumulatively in assessing environmental implications. Where these mechanisms operate together, they may influence the pattern of housing delivery across the county. The SEA screening document does not clearly explain how the interaction between these mechanisms and the Core Strategy framework was considered when evaluating environmental implications.
- How environmental implications with settlement specific growth allocations were evaluated, including Clane. The position of Clane in the settlement hierarchy, its location outside the Dublin Metropolitan Area Strategic Plan area and the lack of servicing by rail based transport is noted. As the town is served by road networks (including the N4 corridor), commuting from Clane is predominantly road based. Additional housing in the town may therefore influence regional commuting patterns, traffic volumes on the strategic road network and transport emissions. The submission notes that the PMAs appear to rely on land identified within the Clane LAP 2017 – 2023 which predates the RSES (2019) and the current County Development Plan 2023 – 2029. The

RSES introduced updated spatial planning objectives intended to address development pressures and commuting patterns in the wider Dublin region. Accordingly, zoning capacity identified in the Clane LAP raises the question of whether the environmental implications of additional housing delivery in Clane have been considered in the updated spatial planning framework. The screening documentation does not clearly explain how the environmental implications associated with this settlement-specific growth allocation were evaluated.

- What environmental considerations such as transport demand, climate implications and cumulative effects were taken into account during the formulation of the PMAs. When considered collectively, the mechanisms introduced to facilitate housing delivery may influence the scale of housing delivery, the timing of development and the spatial distribution of settlement growth. The SEA Directive requires screening determinations to consider secondary, cumulative and synergistic environmental effects. The screening documentation does not clearly demonstrate how cumulative environmental implications of these interacting mechanisms were evaluated.

In addition, the submission notes that the Settlement and Site Capacity Audit accompanying the variation focuses primarily on infrastructure serviceability and states that SEA screening must also consider broader environmental implications including transport demand, land use patterns, climate emissions and cumulative settlement growth. It is considered that the screening assessment does not clearly explain how these broader environmental considerations were assessed alongside infrastructure capacity.

Sub Ref No:	044
Name:	Ballymore Group
Summary of Issues Raised:	
<p>The submission requests the following amendments (additional text in <i>red italics</i>, deleted text in <i>strikethrough italics blue</i>) to both the Appropriate Assessment Screening Addendum and the SEA Screening Addendum for the Proposed Material Alterations to Proposed Variation No. 3:</p> <p>Par 2. (page 2) of AA Screening of the Proposed Material Alterations: The Proposed Material Alterations (PMAs) to the Proposed Variation No. 3 provides new objectives, text amendments and text removal in addition to amendments to maps contained within the proposed Variation No. 3 (Newbridge Settlement Plan) in Volume 2, Parts 1 and 2 of the County Development Plan and the Kilcullen Settlement Plan.</p> <p>Par 2. (page 2) of SEA Screening of the Proposed Material Alterations: The Proposed Material Alterations (PMAs) to the Proposed Variation No. 3 provides new objectives, text amendments and text removal in addition to amendments to maps contained within the Proposed Variation No. 3 in Volume 2, Parts 1 and 2 of the County Development Plan and the Kilcullen Settlement Plan.</p>	

Chief Executive's Response

The contents of the submissions are acknowledged. Regarding **Submission No. 044**, the minor clerical errors are noted and will be rectified in relevant documentation following the formal consideration and adoption of the Proposed Variation.

Regarding **Submission Nos. 001 and 038**, detailed responses to both submissions are provided in Appendix A of this Report, prepared by Arup (KCC Environmental advisors). This Chief Executive's Response should be read in conjunction with both of the appended responses.

Arup prepared the Strategic Environmental Assessment (SEA) Report and Natura Impact Report (NIR) for the Kildare County Development Plan 2023 – 2029; together with the relevant screening reports (SEA and AA) for proposed, altered and finalised variations (including screening addendum reports) to the Plan. The responses by Arup confirm that the screening and addendum reports for Proposed Variation No. 3 and its PMAs (which informed the determinations) were carried out in full accordance with relevant legislation, regulations and guidance documentation.

The SEA screening reports for Variation No. 3 included an examination of the proposed amendments to the County Development Plan and the subsequent proposed material alterations; together with a review of existing Plan guidance, policies and objectives (with particular regard to protective environmental provisions) and the mitigation measures of the County Development Plan SEA Report and NIR.

In this regard, the current County Development Plan sets out the growth orientated spatial strategy and strategic development and environmental framework for Kildare, which has been subject to a comprehensive SEA and AA process. This SEA and AA process examined the environmental implications of ongoing significant and variable population and housing growth in the county (including inter alia population related pressures, land use change, transport demand, air quality considerations and climate impacts). As significant growth is anticipated, mitigation measures are embedded to ensure that any growth would be implemented in an environmentally responsible and sustainable manner. The results of the SEA and AA process are reflected in the County Development Plan through embedded guidance, policies and objectives which:

- Place environmental protection at the forefront of Plan implementation and ensure that no significant adverse environmental effects will occur, and
- Are designed to ensure that all development arising from the Plan (directly or arising through variations) are brought forward within the parameters of these environmental safeguards.

Taking the above into account, the SEA screening undertaken outlines that Proposed Variation No. 3 and the associated PMAs are not likely to give rise to significant environmental effects, over and above what was already assessed and mitigated within a development and environmental framework which remains in place to regulate how development facilitated by the Variation will occur. The Arup responses outline that the changes incorporated in the Variation and PMAs:

- Do not alter the overall environmental protection of the Plan or its SEA,

- Do not introduce new unassessed pathways for environmental effects or change anticipated development beyond what has already been evaluated.
- Operate wholly within the existing strategic, environmental and mitigation framework of the Plan.

The Arup responses collectively outline that an uplift in housing allocations (regardless of quantum, distribution and delivery mechanism) is not singularly determinative of environmental significance and are considered in conjunction with environmental safeguards present in the Plan. It is noted that the objectives of the Plan clearly acknowledge that housing growth is subject to change considering national and regional strategies; and provide that an adequate supply of land be available to accommodate such growth. In addition, it is outlined that the SEA of the current County Development Plan assessed combined effects of zoning lands, settlement expansion, strategic development areas and infrastructure-led sequencing at the scale of the county's settlement hierarchy. It assessed growth patterns not in isolation, but collectively across transport, climate, biodiversity, water, landscape and population-health pathways, and for settlement level effects. The current Plan has embedded mitigation measures and protective policies to ensure that cumulative, secondary and synergistic effects would be avoided or managed over the lifetime of the Plan.

Considering the above, the Arup responses state that the screening determination appropriately concludes that neither the cumulative operation of the Plan's housing delivery mechanisms, nor the broader environmental considerations identified by the submissions, give rise to a need for full SEA. The environmental effects associated with the Variation and PMAs fall entirely within the assessment envelope already established for the County Development Plan.

Chief Executive's Recommendation

It is recommended that minor clerical amendments are included to provide clarity.

7 Submissions/Observations Received Relating to Miscellaneous Issues (Including Land Use Zoning Requests)

Section 13(6) of the Planning and Development Act 2000 (as amended) states that written submissions or observations with respect to the Proposed Material Alterations or accompanying environmental assessments and made to the planning authority within a stated period shall be taken into account before the variation of the development plan is made. Having regard to this provision within the legislation, the public notice relating to the public consultation for the Proposed Material Alterations stated that only submissions or observations made in respect of the Proposed Material Alterations and accompanying documents (including submissions relating to the likely significant effects on the environment of implementing the Proposed Material Alterations) will be taken into consideration before the variation of the development plan is made. Submissions or observations in relation to any other aspects of the Proposed Variation cannot be considered at this stage in the process.

This section outlines the issues raised in submissions/observations received that did not specifically relate to a Proposed Material Alteration. In some instances, submissions/observations referred to a range of issues, some of which relates to one or more Proposed Material Alteration whilst also raising issues (including land use zoning requests) which do not relate to any Proposed Material Alteration.

Furthermore, the submissions/observations which cannot be considered have also been summarised in their entirety in Appendix B of this report.

Issue: Additional Residential Units to be Allocated to Naas to Accommodate Development of Lands at Kilcullen Road

Sub Ref No:	057
Name:	Green Project Management
Summary of Issues Raised:	
<p>Submission outlines the rationale and spatial planning context behind Proposed Variation No. 3 and notes the provisions of Proposed Material Alteration No. 1. The submitter highlights lands within their ownership forming a 10-ha landholding located on Kilcullen Road, Naas. States that this includes a 2.6 ha portion of the lands identified as “<i>SITE 1 Kilcullen Road</i>” on Map V3 2.1 in Proposed Variation No. 3, corresponding to lands identified as Site C5 in the Naas LAP 2021–2027.</p> <p>The submission welcomes the proposed designation of the 2.6 ha <i>SITE 1</i> as “<i>C: New Residential</i>” and wishes to reaffirm their intention to actively progress residential development on these lands, noting that a design team has been appointed and preliminary design work is underway with a view to preparing a planning application.</p> <p>Notes the locational attributes and characteristics of the larger 10 ha landholding stating that they are located within the existing built-up area of Naas and benefit from access to established infrastructure and services of the town. States that the lands have received a positive feasibility confirmation from Uisce Éireann, confirming the capacity to accommodate approximately 290 residential units.</p>	

across the landholding. Submits that Table 2.8 be amended to include the additional 178 units which can be delivered on the remaining 7.8 ha of the lands.

Contends that the 7.8 ha balance of lands within the submitter's ownership presents an opportunity (as part of a masterplanning exercise in collaboration with the Council) to support the coordinated delivery of active recreation and community infrastructure which would benefit the wider settlement. Submission concludes by referring to their original submission (Ref. No.: KCC-C418-121) to the Proposed Variation.

Chief Executive's Response

The contents of the submission are acknowledged. It is noted that the submission states that it is related to Proposed Material Alteration No. 1, but this PMA does not specifically deal with the quantum of unit allocations to Naas in Proposed Variation No. 3 (Tables 2.8A and 2.8B) which is covered by PMA No. 3. Notwithstanding this, it should be noted that under Section 13 of the Planning and Development Act 2000 (as amended) a further modification to the Proposed Material Alterations may only be made where it is minor in nature. An increase in the allocation of housing to the settlement of Naas at this stage of the variation process would constitute a material change and therefore cannot be considered.

Chief Executive's Recommendation

No change recommended.

Issue: Land Use Zoning Request – Blackberry Lane and Morristown Road, Newbridge

Sub Ref No:	042
Name:	McGreevy Construction/Enterprises
Summary of Issues Raised:	
<p>This submission has been prepared by Hughes Planning and Development Consultants on behalf of landowners McGreevy Construction/Enterprises in respect of lands to the east of Blackberry Lane and Morristown Road in Newbridge.</p>	
<p>The submission refers to both Proposed Variation No. 3 and Proposed Variation No. 2 (Newbridge Settlement Plan). The submission notes additional zoned lands have been selected following consultation with the Office of the Planning Regulator and while this is welcomed, the submission considers that Newbridge would benefit from additional zoned land.</p>	
<p>The submission contends that the subject site was zoned agricultural in the previous Newbridge LAP and that the Newbridge town boundary under Proposed Variation No. 3 and Proposed Variation No. 2 has been moved to omit part of the subject site and rezones another part as Strategic Reserve. The submission notes the land zoning proposal for the subject site is under Proposed Material Alteration No. 58 of Variation No. 2 (Newbridge Settlement Plan) to provide a consolidated land bank. The submission considers the proposal to be misinformed given the strategic location of the site regarding public transport, services and the town centre. The submission considers that zoning the whole site as '<i>New Residential</i> –</p>	

Phase 2' would allow continuous development of the entire site given it is in single ownership and its location immediately adjacent to existing residential land uses and given the proposed route for a new road through the lands. The submission considers 'New Residential – Phase 2' zoning would achieve the same goals as the proposed strategic reserve zoning objective.

The submission considers the lands meet the criteria set out in Section 28 Guidelines as they are serviced with direct access to two roads, water and wastewater infrastructure, are located 800m from the train station, and can facilitate upgrade works on Morrinstown Road bridge over the rail line allowing for safe pedestrian access and increased permeability.

The submission considers additional housing unit numbers are required in Newbridge based on existing demand, ongoing population growth and backlog of unmet housing need and requests the Council to consider the inclusion of the subject site to increase the supply of residential development land.

Chief Executive's Response

The contents of the submission are noted. It is noted that the land use zoning request was previously responded to in the Chief Executive's Report on Submissions/Observations Received to the Proposed Variation No. 3 to the Kildare County Development Plan (CDP) 2023-2029 (as varied) which was published on 19th December 2025 on the Council's public consultation website (<https://consult.kildarecoco.ie/>). As noted in this response, the statutory process for the consideration of land use zoning in Newbridge was Variation No. 2 (Newbridge Settlement Plan) to the Kildare County Development Plan which was recently adopted on 23rd February 2026. The request to rezone lands at Blackberry Lane and Morrinstown Road does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the legislation, be considered at this stage of the plan making process.

Chief Executive's Recommendation

No change recommended.

Issue: Land Use Zoning Request – Distillery Lane, Leixlip

Sub Ref No:	051
Name:	Pat Toolan
Summary of Issues Raised:	
<p>The submission by Hughes Planning and Development Consultants on behalf of Pat Toolan relates to lands comprising 0.61 ha at Distillery Lane in Leixlip which are currently zoned F: Open Space and Amenity for which it is requested be zoned for residential development, with an objective to provide community facilities further west along the river as part of the current review of the County Development Plan (CDP). The submission refers to the Proposed Material Alterations which have selected additional lands for rezoning following consultation. States that whilst the additional zoned land is welcomed, it is considered that Leixlip could benefit from additional zoned land.</p>	

The submission outlines the locational attributes and overall suitability of the site in terms of its potential to accommodate residential development and states that its fully serviced and accessible. Submits that the subject lands present a deliverable and shovel-ready opportunity to contribute to meeting housing targets and deal with the persistent backlog of unmet housing need.

This submission attaches their previous submission to Proposed Variation No. 3, made in November 2025. A summary of this submission is outlined in Appendix B.

Chief Executive’s Response

The contents of the submission are noted. It is noted that this land use zoning request was previously responded to in the Chief Executive’s Report on Submissions/Observations Received to the Proposed Variation No. 3 to the Kildare County Development Plan (CDP) 2023-2029 (as varied) which was published on 19th December 2025 on the Council’s public consultation website (<https://consult.kildarecoco.ie/>). The requested rezoning of lands at Distillery Road, Leixlip does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the legislation, be considered at this stage of the plan making process.

Chief Executive’s Recommendation

No change recommended.

Issue: Land Use Zoning Request – West of Shackleton Road, Celbridge

Sub Ref No:	048
Name:	Helen O’Brien, Elizabeth Donovan and Hugh Donovan
Summary of Issues Raised:	
<p>This submission has been prepared by Hughes Planning and Development Consultants on behalf of Helen O’Brien, Elizabeth Donovan and Hugh Donovan in respect of zoning request for lands to the west of Shackleton Road Kildare from ‘I: Agricultural’ to ‘C: New Residential’.</p> <p>The submission welcomes the provision of additional zoned lands in the revised Proposed Variation No. 3 following consultation with the Office of the Planning Regulator. However, the submission considers that Celbridge, identified as a Self-Sustaining Town in the Development Plan, could benefit from additional zoned lands as it is one of Kildare’s largest towns and employment centres.</p> <p>The submission requests the Council to consider the rezoning of the subject site to residential use based on its location approximately 1 km from Celbridge Town Centre and as it is directly adjacent to existing residential development ensuring compact and sequential development consistent with national planning policy. It is submitted that the subject site is serviceable and well connected to existing infrastructure including roads, utilities and public transport links, which would facilitate the delivery of housing in the short term. The submission considers the request supports the objectives of the revised NPF and housing growth requirements guidelines.</p>	

It is noted that the submission includes an attached appendix entitled 'Rezoning Submission' (November 2025) prepared by Hughes Planning and Development Consultants on behalf of Helen O'Brien, Elizabeth Donovan and Hugh Donovan which appears to be a copy of their previous submission at Draft Proposed Variation No. 3 public consultation stage (KCC Consultation Portal Reference No. KCC-C418-129). A summary of this submission is outlined in Appendix B.

Chief Executive's Response

The contents of the submission are acknowledged. The requested rezoning of the subject site in Celbridge does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the legislation, be considered at this stage of the plan making process. It should be noted that Proposed Material Alteration No. 1 of the Variation provides for a new a Settlement Plan to be prepared for Celbridge in '2026/2027'. As part of the preparation of this Plan, the land use zoning objectives in the town will be reviewed and the zoning of additional sites for new residential development will be considered. It should be noted that the background and preparatory work to inform the new Settlement Plan for the town has commenced.

Chief Executive's Recommendation

No change recommended.

Issue: Land Use Zoning Request – Reclassification of suitably serviced 'I: Agricultural' Lands within the LAP Boundary to Residential Zoning (Celbridge)

Sub Ref No:	033
Name:	Ad Meloria Management Ltd
Summary of Issues Raised:	
<p>This submission by Ad Meloria Management Ltd states that it primarily relates to Proposed Material Alterations Nos. 1 and 5, the allocation of 2,000 units for Simmonstown and Ballyoulster, Celbridge, the lack of delivery on these lands over the life of the current Development Plan and additional options available to achieve housing targets for Celbridge.</p> <p>The submission notes it is made having regard to relevant planning legislation, Section 28 Ministerial guidelines and Housing for All policy. The submission welcomes the plan-led response to the national housing growth requirements, the allocation of additional housing growth to key town, the inclusion of CS O33 facilitating services and serviceable lands, and the stated objective of continuity in housing supply. These measures are stated as being consistent with national policy direction and Housing for All objectives.</p> <p>The submission notes that most lands zoned New Residential in the Celbridge Local Area Plan (LAP) 2017-2023 have been advanced through the planning process or are currently under construction except for lands at Ballyoulster and Simmonstown, KDAs 2 and 5 respectively. The submission notes the variation does not propose any change to the housing allocation or land zoning designation for Celbridge and that the variation believes the 2,000 unit allocation can be delivered at the existing Ballyoulster and Simmonstown lands.</p>	

The submission understands the progression of these lands to be contingent on the delivery of substantial road infrastructure and refers to a recent refusal by An Coimisiún Pleanála (ACP) for an SHD application for 344 residential units at Ballyoulster based on concerns regarding infrastructure and prematurity pending a new zoning plan for the town. The submission notes recently submitted planning and CPO applications to ACP for the transport infrastructure.

Having regard to the infrastructural deficit of these lands, it is submitted that consideration should be given to reclassification of suitably serviced 'I: Agricultural' lands within the LAP boundary to either 'B: Existing Residential/Infill' or 'C: New Residential', as appropriate, to ensure the allocated housing targets are met. It is stated that this approach would align with Ministerial Direction and would reflect the strategy used by other neighbouring local authorities including South Dublin County Council.

It is submitted that this approach would be consistent with Housing for All objectives, national policy, the stated proposed material alterations and the overarching purpose of Proposed Variation No. 3, as stated in the KCC Chief Executive's Report.

Chief Executive's Response

The contents of the submission are acknowledged. It should be noted that Kildare County Council are satisfied that development on the lands at Ballyoulster and Simmonstown is deliverable within the remaining life of the Development Plan.

The requested rezoning of I: Agricultural lands in Celbridge does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the legislation, be considered at this stage of the plan making process.

Notwithstanding the above, Proposed Variation No. 3 did not provide for any rezoning of lands in higher order settlements such as Celbridge, as it was the intention that the zoning of lands in the town would be carried out as part of the preparation of a comprehensive evidence-led settlement plan. In this regard, Proposed Material Alteration No. 1 provides for a new a Settlement Plan to be prepared for Celbridge in '2026/2027'. As part of the preparation of this Plan, the land use zoning objectives in the town will be reviewed and the zoning of additional sites for new residential development will be considered. It should be noted that the background and preparatory work to inform the new Settlement Plan for the town has commenced.

Chief Executive's Recommendation

No change recommended.

Issue: Land Use Zoning Request – Osberstown Road, Sallins

Sub Ref No:	016
Name:	John Kehoe
Summary of Issues Raised:	
<p>The submission details that circa 15 acres of land zoned Agriculture on the Osberstown Road in Sallins which it states would be suitable for immediate development subject to suitable rezoning. Notes and welcomes the revised allocation of an additional 500 units for Sallins. Outlines that the lands are bounded by housing estates to the north and east and are adjacent to all services, including bus and rail connections, shopping, schools, medical services, Post Office and supermarket. Development of these lands would ensure infill, avoid leapfrogging and comply with the guidelines of the Planning and Development Acts.</p>	

Chief Executive's Response

The contents of the submission are acknowledged. The requested rezoning of this site in Sallins does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the legislation, be considered at this stage of the plan making process.

It should be noted that work on the Sallins Settlement Plan is at an advanced stage. The Plan which will be incorporated into the CDP as part of the statutory variation process is envisaged to be published in Quarter 2 2026. The Settlement Plan will include provision for additional new residential zonings in the town based on the increased unit allocation provided for under Variation No. 3.

Chief Executive's Recommendation

No change recommended.

Issue: Land Use Zoning Request – Rathangan (SS: Serviced Sites to C: New Residential)

Sub Ref No:	017
Name:	Leo and Mary Mather
Summary of Issues Raised:	
<p>The submission by KBM Architects Ltd on behalf of Leo and Mary Mather seeks the rezoning of lands extending to circa 3 hectares in Rathangan from SS: Serviced Sites to New Residential to increase the potential deliverable housing supply.</p> <p>The submission outlines the rationale for the zoning request, outlined that the subject lands are located adjacent to existing residential developments, are within 500m of the town centre and local schools, are directly accessed from a public road (including associated services) and benefit from favourable ground conditions and topography.</p>	

Chief Executive's Response

The contents of the submission are noted. The requested rezoning of this 3-hectare site in Rathangan does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the

legislation, be considered at this stage of the plan making process. As part of the preparation of the next CDP, the land use zoning objectives of all settlements in the county will be reviewed.

Chief Executive's Recommendation

No change recommended.

Issue: Land Use Zoning Request – Rathangan (F: Open Space and Amenity to C: New Residential)

Sub Ref No:	019
Name:	Leo and Mary Mather
Issues Raised:	
<p>This submission has been prepared by KBM Architects Ltd on behalf of landowners Leo and Mary Mather seeking the zoning of circa 0.74 ha of lands at Bracknagh Road, Rathangan from 'F: Open Space and Amenity' to New Residential in order to increase the potential deliverable supply in Rathangan.</p> <p>The submission states that the subject site is greenfield, adjacent to existing residential developments, located within 200m of town centre and 300m of local schools, has direct access from the public road and associated services, and has favourable topography and ground considerations within the site.</p>	

Chief Executive's Response

The contents of the submission are noted. The requested rezoning in Rathangan does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the legislation, be considered at this stage of the plan making process.

Chief Executive's Recommendation

No change recommended.

Issue: Land Use Zoning Request – Ballymore Eustace

Sub Ref No:	047
Name:	Ballymore Beef Limited
Summary of Issues Raised:	
<p>The submission by Ballymore Beef Limited welcomes and supports the proposed alterations and amendments as they pertain to the townland of Ballymore Eustace. Submits that Ballymore Eustace can accommodate additional housing and requests that consideration be given to their submission sent to the Council in November 2025 in response to the publication of Proposed Variation No. 3.</p> <p>This submission relates to the requested rezoning of agricultural lands extending to 12.8 acres at Ballymore Eustace to 'C': New Residential (see maps below highlighting lands outlined in red/red hashing). The submission notes that the lands were previously zoned and consideration should be given to zone this land again given it is fully serviced and connected to an existing residential development within the town. Submits that the development of the lands will result in public gain through the delivery a much-needed pedestrian bridge.</p>	

The submission states that the original submission has been attached to this submission. A summary of this submission is outlined in Appendix B.

Chief Executive’s Response

The contents of the submission are noted. The requested rezoning of this landholding in Ballymore Eustace does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the legislation, be considered at this stage of the plan making process. As part of the preparation of the next CDP, the land use zoning objectives of all settlements in the county will be reviewed.

Chief Executive’s Recommendation

No change recommended.

Issue: Land Use Zoning Request – Suncroft

Sub Ref No:	013
Name:	Paul Dunny
Summary of Issues Raised:	
<p>The submission seeks the rezoning of circa 3.4 ha of lands at Newtown, Suncroft, from Agriculture to C: New Residential.</p> <p>The submission outlines the following in relation to the subject lands:</p> <ul style="list-style-type: none"> • The lands adjoin the existing Newtown Grove development (Phase 1). The subject lands were envisaged as the next logical and sequential development phase. Development of these lands would avoid ribbon or leapfrog development. • The lands would provide a modest, village appropriate development with a density and housing mix that integrates with established forms and is consistent with the character and scale of Suncroft. There are no significant undeveloped residential lands in Suncroft that are capable of short-term housing delivery. • The lands represent a logical, sequential and infrastructure efficient extension of the footprint of Suncroft Village within the lifetime of the Plan. • Planning permission was refused in 2007 (Planning Ref. 06/376) established the principle of the sequential expansion of Newtown Grove. Permission was refused on infrastructure grounds only, relating to the lack of wastewater treatment capacity at Osberstown WWTP and prematurity pending the construction and commissioning of foul sewer infrastructure. • The wastewater infrastructure context has materially changed following significant upgrades to the wider catchment. The Osberstown WWTP has been upgraded to address capacity constraints and facilitate growth in the Naas/Newbridge catchment, increasing treatment capacity from 80,000 population equivalent (PE) to 13,000 PE. • The majority of the lands are within circa 400m of the village core. The lands benefit from access via an estate road in Newtown Grove with documented easement rights to existing infrastructure/utilities (including foul infrastructure), they are free from flood risk and are not subject to heritage or ecological 	

constraints. Development on the subject lands would not require any significant new capital works due to existing infrastructure availability.

- A zoning would facilitate modest, village-appropriate residential development in keeping the character of Suncroft.
- Suncroft benefits from significant public and community investment, including recent upgrades to the National School and the GAA Club together with recent announcements regarding improved TFI Local Link services to Newbridge and Kildare. Submits that the long term sustainability of the village demonstrated infrastructure capacity, community vitality and improved public transport connectivity to employment / transportation / education hubs would be supported by modest residential growth.

Chief Executive's Response

The contents of the submission are noted. The requested rezoning of this landholding in Suncroft does not relate to any Proposed Material Alteration to Proposed Variation No. 3. Consequently, this request cannot, in accordance with the legislation, be considered at this stage of the plan making process. As part of the preparation of the next CDP, the land use zoning objectives of all settlements in the county will be reviewed.

Chief Executive's Recommendation

No change recommended.

Issue: Additional Housing Units to be Allocated to Blessington

Sub Ref No:	040
Name:	Kelland Homes Ltd
Summary Issues Raised:	
<p>This submission has been prepared by Armstrong Fenton Associates on behalf of landowners Kelland Homes Ltd in respect of lands at Newtown Little, Blessington, County Kildare.</p> <p>The submission relates to lands extending to approximately 14 ha of which circa 8 ha is zoned 'C: New Residential' and circa 6.23 ha is zoned 'F: Open Space and Amenity'. Notes the site-specific objective to deliver the Blessington Inner Relief Road (BIRR). Further notes that while the vast majority of their lands are in County Kildare a portion is located within County Wicklow. The submission welcomes the proposed additional 100 units allocated to Blessington stating that it's a step in the right direction. It suggests that additional housing numbers be allocated to Blessington to sustain the delivery of the southern section of the BIRR in its totality.</p> <p>The submission notes the Proposed Variation No. 3 seeks to align the current Development Plan with the NPF Implementation: Housing Growth Requirements guidelines which set out two time periods, from 2025 to 2034 and 2034 to 2040. However, it notes the Proposed Variation No. 3 only provides for additional housing unit allocation up to 2029. The submission suggests that if the Council is to target the delivery of 2,755 units annually until 2034 and a further 1,919 units annually from 2034 to 2040, this would amount to over 37,000 units up to 2040 for</p>	

the entire county. The submission states that 1% of this figure would equate to circa 370 additional units being allocated to Blessington up to 2040. In support of this request, it contends that there needs to be adequate Core Strategy allocation to deliver compact forms of housing, as well as aiding the delivery of much needed infrastructure. Refers to a previous submission sent to the council in respect of Proposed Variation No. 3 in November 2025.

Chief Executive’s Response

The contents of the submission are acknowledged. It should be noted that under Section 13 of the Planning and Development Act 2000 (as amended) a further modification to the Proposed Material Alterations may only be made where it is minor in nature. An increase in the allocation of housing to the Blessington Environs over and above that set out in Proposed Material Alteration (PMA) No. 3 is considered to be a material change and therefore cannot be introduced at this stage of the variation process.

Notwithstanding the above, it is considered that the additional allocation proposed as part of PMA No. 3 is an appropriate and sustainable figure for the Environs which will provide for a sizeable quantum of housing development, alongside the delivery of critical serving infrastructure in the area over the remaining period of the Plan.

Chief Executive’s Recommendation

No change recommended.

Issue: Opposes the Scale/Timing of Housing Allocation to Celbridge

Sub Ref No:	003
Name:	Stewart McCarthy
Summary Issues Raised:	
<p>Whilst seeking to clarify that it is not an objection to housing delivery the submission seeks to oppose the scale and timing of the 2,000 additional unit increase (270% increase) for Celbridge, stating that the provision of houses without corresponding social infrastructure denies current and future residents the right to a sustainable and functional society. In this regard, the submission:</p> <ul style="list-style-type: none"> • Considers that the current proposal breaches the statutory requirement for Integrated Planning under Section 10(2)(d) of the Planning and Development Act 2000, which requires that development plans include objectives for “<i>..the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population.</i>” • Asserts that Celbridge is underserviced in key areas when compared to towns of similar or smaller populations. The submission outlines that the town has only one playground for 20,000 people and lacks a public swimming pool or regional park facility. The submission considers that the existing library capacity and lack of a dedicated, high-capacity community centre mean that the town cannot support the social integration of 2,000 additional households. The front loading of residential density without a concurrent, legally binding commitment to social infrastructure is planning for social isolation, with new residents deserving a town that is ready to receive them. The lack of services and the 	

closure of services recently have had a compounding impact on a sense of society in the area.

- It is contended that the proposal decouples housing from social and community infrastructure requirements by front-loading of 2,000 units while delaying the Celbridge Settlement Plan until 2026 / 2027 and is a direct violation of the requirement to integrate planning with the needs of the population. It is stated that the proposal offers no concrete delivery mechanism for the integration of social and community facilities / services, failing the “sustainable communities” test.
- Considers that the proposal fails to meet the ‘infrastructure-led’ requirements of the National Planning Framework (NPF) and violates National Planning Objective (NPO) 72a of the NPF, which explicitly mandates a “service-led” approach to land release, stating that *“Planning authorities will be required to apply a standard tiered approach to differentiate (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan”*. The submission notes that Proposed Material Alteration No. 1 admits that residential land should only be released where *“...it can be demonstrated...that the lands are readily serviced or serviceable...and where the proposal addresses any identified social infrastructure deficit in the respective settlement.”*
- States that given the documented deficit in basic amenities, it is stated that the identification of 73 hectares at Simmonstown and Ballyoulster is premature and that the Council cannot demonstrate serviceability when existing residents are already underserved in terms of amenities, power, water and sewerage.
- States that the scale of development at Simmonstown and Ballyoulster will generate significant trip demand and that proceeding without a site-specific Local Area Plan or revised Area Based Transport Assessment (ABTA) is irresponsible. It is asserted that the R403 is at peak capacity and that reliance on future unconfirmed public transport upgrades to mitigate the immediate impact of 2,000 additional homes creates significant risk to the town’s mobility.
- The submission concludes by stating that the proposed alteration should be rejected in its current form, with any increase in housing targets contingent upon a “Service-First” trigger. Submits that the Council must complete a Social Infrastructure Audit, and secure funding for a second municipal playground, public swimming pool and/or expanded library services before the strategic lands in Celbridge are developed. The submission is accompanied by a map outlining Celbridge.

Chief Executive’s Response

The contents of the submission are acknowledged. It is not accepted that the proposed housing allocation represents a 270% increase in allocation for Celbridge. It also not accepted that the proposal decouples housing from social and community infrastructure requirements. It should be noted that the lands identified for this allocation recognises the capacity of the two sites (Ballyoulster and Simmonstown Key Development Areas) to sustainably accommodate such development over the remaining life of the Plan, subject to specific servicing infrastructure provisions.

The consideration of the suitability of these lands for new residential development is longstanding in nature with both locations having been zoned C: New Residential in the Celbridge 2016-2023 Local Area Plan (LAP) and portions of both sites zoned

new residential in the 2010 LAP. Sections 12.2.2, 12.2.5 and 12.5 of the 2016-2023 LAP outlines a range of requirements relating to the phasing and delivery of key servicing infrastructure which must accompany residential development on both sites. In this regard, it is important to note that Proposed Material Alteration No. 1 of Proposed Variation No. 3 provides for the Council to have regard to the provisions of any expired Local Area Plan (including Celbridge LAP) when considering proposals for new development until such time as that plan is replaced, revoked or integrated into the County Development Plan.

Proposed Material Alteration No. 1 also provides for a new a Settlement Plan to be prepared for Celbridge in '2026/2027'. As part of the preparation of this Plan, a range of supporting studies including, but not limited to, a Social Infrastructure Audit and an Area-Based Transport Assessment will be undertaken in order to inform the provisions of the Plan. The Planning Department has, as of Quarter 1 2026, commenced background work on the Settlement Plan for Celbridge.

Chief Executive's Recommendation

No change recommended.

Issue: Concerns Relating to Housing and Accompanying Servicing / Social Infrastructure Delivery in Naas

Sub Ref No:	018
Name:	Naas Town Strategy Group
Summary of Issues Raised:	
<p>The submission considers that the Proposed Material Alterations do not provide a clear or time bound pathway for the meaningful acceleration of housing delivery or associated community/social infrastructure in Naas. The submission states it has identified gaps in the Proposed Material Alterations (PMAs), which risks stalling meaningful housing delivery for several years, including:</p> <ul style="list-style-type: none"> • An identified capacity gap in appropriately zoned land to accommodate expected housing (5,500 homes) over a 15-year timeframe. • The additional housing provided by the variation (998 units) falls significantly short of anticipated need; • No new zoning in the variation, with heavy reliance on the Naas Northwest Quadrant (NWQ); • No contingency mechanism if the NWQ or Phase 2 lands do not deliver housing in the plan period, considering that projected capacity does not guarantee delivery; • No planned interim assessment of lands, including those submitted previously, for additional residential zoning in Naas – such an assessment has been deferred to a future County Development Plan review without a definitive timeline; • No programmed Settlement Plan for Naas, noting that programmes have been provided for other settlements for 2026; • No Naas specific infrastructure phasing statement linked to housing growth; • Ongoing national and regional alignment processes under the Planning and Development Act 2024, noting the commencement of a County Development Plan review in August 2026 with a potential extension of this review cycle to 	

align with RSES timeframes. Such an extension would further delay zoning matters.

The submission considers that there are two unanswered questions, namely:

1. How would the identified short term 998 new homes be delivered with certainty by 2028?
2. Through what mechanism would the longer-term housing requirement for Naas over 15 years be met?

Accordingly, the submission requests that the Council use this variation to establish a clear and time bound pathway for Naas through one of the following:

- That the 2026 variation to integrate the Naas Northwest Quadrant (NWQ) also include an assessment of additional compact and serviceable lands in Naas, or
- The Material Alterations commit to the commencement of a new Naas LAP or Settlement Plan in 2027, irrespective of broader County Development Plan timelines.

It is considered that either option would reduce risk, provide certainty and align with national policy objectives regarding timely housing and infrastructure delivery. It is stated that the current variation provides no credible or realistic settlement level pathway/trajectory for housing delivery in Naas.

The submission outlines that based on the Housing Growth Guidelines 15-year horizon, assuming a 15% typical allocation for a designated Key Town, Naas would be expected to accommodate:

- Approximately 413 homes per annum, equating to 1,650 homes between 2025 – 2028.
- Approximately 5,534 homes between 2025 and 2039 (15 years).

In this regard, the submission states that the capacity audit by the Council (September 2025) identified circa 38 ha of undeveloped residential zoned lands in Naas with a maximum yield of 572 units to the end of the plan period. This illustrates a significant capacity gap between what is currently zoned versus what would typically be expected to be delivered over 15 years based on the Guidelines. The submission notes that the variation does not bring forward new zonings to address the shortfall between typical anticipated delivery in Key Towns and zoned land supply, querying where the remaining housing delivery over the 15-year horizon is to be accommodated in Naas.

The submission states that through Variation No. 3, additional housing delivery is limited to Phase 2 lands at the Kilcullen and Blessington Roads, together with the future Naas Northwest Quadrant (Naas NWQ) project. In addition, the submission states that the OPR has emphasised that where identified lands are unlikely to come forward within the plan period, planning authorities should consider zoning alternative lands capable of short to medium term delivery. In this regard, the submission:

- States it is unlikely that the phase 2 lands will deliver the 455 new homes envisaged as part of the variation. Reference is made to a previous consultation submission (Ref. No. KCCC-C418-137) by the landowner of part

of the Phase 2 Kilcullen Road site, noting that the landowner has no intention of developing part of the Kilcullen Road site.

- Outlines that over reliance on a single complex, infrastructure heavy site (Naas NWQ) undermines the Housing Growth Requirements Guidelines, which emphasise activation and continuity of supply. The submission outlines that no work has commenced on the Naas NWQ and that a previous masterplan (published 20 years ago) did not yield any residential units.
- The submission contends that the Naas NWQ involves multiple landowners, has flood risk issues, require significant transport / infrastructure interventions and requires a detailed masterplan. These characteristics, without a contingency mechanism, increase the risk of delivery in the short to medium term and delays. The submission is concerned that proposed transport infrastructure over the canal would generate public opposition, noting previous experiences regarding the new road through the Gallops and may result in extended processes and delays. These infrastructure projects are technically, environmentally and socially complex.
- The submission queries how realistic it is that the reduced 534 units will be built by 2028 considering that a masterplan has not yet been published and the scale of infrastructure required. The submission considers that information from KCC indicates that the delivery timeframe for the NWQ area will be 30 years, resulting in an average of 133 units per year and a slow build out. It is considered that the NWQ may deliver 2,000 units over the next 15 years but leaves a significant gap for the 5,500 to be delivered.

Conversely, the submission outlines national policy regarding the delivery of housing with accompanying community, social and transport infrastructure and notes the content of the groups previous submission supporting growth in Naas aligned with necessary services and community facilities. The submission considers that the current approach does not provide a clear pathway for the delivery of such services/facilities alongside housing growth. The deferring of housing delivery and zoning also defers much needed social and community infrastructure delivery in tandem and subjects it to the same risks. In this regard, the submission details existing capacity pressures regarding the following:

- Recreation: K Leisure and other sports facilities, together with associated parking are routinely oversubscribed and exceed capacity. It is considered that Naas is underprovided in terms of sport facilities and pitches.
- Primary Schools: Recent reporting confirmed that 30 children in Naas were unable to secure a primary school place, with temporary measures introduced as a band aid for insufficient provision in the town. No new primary schools are currently under construction.
- Town Centre Vitality: The submission states that the town centre has experienced increasing vacancy and relocation of key retail anchors to peripheral retail parks. A press report in December 2025 confirmed that Naas had the highest commercial vacancy rate (15.9%) in the county, above the national average and other towns. Sustainable residential growth will bring much needed town centre vitality.

Chief Executive's Response

The contents of the submission are acknowledged. The Proposed Variation along with the relevant Proposed Material Alterations (PMAs) provides Naas with two

additional sites for residential development alongside the allocation of a significant quantum of units to the Northwest Quadrant (NWQ). It must be remembered that the overarching purpose of the Variation is to transpose the provisions of the Housing Growth Requirements Guidelines into existing Development Plans '*as quickly as possible*' (Policy and Objective No. 3 of the Guidelines refers). To this end, Kildare County Council is confident that the plan-led delivery mechanisms included in the Proposed Variation, alongside PMAs for Naas, provides an ambitious but realistic basis to facilitate the development of much needed additional housing in the town over the remaining period of the Plan.

Regarding the development of lands within the Northwest Quadrant, it should be noted the preparation of the Masterplan is at an advanced stage and is anticipated to be published in Q2 2026. The Masterplan will be incorporated into the County Development Plan through the variation process which will include the zoning of additional new residential lands within the NWQ.

The reference to the need to integrate a 15-year time horizon (as per the Housing Growth Requirements Guidelines) into the housing delivery mechanisms is noted. Whilst the Proposed Variation does identify lands within the county (including the NWQ) for strategic long term residential development, this time frame is far beyond the remaining period of the CDP to provide for more detailed consideration. Accordingly, the integration of the 15-year time horizon would be more appropriately and comprehensively dealt with in the context of the wider review of the CDP and the move to 10-year development plans. Having regard to the future growth of Naas and in particular anticipated residential development, it is noted that regional, county and local planning policy all clearly signpost the Northwest Quadrant as being central to the long term strategic expansion of the town and will be the key area of focus for the development of Naas in the years to come.

The request that the variation to integrate the NWQ also includes an assessment of additional compact and serviceable lands in Naas is not accepted as the present Naas Local Area Plan 2021-2027, which was subject of a comprehensive Sustainable Planning and Infrastructure Assessment, still remains in effect. The request that the material alterations commit to the commencement of a new Naas LAP or Settlement Plan in 2027, irrespective of broader County Development Plan timelines is also not accepted. The Variation alongside the PMAs set out a work programme for the Planning Department with regard to the preparation of Settlement Plans / Variations to the CDP over 2026/2027 period. It would be remiss of the Council to undertake to carry out further work over and above what has been committed to, given the limited resources of the Planning Department and the need to commence extensive background and preparatory work as part the upcoming review of the CDP. Whilst the reference in the submission to the potential extension of the CDP review process is acknowledged, it should be noted the Council has to work within the existing timeframe until such legislation is enacted/utilised and alternative arrangements are provided for / required.

The concerns related to the delivery of accompanying community social and transport infrastructure alongside new housing in Naas is acknowledged. The Naas LAP is predicated on a comprehensive range of assessments including a Transport Strategy, Infrastructural Assessment and Social Infrastructure Assessment. These

evidence-based studies have been integrated into the Plan and provide the basis for range of requirements (as outlined in Section 11.2 of the LAP) relating to the phasing and delivery of key servicing infrastructure which must accompany residential development within specific sites. The NWQ Masterplan will further support the delivery of critical infrastructure in the town through the inclusion of a refined phasing strategy which will comprehensively link development on the lands to the provision of a range of identified servicing and social infrastructure.

Chief Executive's Recommendation

No change recommended.

Issue: Support for Objective CS O29 / Objection to OPR Submission to Proposed Variation No. 3

Sub Ref No:	037
Name:	Pousterle Limited
Summary of Issues Raised:	
<p>The submission from Brock McClure Planning and Development Consultants on behalf of Pousterle Limited primarily relates to lands at Southgreen Road and Old Road, Kildare Town, which, under the Variation are proposed to be zoned 'C1: 2 New Residential'. The submission notes the location and context of the subject site at Southgreen, Kildare Town and refers to the planning history/development of adjacent sites. States that a Large Scale Residential Development (LRD) planning application for site was lodged on 6th March (Reg Ref: 2660248) seeking permission for 146 residential, creche, and associated services.</p> <p>Notes and welcomes the provisions of Proposed Variation No. 3 (Objective CS O29) which releases lands zoned Phase 2 New Residential for development in Kildare Town, including the subject lands at Southgreen. Also welcomes the apparent support for their submission as iterated in the Chief Executive's Report (dated 19 December 2025).</p> <p>Submits that as part of the submission they seek address comments raised by the Office of the Planning Regulator (OPR) in their submission of 27 November 2025. Notes that Pousterle Limited controls lands comprising circa 83 hectares that are located to the northwest of Kildare town at Green Road, South Green Road, and Old Road, a significant portion of which are already zoned 'Strategic Reserve'.</p> <p>Submits that in their submission to Variation No. 2 the OPR raised a concern regarding Phase 2 lands, generally, in Kildare County Council and with respect to the South Green lands stated as follows: <i>'The Office has concerns regarding the immediate delivery of lands identified in Kildare Town (Ruanbeg and Southgreen) due to infrastructural constraints, such as access through third party lands, road improvements, and water supply.'</i></p> <p>Submission seeks to take the opportunity to strongly refute this contention and submits that there are no constraints or impediments to the delivery of residential development on this wider site. States that the lands are entirely unencumbered,</p>	

can be accessed independently and delivery of residential development would be assured in the event that that the lands received a supportive zoning for same.

The submission details the attributes of the wider lands noting their development potential to deliver 2,000 new housing units (along with community and commercial uses), their sequential location, their potential to support the realisation of the 10-minute town and the fact that a portion of the lands have already been identified in the Kildare Town LAP as a 'Key Development Area'. States that they have a proven track record in delivering housing in the town (i.e. Walker's Gate). Submission outlines various attributes of the lands in terms of road access, water and wastewater servicing, surface water drainage, flood risk and pedestrian and cycle infrastructure. Submits that the overall lands have access to public services, including water supply and the public drainage network and there has been significant investment in recent years on critical infrastructure.

Chief Executive's Response

The contents of the submission are acknowledged. The support for Objective CS O29 (PMA No. 5) as relating to a portion of lands at Southgreen, Kildare Town is noted.

The contents of the submission related to the details in the Office of the Planning Regulator (OPR) submission relating to the subject lands is further noted. It is considered that the views and contentions contained in this submission is a matter for the OPR.

Chief Executive's Recommendation

No change recommended.

Issue: Increasing Biodiversity in Developments

Sub Ref No:	029
Name:	Karen Tyrrell
Summary of Issues Raised:	
The submission recommends the inclusion of swift nesting bricks into current building requirements. It further requests the design and inclusion of wildlife ponds in large-scale housing developments, which have the potential to vastly enhance biodiversity through the use of geotextile clay liners where minimum maintenance and aftercare is required.	

Chief Executive's Response

The issues raised in the submission do not relate any Proposed Material Alternations of Proposed Variation No. 3. It should be noted that the Kildare County Development Plan 2023-2029 (as varied) already contains provisions to promote biodiversity within new development. For example, Objective BI O18 seeks to *'require all applications for new developments to identify, protect and sensitively enhance the most important ecological features and habitats, and incorporate these into the overall open space network, keeping free from development and to provide links to the wider Green Infrastructure network as an essential part of the design process and by making*

provision for local biodiversity (e.g. through provision of swift boxes or towers, bat roost sites, hedgehog highways, green roofs, etc.).'

Chief Executive's Recommendation

No further change is recommended.

Issue: Safeguarding Built Heritage and the Promotion of Traditional Vernacular Architecture

Sub Ref No:	004
Name:	Community Campaigner David Barton
Summary of Issues Raised:	
<ul style="list-style-type: none"> • Submitter outlines his role as a community campaigner promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA) / Traditional Architecture as a key feature across UK-wide local authorities. States that the submission is an 'umbrella representation.' • Submission outlines the background of the submitter including successful campaigns in the UK to promote and protect historic buildings. • States that the submission is supported by 32 Appendices. It is noted that these have not been included with the submission. However, hyperlinks to websites have been provided for the majority. • Submission calls for the establishment of design codes based on TVA principles and that local authorities should partner with key stakeholder organisations. Outlines a range of suggestions about to policy in this regard, including the non-demolition of pre-1950s buildings. • Regarding conservation areas, the submission outlines the need for enhanced conservation efforts in designated areas. Outlines a range of suggested actions including a streamlined process for listed building consent, the preservation of historic street furniture and financial incentives for maintaining/restoring buildings. • Highlights role of historic buildings in combatting climate change and suggests a range of actions, including a focus on increasing the stock of carbon-rich old buildings, retrofitting historic buildings and financial incentives for the demolition of carbon poor contemporary buildings. • Outlines actions that could be taken on historic buildings including the creation of a Designated and a Non-Designated Heritage Asset List and a scheme to rebuild long lost buildings. • Suggests a range of actions that can be taken to promote traditional value architecture. • Regarding to the planning system, the submission emphasises the need to identify applicants which have a history of harming civic heritage and states that this should be a consideration in the granting of permission. Requests Local Authorities to collaborate with the community and heritage bodies to give these people a voice. • Submission concludes by identifying a range of miscellaneous issues which are aimed at supporting the historic built environment. These include support for well-designed car parking, the utilisation of specialist skills and the creation of a Top 10 Buildings at Risk Register. 	

Chief Executive's Response

The issues raised in the submission do not relate to Proposed Material Alternations of Proposed Variation No. 3. Furthermore, as part of the preparation of the next CDP and the move to 10-year development plans, all provisions in the Plan relating to the built heritage of the county will be reviewed.

Chief Executive's Recommendation

No further change is recommended.

8 Overview of Chief Executive's Recommendations

Having regard to all submissions or observations received, in particular to the submission from the Office of the Planning Regulator and the recommendations contained therein, and to all other material considerations related to the proper planning and sustainable development of the plan area, including SEA, AA and SFRA, it is recommended:

- (i) That the following Proposed Material Alterations **be adopted** as published on the 6th of February 2026: Proposed Material Alterations No. 2, No. 4, No. 9, No. 10, No. 13, No. 14, No. 15, No. 16, No. 17, No. 18, No. 22, No. 24, No. 25, No. 26, No. 27, No. 28, No. 29 and No. 30,
- (ii) That the following Proposed Material Alterations **be adopted with minor modifications** as detailed in this report: Proposed Material Alterations No. 1, No. 3, No. 5, No. 6, No. 7, No. 8, No. 12, No. 19, No. 20 and No. 23.
- (iii) That the following Proposed Material Alterations **should not be adopted** for the reasons outlined in this report: Proposed Material Alteration No. 11 and Proposed Material Alteration No. 21.

9 Conclusion

The Elected Members are advised that pursuant to Section 13(7) of the Planning and Development Act 2000 (as amended) that in making a variation under this Section the members of the authority 'shall be restricted to considering the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.'

Section 13(14) of the Planning and Development Act 2000 (as amended) states "statutory obligations" include, in relation to the local authority, the obligation to ensure that the development plan is consistent with:

- i. the national and regional development objectives specified in-
 - I. the National Planning Framework, and
 - II. the regional spatial and economic strategy, and
- ii. specific planning policy requirements specified in guidelines.

Accordingly, should the Elected Members decide not to comply with any recommendation made in the proposed variation and report, it shall inform the Office of the Planning Regulator as soon as practicable by notice in writing, which notice shall contain reasons for the decision.

A variation made to a development plan shall have effect from the day that the variation is made.



**Appendix A:
Technical Responses
Prepared by Arup
of SEA / AA Screening
of Proposed Material Alterations**





**Planning Department,
Kildare County Council,
Áras Chill Dara,
Devoy Park, Naas,
Co. Kildare W91 X77F**

Technical Note

Project title	Variation No. 3 to the KCC CDP
Job number	312816-00
File reference	Issue
cc	KCC
Prepared by	Sinead Whyte
Date	20 February 2026
Subject	Response to Submission No. 1 on SEA and AA determinations

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1. Introduction

A submission (Ref No. KCC-C455-1) was received during the public consultation process for the Proposed Material Alterations to Proposed Variation No. 3 of the Kildare County Development Plan 2023-2029 (as varied). The submission relates to the determinations of Kildare County Council that a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) of the Proposed Material Alterations to Proposed Variation No. 3 of the Kildare County Development Plan (CDP) 2023–2029 are not required.

This note responds to the submission received.

2. Background

The Kildare CDP 2023-2029 structures and provides the framework for the proper planning and sustainable development across the entire functional area of County Kildare over the six year statutory time period of the Plan. The Kildare CDP 2023 – 2029 was subject to SEA and AA in accordance with applicable legislative requirements. These assessments considered the environmental implications of core strategic level planning provisions including, inter alia, ongoing significant housing and population growth in the county, the designation of lands for a variety of development forms and types (including through residential zoning of greenfield lands), the identification of strategic development areas, establishment of a settlement hierarchy and infrastructure / housing delivery mechanisms.

The SEA and AA (Stage 2 Natura Impact Report) recommended a suite of mitigation measures to be embedded in the Plan following the assessment of the draft Plan. These measures were included in the SEA Environmental Report for the Kildare CDP 2023 – 2029 (as varied). In addition, a suite of measures were incorporated into the published Kildare CDP 2023 – 2029 (as varied) as a suite of embedded protective policies and objectives that are applicable to development proposals of all scales, land uses and plans, forming an integral part of the overall framework and strategic level provisions for the proper planning and sustainable development of County Kildare. These measures

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have been designed to avoid the potential for Likely Significant Effects on the integrity of European sites and to prevent, reduce and as fully as possible offset any significant adverse impacts on the environment. The CDP SEA and AA therefore established the environmental baseline, identified potential effects associated with future development, and set out the framework and mitigation measures that apply to all subsequent variations.

The Proposed Variation has been prepared primarily to align the Kildare CDP 2023-2029 (as varied) with certain Section 28 Ministerial Guidelines published after the adoption of the Plan, namely the NPF Implementation: Housing Growth Requirements Guidelines (2025) and the Sustainable Residential Development and Compact Settlements Guidelines (2024). The Housing Growth Guidelines give effect to the National Planning Framework and provide housing growth requirements for each County. These guidelines were subject to SEA and AA. The Sustainable Residential Development and Compact Settlement Guidelines provide for the sustainable growth of existing settlements through new national rules for residential development and were also subject to SEA and AA.

The Proposed Variation (as originally published in October 2025) incorporated textual changes, policy revisions, revisions to existing objectives and new objectives to the CDP to give effect to Guidelines that were subject to SEA and AA. The Proposed Variation was also subject to Screening for AA and SEA. The methodology for the Screening for SEA and AA for the Proposed Variation accorded with all relevant legislative provisions and guidelines. None of the relevant environmental authorities consulted raised any issues with the methodology, content or conclusions of the Screening for SEA and AA as part of the consultation process.

The Screening Reports found that the proposed Variation, whilst altering the CDP through new / revised objectives and other amendments, does not:

- Result in changes to the overarching and preeminent strategic and environmental protection provisions and framework for the proper planning and sustainable development of the County,
- Alter the embedded environmental protections, considerations and requirements provided in the CDP,
- Materially change the overarching pattern of housing development for Kildare, particularly regarding the growth of urban settlements in a sustainable and environmentally appropriate manner.
- Create new impact pathways / environmental risks that have been unassessed and / or would be likely to result in likely significant environmental effects.

The amendments proposed reinforce continuing growth in existing settlements through sustainable development, subject to environmental considerations and assessment and operate within the baseline and overarching planning framework established by the CDP and its AA / SEA.

The Proposed Material Alterations to the Proposed Variation build upon the overarching alterations as originally proposed to ensure that the new Guidelines (particularly the Housing Growth Guidelines), which were subject to SEA and AA, are fully integrated into the CDP. The Screening

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Addendums for the Proposed Material Alterations assessed each further amendment and / or new amendment individually to determine whether it would alter the likelihood, nature, scale, location, or significance of environmental effects already evaluated through the CDP environmental assessments. In this regard, it should be noted that the proposed new / revised land use zonings and designations (including settlement boundary alterations) and movement of Newtown upwards in the Settlement Hierarchy do not:

- Result in changes to the overarching and preeminent strategic and environmental protection provisions and framework for the proper planning and sustainable development of the County,
- Alter the embedded environmental protections, considerations and requirements provided in the CDP,
- Materially change the overarching pattern of housing development for Kildare, particularly regarding the growth of urban settlements in a sustainable and environmentally appropriate manner.
- Create new impact pathways / environmental risks that have been unassessed and / or would be likely to result in likely significant environmental effects.

The amendments proposed reinforce continuing growth in existing settlements through sustainable development, subject to environmental considerations and assessment and operate within the baseline and overarching planning framework established by the CDP and its AA / SEA. It is noted that the CDP SEA evaluated the environmental effects of converting greenfield land to residential use, establishing new strategic growth areas and identifying settlement expansion lands.

3. Response to point 1

It is accepted that the PMAs do not only constitute minor textual changes. As outlined in Table 2.1 of the SEA screening and Table 2.1 of the AA screening, the changes comprise of text changes, new objectives and modifications to existing objectives. The SEA screening was carried out in accordance with S.I. No. 456 of 2025 European Union (Land Use Planning-Strategic Environmental Assessment) Regulations 2025 to determine the potential for significant environmental effects of the implementation of the variation and subsequent proposed amendments.

Under this legislation, there is no automatic requirement to carry out SEA just because a Variation to a CDP sets a *framework for future development of land*. This is, however, considered as part of the broader assessment of likely significant effects as set out under Schedule 2 of S.I. No. 456 of 2025. Similarly, the AA screening has been carried out in accordance with the Habitats Directive by assessing if the variation and subsequent amendments are likely to have significant effects on the conservation objectives of Natura 2000 sites.

Table 2.1 of the SEA screening report, clearly assesses each PMA individually and assesses the likelihood of significant environmental effects. The screening considers each amendment in the context of the existing CDP and the associated environmental reports. Considered in absolute

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isolation, certain amendments could give rise to the potential for significant environmental effects in the absence of mitigation measures and an appropriate development / environmental protection framework. However, the assessment relates to amendments which sit within an overarching and preminent development and environmental protection frameworks of the CDP with mitigation measures embedded and described within the SEA prepared for the CDP. These measures apply to the CDP and all subsequent variations. All variations are integral to the CDP and it is reasonable to rely upon the mitigation measures contained within the SEA for the purposes of assessing the likely significant effects of the variation (and subsequent amendments).

Similarly, Table 2.1 of the AA screening addendum, clearly assesses each PMA individually and assesses the likelihood of significant environmental effects. The screening considers each amendment in the context of the existing CDP and the associated environmental reports. As outlined in Section 1 of the AA screening addendum:

The assessment of the proposed Material Alterations is set out in this Addendum to the AA Screening Report. This Addendum should be read in conjunction with the SEA Environmental Report and the Natura Impact Statement (NIS) of the Kildare County Development Plan 2023 – 2029 (as amended), as well as the SEA and AA Screening of the Proposed Variation No. 3. All mitigation measures proposed as part of the SEA Environmental Report and NIS of the Kildare County Development Plan 2023-2029 (as varied) (CDP) will be applied to all Proposed Material Alterations, to minimize any potential for environmental impacts.

4. Response to point 2

The AA screening relies on potential source of impacts, potential pathways and receptors, it does not only rely on project level AA. The assessment refers out to objectives in the CDP that require project level AA. The screening is based on the potential for likely significant effects, which is the test for AA. The AA screening of the amendments relies on the AA screening of the variation and the AA completed for the CDP. As outlined in Section 1 of the AA screening addendum:

The assessment of the proposed Material Alterations is set out in this Addendum to the AA Screening Report. This Addendum should be read in conjunction with the SEA Environmental Report and the Natura Impact Statement (NIS) of the Kildare County Development Plan 2023 – 2029 (as amended), as well as the SEA and AA Screening of the Proposed Variation No. 3. All mitigation measures proposed as part of the SEA Environmental Report and NIS of the Kildare County Development Plan 2023-2029 (as varied) (CDP) will be applied to all Proposed Material Alterations, to minimize any potential for environmental impacts.

Appendix A2 of the AA screening report into the variation lists the measures embedded into the policies and objectives of the Kildare CDP (as varied) to prevent likely significant effects arising and to avoid adverse impacts on the integrity of European sites. Appendix A.3 refers to embedded protective policies and objectives relevant to European sites. Specific measures include:

BI O6 Apply the precautionary principle in relation to proposed developments in environmentally sensitive areas to ensure that all potential adverse impacts on a designated NHA or Natura 2000

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Site arising from any proposed development or land use activity are avoided, remedied, or mitigated.

BI P2 Seek to contribute to maintaining or restoring the conservation status of all sites designated for nature conservation or proposed for designation in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar Sites and Statutory Nature Reserves.

BI O9 Avoid development that would adversely affect the integrity of any Natura 2000 site and promote favourable conservation status of habitats and protected species including those listed under the Birds Directive, the Wildlife Acts and the Habitats Directive, to support the conservation and enhancement of Natura 2000 Sites including any additional sites that may be proposed for designation during the period of this Plan and protect the Natura 2000 network from any plans and projects that are likely to have a significant effect on the coherence or integrity of a Natura 2000 Site.

BI O10 Ensure an Appropriate Assessment Screening, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive, Section 177A of the Planning and Development Act (2001-2022) or any superseding legislation and with DEHLG guidance (2009), is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest.

5. Response to point 3

Objectives referencing flood-risk assessment do not signal new impact pathways; they reinforce the requirement for site-specific Flood Risk Assessments consistent with national guidance and existing CDP policies. The CDP SEA already accounted for development in areas where flood-risk considerations apply, and the PMAs serve to enhance rather than weaken environmental safeguards. No new environmental pathways are created.

In addition, by way of example, the following mitigation measures are included in the SEA Environmental Report prepared for the CDP:

Ensure that any new development does not present an inappropriate risk of flooding or does not cause or exacerbate such a risk at other locations.

Comply with the DoECLG/OPW guidance on development and flood risk through the control of development in any flood plain so that new and existing developments are not exposed to increased risk of flooding and that any loss of flood storage is compensated for elsewhere in the river catchment.

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These measures and all other mitigation measures included in the SEA and AA for the CDP apply to any subsequent variations and amendments to variations. On that basis, the potential for significant adverse effects could be screened out.

6. Response to point 4

As outlined in response to point 1, the environmental assessment of the PMAs is included in Table 2.1 of the SEA screening addendum. The assessment is an addendum to the SEA screening of the variation which assesses the variation in accordance with S.I. No. 456 of 2025 European Union (Land Use Planning-Strategic Environmental Assessment) Regulations 2025 to determine the potential for significant environmental effects of the implementation of the variation. Under this legislation, there is no automatic requirement to carry out SEA just because a Variation to a CDP sets a *framework for future development of land*. This is, however, considered as part of the broader assessment of likely significant effects as set out under Schedule 2 of S.I. No. 456 of 2025:

1. *The characteristics of the plan having regard, in particular, to:*
 - *The degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;*
 - *The degree to which the plan influences other plans, including those in a hierarchy; – The relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development;*
 - *Environmental problems relevant to the plan; and*
 - *The relevance of the plan for the implementation of European Union legislation on the environment (e.g. plans linked to waste-management or water protection).*
2. *Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:*
 - *The probability, duration, frequency and reversibility of the effects;*
 - *The cumulative nature of the effects,*
 - *the transboundary nature of the effects;*
 - *The risks to human health or the environment (e.g. due to accidents);*
 - *The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);*
3. *The value and vulnerability of the area likely to be affected due to:*
 - a. *Special natural characteristics or cultural heritage*
 - b. *Exceeded environmental quality standards or limit values*

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c. Intensive land-use. – The effects on areas or landscapes which have a recognised national, European Union or international protection status.

The SEA screening of Variation No. 3 was assessed in the context of Schedule 2 of S.I. No. 456 of 2025. The assessment of the PMAs to the Variation considered the potential for additional significant environmental effects on the basis of implementing the PMAs with the implementation of mitigation measures contained within the SEA Environmental Report of the CDP.

Mitigation measures relating to the potential biodiversity, population and human health, land and soils, water resources, air noise and climate, archaeology, architectural heritage and cultural heritage, landscape and visual and material assets. In addition, monitoring of potential adverse impacts is required as outlined in detail in section 6 of the SEA Environmental Report prepared for the CDP.

7. Response to point 5

The SEA and AA screenings do not rely on project level assessments. Where the AA screening refers to project level AA, it refers to the objectives contained within the CDP which refer to project level AA. There is no reference to project level assessments within the SEA screening. The SEA screening recognises that the CDP SEA has already assessed the plan-level impacts associated with the development patterns enabled by the CDP. All Variation objectives operate within that fully assessed and mitigated framework. As no new plan-level environmental effects arise from the PMAs of the Variation following the consideration of policies within the CDP and mitigated in the environmental assessments, a full SEA is not triggered. Any future planning application must still comply with CDP policies, including environmental protection, flood-risk management, AA, and other regulatory requirements.

Technical Note

Project title	Kildare County Development Plan Variation No. 3
Job number	312816-00
File reference	Issue
cc	KCC
Prepared by	Ailsa Doyle
Date	19 March 2026
Subject	Submission No. 38 FIE - Submission Response

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1. Introduction

A submission (Ref No. KCC-C455-38) was received during the public consultation process for the Proposed Material Alterations to Proposed Variation No. 3 of the Kildare County Development Plan 2023-2029 (as varied).

This response addresses the matters raised in this submission by Friends of the Irish Environment (FIE) concerning the SEA Screening determination for Variation No. 3 to the Kildare County Development Plan (CDP) 2023–2029 and its associated Proposed Material Alterations (PMAs). The submission questions whether the Schedule 2A / Annex II criteria (now Schedule 2 of S.I. No. 456 of 2025) were sufficiently demonstrated in respect of the uplift in housing, its spatial distribution and the various delivery mechanisms introduced through the PMAs. It suggests that reliance on the SEA for the adopted CDP is inadequate without a clear account of how the final form of the Variation was evaluated.

It is the strong opinion of Arup that the SEA Screening of the PMAs was carried out in full accordance with the SEA Directive, SEA Regulations, the Planning and Development Regulations and all relevant national guidance. It is grounded in the established position that the CDP sets out a growth-orientated spatial strategy for Kildare and was assessed as such through a comprehensive SEA and AA process. Those assessments have already examined the environmental implications of accommodating ongoing and variable population and housing growth across the county and identified the mitigation measures required to ensure that any growth would be implemented in an environmentally responsible and sustainable manner over the lifetime of the Plan.

This strategic environmental framework is further reinforced by the extensive suite of protective policies and objectives embedded within the CDP. These provisions are expressly designed to ensure that all development arising from the Plan-whether directly or through subsequent variations-is brought forward within the parameters of these environmental safeguards. The objectives of the CDP are intentionally formulated to place environmental protection at the forefront of plan implementation, while the mitigation measures established through the SEA ensure that no significant adverse environmental effects will occur, provided the Plan is implemented in line with these protections.

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In undertaking the SEA Screening for the Proposed Variation and its associated amendments, Arup carried out a detailed review of the CDP’s existing policies and objectives, with particular regard to its protective environmental provisions and the mitigation measures set out in the SEA Environmental Report and Natura Impact Report. The conclusion that the Proposed Variation and Amendments are not likely to give rise to significant environmental effects, over and above what was already assessed and mitigated, is based on this established and already assessed environmental framework, which remains fully in force and continues to regulate how development facilitated by the Variation will occur.

2. Submission Response

2.1 Part 1

The primary purpose of the Proposed Variation and Amendments is to incorporate updated housing growth requirements arising from Section 28 Ministerial Guidelines published after the Plan’s adoption, specifically the *NPF Implementation: Housing Growth Requirements Guidelines (2025)* and the *Sustainable Residential Development and Compact Settlements Guidelines (2024)*. These Guidelines establish revised county based housing growth requirements derived from the National Planning Framework First Revision national / regional housing requirements and updated principles for compact settlement consolidation respectively. It is noted that the National Planning Framework First Revision and the Sustainable Residential Development and Compact Settlements Guidelines (2024) are accompanied by SEA and AA Determinations together with associated reports. The Variation therefore does not introduce any new or unforeseen strategic direction; rather, it ensures that the CDP remains aligned with national policy, as required by statute, by adjusting the existing Core Strategy framework to reflect updated growth requirements.

An acknowledgement that the housing targets and growth projects for the county are subject to change, depending on the national and regional growth strategy at the time, is inherent in Objective CS O1 of the Core Strategy. (Table 2.1)

Table 2.1

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’.
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Crucially, the CDP already anticipates and provides for ongoing population and housing growth throughout the plan period. Objectives such as CS O4, HO P3, HO P4, HO O2 and HO O8 (Table 2.2) set out clear commitments to maintain an adequate supply of zoned and serviced land, deliver compact growth, and manage development within the settlement hierarchy.

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Table 2.2

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.
HO P3	Implement, in conjunction with the Housing Section, the Housing Strategy and Housing Need Demand Assessment (HNDA) to meet the projected population, changing household size and housing needs, including social and affordable housing requirements for County Kildare over the lifetime of the County Development Plan.
HO P4	Ensure that sufficient zoned land continues to be available at appropriate locations to fulfil the housing requirements of the county.
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.
HO O8	Support new housing provision over the Plan period to deliver compact and sustainable growth in the towns and villages in the County, and supporting urban renewal, infill and brownfield site development and regeneration, to strengthen the roles and viability of the towns and villages, including the requirement that at least 30% of all new homes in settlements be delivered within the existing built- up footprint.

The very nature of these objectives is that is grounded in the established position that the CPD sets out a growth-orientated spatial strategy for Kildare and was assessed as such through a comprehensive SEA and AA process. Those assessments have already considered the environmental implications of accommodating growth in population and housing across the county (including population related pressures, land use change, transport demand, air quality considerations and climate impacts). They also identify mitigation measures required to ensure that such growth -irrespective of the specific quantum- would be implemented in an environmentally responsible and sustainable manner over the lifetime of the Plan (sample selection provided in Table 2.3).

Table 2.3

To require all planning applications for development that may have (or cannot rule out) likely significant effects on European Sites in view of the site's Conservation Objectives, either in isolation or in combination with other plans or projects, to submit a Natura Impact Statement in accordance with the requirements of the EU Habitats Directive and the Planning and Development Act, 2000 (as amended).
To ensure the protection and conservation of areas, sites, species and ecological networks/corridors of biodiversity value outside of designated sites throughout the country and to require an ecological assessment to accompany development proposals likely to impact on such areas or species
To implement the EIA Directive, ensuring that all elements/stages or components of the project are included in one overall assessment and all reasonable alternatives are taken into consideration in choosing the option with the least environmental impact.

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Prevent the alteration of natural drainage systems and in the case of development works require the provision of acceptable mitigation measures in order to minimise the risk of flooding and negative impacts on water quality.
Consideration of likely noise impacts/effects associated with new developments. This includes being cognisant of proximity to sensitive receptors when siting new developments and consideration of existing noise sources when zoning lands for residential development.
To ensure that developments do not give rise to negative effects on air quality, during both construction and operation.
To ensure that new developments within or adjacent to an ACA respect the established character context of the area and contribute positively to the ACA in terms of design, scale, setting and material finishes

Further, the CDP contains a wide range of protective policies that ensure robust environmental safeguards are applied to any development arising from the Plan (sample selection provided in Table 2.4). As part of the SEA Screening, Arup undertook a detailed review of these policies and confirmed that, when read alongside the mitigation measures identified in the CDP SEA Environmental Report, they provide a comprehensive and effective environmental protection framework. This established framework ensures that development facilitated by the Proposed Variation and PMAs continues to be implemented within clear environmental parameters, thereby preventing any significant adverse environmental effects beyond those already assessed and mitigated through the SEA of the adopted CDP.

Table 2.4

<i>BI O1</i>	<i>Require, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation and to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development. Such assessments shall be carried out in line with the CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.</i>
<i>BI O9</i>	<i>Avoid development that would adversely affect the integrity of any Natura 2000 site and promote favourable conservation status of habitats and protected species including those listed under the Birds Directive, the Wildlife Acts and the Habitats Directive, to support the conservation and enhancement of Natura 2000 Sites including any additional sites that may be proposed for designation during the period of this Plan and protect the Natura 2000 network from any plans and projects that are likely to have a significant effect on the coherence or integrity of a Natura 2000 Site</i>
<i>BI P3</i>	<i>Ensure that any proposal for development within or adjacent to a Natural Heritage Area (NHA), Ramsar Sites and Nature Reserves is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Acts and the Habitats and Birds Directive including their habitats. Objectives</i>

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<p><i>BI O12</i></p>	<p><i>Require the preparation of an Ecological Impact Assessment (EcIA) by a suitably qualified professional for proposals for development within or adjacent to a Natural Heritage Area (NHA)/proposed Natural Heritage Areas (pNHA), to ensure the development is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Acts. Such assessments shall be carried out in line with the CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.</i></p>
<p><i>BI P4</i></p>	<p><i>Ensure that any new development proposal does not have a significant adverse impact, incapable of satisfactory mitigation on plant, animal or bird species which are protected by law.</i></p>
<p><i>BI O29</i></p>	<p><i>Require the undertaking of a comprehensive tree survey carried out by a suitably qualified arborist where development proposals require felling of mature trees; the tree survey shall assess the condition, ecological and amenity value of the tree stock proposed for removal as well as mitigation planting and a management scheme. It should be noted that rotting and decaying trees are an integral part of a woodland ecosystem and can host a range of fungi and invertebrates, important for biodiversity. While single or avenue trees that are decaying may be removed, others that are part of group or cluster may be subject to retention.</i></p>
<p><i>BI O52</i></p>	<p><i>Require the preparation and submission of a Hydrological Report/Assessment for significant developments within and in close proximity to protected raised bogs and to take account of same in the assessment of impacts on the integrity of peatland ecosystems.</i></p>
<p><i>BI O56</i></p>	<p><i>Ensure that development proposals or activities that may impact on sensitive water habitats, in particular wetlands (identified as part of the County Kildare Wetland Survey 2012-2014, (See Table 12.6), shall not be permitted without the introduction of mitigation measures agreed in writing with the Council to eliminate negative environmental impacts.</i></p>

The primary and overarching consideration in the SEA Screening process was, ultimately, that the Kildare CDP is, by design, a growth-orientated strategic framework, and was assessed and environmentally appraised on that basis during its preparation.

The SEA undertaken for the adopted Plan evaluated the environmental implications of accommodating significant and continual population and housing growth across the county and established the mitigation measures and protective objectives to ensure that such growth would occur within a robust environmental protection framework. These mitigation measures and protective policies- embedded throughout the CDP- continue to apply in full to any development facilitated by the Proposed Variation and PMAs, ensuring that environmental safeguards remain operative regardless of the precise housing quantum provided in response to updated national guidance and requirements. For this reason, the uplift in housing numbers introduced through the Variation and PMAs is not, in itself, determinative of environmental significance. What is determinative is whether the established environmental safeguards, mitigation measures and protective policies remain in force, and they do so without qualification. The Variation and PMAs do not alter these protections, do not introduce new or unassessed pathways for environmental

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effects, and do not expand the scope of development beyond what has already been evaluated through the CDP SEA. It is on this basis - namely that the Variation operates wholly within the strategic, environmental and mitigation framework already established - that the Proposed Variation and PMAs were screened out as not being likely to give rise to significant environmental effects beyond those already assessed.

It is within this same context, that the response to FIE’s other submission items is based. For example, FIE also queries whether the screening adequately considered transport, air quality and climate related implications associated with allocating additional housing to rail served and non-rail settlements. Again, the CDP already contains a comprehensive movement and transport framework which anticipates ongoing population and housing growth and ensures that its associated transport impacts are assessed and managed in a manner consistent with compact settlement patterns, sustainable mobility and climate resilience. The Plan prioritises modal shift, anchors higher proportions of growth to public transport corridors, and embeds requirements for permeability, walking and cycling networks, and mobility management planning.

The relevant provisions include CS O22 on anchoring growth to high capacity public transport corridors through LAP processes (applicable to Settlement Plans); TM P1 on prioritising walking, cycling and public transport; TM O20 and TM O21 on permeability and ten minute settlement principles; TM A5 on network planning for walking and cycling; TM P9 on traffic impact management and maximising efficient use of existing networks; and the development management requirements for mobility management and public transport capacity assessments under TM A25 and TM O61. The screening reached the view that the PMAs do not set aside, weaken or disapply these provisions and therefore do not give rise to additional, unassessed transport or associated emissions effects beyond those already addressed in the SEA impact assessment and mitigated through measures proposed.

Accordingly, the Variation and PMAs does not introduce any new transport, air quality or climate pathways, nor does it modify the Plan’s mechanisms for avoiding or mitigating such effects. Because the CDP already anticipates population and housing growth, already embeds the policies required to regulate its environmental implications (Table 2.5), and already contains a robust mitigation framework that continues to apply to all varied objectives, the screening concluded that the Proposed Variation and PMAs are not likely to give rise to significant environmental effects beyond those previously assessed and mitigated.

Table 2.5

CS O22	Ensure that all sustainable urban extensions to settlements along high-capacity public transport routes (Dart+ services, Bus Connects routes and any designated bus only/ bus priority route) are considered in the appropriate Local Area Plan process, in conjunction with the Regional Spatial and Economic Strategy to support new distributed growth in County Kildare during the life of this Plan and to inform the next County Development Plan, LAPs, UDZs and or any other plans or variation.
TM P1	Promote sustainable development through facilitating movement to, from, through and within the County that is accessible to all and prioritises walking, cycling and public transport.

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TM O20	Ensure new development areas are fully permeable for walking and cycling at a minimum, public transport (where appropriate) and provide for filtered permeability for private vehicle access in accordance with the NTA Permeability Best Practice Guide in order to give a competitive advantage to active travel modes for local trip making
TM O21	Ensure site layout proposals detail present and possible future connections to pedestrian/cycle links and improve permeability between existing and proposed developments including adjacent developments thereby facilitating the '10-minute settlement' concept.
TM A5	Prepare a walking and cycling strategy to identify and invest in new high-quality, suitable, safe, and sustainable walking and cycling routes, in consultation with stakeholders with links from towns and villages to public transport services, amenities, services, schools, and existing and proposed developments. These walking and cycling routes should be segregated and the cycling routes should accommodate two-way access, whenever possible.
TM P3	Promote the sustainable development of the county by supporting and guiding national agencies in delivering major improvements to the public transport network and to encourage a shift from car-based travel to public transport that is accessible for all, regardless of age, physical mobility, or social disadvantage.
TM P9	Effectively manage and minimise the impacts of traffic in urban areas and prioritise the movement of pedestrians, cyclists and public transport particularly at key junctions, while maximising the efficient use of existing resources
TM A25	Require all multi-unit developments and schools to submit mobility management plans and travel plans, including an assessment of the public transport capacity in a manner consistent with existing NTA guidance and to implement mobility management initiatives to minimise the impact of new developments on the road and street network of the County.
TM O61	Require all developments to undertake an assessment of the public transport capacity related to the area of the proposed development site.

Arup's consideration of FIE's submission item concerning the suitability of facilitating additional housing delivery in Clane and other towns/settlements is grounded in the same strategic and environmental principles already outlined above. The purpose of the Proposed Variation and PMAs is to update housing growth requirements in line with national policy, and the uplift now assigned to settlements, including Clane, sit comfortably within the growth-orientated strategic framework that was already assessed as part of the adopted CDP. The CDP anticipated continued population and housing growth throughout the plan period across settlements and is underpinned by objectives such as CS O4, HO P3, HO P4, HO O2 and HO O8, all of which were evaluated in the SEA for their implications on land use, transport, air quality, climate and population related pressures, irrespective of the precise quantum ultimately delivered. The SEA mitigation measures and embedded protective objectives established a robust environmental envelope specifically designed to accommodate future variations in housing demand. For this reason, the increased housing allocation for Clane and other settlements introduced through the Variation and PMAs is not, in itself, determinative of environmental significance. The decision-making process for development proposals in Clane and across the county operate within the environmental framework of the CDP

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(and its protective measures) together with current national and regional planning policy which anticipate ongoing population and housing growth in settlements of all scales and contexts, subject to a range of considerations beyond estimated potential housing quantum's.

In addition, the Variation and PMAs explicitly provide for the preparation of a new Settlement Plan for Clane, to be brought forward by means of a further Variation to the CDP (Table 2.6). This forthcoming Settlement Plan will be prepared in accordance with the statutory requirements of the Planning and Development Act and will be subject to SEA and AA Screening as part of its formal plan-making process. Once adopted, it will supersede the earlier LAP and will operate within the national, regional and local planning policy context, including the RSES and the current CDP.

Accordingly, the Variation also puts in place a clear and contemporary plan making pathway through which Clane's future development strategy will be assessed afresh, using a comprehensive and environmentally robust framework. Future housing delivery in Clane will be evaluated under the Core Strategy, the CDP's protective policies and SEA mitigation measures, and the environmental assessment requirements applicable to a new Settlement Plan, thereby addressing the concerns raised in the submission in a manner fully aligned with statutory planning and environmental assessment procedures.

Table 2.6

CS O31	<i>Prepare settlement plans for Monasterevin Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared and integrated into the County Development Plan by way of a statutory variation including the additional housing growth requirement included in Table 2.8 and 2.8A on serviced lands to be informed by infrastructural and environmental assessments.</i>
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FIE's submission also raises concerns regarding the potential for cumulative environmental effects arising from the combination of housing delivery mechanisms introduced through the Variation and PMAs, as well as whether wider environmental considerations-such as transport demand, land use patterns, climate emissions and overall settlement growth-were properly evaluated alongside infrastructure capacity.

Returning to the established position that the CPD sets out a growth orientated spatial strategy for Kildare and was assessed as such through a comprehensive SEA and AA process, it can be reasonably concluded that these matters have already been comprehensively assessed through the strategic and environmental framework of the adopted CDP and its SEA. The SEA evaluated the combined effects arising from new zonings, rezonings, settlement expansion, strategic development areas and infrastructure-led sequencing at the scale of the county's settlement hierarchy. It assessed growth patterns not in isolation, but collectively across transport, climate, biodiversity, water, landscape and population-health pathways, and embedded mitigation measures and protective

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policies to ensure that cumulative, secondary and synergistic effects would be avoided or managed over the lifetime of the Plan.

The Proposed Variation and PMAs sit entirely within this established framework. They do not alter the overarching Core Strategy principles and provisions, settlement hierarchy or the underlying environmental protection provisions that the SEA relied upon, nor do they introduce any new development mechanism that would give rise to unassessed cumulative effects. Because the Variation does not weaken or displace these safeguards, it does not generate new or intensified cumulative effects.

Likewise, FIE's concern that infrastructure capacity considerations were not assessed alongside broader environmental implications is unfounded. The SEA for the CDP addressed not only infrastructure serviceability but also transport demand, modal shift, air quality pathways, climate implications, biodiversity networks and cumulative settlement level effects. These environmental safeguards continue to apply in full to development arising from the PMAs, and plan implementation must continue to comply with them. The SEA Screening therefore correctly focused on whether the PMAs altered the existing environmental protections; they do not.

For these reasons, the screening determination appropriately concludes that neither the cumulative operation of the Plan's housing-delivery mechanisms, nor the broader environmental considerations identified by FIE, give rise to a need for full SEA. The environmental effects associated with the Variation and PMAs fall entirely within the assessment envelope already established for the CDP, and the existing mitigation measures remain fully in force.

2.2 Part 2

Part 2 of the FIE submission relates to PMA BI O26.

The objective was set out in the CDP, when originally prepared, and subject to SEA as follows:

BI O26 Prevent, in the first instance, the removal of hedgerows to facilitate development. Where their removal is unavoidable, same must be clearly and satisfactorily demonstrated to the Planning Authority. In any event, removal shall be kept to an absolute minimum and there shall be a requirement for mitigation planting comprising a hedge of similar length and species composition to the original, established as close as is practicable to the original and where possible linking to existing adjacent hedges. Ideally, native plants of a local provenance and origin should be used for any such planting. Removal of hedgerows and trees prior to submitting a planning application will be viewed negatively by the planning authority and may result in an outright refusal.

The proposed Variation No. 3 did not propose any changes to this Objective; however Proposed Material Alteration No. 34 to the Proposed Variation No. 3 does propose a change to this Objective, as follows:

BI O26 Avoid, in the first instance, the removal of hedgerows to facilitate development. Where their removal is unavoidable, there shall be a requirement for mitigation planting comprising a hedge of similar length, established as close as is practicable to the original and where possible linking to existing adjacent hedges. Ideally, native plants should be used for such planting. Removal of

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hedgerows and trees prior to submitting a planning application will be viewed negatively by the planning authority.

The SEA Screening of the Proposed Material Alteration found that no further assessment is required.

FIE, in their submission, argue that the basis for this conclusion is not clearly explained having regard to the nature of the proposed changes. It is the opinion of FIE that the amendment would alter the operative decision-making framework governing hedgerow removal by taking out the evidential threshold for loss, the requirement to minimise removal and the stronger mitigation measures provided by the current objective wording.

FIE seek clarification on how the environmental implications of the weakening of Objective BI O26 (as detailed above) were considered and evaluated would assist in demonstrating the robustness of the SEA screening process and the conclusion that the alteration is not likely to give rise to significant environmental effects.

Although the proposed alteration to BI O26 undoubtedly softens certain elements of the original wording, Arup does not consider that this change gives rise to likely significant negative environmental effects within the meaning of the SEA Regulations. The retention-first principle remains embedded in the amended objective, which continues to require avoidance of removal in the first instance and mandates mitigation planting, established as close as practicable to the original alignment and linked with adjacent hedgerows where possible. This retains an operative policy structure that secures replacement of lost hedgerow features and ensures the continued functioning of ecological corridors within development sites. Furthermore, the objective sits within a broader and more comprehensive protective policy framework that remains wholly intact. Of particular relevance is Objective BI O27, which requires the retention and appropriate management of hedgerows (Table 2.7). This objective, together with the wider biodiversity and landscape policies of the CDP, ensures that hedgerow networks continue to be protected, reinforced and integrated into development proposals irrespective of the amended wording of BI O26.

Table 2.7

BI O27	Require the retention and appropriate management of hedgerows and to require infill or suitably sized transplanted planting where possible in order to ensure an uninterrupted green infrastructure network.
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In undertaking the SEA Screening of the PMAs, Arup assessed the proposed alteration within the context of this established environmental protection framework. The assessment considered the suite of mitigation measures already embedded in the CDP, including requirements to: protect and conserve areas, sites, species and ecological networks of biodiversity value; ensure ecological assessment of proposals likely to impact such areas; promote the conservation of natural heritage, flora and fauna through habitat protection and enhancement; safeguard biodiversity by protecting sites of importance and wildlife corridors both within and between designated sites and the wider plan area; and ensure that development proposals support and enhance habitat connectivity by incorporating natural features into their design (Table 2.8). The SEA framework also requires that

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the development of new infrastructure be subject to site options assessment and appropriate environmental evaluation.

Table 2.8

To ensure the protection and conservation of areas, sites, species and ecological networks/corridors of biodiversity value outside of designated sites throughout the country and to require an ecological assessment to accompany development proposals likely to impact on such areas or species
To protect and promote the sustainable management of the natural heritage, flora and fauna of the county through the promotion of biodiversity, the conservation of natural habitats and the enhancement of new and existing habitats.
To promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area.
To ensure that development proposals support and enhance the connectivity and integrity of habitats in the plan area by incorporating natural features into the design of development proposals.
The development of new infrastructure should be subject to site options assessment and environmental assessment, where required.

When viewed within this wider protective and mitigation structure, the amendment to BI O26 does not alter the environmental safeguards relied upon in the original SEA. The mechanisms that prevent significant environmental effects—namely, retention-led policies, ecological assessment requirements, hedgerow management and enhancement, protection of ecological networks and corridors, and mitigation planting—remain firmly in place. On this basis, Arup is satisfied that the proposed wording change does not give rise to likely significant environmental effects and can be appropriately accommodated within the robust environmental envelope already established by the County Development Plan.



Appendix B: Summaries of Submissions/Observations Received





**Planning Department,
Kildare County Council,
Áras Chill Dara,
Devoy Park, Naas,
Co. Kildare W91 X77F**

Appendix B: Summary of Submissions/Observations Received

The submissions summarised in Appendix B below **exclude** the following:

- The submission from the Office of the Planning Regulator (see Section 3 of the Chief Executive's Report)
- Submissions from Prescribed Authorities and Public Bodies (see Section 4 of the Chief Executive's Report)

Sub Ref No:	001
Name:	Conor Morgan
Issues Raised:	
<p>The submission asserts that the conclusions reached in the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening reports and associated determinations for the Proposed Material Alterations to Proposed Variation No. 3 are flawed in law and planning practice for the following reasons:</p> <ol style="list-style-type: none"> 1. The alterations are not minor textual changes but material changes to development capacity, introducing: <ul style="list-style-type: none"> • New residential and serviced site zonings, • Changes to lands from open space / strategic reserve / non-development status to residential or settlement expansion lands, • Amendments to settlement boundaries, • Alterations to the settlement hierarchy (movement of locations from a rural node to a rural settlement), • Introduction of additional lands into development frameworks across multiple settlements. <p>Submission considers that these alterations materially change how much development can occur compared to the existing adopted plan framework. It is stated that this is critical as the test under the SEA Directive and Habitats Directive are based on the effect of the plan, not on how alterations are described. States that plans that set the framework for future development of land are precisely the type of plans which SEA and AA are intended.</p> 2. Failure to properly consider Indirect and In-combination effects (AA Screening). The submission contends that the AA Screening Determination heavily relies on the assertion that no direct pathway for impact exists to any Natura 2000 site and that future development will be assessed at project stage. <p>Submits that this approach is inconsistent with EU case law. Where a plan itself enables additional development capacity, the potential effects on water bodies, wastewater loading, surface water runoff, river catchments and downstream European sites must be assessed at plan stage and cannot be deferred to individual planning applications.</p> <p>Notes that the alterations increase the population and development potential in multiple settlements. This necessarily increases pressure on water services and receiving water bodies, which ultimately connect to European sites. This</p> 	

represents a clear indirect pathway for impact. Furthermore, the screening does not adequately consider in-combination effects of multiple alterations across the county when assessed cumulatively.

States that the legal threshold for AA is “the possibility of significant effects”, not proof of such effects. Contends that this threshold is clearly met.

3. Interaction with flood risk and watercourses. States that several alterations explicitly reference the need for site-specific flood risk assessments and the consideration of climate change flood extents. Submits that this indicates that lands being brought into development frameworks interact with floodplains and watercourses, which represent established pathways to European sites. Contends that the acknowledgement of flood risk interaction undermines the conclusion that no pathway for impact exists.

4. SEA Screening – Likely Significant Environmental Effects. Notes that the SEA Addendum concludes that the alterations are not likely to have significant environmental effects. However, further notes that the alterations:

- a. Expand development areas,
- b. Increase residential zoning,
- c. Affect greenfield lands,
- d. Alter settlement structures,
- e. Interact with flood risk areas,
- f. Increase potential traffic, wastewater and surface water runoff.

States that these are the type of plan changes that SEA is designed to assess, and it is difficult to reconcile these changes with a conclusion of “no likely significant environmental effects”.

5. States that reliance on project stage assessment is not sufficient. Contends that both screenings rely on the argument that impacts can be dealt with at project stage. Submits that this is not legally sufficient where the plan itself creates the development potential that gives rise to those impacts.

The submission concludes by highlighting that the Proposed Material Alterations materially increase development capacity, create clear indirect pathways for environmental impact, fail to properly assess in-combination effects, interact with flood risk lands and watercourses, and meet the low legal threshold for both SEA and AA. It is submitted that the determinations that full SEA and AA are not required are unsound, and that full SEA and AA should be undertaken prior to the adoption of these alterations.

Sub Ref No: 002

Name: Paul Barry

Issues Raised:

The submission relates to the proposed change to Objective BI O26, stating that the new wording weakens the protection of hedgerows in Kildare. This weakening occurs at a time when hedgerows are more important than ever for biodiversity, climate resilience, and the character of the rural landscape. Submits that the original wording of the objective is stronger, clearer and more in line with public expectations in terms of environmental protection. The submission requests that

the Council keep the original text of Objective BI O26 or strengthen it further, rather than diluting it.

The submission outlines that the current objective wording:

- Clearly provides that hedgerow removal should only happen where it is “*clearly and satisfactorily demonstrated*” to the Planning Authority. This is an important safeguard to ensure that removal is genuinely unavoidable. The proposed revised wording removes this requirement entirely, thereby making it much easier for developers to justify removing hedgerows without strong evidence.
- States that removal should be kept to an “*absolute minimum*”. The proposed revised wording takes out this element and is a step backwards.
- States “*Prevent, in the first instance, the removal...*”. The term “*prevent*” is a strong and clear statement. The proposed revised wording instead states to “*Avoid, in the first instance.....*”. The term “*avoid*” is vague, easier to get around, reduces the ability of the Council to stand firm in its assessment of planning applications and makes the policy far less effective.

The submission further states that the proposed revised wording lowers the standard for replacement planting. Notes that the current wording requires replacement hedges of similar length and composition, which helps maintain the ecological value of what was lost. States that the proposed revised wording drops the reference to species, which could lead to poorer-quality replacements. States that the current emphasis on using native planting has also been softened in the proposed revised wording.

Sub Ref No: 003

Name: Stewart McCarthy

Issues Raised:

Whilst seeking to clarify that it is not an objection to housing delivery the submission seeks to oppose the scale and timing of the 2,000 additional unit increase (270% increase) for Celbridge, stating that the provision of houses without corresponding social infrastructure denies current and future residents the right to a sustainable and functional society. In this regard, the submission:

- Considers that the current proposal breaches the statutory requirement for Integrated Planning under Section 10(2)(d) of the Planning and Development Act 2000, which requires that development plans include objectives for “*..the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population.*”
- Asserts that Celbridge is underserviced in key areas when compared to towns of similar or smaller populations. The submission outlines that the town has only one playground for 20,000 people and lacks a public swimming pool or regional park facility. The submission considers that the existing library capacity and lack of a dedicated, high-capacity community centre mean that the town cannot support the social integration of 2,000 additional households. The front loading of residential density without a concurrent, legally binding commitment to social infrastructure is planning for social isolation, with new residents deserving a town that is ready to receive them. The lack of services and the closure of services recently has had a compounding impact on a sense of society in the area.
- It is contended that the proposal decouples housing from social and community infrastructure requirements by front-loading of 2,000 units while delaying the

Celbridge Settlement Plan until 2026/2027 and is a direct violation of the requirement to integrate planning with the needs of the population. It is stated that the proposal offers no concrete delivery mechanism for the integration of social and community facilities / services, failing the “sustainable communities” test.

- Considers that the proposal fails to meet the ‘infrastructure-led’ requirements of the National Planning Framework (NPF) and violates National Planning Objective (NPO) 72a of the NPF, which explicitly mandates a “service-led” approach to land release, stating that *“Planning authorities will be required to apply a standard tiered approach to differentiate (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan”*. The submission notes that Proposed Material Alteration No. 1 admits that residential land should only be released where *“....it can be demonstrated...that the lands are readily serviced or serviceable....and where the proposal addresses any identified social infrastructure deficit in the respective settlement.”*
- States that given the documented deficit in basic amenities, it is stated that the identification of 73 hectares at Simmonstown and Ballyoulster is premature and that the Council cannot demonstrate serviceability when existing residents are already underserved in terms of amenities, power, water and sewerage.
- States that the scale of development at Simmonstown and Ballyoulster will generate significant trip demand and that proceeding without a site-specific Local Area Plan or revised Area Based Transport Assessment (ABTA) is irresponsible. It is asserted that the R403 is at peak capacity and that reliance on future unconfirmed public transport upgrades to mitigate the immediate impact of 2,000 additional homes creates significant risk to the town’s mobility.
- The submission concludes by stating that the proposed alteration should be rejected in its current form, with any increase in housing targets contingent upon a “Service-First” trigger. Submits that the Council must complete a Social Infrastructure Audit, and secure funding for a second municipal playground, public swimming pool and/or expanded library services before the strategic lands in Celbridge are developed. The submission is accompanied by a map outlining Celbridge.

Sub Ref No: 004

Name: Community Campaigner David Barton

Summary of Issues Raised:

- Submitter outlines their role as a community campaigner promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA) / Traditional Architecture as a key feature across UK-wide local authorities. States that the submission is an ‘umbrella representation.’
- Submission outlines the background of the submitter including successful campaigns in the UK to promote and protect historic buildings.
- States that the submission is supported by 32 Appendices. It is noted that these have not been included with the submission. However, hyperlinks to websites have been provided for the majority.
- Submission calls for the establishment of design codes based on TVA principles and that local authorities should partner with key stakeholder

organisations. Outlines a range of suggestions about to policy in this regard, including the non-demolition of pre-1950s buildings.

- Regarding conservation areas, the submission outlines the need for enhanced conservation efforts in designated areas. Outlines a range of suggested actions including a streamlined process for listed building consent, the preservation of historic street furniture and financial incentives for maintaining/restoring buildings.
- Highlights the role of historic buildings in combatting climate change and suggests a range of actions, including a focus on increasing the stock of carbon-rich old buildings, retrofitting historic buildings and financial incentives for the demolition of carbon poor contemporary buildings.
- Outlines actions that could be taken on historic buildings including the creation of a Designated and a Non-Designated Heritage Asset List and a scheme to rebuild long lost buildings.
- Suggests a range of actions that can be taken to promote traditional value architecture.
- Regarding to the planning system, the submission emphasises the need to identify applicants which have a history of harming civic heritage and states that this should be a consideration in the granting of permission. Requests Local Authorities to collaborate with the community and heritage bodies to give these people a voice.
- Submission concludes by identifying a range of miscellaneous issues which are aimed at supporting the historic built environment. These include support for well-designed car parking, the utilisation of specialist skills and the creation of a Top 10 Buildings at Risk Register.

Sub Ref No:	005
Name:	Neville Homes Limited

Issues Raised:
 The submission supports the plan-led response to revised national housing growth requirements, the allocation of additional growth to key towns (including Sallins), the inclusion of objective CS O33 and the stated objective of continuity in housing supply. The submission notes that the measures in the Variation are consistent with national policy direction and Housing for All objectives.

However, the submission requests the following clarifications regarding Sallins:

- That statutory spatial clarity be provided through the insertion of a zoning map into Volume 2 or the provision of transitional guidance confirming the planning status of lands within the settlement boundary pending the adoption of the Settlement Plan. States that the absence of an adopted zoning map should not operate as a barrier to housing delivery
- The Proposed Material Alterations (PMAs) confirm that serviced and serviceable lands within the defined settlement boundary may proceed notwithstanding Settlement Plan preparation.

Submits that without the clarifications requested regarding Sallins, there is a material risk that the absence of zoning clarity and the pending Settlement Plan could result in an unintended delay in housing delay during 2026 until the Settlement Plan is adopted and in force. States that this would be inconsistent with

Housing for All objectives, the Housing Supply Target Methodology, the Compact Settlement Guidelines and the stated purpose of the PMAs.

In this regard, the submission states that such further refinement would ensure policy clarity and alignment with national housing activation objectives, noting the following:

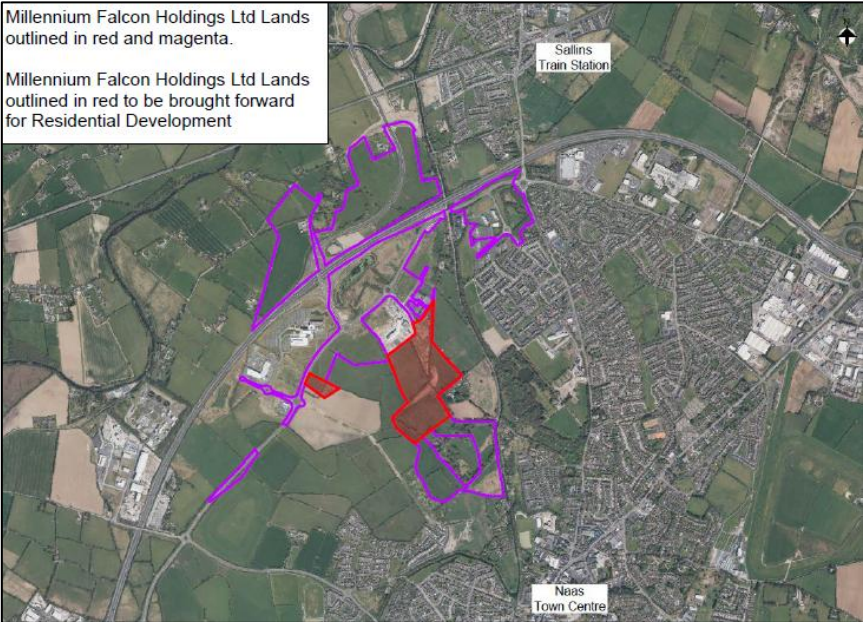
- The focus of the Proposed Material Alterations should be to enable the delivery of the 500 dwellings for Sallins (Table 2.8A refers), noting that no lands are spatially identified as capable of delivering the allocation, the zoning status is TBD (with no zoning map in the Development Plan) and a settlement plan is proposed under objective CS O31 for the town. While planning applications may continue to be made and determined, additional spatial clarity within the PMAs would assist in supporting the effective implementation and timely delivery of the 500-unit allocation.
- Section 10A of the Planning and Development Act 2000 requires the Core Strategy to demonstrate consistency between housing growth and land use planning. States that further spatial expression in the PMAs would provide clarity as to how growth is to be accommodated, align infrastructure planning with housing delivery and support consistent decision making through development management. The refinements would enhance the practical operation of the PMAs while maintaining commitment to housing delivery in Sallins.
- The national policy direction under Housing for All and the updated Housing Supply Target Methodology emphasises accelerated housing delivery, the activation of serviced/serviceable lands and the avoidance of artificial phasing constraints. The Sustainable Residential Development and Compact Settlement Guidelines (2024) reinforce that development within established settlements should be facilitated, the efficient use of lands within built-up footprints and that artificial barriers to delivery should be avoided where infrastructure capacity exists. In addition, the Guidelines emphasise deliverability and compact consolidation rather than sequencing delay.

Having regard to the provisions of Objective CS O34, the submission states that it is important that this objective operates proportionately, remains impact based and does not unduly restrict housing delivery. Accordingly, the submission requests that CS O34 clarify that:

- Infrastructure requirements must be proportionate to the scale and impact of the development
- Development shall not be required to remedy historic or strategic infrastructure deficits unrelated to the scheme
- Statutory Section 48 and 49 contribution schemes remain the primary mechanisms for funding wider infrastructure
- The objective should not operate to defer housing delivery where infrastructure capacity exists.

The submission considers that there is a risk that CS O34 could undermine the housing delivery objectives of the Proposed Material Alterations without the above clarifications.

Sub Ref No:	006
Name:	EPA
See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.	
Sub Ref No:	007
Name:	Marese Hickey
<p>Issues Raised:</p> <p>The submission considers that the proposed revised wording of BI O26 weakens the protections for hedgerows when they are more important than ever for biodiversity, climate resilience and rural landscape character. It is stated that the current wording is stronger, clearer and more in line with public expectation regarding environmental protection. Accordingly, the submission requests that the Council retain the current wording of BI O26 and consider strengthening it rather than diluting it.</p> <p>The submission raises the following points in relation to the existing and proposed revised wording of BI O26:</p> <ul style="list-style-type: none"> • The Council should be doing all they can to protect hedgerows, including using plain language that is unequivocal in demanding that hedgerows are protected from anyone seeking their removal. The proposed change from 'Prevent' to 'Avoid' in the objective is a major concern as prevent is clear and avoid is open to interpretation. • The current wording is clear that hedgerow removal should only occur where it's a necessity has been clearly and satisfactorily demonstrated to the Planning Authority. The proposed revised wording removes this requirement and will make it easier to justify hedgerow removals without strong evidence. • The current wording provides that hedgerow removal should be kept to an absolute minimum. The absence of this requirement in the proposed revised text panders to developers and is a retrograde step. • The current wording requires that a hedgerow of similar length and species composition be provided to compensate for removals and maintain ecological value, incorporating reference to the use of native plants. The proposed revised text removes reference to species and softens the emphasis on using native plants, which could lead to cheaper, poor quality or unsuitable replacements. 	
Sub Ref No:	008
Name:	HSE National Environmental Health Service
See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.	
Sub Ref No:	009
Name:	Meath County Council
See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.	

Sub Ref No:	010
Name:	Transport Infrastructure Ireland
See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.	
Sub Ref No:	011
Name:	National Transport Authority
See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.	
Sub Ref No:	012
Name:	Millenium Falcon Holdings Ltd
<p>Issues Raised:</p> <p>The submission seeks to ensure that the statutory planning policy framework guiding development in the Naas Northwest Quadrant (NWQ) provides for the early delivery of new housing, noting the content of their previous submission (Ref. No. KCC-C418-104) to the public consultation process for Proposed Variation No. 3 (dated 26 November 2025) and appended to this submission.</p> <p>The submission supports the overall objective in the Proposed Variation and the Proposed Material Alterations (PMA) for increasing housing supply. However, the submission proposes further detailed recommendations for inclusion in the Variation. These recommendations are provided with regard to the lands outlined below, in order to provide for the delivery of urgently needed new housing in the NWQ.</p>	
 <p>Millennium Falcon Holdings Ltd Lands outlined in red and magenta.</p> <p>Millennium Falcon Holdings Ltd Lands outlined in red to be brought forward for Residential Development</p>	
<p>In relation to the above lands, the submission outlines the following:</p> <ul style="list-style-type: none"> • The overarching national policy support for increased housing provision, • The strategic location of the above lands in relation to public transport and services, 	

- That all necessary major infrastructure for growth is in place for development on the lands. The submission considers that the lands qualify as Tier 1 – Serviced Lands.
- That the landowner is eager to deliver housing (500 – 600 units) at the earliest opportunity, together with requisite social, community and retail provisions during the lifetime of the current County Development Plan.

The submission recommends the following:

- That the additional dwelling provision for the NWQ in Table 2.8 is maintained at 1,294 no. units, as originally set out in the Proposed Variation.
- That the variation ensures that the NWQ Masterplan be rigorously reviewed to ensure it provides a clear policy and land use zoning support for:
 - The delivery of housing in the NWQ (1,294 units in the short – medium term and 4,000 in the longer term) and
 - The provision of a public transport route link the town centre, the NWQ and the Sallins / Naas Train Station via Junction 9a.
- That the variation ensures that formal public consultation for the draft Masterplan stage is undertaken, in addition to engagement with key stakeholders (including landowners) prior to finalisation.

The submission summarises the Proposed Material Alterations relating to housing delivery for the NWQ and outlines the following:

- That the reasoning for the reduction from 1,294 units to 543 no. units for the NWQ in Table 2.8B is unclear. It is stated that this reduction may (a) restrict housing delivery in the NWQ in the short – medium term, (b) generate uncertainty and confusion regarding residential development in the NWQ and (c) make the securing funding more difficult.

Accordingly, the submission recommends that the additional dwelling provision for the NWQ in Table 2.8 is maintained at 1,294 no. units, as originally set out in the Proposed Variation.

- While a footnote to Table 2.8B outlines that longer term additional housing growth for the NWQ (circa 4,000 units) will be provided through the next County Development Plan and future Urban Development Zone (UDZ), it is considered that the lack of certainty makes it difficult to plan for housing delivery in the area.

Accordingly, the submission recommends that that the NWQ Masterplan be rigorously reviewed to ensure it provides a clear policy and land use zoning support for the delivery of housing in the NWQ (1,294 units in the short – medium term and 4,000 in the longer term).

- That the NWQ masterplan process has been lengthy and that the landowner has only had limited consultation thus far. The submission notes that a masterplan has yet to be published, noting that KCC's website indicates that a "Final Masterplan" would be available in Q4 2025.

Accordingly, the submission recommends that formal public consultation for the draft Masterplan stage is undertaken, in addition to engagement with key stakeholders (including landowners) prior to finalisation.

- That the masterplan may not adequately provide for the needed public transport infrastructure and that there will be no opportunity to revise the masterplan as part of the variation process. The submission considers that a public transport link which connects Junction 9a, Sallins and Naas train station is critical for future development. It is noted that this link was identified in the Naas Integrated Framework Plan for Land Use and Transportation (2003) (IFPLUT) and previous masterplans.

Accordingly, the submission recommends that the NWQ Masterplan be rigorously reviewed to ensure it provides a clear policy and land use zoning support for the provision of a public transport route link the town centre, the NWQ and the Sallins / Naas train station via Junction 9a.

Appendix A

A previous submission (Ref. No. KCC-C418-104) to the public consultation process for Proposed Variation No. 3 (dated 26 November 2025) is appended to the submission and summarised below.

This submission has been prepared by RPS Group Limited (RPS) on behalf of Millennium Falcon Holdings Ltd with input from ARUP seeking the rezoning of Tier 2 lands (18.55 ha) located within the Northwest Quadrant (NWQ) in Naas from Strategic Reserve to 'C': New Residential, which will require amendments to the Proposed Variation as follows:

1. Include the following objective to facilitate an amendment to the Naas Local Area Plan (2017-2022): *"In order to facilitate the development of 1,294 dwellings within the NWQ in the lifetime of the current County Development Plan, the Naas Local Area Plan 2021-2027 should be amended immediately following the passing of the Proposed Variation to designate lands Tier 1 and zone 'New Residential' lands within the NWQ."*
2. Add the following text to the end of Objective CS O32: *"Prior to the completion of the Northwest Quadrant Masterplan and its integration into Volume 2 of the County Development Plan, the Naas Local Area Plan 2021-2027 should be amended to allow for the immediate zoning of additional lands within the NWQ for residential development."*

Plot 1 comprises circa 17.23 ha / 42.58 acres and is situated adjacent to Naas Community College. The site is currently undeveloped, and access is available via the R445 / Millennium Park Road alongside Naas Community College Road and the lands benefit from proximity to essential services and infrastructure, making it suitable for Tier 1 residential development.

Plot 3 comprises circa 1.32 ha (3.26 acres) and is situated adjacent to the Glenveagh lands (Plot 2) fronting the R445 / Millennium Park Road.

- Refers to the existing businesses and services within the NWQ and Millennium Park and states that the lands are within walking and cycling distance of the Naas-Sallins Greenway, which offers a safe, segregated route to Naas town centre, Sallins village and Sallins Railway Station.
- Refers to the proposed transport measures identified in the Naas LAP, which include a new bus-only link from Naas to the Sallins By-pass and a new north-south bus-priority link through the subject lands and the proposed rail upgrades identified in the All-Island Strategic Rail Review 2024, which recommends the electrifying of the Dublin-Cork railway through Kildare.
- Notes that the subject lands are already serviced with water supply, wastewater infrastructure and surface-water drainage and is readily serviceable with electricity and telecommunications connections.
- Refers to the Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study was completed in 2022, which it states confirms that the subject lands in this submission are located outside all identified flood zones.
- Refers to the Sustainable Planning and Infrastructural Assessment (SPIA), which was prepared by KCC as a key evidence-based input to the Naas LAP, and states that the outcome of the SPIA demonstrates that the subject lands satisfy the requirements for classification as Tier 1, without dependency on uncommitted investment, major upgrades, or sequential infrastructure delivery.
- Submissions refers to the requirements of the Proposed Variation in relation to the delivery of an increased quantum of housing in Naas, which identifies sites on the Kilcullen Road, Blessington/Tipper Road and the NWQ, but states that in relation to the NWQ, the Variation fails to support the zoning of lands to enable this development to proceed now, notwithstanding that the required infrastructure to support new housing is in place, and instead requires a Masterplan and/or a UDZ be completed to support the development of the NWQ lands, which it states will take many years to secure and be well outside the current CDP period.
- Further states that in the context of the very real urgency of delivering additional housing, the Proposed Variation does not reflect the urgency of the situation and it is wholly unsatisfactory that such obstacles to the development of housing be included in a Proposed Variation which is being brought forward with the explicit objective of increasing housing supply and states that such delays are inexcusable in the context of the current housing shortage, given the level of infrastructure that exists in the NWQ.
- Refers to the provisions of the recent policy statements and policy documents that includes, *inter alia*, the Revised NPF (2025), the s.28 Guidelines NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities (2025) and Delivering Homes, Building Communities (the Housing Plan) (2025).
- States that the development of the subject lands at a density of circa 40dph, which comprise 18.55 hectares could accommodate circa 500-600 housing units in addition to the requisite associated social, community and retail provisions.

Sub Ref No:	013
Name:	Paul Dunny

Issues Raised:

The submission seeks the rezoning of circa 3.4ha of lands at Newtown, Suncroft, from Agriculture to C: New Residential. The submission is accompanied by a map indicating the location of the subject lands.



The submission outlines the following in relation to the subject lands:

- The lands adjoin the existing Newtown Grove development (Phase 1). The subject lands were envisaged as the next logical and sequential development phase. Development of these lands would avoid ribbon or leapfrog development.
- The lands would provide a modest, village appropriate development with a density and housing mix that integrates with established forms and is consistent with the character and scale of Suncroft. There are no significant undeveloped residential lands in Suncroft that are capable of short-term housing delivery.
- The lands represent a logical, sequential and infrastructure efficient extension of the footprint of Suncroft Village within the lifetime of the Plan.
- Planning permission was refused in 2007 (Planning Ref. 06/376) established the principle of the sequential expansion of Newtown Grove. Permission was refused on infrastructure grounds only, relating to the lack of wastewater treatment capacity at Osberstown WWTP and prematurity pending the construction and commissioning of foul sewer infrastructure.
- The wastewater infrastructure context has materially changed following significant upgrades to the wider catchment. The Osberstown WWTP has been upgraded to address capacity constraints and facilitate growth in the Naas/Newbridge catchment, increasing treatment capacity from 80,000 population equivalent (PE) to 13,000 PE.
- The majority of the lands are within circa 400m of the village core. The lands benefit from access via an estate road in Newtown Grove with documented easement rights to existing infrastructure / utilities (including foul infrastructure), they are free from flood risk and are not subject to heritage or ecological constraints. Development on the subject lands would not require any significant new capital works due to existing infrastructure availability.
- A zoning would facilitate modest, village-appropriate residential development in keeping the character of Suncroft.

- Suncroft benefits from significant public and community investment, including recent upgrades to the National School and the GAA Club together with recent announcements regarding improved TFI Local Link services to Newbridge and Kildare. The long term sustainability of the village, demonstrated infrastructure capacity, community vitality and improved public transport connectivity to employment / transportation / education hubs would be supported by modest residential growth.

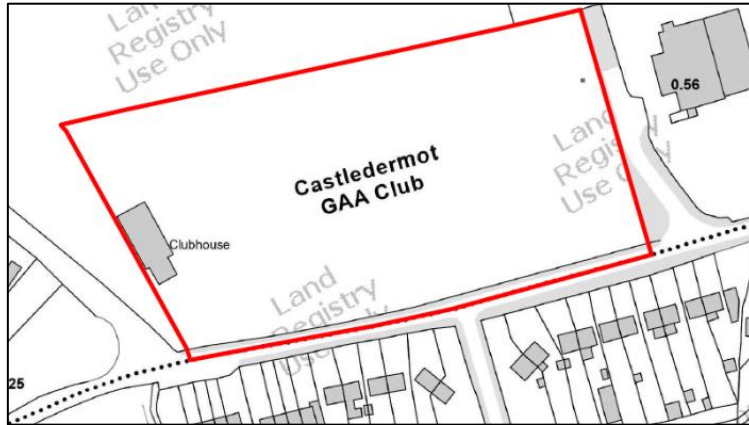
Sub Ref No: 014

Name: Castledermot GAA Club

Issues Raised:

Proposed Material Alteration No. 12

The submission by Dooley Cummins Architects + Engineers on behalf of Castledermot GAA seeks to extend the proposed new residential land use zoning (C*) in Castledermot provided by Map Ref. V2_PMA 12, requesting that the C* map be amended to correspond to the folio (KE4318) for the Castledermot GAA Club outlined in red below.



The submission outlines that the area proposed to be rezoned to C* in yellow outline on Map Ref. V2_PMA 12 does not correspond exactly to the folio of the existing site of the Castledermot GAA Club, noting that the yellow line bisects the exiting GAA Club building on the western side of the site and with the northeastern corner chamfered. The submission states that the reasoning for this proposed boundary between the 'C*' and 'F' land use zonings is not apparent.

Sub Ref No: 015

Name: An Taisce

See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.

Sub Ref No: 016

Name: John Kehoe

Issues Raised:

The submission details that circa 15 acres of land zoned Agriculture on the Osberstown Road in Sallins which it states would be suitable for immediate development subject to suitable rezoning. Notes and welcomes the revised allocation of an additional 500 units for Sallins. Outlines that the lands are bounded by housing estates to the north and east and are adjacent to all services,

including bus and rail connections, shopping, schools, medical services, Post Office and supermarket. Development of these lands would ensure infill, avoid leapfrogging and comply with the guidelines of the Planning and Development Acts.

Sub Ref No: 017

Name: Leo and Mary Mather

Issues Raised:

The submission by KBM Architects Ltd on behalf of Leo and Mary Mather seeks the rezoning of lands extending to circa 3 hectares in Rathangan from SS: Serviced Sites to New Residential to increase the potential deliverable housing supply.



The submission outlines the rationale for the zoning request, outlined that the subject lands are located adjacent to existing residential developments, are within 500m of the town centre and local schools, are directly accessed from a public road (including associated services) and benefit from favourable ground conditions and topography.

Sub Ref No: 018

Name: Naas Town Strategy Group

Issues Raised:

The submission considers that the Proposed Material Alterations do not provide a clear or time bound pathway for the meaningful acceleration of housing delivery or associated community/social infrastructure in Naas. The submission states it has identified gaps in the Proposed Material Alterations (PMAs), which risks stalling meaningful housing delivery for several years, including:

- An identified capacity gap in appropriately zoned land to accommodate expected housing (5,500 homes) over a 15-year timeframe.
- The additional housing provided by the variation (998 units) falls significantly short of anticipated need;
- No new zoning in the variation, with heavy reliance on the Naas Northwest Quadrant (NWQ);
- No contingency mechanism if the NWQ or Phase 2 lands do not deliver housing in the plan period, considering that projected capacity does not guarantee delivery;
- No planned interim assessment of lands, including those submitted previously, for additional residential zoning in Naas – such an assessment has been

deferred to a future County Development Plan review without a definitive timeline;

- No programmed Settlement Plan for Naas, noting that programmes have been provided for other settlements for 2026;
- No Naas specific infrastructure phasing statement linked to housing growth;
- Ongoing national and regional alignment processes under the Planning and Development Act 2024, noting the commencement of a County Development Plan review in August 2026 with a potential extension of this review cycle to align with RSES timeframes. Such an extension would further delay zoning matters.

The submission considers that there are two unanswered questions, namely:

1. How would the identified short term 998 new homes be delivered with certainty by 2028?
2. Through what mechanism would the longer-term housing requirement for Naas over 15 years be met?

Accordingly, the submission requests that the Council use this variation to establish a clear and time bound pathway for Naas through one of the following:

- That the 2026 variation to integrate the Naas Northwest Quadrant (NWQ) also include an assessment of additional compact and serviceable lands in Naas, or
- The Material Alterations commit to the commencement of a new Naas LAP or Settlement Plan in 2027, irrespective of broader County Development Plan timelines.

It is considered that either option would reduce risk, provide certainty and align with national policy objectives regarding timely housing and infrastructure delivery. It is stated that the current variation provides no credible or realistic settlement level pathway / trajectory for housing delivery in Naas.

The submission outlines that based on the Housing Growth Guidelines 15-year horizon, assuming a 15% typical allocation for a designated Key Town, Naas would be expected to accommodate:

- Approximately 413 homes per annum, equating to 1,650 homes between 2025 – 2028.
- Approximately 5,534 homes between 2025 and 2039 (15 years).

In this regard, the submission states that the capacity audit by the Council (September 2025) identified circa 38 ha of undeveloped residential zoned lands in Naas with a maximum yield of 572 units to the end of the plan period. This illustrates a significant capacity gap between what is currently zoned versus what would typically be expected to be delivered over 15 years based on the Guidelines. The submission notes that the variation does not bring forward new zonings to address the shortfall between typical anticipated delivery in Key Towns and zoned land supply, querying where the remaining housing delivery over the 15-year horizon is to be accommodated in Naas.

The submission states that through Variation No. 3, additional housing delivery is limited to Phase 2 lands at the Kilcullen and Blessington Roads, together with the future Naas Northwest Quadrant (Naas NWQ) project. In addition, the submission states that the OPR has emphasised that where identified lands are unlikely to

come forward within the plan period, planning authorities should consider zoning alternative lands capable of short to medium term delivery. In this regard, the submission:

- States it is unlikely that the phase 2 lands will deliver the 455 new homes envisaged as part of the variation. Reference is made to a previous consultation submission (Ref. No. KCCC-C418-137) by the landowner of part of the Phase 2 Kilcullen Road site, noting that the landowner has no intention of developing part of the Kilcullen Road site.
- Outlines that over reliance on a single complex, infrastructure heavy site (Naas NWQ) undermines the Housing Growth Requirements Guidelines, which emphasise activation and continuity of supply. The submission outlines that no work has commenced on the Naas NWQ and that a previous masterplan (published 20 years ago) did not yield any residential units.
- The submission contends that the Naas NWQ involves multiple landowners, has flood risk issues, require significant transport / infrastructure interventions and requires a detailed masterplan. These characteristics, without a contingency mechanism, increase the risk of delivery in the short to medium term and delays. The submission is concerned that proposed transport infrastructure over the canal would generate public opposition, noting previous experiences regarding the new road through the Gallops and may result in extended processes and delays. These infrastructure projects are technically, environmentally and socially complex.
- The submission queries how realistic it is that the reduced 534 units will be built by 2028 considering that a masterplan has not yet been published and the scale of infrastructure required. The submission considers that information from KCC indicates that the delivery timeframe for the NWQ area will be 30 years, resulting in an average of 133 units per year and a slow build out. It is considered that the NWQ may deliver 2,000 units over the next 15 years but leaves a significant gap for the 5,500 to be delivered.

Conversely, the submission outlines national policy regarding the delivery of housing with accompanying community, social and transport infrastructure and notes the content of the groups previous submission supporting growth in Naas aligned with necessary services and community facilities. The submission considers that the current approach does not provide a clear pathway for the delivery of such services/facilities alongside housing growth. The deferring of housing delivery and zoning also defers much needed social and community infrastructure delivery in tandem and subjects it to the same risks. In this regard, the submission details existing capacity pressures regarding the following:

- Recreation: K Leisure and other sports facilities, together with associated parking are routinely oversubscribed and exceed capacity. It is considered that Naas is underprovided in terms of sport facilities and pitches.
- Primary Schools: Recent reporting confirmed that 30 children in Naas were unable to secure a primary school place, with temporary measures introduced as a band aid for insufficient provision in the town. No new primary schools are currently under construction.
- Town Centre Vitality: The submission states that the town centre has experienced increasing vacancy and relocation of key retail anchors to peripheral retail parks. A press report in December 2025 confirmed that Naas had the highest commercial vacancy rate (15.9%) in the County, above the

<p>national average and other towns. Sustainable residential growth will bring much needed town centre vitality.</p>	
Sub Ref No:	019
Name:	Leo and Mary Mather
<p>Issues Raised: This submission has been prepared by KBM Architects Ltd on behalf of landowners Leo and Mary Mather seeking the zoning of circa 0.74 ha of lands at Bracknagh Road, Rathangan from 'F: Open Space and Amenity' to New Residential (see map below of lands outlined in red) in order to increase the potential deliverable supply in Rathangan.</p>	
<p>The submission states that the subject site is greenfield, adjacent to existing residential developments, located within 200m of town centre and 300m of local schools, has direct access from the public road and associated services, and has favourable topography and ground considerations within the site.</p>	
Sub Ref No:	020
Name:	Lullymore Heritage and Discovery Park
<p>Issues Raised: Proposed Material Alteration No.11 The submission refers to Proposed Material Alteration No.11 and proposed change to Objective BI O26. The submission asserts the proposed change will weaken the protections in place for native hedgerows which currently play a vital role for biodiversity. It requests that the original text be kept or strengthened further to protect nature.</p> <p>It notes the removal of existing wording such as “hedgerow removal should only happen where it is clearly and satisfactory demonstrated to the Planning Authority” and “removal should be kept to an absolute minimum” will leave hedgerows open to removal during development.</p> <p>The submission refers to the original text which seeks to ensure replacement planting must be of similar length and species composition, noting proposed changes do not include wording relating to similar species composition which can lead to planting not benefiting local wildlife which have evolved into rich ecosystems over centuries providing essential habitats, shelter and food for native insects, birds, mammals and wild plants. Notes current biodiversity crisis and the</p>	

challenges we face to achieve the objectives of the EU's Biodiversity Strategy for 2030.

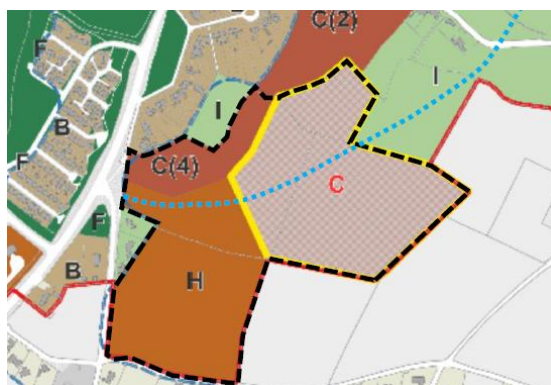
Sub Ref No: 021

Name: Summix NK Developments Limited

Issues Raised:

Proposed Material Alteration No. 29

The submission by Thornton O'Connor Town Planning on behalf of landowners Summix NKK Developments Limited relates to Proposed Material Alteration No. 29 relating to the rezoning of lands at Nicholastown, Kilcullen from 'SR: Strategic Reserve' to 'C: New Residential'.



The submission welcomes the zoning change and requests that it is adopted by the Council. The submission outlines multiple benefits associated with the zoning change, including:

- the creation of a single bank of 'ready to go land' for residential development which can deliver housing in an expeditious manner due to its coherent shape and single-party ownership.
- Increased residential population will generate enhanced critical mass to sustain existing businesses/services and to encourage the establishment of new additions in the settlement.
- The zoning will facilitate the extended delivery of the existing roads objective along the southern and eastern sides of Kilcullen.

The submission highlights that the intention to secure residential zoning and delivery of housing on site is evidenced by their submission at initial consultation stage of Variation No. 3, the appointment of a design team, the preparation of a preliminary site masterplan and their request for Section 247 pre-planning consultation with the Council. The submission notes a pre-planning consultation meeting took place on Friday 6th March 2026 (Ref. No. PP6292).

Sub Ref No: 022

Name: Uisce Éireann

See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.

Sub Ref No:	023
Name:	Kildare Bat Group
<p>Issues Raised:</p> <p>Proposed Material Alteration No.11</p> <p>The submission refers to Proposed Material Alteration No.11 and proposed change to Objective BI O26. The submission asserts the proposed change will weaken the original statement having negative implications for the conservation and protection of hedgerows and the legal protections of Irish bat species in Kildare. The submission refers to the rewording and use of 'avoidance', noting this relies on personal choice to evade or side-step a situation, leaving this open to interpretation rather than being a clear-cut determination.</p> <p>Its states that Irish bat species have evolved and adapted to Irish hedgerows due to the continuous deforestation leaving Ireland with only 1% of tree cover by the early 20th century. In absence of adequate tree cover, hedgerows across the county have become indispensable for bat species between summer, maternity and winter hibernation roosts, their feeding and mating grounds which is unique when compared to other European countries. It notes that bat species are highly mobile and rely heavily on existing hedgerows for connectivity and survival. It further states that hedgerows connect to existing SAC's, SPA's and NHA's ensuring bat gene pool diversity and the relevant Irish and EU conservation aims. The submission states that bat roosts in hedgerow trees are strictly protected, even if not in use.</p> <p>The submission refers to the County Kildare Hedgerow Appraisal Survey (2022) undertaken by Flynn Furney Environmental Consultants, which states 9.6 km of hedgerow has been removed over a 16 year period since 2006, representing an annual removal rate of 0.5% which is almost 5 times the national average. It further states this rate of removal is much higher than the EPA estimate of between 0.16% and 0.3%.</p> <p>It states Kildare recorded only 2% (2.6ha) of natural forest in 2020 which is considered very low for ecological, biodiversity and environmental standards. It further states the importance and urgent protection of Kildare's hedgerow for conservation measures and bat species due to loss of natural forest. The submission states that 8 bat species in the east of Ireland have been detected in Kildare which are listed under Annex IV of the Habitat's Directive.</p> <p>The submission notes the protection of endangered migratory species during activities in Ireland under the 1995 'Agreement on the conservation of populations of European Bats'. It also notes Ireland's signatory to the Bern Convention in 1982 which gives special attention and protection to endangered species, ensuring appropriate measures are used in the conservation of habitats of wild flora and fauna, specifically Microchiroptera (Appendix II) and Pipistrellus pipistrellus (Appendix III).</p> <p>The submission refers to 'Section 12.7 Protected Habitats and species outside Designated Areas' of the Kildare County Development Plan 2023-2029 (as varied) (CDP) which highlights the importance of hedgerows as features of the landscape which are essential for wild flora and fauna, including their function as 'stepping</p>	

stones' which are important for migration, dispersal and genetic exchange of wild species.

The submission refers to 'Section 12.8 County Biodiversity Sites' of the CDP which notes the biodiversity value of a number of sites in the county which have not been fully surveyed, however they currently meet international and national criteria for designation.

The submission refers to 'Section 12.9.1 Hedgerows' of the CDP which notes the county's hedgerow network as a huge asset, particularly older hedges made up of native trees, shrubs, larger banks and ditches which provide greater value in terms of wildlife being richer in species diversity. It further notes Objectives BI P6, BI O15 and Action BI A11 of the CDP which recognises the importance of trees and hedgerows for climate mitigation, resilience and adaptation which should be protected and removal prevented in the first instance.

Requests stronger policy regarding the removal of hedgerow where applicants especially large-scale developers must rationally substantiate any proposed removal of hedgerows with comprehensive evidence which includes alternative site layouts that retain valuable native hedgerows. Also requests original text regarding the length of hedgerow removal to be re-instated, noting some bat species will not cross hedgerow gaps greater than 10-50m. It states greater gaps between two hedgerows can be fatal to bat species.

Further requests the original text referring to the replacement of native hedgerow species to be reinstated to prevent the planting of cheaper, non-native, invasive, poor-pollinator and poor biodiverse plant species, with only county sourced and grown species planted. It asserts the protection of hedgerows is unequivocally important to the conservation and protection of Irish bat species. Submission concludes by asking for the re-wording of objective BIO O26 should be removed with original/existing text reinstated and made even more robust to strengthen protection of this ecosystem.

Sub Ref No:	024
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Name:	Department of Education and Youth
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See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.

Sub Ref No:	025
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Name:	Rathangan Tidy Towns
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Issues Raised:

Proposed Material Alteration No. 11

The submission objects to proposed changes to Objective BI O26 which it states will weaken the protection and conservation of hedgerows in the county with consequences for wildlife that depends on shelter, nests/roosts, food and connectivity.

The submission notes existing policy throughout the Kildare County Development Plan 2023-2029 (as varied) which recognises the importance of hedgerows to the county. It states the proposed amendment contradicts the rest of the plan and

<p>questions why it is proposed and what are the motivations for such change. It states the use of the term 'avoid' is subjective which will be left to interpretation placing hedgerow value at risk.</p> <p>The submission requests that the original wording of BI O26 is kept in its entirety, if not strengthened further. It suggests that a. It further states the use of native species of local provenance should only be considered in this regard.</p> <p>The submission concludes by requesting that the re-instatement and stipulation where the removal of hedgerows prior to submitting an application may result in an outright refusal which will strengthen conservation and protection measures.</p>	
Sub Ref No:	026
Name:	David Fraser
<p>Issues Raised:</p> <p>Proposed Material Alteration No. 22</p> <p>This submission is on behalf of the Fraser family, who own lands in Kilmeague Village. The submission is in favour of the proposal to insert Proposed Amendment No. 45 to Proposed Variation No. 3 to amend the Kilmeague Land Use Zoning Map (Map Ref. V2-3.11) to insert a new C: New Residential zoning on lands outlined in solid yellow line on map and denoted by "C" in red text on map.</p>	
Sub Ref No:	027
Name:	Margaret Stapleton
<p>Issues Raised:</p> <p>Proposed Material Alteration No. 11</p> <p>The submission strongly disagrees to the proposed changes to Objective BI O26 which will reduce the protection and conservation of hedgerows in the county, noting their value as a primary habitat for biodiversity in rural areas, providing nesting, food, shelter for birds while acting as wildlife corridors. The submission states that native hedgerow have become a substitute for native woodland where Ireland has only 11% forest cover compared to the EU average of 35%.</p> <p>It states the use of the word 'avoid' is not as strong as the word '<i>prevent</i>' which forms the original objective. It further states the removal of wording '<i>must be clearly and satisfactorily demonstrated to the Planning Authority. In any event the removal shall be kept to an absolute minimum</i>' will reduce the power of the Council and the need to keep hedgerow removal to an absolute minimum.</p> <p>The submission notes the removal of wording '<i>Ideally, native plants of a local provenance and origin should be used for any such planting</i>' is not in line with best practise for farmers participating in schemes like ACRES, whilst allowing the planting of non-native plants which does not enhance biodiversity. Further states the removal of wording '<i>may result in an outright refusal</i>' will further weaken the protections in place for hedgerows during the planning process. The submission encourages the Council to work with communities in the protection of native hedgerows and ensure the original text of Objective BI O26 is re-instated in full.</p>	
Sub Ref No:	028
Name:	Janet Buckley
<p>Issues Raised</p> <p>Proposed Material Alteration No. 11</p>	

The submission seeks to have the original text of Objective BI O26 retained.	
Sub Ref No:	029
Name:	Karen Tyrrell
<p>Issues Raised: Proposed Material Alteration No. 11 The submission objects to proposed changes to Objective BI O26 which will further weaken the protection and retention of hedgerows which are regularly replaced with walls/fences and non-native plant species. It states that the wording should not change and be further strengthened to overtly protect and retain hedgerows in private and large-scale housing development. The submission contends that the proposed amendment is shortsighted and irresponsible given the current biodiversity crisis.</p> <p>Increased Biodiversity in Developments The submission recommends the inclusion of swift nesting bricks into current building requirements. It further requests the design and inclusion of wildlife ponds in large-scale housing developments, which have the potential to vastly enhance biodiversity through the use of geotextile clay liners where minimum maintenance and aftercare is required.</p>	
Sub Ref No:	030
Name:	Sonja Moore c/o Kildare Bat Group
<p>Issues Raised: Proposed Material Alteration No. 11 The submission by Sonja Moore on behalf of Kildare Bat Group raises the same issues as submission No. 23. Please refer to submission No. 23 for a summary of the issues raised.</p>	
Sub Ref No:	031
Name:	Office of Public Works
See Section 4 of the Chief Executive's Report for submissions recieved from Prescribed Authorities and Public Bodies.	
Sub Ref No:	032
Name:	Birdwatch Ireland (Kildare Branch)
<p>Issues Raised: Proposed Material Alteration No. 11 The submission objects to proposed changes to Objective BI O26 which can be viewed as weakening the protection of existing hedgerows and their value in the protection of birds and biodiversity. The submission refers to low level of forestry in Ireland which is estimated to be 11.6% (808,848 ha) of the total land area with 49.1% of this land in the ownership of Coillte, where 70% of the stocked forest area is less than 30 years of age.</p> <p>The submission refers to a peer review study and BTO habitat-specific territory densities show that a single kilometre of mature, species rich hedgerow can typically support 50-100 nesting attempts per breeding season by small passerine species. It also refers to two academic studies which demonstrates that</p>	

hedgerows with good structure support 10-20 territories per 100m for small passerines. Notes a recent NPWS enforcement case in Laois where the District Conservation Officer uncovered evidence that 1,200 metres of hedgerows and 54 mature trees were destroyed. It emphasises that many bird species attempt to 2-3 broods per season, and the loss of hedgerow can remove nesting habitats for decades and not just one season.

The submission refers to Birdwatch Ireland research which states that 63% of regularly occurring Irish birds are now of conservation concern with 26% red listed, noting the impact of hedgerow removal as a major driver. It states that one kilometre of mature hedgerow can support approximately 50-100 nesting attempts per year by common farmland birds, where the loss of 1,000 kilometres of hedgerow can equate to the loss of 50,000-100,000 nests annually according to NPWS enforcement cases. The submission states that national estimates indicate that between 2,000 and 6,000 kilometres of hedgerows are removed annually depending on the methodology used. However, it notes that Ireland has no national hedgerow monitoring system that tracks removal in real time.

The submission refers to Teagasc guidance under the Basic Income Support for Sustainability (BISS) scheme for farmers which requires the retention of designated landscape features such as drains, ditches and hedgerows as a baseline requirement for all applicants. Under this guidance, for every 10 metres of hedgerow removed, 20 metres must be planted in the vicinity of the removal using traditional local species that can connect with existing hedgerows and woodlands.

The submission refers to an amendment to Section 40 (1) of the Wildlife Act 1976 which prohibits the cutting, grubbing, burning or other destruction of vegetation growing on any land during the period March 1st – August 31st in any year. The submission also refers to the Heritage Act 2018 which introduced pilot provisions to allow cutting of roadside hedges in August for road safety and burning in March under certain conditions in order to protect bird life and wildlife habitats during nesting season. It further notes that Section 40 of the Wildlife Act 1976 (as amended) states it is a criminal offence to destroy vegetation during the bird nesting season unless specific exemptions apply.

The submission notes that no protections or compensation measures exist for ancient hedgerows outside of those designated areas that impact negatively on a Natura Site and farmlands part of the BISS scheme. However, it states that Irish farmers can generally remove up to 500 metres of hedgerow without formal approval outside of nesting season, unless the removal exceeds 500 metres or creates a field larger than 5 hectares, a screening for EIA is required.

The submission states there is currently a gap in protection of Ireland's hedgerows (other than those specifically outlined above) noting the importance and current wording of Objective BI O26 in the County Development Plan. Furthermore, the submission requests the existing standard and current wording of "a similar length" to be replaced in contrast to the standard of "double the length" outlined in the BISS scheme requirements.

Sub Ref No:	033
Name:	Ad Meloria Management Ltd
Issues Raised:	
<p>This submission by Ad Meloria Management Ltd states that it primarily relates to Proposed Material Alterations Nos. 1 and 5, the allocation of 2,000 units for Simmonstown and Ballyoulster, Celbridge, the lack of delivery on these lands over the life of the current Development Plan and additional options available to achieve housing targets for Celbridge.</p> <p>The submission notes it is made having regard to relevant planning legislation, Section 28 Ministerial guidelines and Housing for All policy. The submission welcomes the plan-led response to the national housing growth requirements, the allocation of additional housing growth to key town, the inclusion of CS O33 facilitating services and serviceable lands, and the stated objective of continuity in housing supply. These measures are stated as being consistent with national policy direction and Housing for All objectives.</p> <p>The submission notes that most lands zoned New Residential in the Celbridge Local Area Plan (LAP) 2017-2023 have been advanced through the planning process or are currently under construction except for lands at Ballyoulster and Simmonstown, KDAs 2 and 5 respectively. The submission notes the variation does not propose any change to the housing allocation or land zoning designation for Celbridge and that the variation believes the 2,000 unit allocation can be delivered at the existing Ballyoulster and Simmonstown lands.</p> <p>The submission understands the progression of these lands to be contingent on the delivery of substantial road infrastructure and refers to a recent refusal by An Coimisiún Pleanála (ACP) for an SHD application for 344 residential units at Ballyoulster based on concerns regarding infrastructure and prematurity pending a new zoning plan for the town. The submission notes recently submitted planning and CPO applications to ACP for the transport infrastructure.</p> <p>Having regard to the infrastructural deficit of these lands, it is submitted that consideration should be given to reclassification of suitably serviced 'I: Agricultural' lands within the LAP boundary to either 'B: Existing Residential/Infill' or 'C: New Residential', as appropriate, to ensure the allocated housing targets are met. It is stated that this approach would align with Ministerial Direction and would reflect the strategy used by other neighbouring local authorities including South Dublin County Council.</p> <p>It is submitted that this approach would be consistent with Housing for All objectives, national policy, the stated proposed material alterations and the overarching purpose of Proposed Variation No. 3, as stated in the KCC Chief Executive's Report.</p>	
Sub Ref No:	034
Name:	Kildare Green Party
Issues Raised:	
Proposed Material Alteration No. 11	

The submission objects to proposed changes to Objective BI O26 which it contends will weaken the protection and conservation of hedgerows in the county. The submission requests the reinstatement of original objective or strengthened further in support of the restoration of nature. It notes the proposed amendment will leave it open for those involved in a project to decide what is best effort in the retention of hedgerows in development.

The submission states the proposed change will remove the requirement for hedgerow removal to be satisfactorily demonstrated to the Planning Authority which is a crucial safeguard. The removal of this requirement in its entirety makes it easier for developers to justify hedgerow removal without strong evidence. It further states the removal of wording '*removal should be kept to an absolute minimum*' is a step backwards.

The submission notes the proposed amendment will lower the standard of replacement planting where the original text requires a hedge of similar length and species composition ensuring ecological value is maintained. It states the proposed change will lead to poor quality planting of non-native species. It further notes the popularity of Laurel hedging and its risks to biodiversity, compared to other native planting such as Hazel, Holly and Crab Apple which provide a safe haven to wildlife.

The submission highlights concern in the change of wording from 'Prevent' in the first instance to 'Avoid'. It asserts the use of the word prevent is strong and clear, where the use of avoid is vague relying on individuals being appropriately judicious. It states the proposed change will make the policy less effective, reducing the Council's ability to enforce protection at the planning stage. The submission concludes by requesting the retention of the existing text contained in BI O26, including the potential for strengthening protections rather than diluting it.

Sub Ref No:	035
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Name:	T.D Housing Limited
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Issues Raised:

The submission by The Planning Partnership on behalf of T.D Housing Limited relates in particular but not limited to, the Proposed Material Alterations (PMAs) which interact with sequentially appropriate and serviced lands (1.17 ha) at Church Avenue, Sallins. The submission states that the housing target for Sallins remains insufficient and that the status of the forthcoming draft settlement plan requires clarification (so as not to be overruled by a lapsed LAP in the transition period) and to bridge a potential delivery gap regarding the release of lands as early as possible and to prevent procedure being a barrier. As such, ancillary modifications are appropriate and necessary, including the following:

PMA No. 1: To include the following additional text (in *italics amber*) to proposed additional housing delivery mechanism no. 6:

Include additional Core Strategy objectives in Chapter 2 to address continuity in housing supply across all settlements. In this regard, the objectives will, notwithstanding the housing growth allocated to that settlement, make provision for the release of any lands which have the benefit of a residential zoning ("B" or "C"

in relevant land use zoning maps), or had the benefit of a lapsed zoning (residential or otherwise), where it can be demonstrated to the satisfaction of the Planning Authority that the lands are readily serviced or serviceable through upgrades to infrastructure as part of any application on the lands and where the proposal addresses any identified social infrastructure deficit in the respective settlement.

Noting settlements with expired zoning plans (such as Sallins), the effect of this additional text would be to give consideration principally to formerly zoned lands, including those lands previously identified for purposes other than purely residential. Pending the adoption of settlement plans, this interim measure would be a proportionate response and in keeping with the spirit of Proposed Material Alteration No. 1.

PMA No. 1: To include the following additional text (in *italics amber*) to the last and second last paragraph in PMA No. 1:

Kildare County Council will have regard to the provisions of any expired Local Area Plan alongside the current context prevailing when considering proposals for new development until such time as that plan is replaced, revoked or integrated into the County Development Plan and/or a draft settlement plan is published, at which point primary regard shall be had to any draft settlement plan.*

** 'Provisions' refers to all aspects of the plan including Land Use Zoning objectives but excluding Core Strategy allocation which is contained in the County Development Plan.*

The additional text seeks to address unintended consequences that may arise from the last paragraphs of PMA No. 1, including:

- Expired zonings are no longer relevant or reflective of current circumstances, such as at the 1.17 ha site at Church Avenue. These lands include a community zoning and an objective for school expansion which are now surplus to requirements, with ongoing regard to the outdated reasoning for these designations being a disproportionate constraint to development. Further detail is provided in Appendix A of the submission.
- Regard to an expired LAP should not take precedence over an emerging Draft Variations incorporating Settlement Plans, particularly in relation to Sallins. Expired zoning plans should be generalised, with regard had to the suitability of lands within expired LAP boundaries for the delivery of residential development, irrespective of the existing zoning objective.

PMA No. 3: The submission reiterates the content of a previous public consultation submission made to Proposed Variation No. 3, outlining that there is a need to project housing targets to a horizon of 2038 and to incorporate appropriate headroom under the Housing Growth Guidelines. In this regard, it is stated that there is an estimated need for between 836 units (without 50% headroom) and 1,255 units (with 50% headroom) in Sallins. Accordingly, the 500 unit allocation to Sallins remain significantly below intended targets (by more than half) when applied to Sallins on a pro-rata basis. It is considered that the following issues arise:

- The Chief Executive's Report on the submissions/observations to Proposed Variation No. 3 suggests that the inclusion of a horizon to 2038 is unnecessary. Notwithstanding, it is submitted that the Guidelines are explicit that the current variation process should include for this 'arc of development' at this stage as an immediate priority and not as part of the next development plan cycle.
- The preference for achievement of a 50% headroom is clear in the Guidelines and deviation from this target should be avoided to the greatest extent possible.
- The Chief Executive's Report on the submissions / observations to Proposed Variation No. 3 considers that there is no stipulation in the guidelines requiring local authorities to apply headroom proportionally to each settlement. The submission considers that if headroom is not proportionally distributed, this would indirectly and materially alter the settlement hierarchy and core strategy for the County. Such a change should be well flagged and publicised and only intentionally adopted rather than as an indirect / unintended consequence. Accordingly, the distribution provided by the existing plan should be followed as the default benchmark.

PMA No. 5: The submission reiterates that the forthcoming Settlement Plan should be formulated based on a higher housing target for the settlement and that regard should be had to the Draft Settlement Plan as soon as it is published, rather than an expired LAP taking precedence. The submission also seeks that additional text (in *italics amber*) be included in CS O33 to be consistent with the additional text sought for PMA 1, as follows:

'Ensure continuity and facilitate housing delivery across all settlements through the favourable consideration of proposals for housing on lands which have the benefit of a residential zoning ("B" or "C" in relevant land use zoning maps and Settlement Expansion lands), or had the benefit of a lapsed zoning (residential or otherwise), where it can be demonstrated to the satisfaction of the Planning Authority that the lands are readily serviced or serviceable through existing infrastructure or upgrades to infrastructure as part of any application on the lands and where the proposal addresses the delivery of affordable housing and any identified social infrastructure deficit in the respective settlement in accordance with Objectives SC O15 and SC O17 of this Plan.'

PMA No. 6: Welcomes the contents of the PMA noting that it could be easily applicable to the subject site.

Proposed Non-Material Change No. 1: The substantial change in housing target from 9,144 to 16,970 must be supported by the requisite updates elsewhere as set out in the submission in terms of settlement targets and releasing lands where possible pending the adoption of settlement plans.

The submission concludes by stating that the above suggested alterations to the PMA are necessary to achieve the objectives of the Guidelines and the Development Plan, including:

- Avoiding unintended consequences of formalising regard to lapsed Local Area Plans by introducing a corresponding regard to forthcoming Draft Settlement Plans.

- Providing housing targets to the horizon year of 2038 and 50% headroom sought by the Guidelines.
- Increasing the long-term target for Sallins from 500 units to 1,255 units and allowing the Settlement Plan to address the phasing / roll out of the relevant landbanks.
- Maintaining the link between the existing proportionality of distribution of housing in the County.
- Considering activation measures in terms of interim policy flexibility to bridge a delivery gap.

Sub Ref No: 036

Name: Celbridge Community Council

Issues Raised:

Proposed Material Alteration No. 5

This submission on behalf of the Celbridge Community Council notes the role of the organisation as a voluntary community group. It welcomes the Council's commitment to include a Social Infrastructure Audit in the upcoming Celbridge Settlement Plan and proposes that this commitment is more explicitly called out in the proposed material changes to objective CS O31.

The submission notes ambiguity in the County Development Plan (Objective TM A2) around the methodology for formulating a transport plan for Celbridge as there is no mention of self-sustaining towns, which Celbridge is designated as. The submission acknowledges that TM A2 falls outside the scope of this consultation but notes an opportunity to address the gap in CS O31. The submission recommends adding additional text to objective CS O31, as shown in **bold orange font**:

*Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared and integrated into the County Development Plan by way of statutory variation, including the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced lands to be informed by infrastructural and environmental assessments, **including, but not limited to, a Social Infrastructure Audit and an Area-Based Transport Assessment.***

The submission welcomes that the proposed material alterations did not include any additional sites beyond Ballyoulster and Simmonstown and no further increase beyond target of 37 dwellings per hectare.

Sub Ref No: 037

Name: Pousterle Limited

Issues Raised:

The submission from Brock McClure Planning and Development Consultants on behalf of Pousterle Limited primarily relates to lands at Southgreen Road and Old Road, Kildare Town, which, under the Variation are proposed to be zoned 'C1: 2

New Residential'. The submission notes the location and context of the subject site at Southgreen, Kildare Town and refers to the planning history/development of adjacent sites. States that a Large Scale Residential Development (LRD) planning application for site was lodged on 6th March (Reg Ref: 2660248) seeking permission for 146 residential, creche, and associated services.

Notes and welcomes the provisions of Proposed Variation No. 3 (Objective CS O29) which releases lands zoned Phase 2 New Residential for development in Kildare Town, including the subject lands at Southgreen. Also welcomes the apparent support for their submission as iterated in the Chief Executive's Report (dated 19 December 2025).

Submits that as part of the submission they seek address comments raised by the Office Of the Planning Regulator (OPR) in their submission of 27 November 2025. Notes that Pousterle Limited controls lands comprising circa 83 hectares that are located to the northwest of Kildare town at Green Road, South Green Road, and Old Road, a significant portion of which are already zoned 'Strategic Reserve'.

Submits that in their submission to Variation No. 2 the OPR raised a concern regarding Phase 2 lands, generally, in Kildare County Council and with respect to the South Green lands stated as follows:

'The Office has concerns regarding the immediate delivery of lands identified in Kildare Town (Ruanbeg and Southgreen) due to infrastructural constraints, such as access through third party lands, road improvements, and water supply.'

The submission seeks to take the opportunity to strongly refute this contention and submits that there are no constraints or impediments to the delivery of residential development on this wider site. States that the lands are entirely unencumbered, can be accessed independently and delivery of residential development would be assured in the event that that the lands received a supportive zoning for same.

The submission details the attributes of the wider lands noting their development potential to deliver 2,000 new housing units (along with community and commercial uses), their sequential location, their potential to support the realisation of the 10-minute town and the fact that a portion of the lands have already been identified in the Kildare Town LAP as a 'Key Development Area'. States that they have a proven track record in delivering housing in the town (i.e. Walker's Gate). Submission outlines various attributes of the lands in terms of road access, water and waste water servicing, surface water drainage, flood risk and pedestrian and cycle infrastructure. Submits that the overall lands have access to public services, including water supply and the public drainage network and there has been significant investment in recent years on critical infrastructure.

Sub Ref No:	038
Name:	Friends of the Irish Environment
Issues Raised:	
The submission relates primarily to the following:	
<ul style="list-style-type: none"> The Proposed Material Alteration (PMA) regarding Objective BI O26, recommending that the PMA not be adopted considering available county evidence and the surrounding policy context. Retention of the existing objective 	

would support the biodiversity, green infrastructure and climate resiliency framework of the Development Plan and maintain alignment with the wider planning policy hierarchy.

- The SEA determination and the extent to which environmental implications of the PMAs have been assessed and presented for consultation.

Annex I of the submission provides an overview of the initial establishment, goals and work of the Friends of the Irish Environment CLG, noting that it has taken legal action to hold the Irish Government accountable for meeting national and international commitments regarding carbon emissions.

Amendment to Objective BI O26

The submission outlines the following in relation to the proposed amendment to BI O26:

- It is noted that hedgerows are critical habitats for pollinators, food resources, nesting sites and shelter while acting as corridors for insects and wildlife to move through farmed landscapes – as highlighted in the All-Ireland Pollinator Plan. They also provide ecosystem services and are a defining feature of rural Kildare in terms of landscape character, local heritage and visual amenity. In addition to biodiversity, they contribute to soil protection, nutrient retention, flood mitigation / attenuation, air quality, oxygen production, water quality, carbon storage / sequestration, pollution absorption and landscape climate resilience. Climate and green infrastructure policy supports enhancing and increasing hedgerows and trees. Considering the above, the planning response should favour stronger retention rather than weaker protection.
- It is considered that the current objective establishes a clear decision-making framework whereby removal is prevented in the first instance, unavoidable removal must be clearly justified, removal must be kept to an absolute minimum and ecologically equivalent mitigation is required where loss cannot be avoided. Changes to the strength or clarity of such objectives can therefore influence how that framework operates in practice across a wide range of future cases.
- It is considered that the proposed amendment would weaken current policy by replacing a retention-first, evidence based and enforcement capable objective with a less exacting and more permissive formulation through:
- Replacing “prevent” with “avoid”. “Prevent” establishes a stronger presumption against removal, whereas “avoid” expresses a preference but allows greater discretion. This change also weakens alignment with mitigation hierarchy used in assessments, under which removal avoidance and retention in the first instance is the preferred and most effective approach;
 - Removing the requirement that unavoidable removal be clearly and satisfactorily demonstrated;
 - Removing the requirement that removal be kept to an absolute minimum;
 - Reducing mitigation from a similar length and species composition to similar length only;
 - Removing reference to local provenance and origin; and
 - Removing the explicit statement that pre-application removal may result in outright refusal. This element seeks to discourage pre-emptive removal of hedgerows prior to submission of applications and helps to

preserve ecological baselines for assessments. The removal of this explicit deterrent is significant in development management terms and reduces the ability of the planning authority to properly evaluate the ecological value of hedgerows on a site and wider landscape level.

- It is outlined that the proposed amendment arises at a time when the Kildare Hedgerow Survey (2022) demonstrates measurable loss, fragmentation and deterioration / declining ecological quality of hedgerows in the county. The submission highlights certain results of the Kildare Hedgerow Survey (2022) regarding declining hedgerow length, condition and ecological quality together with the industry / sector contribution to hedgerow removal. The submission notes that hedgerow fragmentation is higher in Kildare than other counties due to the extent of rural development. It is stated that this is evidence of a weakened ecological network under pressure and does not support a weakening of policy protections. It is considered that the current wording of the objective is structured to address the pressures identified in the survey evidence.
- It is stated that replacement planting cannot replicate the ecological value of mature hedgerows for years and may never fully replace the structural complexity, species diversity and habitat function of established hedgerow networks. Planting stock that is not derived from local parent material may lack the adaptations to local soil and micro-climatic conditions – reducing resilience, survival rates and long-term ecological effectiveness. As such, mitigation based on length alone is weaker than one based on length and species composition.
- It is considered that the proposed revised wording reduces the Council's ability to resist cumulative incremental loss due to the revised wording which omits the need to justify removals and keep loss to an absolute minimum. A strong retention first policy is important to preventing progressive landscape fragmentation.
- It is outlined that national and regional policy has moved towards stronger biodiversity protection and ecological connectivity rather than diluting existing safeguards. Development Plans must be consistent with the NPF and RSES, and must also support the protection, conservation and restoration of biodiversity / natural heritage within plan-led development. The submission also refers to the Planning and Development Act 2024, the NPF, the National Biodiversity Action Plan, the EU Nature Restoration Law and the National Restoration Plan in relation to policies, objectives and outcomes regarding climate, biodiversity, natural heritage and green and blue infrastructure.
- In relation to the NPF, the submission refers to NSO 7, NSO 8 and NSO 9 together with NPO 83, NPO 85, NPO 86, NPO 88 and NPO 30. It is stated that hedgerows directly contribute to these outcomes / objectives, which are aligned with wider EU policy.
- The submission also considers that the weakening of the objective would reduce alignment with the RSES in relation to the requirement for the identification, protection and management of green infrastructure and ecological networks in support of the Habitats and Birds Directives (including the Natura 2000 network). In this regard, the submission refers to Article 10 of the Habitats Directive, which recognises the importance of landscape features such as hedgerows and notes the integration of the Directive into the Irish legislative context.

- Hedgerows are considered to be part of the wider ecological connectivity network as movement corridors. It is stated that ecological connectivity can be relevant in relation to Appropriate Assessment under Article 6 of the Habitats Directive, as fragmentation may influence the movement of species or functional connections between Natura 2000 sites and the wider landscape. Maintaining features through strong policy helps reduce the risk of incremental fragmentation that would complicate the assessment of plans or projects in relation to Natura 2000 sites.
- It is stated that the wider County Development Plan framework and policy recognises the importance of hedgerows as contributors to biodiversity, climate mitigation, resilience and describes the hedgerow network as a “huge asset” in terms of agriculture, landscape, flora/fauna, water quality and carbon sequestration. Other objectives in the County Development Plan seek to identify, protect and sensitively enhance important ecological features, link them to the wider Green Infrastructure network, support landscape features (such as hedgerows) and identify biodiversity features and significant native / indigenous hedgerows between Biodiversity Sites. Weakening the principal objective regarding hedgerow removal would risk undermining the coherence of the wider biodiversity, green infrastructure and climate strategy of the County Development Plan.
- The submission outlines that Proposed Variation No. 3 was a targeted variation to implement the Housing Growth Guidelines, seeking to ensure that Plans accommodate the revised housing growth requirements from the NPF through ensuring adequate zoned and serviced / serviceable land and settlement capacity to meet projected demand. Objective BI O26 is within the environmental and natural heritage framework of the County Development Plan and is not within the strategic mechanisms to allocate or distribute housing growth. Such an alteration would normally be considered through a full Plan review process, including statutory environmental assessments for Plan preparation. It is not evident how the proposed revised text to BI O26 has arisen or how it forms part of the implementation of the Housing Growth Guidelines as it appears to be outside the scope of the Guidelines.
- It is submitted that the proposed amendment is not required by national policy or legislation and is therefore a discretionary weakening of the county's principal hedgerow protection objective, counter to the EU, national and regional policy direction. In this regard, it is stated that the preparation and amendment of Development Plans must be considered in light of statutory obligations placed on public bodies under the Climate Action and Low Carbon Development Act 2015 (as amended). Section 15 of this Act requires bodies, including planning authorities, to perform their statutory functions (including plan making functions such as variations) in a manner consistent, insofar as practicable, with the most recent Climate Action Plan, National Long Term Climate Action Strategy and the objective of mitigating greenhouse gas emissions and adapting to climate change. As such, it is stated that where a planning authority exercises discretion in Development Plan policy (including the changes to Objective BI O26), it must have regard to whether the approach adopted is consistent, insofar as practicable, with national climate policy and the statutory objective of climate mitigation and adaptation.
- The SEA Screening Addendum Report for the Proposed Material Alterations concludes that this alteration does not significantly alter the meaning or context

of the objective. The basis for this conclusion is not clearly explained having regard to the nature of the proposed changes. It is considered that the amendment would alter the operative decision-making framework governing hedgerow removal by taking out the evidential threshold for loss, the requirement to minimise removal and the stronger mitigation measures provided by the current objective wording.

- The submission states that SEA requires consideration of not only policies but also the environmental implications of changes in policies intended to protect environmental resources. When protection policies are weakened, environmental implications may arise through indirect and cumulative pathways rather than direct effects. The Annex II criteria of the SEA Directive and Schedule 2A of the Planning and Development (Strategic Environmental Assessment) Regulations require the consideration of the potential for cumulative and indirect environmental effects. For hedgerows, such implications may arise through the removal of a deterrence against pre-application clearance, cumulative incremental removal / loss due to individual development proposals, progressive fragmentation of the hedgerow network which weakens ecological connectivity and biodiversity corridors and deterioration of the ecological effectiveness and species diversity where mitigation planting is simplified. As survey evidence in Kildare demonstrates measurable loss, simplification and fragmentation, the strength of this objective forms an important component in the plan led framework for which such pressures are managed.
- Clarification on how the environmental implications of the weakening of Objective BI O26 (as detailed above) were considered and evaluated would assist in demonstrating the robustness of the SEA screening process and the conclusion that the alteration is not likely to give rise to significant environmental effects.
- It is considered that maintaining the existing objective as part of a framework to protect existing ecological infrastructure is more aligned with statutory / legislative considerations and climate objectives together with national, regional and local policy highlighted in this submission, rather than weakening safeguards.

Strategic Environmental Assessment Screening

The submission notes that SEA provides a framework for evaluating the likely significant environmental effects of implementing plans and programmes before they are adopted, and that the objective of Directive 2001/42/EC is to ensure a high level of environmental protection and to integrate environmental considerations into the preparation and adoption of plans and programmes. It is considered that clear documentation of the reasoning underlying SEA screening documentation is necessary to:

- Demonstrate how environmental considerations have informed plan making and how the statutory environmental assessment framework has been applied during the preparation of the Proposed Material Alterations.
- Assist in ensuring that the environmental implications of plan-making decisions can be understood by the public during the consultation process.

The submission outlines that having considered Proposed Variation No. 3 and the accompanying SEA Screening Report, the SEA Screening Addendum for the

PMA's and the Members' Meeting Report, it is unclear how the screening determination demonstrates compliance with the requirements of Directive 2001/42/EC and Schedule 2A of the Planning and Development (Strategic Environmental Assessment) Regulations. It is considered that the documentation does not clearly demonstrate how the Schedule 2A criteria were applied to:

- The specific additional housing growth quantum in the variation,
- The spatial distribution of additional housing growth across the settlement hierarchy in the variation, and
- The housing delivery/development mechanisms in the variation, including phase 2 land release, revised housing allocations in the settlement hierarchy, designation of strategic sites, Urban Development Zone pathways and Settlement Plan mechanisms.

The submission states that the screening documentation relies in part on the previous SEA of the adopted County Development Plan and considers that the existence of earlier environmental assessment at the Development Plan stage does not in itself demonstrate how the environmental implications of subsequent amendments or variations have been evaluated. In particular, it is outlined that the screening documentation does not clearly explain how the environmental implications associated with the following were assessed/evaluated in determining that the PMA's are not likely to give rise to significant environmental effects:

- The scale of the 2026 – 2028 housing uplift;
- The provisions for the release of Phase 2 residential lands;
- Settlement Plan mechanisms;
- Urban Development Zone pathways; and
- Changes to individual settlement allocations.

It is outlined that Article 4 of the SEA Directive requires that environmental assessment be undertaken during plan preparation and before its adoption. In this regard, it is stated that the SEA screening addendum appears to confirm the conclusions of the earlier SEA screening undertaken for the variation without clearly demonstrating how environmental implications of the PMA's were evaluated - having regard to the final form of the variation. In addition, it is stated that the Members' Meeting Report does not document how environmental implications (beyond reference to flood risk) informed the discussion of amendments and were considered prior to the finalisation of amendments.

Accordingly, to support transparency, it would assist if the screening record including concise explanations addressing:

- How the housing uplift and growth distribution were evaluated against Schedule 2A - including magnitude, spatial extent, likelihood and cumulative effects. It is considered that the integration of approximately 7,826 additional units distributed through various mechanisms is a significant adjustment to the housing framework for the remaining period of the Development Plan and has the potential to influence/affect the spatial distribution and timing of development across the settlement hierarchy, settlement growth patterns, transport demand, infrastructure demands and cumulative environmental effects. The screening documentation does not clearly explain how the

environmental implications associated with scale and distribution of additional housing growth were evaluated.

- How the additional housing growth allocation was considered in terms of potential transport related environmental effects across rail and non-rail served settlements.

The proposed material alterations introduce changes which may influence the spatial distribution of development across the county. SEA guidance recognises that spatial planning decisions may influence environmental outcomes through effects on transport demand, energy use and greenhouse gas emissions. In addition, Annex 1 of the SEA Directive identifies environmental receptors to be considered in environmental assessment including population, human health, air and climatic factors. Additional housing growth to settlements with differing levels of transport accessibility may also influence commuting patterns, transport volumes and transport emissions. It is considered that the screening documentation does not clearly demonstrate how spatial and transport related environmental pathways were evaluated in reaching the screening determination.

In addition, the submission notes the PMAs introduce provisions which may facilitate additional housing delivery in villages and rural settlements. Development Plans typically regulate the scale and pace of development in such settlements through growth thresholds, targets and development management criteria. Where these constraints are relaxed, development may occur primarily based on site availability rather than growth allocations and at locations not originally identified for growth in the Core Strategy framework. It is considered that the SEA screening documentation does not clearly explain how the environmental implications of relaxing these settlement growth constraints were evaluated.

- How the interaction between the revised housing allocations, Phase 2 land release provisions, Settlement Plan triggers, strategic site allocations and Urban Development Zone pathway mechanisms were considered collectively/cumulatively in assessing environmental implications. Where these mechanisms operate together, they may influence the pattern of housing delivery across the county. The SEA screening document does not clearly explain how the interaction between these mechanisms and the Core Strategy framework was considered when evaluating environmental implications.
- How environmental implications with settlement specific growth allocations were evaluated, including Clane. The position of Clane in the settlement hierarchy, its location outside the Dublin Metropolitan Area Strategic Plan area and the lack of servicing by rail based transport is noted. As the town is served by road networks (including the N4 corridor), commuting from Clane is predominantly road based. Additional housing in the town may therefore influence regional commuting patterns, traffic volumes on the strategic road network and transport emissions. The submission notes that the PMAs appear to rely on land identified within the Clane LAP 2017 – 2023 which predates the RSES (2019) and the current County Development Plan 2023 – 2029. The RSES introduced updated spatial planning objectives intended to address

development pressures and commuting patterns in the wider Dublin region. Accordingly, zoning capacity identified in the Clane LAP raises the question of whether the environmental implications of additional housing delivery in Clane have been considered in the updated spatial planning framework. The screening documentation does not clearly explain how the environmental implications associated with this settlement-specific growth allocation were evaluated.

- What environmental considerations such as transport demand, climate implications and cumulative effects were taken into account during the formulation of the PMAs. When considered collectively, the mechanisms introduced to facilitate housing delivery may influence the scale of housing delivery, the timing of development and the spatial distribution of settlement growth. The SEA Directive requires screening determinations to consider secondary, cumulative and synergistic environmental effects. The screening documentation does not clearly demonstrate how cumulative environmental implications of these interacting mechanisms were evaluated.

In addition, the submission notes that the Settlement and Site Capacity Audit accompanying the variation focuses primarily on infrastructure serviceability and states that SEA screening must also consider broader environmental implications including transport demand, land use patterns, climate emissions and cumulative settlement growth. It is considered that the screening assessment does not clearly explain how these broader environmental considerations were assessed alongside infrastructure capacity.

Sub Ref No: 039

Name: Land Development Agency

See Section 4 of the Chief Executive's Report for submissions received from Prescribed Authorities and Public Bodies.

Sub Ref No: 040

Name: Kelland Homes Ltd

Issues Raised:

This submission has been prepared by Armstrong Fenton Associates on behalf of landowners Kelland Homes Ltd in respect of their lands at Newtown Little, Blessington, County Kildare (as outlined in yellow on map below).



The submission relates to lands extending to approximately 14 ha of which circa 8 ha is zoned 'C: New Residential' and circa 6.23 ha is zoned 'F: Open Space and Amenity'. Notes the site specific objective to deliver the Blessington Inner Relief Road (BIRR). Further notes that while the vast majority of their lands are in County Kildare a portion is located within County Wicklow. The submission welcomes the proposed additional 100 units allocated to Blessington stating that it's a step in the right direction. It suggests that additional housing numbers be allocated to Blessington to sustain the delivery of the southern section of the BIRR in its totality.

The submission notes the Proposed Variation No. 3 seeks to align the current Development Plan with the NPF Implementation: Housing Growth Requirements guidelines which set out two time periods, from 2025 to 2034 and 2034 to 2040. However, it notes the Proposed Variation No. 3 only provides for additional housing unit allocation up to 2029. The submission suggests that if the Council is to target the delivery of 2,755 units annually until 2034 and a further 1,919 units annually from 2034 to 2040, this would amount to over 37,000 units up to 2040 for the entire county. The submission states that 1% of this figure would equate to circa 370 additional units being allocated to Blessington up to 2040. In support of this request, it contends that there needs to be adequate Core Strategy allocation to deliver compact forms of housing, as well as aiding the delivery of much needed infrastructure. Refers to a previous submission sent to the council in respect of Proposed Variation No. 3 in November 2025.

Sub Ref No: 041

Name: Cairn Homes Properties Ltd.

Issues Raised:

The submission considers that the Proposed Variation and Proposed Material Alterations (PMA) are a lost opportunity to provide for the sustainable development of Kildare due to the lack of sufficient serviced sites in higher order settlements, particularly Celbridge, Leixlip, Maynooth and Naas.

The submission references Heading 7 of the General Scheme of the Planning and Development (Amendment) (No. 2) Bill 2025, in which planning authorities may extend the lifetime of current Development Plans by 30 months under Section 68 of the Planning and Development Act 2024 (as amended). It is considered that this inferred deferral of upcoming Development Plan reviews would be detrimental to housing delivery in the future. Accordingly, it is considered imperative that a more ambitious approach to the zoning of land be taken in this variation.

The submission notes the "Call for Sites" public consultation process initiated by other local authorities as part of or in parallel with variation processes. The submission advocates that KCC initiate a similar process to identify sites which may deliver residential development at scale, within a timeframe earlier than sites currently zoned / proposed for zoning under this variation. It is outlined that the Housing Growth Requirements Guidelines 2025 are clear in requiring local authorities to assess if identified lands can deliver housing in the lifetime of the Plan, and that alternative lands should be zoned where this is not the case. This is supported by the OPR submission to Proposed Variation No. 3.

In this regard, the submission states that the sites identified in Table 2.8A will not deliver housing within the remaining lifetime of the plan and that alternative sites should be included, such as Cairn's holdings at Black Avenue (Leixlip), South Ring Road (Naas) and Newtown (Maynooth) – as detailed in the original submission to the public consultation to Proposed Variation No. 3 (attached to the submission as Appendix A). In this regard, it is requested that Kildare County Council (KCC) reconsider Table 2.8A and include additional provision, particularly for Leixlip, Naas and Celbridge.

The submission also outlines the following regarding the Proposed Material Alterations:

PMA No. 1: The submission supports additional housing mechanism point 6 and the final paragraph (regarding the status of expired Local Area Plans) in PMA No. 1.

However, the submission seeks the removal of the additional housing delivery mechanism point 5 in PMA No. 1. It is outlined that growth should be allocated to sites in higher order settlements proximate to services, public transport, and employment opportunities. The submission questions the provision of additional dwellings in lower order settlements, stating that the approach is without justification, strategic policy support or evidence regarding the ability of such settlements to deliver housing. The submission states that no analysis has been undertaken regarding the capacity of these settlements in terms of access, water supply, foul drainage, surface drainage and social / community infrastructure to accommodate such urban generated housing in wide areas of rural Kildare. This approach is stated as being inconsistent with the Development Plan Guidelines 2022 and incongruous with the objectives of sustainable development. In this regard, the original Cairn submission to Proposed Variation No. 3 is noted, in which 3 no. sites were assessed for development suitability in line with the Development Plan Guidelines 2022. This assessment demonstrated that the 3 no. sites were suitable in terms of accessibility, water and wastewater connections and proximity to the necessary social and community infrastructure to support residential development at scale.

It is stated that the approach in the PMAs will result in the baking in of long-term unsustainable travel patterns and car dependency, increasing commuter traffic and urban sprawl at unsuitable locations that are unable to deliver at scale. The inability to deliver at these locations due to a lack of due diligence regarding services and capacity in such settlements may have the opposite intended effect and exacerbate short term housing delivery. It is stated that the focus should be supporting short term housing delivery at scale, on sites with supporting infrastructure in sustainable locations. The submission notes that the 3 no. sites identified in the submission, within higher order settlements, have the potential to deliver sustainable residential development at scale and are better placed to absorb housing growth than small scale villages and rural settlements. In this regard, the submission urges KCC to reconsider the allocations to redirect growth to higher order settlements including Leixlip, Celbridge, Naas and Maynooth.

The submission seeks the following amendments (additional text in **bold underlined purple**, deleted text in ~~strikethrough blue~~) to the additional housing

delivery mechanism point 3 in PMA No. 1 for clarity and consistency regarding the preparation of a settlement plan for Celbridge:

*The allocation of additional housing growth to Athy and Celbridge, together with the identification of strategic sites in Athy and Celbridge for future housing delivery to be integrated into inform new settlement plans in 2026 **for Celbridge and subsequently 2027 for Athy**, ~~t-~~The zoning ~~for which~~ of the strategic sites will be determined during the plan making process having regard to strategic flood risk assessment and other environmental assessments.*

PMA No. 2: The submission notes that the PMA provides for the reallocation of housing growth to lower order settlements (Villages and Rural Settlements) to the order of an estimated 1,000 units on undeveloped lands. The submission reiterates that this is inherently unsustainable, restating the points made in seeking the removal of the additional housing delivery mechanism point 5 in PMA No. 1.

PMA No. 3: The submission notes the proposed changes to Tables 2.8A and 2.8B and reiterates that the focus should be on supporting sites which can deliver housing in the short term, at sustainable locations in tandem with the necessary supporting infrastructure. The submission states that the approach in the Proposed Material Alterations redistributes housing growth and delivery away from higher order settlements to lower order settlements and disagrees with this approach. The submission reiterates the points made in seeking the removal of housing delivery mechanism point 5 in PMA No. 1 and states that they see no justification or support to assert that these settlements have the ability to deliver housing and would exacerbate the housing need in Kildare due to the lack of services and infrastructure to enable development in such settlements. They are practical alternatives to accommodate growth. The submission again notes the 3 no. Cairn sites are shovel ready to provide high density development of scale in higher order settlements in the short term; and that additional allocation should be provided for Leixlip, Maynooth and Naas in the supplementary tables.

The submission supports continued reference to Simmonstown and Ballyoulster in Table 2.8A and notes the concerns of the OPR regarding potential transport infrastructure constraints. It is stated that, subject to grants from An Coimisiún Pleanála in May 2026, these concerns regarding transport will have been addressed.

PMA No. 5: The submission seeks the following additional text (shown in **bold underlined purple**) for CS O31 in PMA No. 5 for clarity and consistency regarding the preparation of a settlement plan for Celbridge:

CS O31 Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared in 2026 for Celbridge and subsequently 2027 for Clane (with timelines regarding their preparation to be issued publicly by the planning authority as soon as practicable), and integrated into the County

Development Plan by way of a statutory variation, including the additional housing growth requirement included in Table 2.8 and 2.8A on serviced lands to be informed by infrastructural and environmental assessments.

The submission considers that Celbridge should be prioritised in the short term as there are lands that can deliver much needed housing.

PMA Nos. 12 – 30: Based on the preceding, it is considered that PMA Nos. 12 – 30 relating to new/revised land use zonings and designations in Villages and Rural Settlements should be omitted.

Appendix A

Appendix A of the submission contains the original Cairn Homes Properties Ltd submission (Sub Ref. 125) to Proposed Variation No. 3. The original submission seeks the zoning of lands (at Leixlip, Naas and Maynooth), the rectification of the Core Strategy numbers, the identification of additional sites/landbanks and the provision of correct classification in updated revised Tables 2.8A and 2.8B.

Core Strategy and Settlement Strategy

Regarding the Core Strategy and Settlement Strategy, the submission raises the following points for consideration:

- Notes the current planning policy context, including the Revised NPF, RSES, and the provisions of the s.28 Guidelines NPF Implementation: Housing Growth Requirements (July 2025). Regarding the new Annual Housing Growth Requirement Target and the 'additional provision' objective, it is stated that this equates to 12,398 no. units (a 171% increase) over the remaining 3 years of the CDP.
- Outlines the policy support for significant housing supply increases in the Government's 'Delivering Homes, Building Communities 2025-2030' (November 2025), which identifies the need for a strong pipeline of zoned and serviced lands that are sufficient to meet demand and support the delivery of a minimum of 300,000 homes (Pillar 1 refers).
- Notes that some lands identified may not be in an immediate position to come forward during the Plan period due to infrastructure constraints (including some Tier 2 lands in Tables 2.8A and 2.8B) to meet the growth requirements identified in the variation.
- States that to ensure that a 'sufficient pipeline of suitable zoned land is available for housing development', it is important that the Planning Authority ensures that Tier 1 lands which are serviceable, sequential and well located be brought forward for development now as a matter of urgency.
- While acknowledging that the Variation identifies some sites which can deliver medium to long term housing, it states that the focus should be on sites which can deliver much needed housing in the short term and avoid undue reliance on the long-term delivery of Tier 2 sites, as is currently the case.
- States that only through the delivery of all potential additional dwellings in the short- and medium-term as listed in Table 2.8A (including those which are dependent on the preparation of Settlement Plans) and those envisaged for long-term delivery through various mechanisms (Masterplans and Urban Development Zones which are also yet to be prepared), would the target of an additional 7,826 dwellings within the lifetime of the plan be achieved.

- States that reliance on Tier 2 sites, which are effectively Long-Term Strategic and Sustainable Development Sites/Opportunity Areas' is contrary to the Housing Growth Requirement Guidelines. The allocation to such sites should be further in addition to both the housing growth requirements and the 50% additional provision provided in the Housing Growth Requirement Guidelines.
- It is requested that KCC take the opportunity to rectify the core strategy numbers and identify additional sites/landbanks so as to ensure that the correct classifications are set out in updated revised Tables 2.8A and 2.8B, which may entail some of the lands in the Long Term Strategic Sites (Tier 1) being brought forward quicker as 'additional provision' where they can be serviced while other lands which are clearly Tier 2 will revert to being 'further additional provision's' as provided for in the s.28 Guidelines.
- The submission urges the planning authority to be ambitious and zone sufficient zoned land which allow for flexibility and a strong delivery of housing in the right locations.
- Submits that the landowner has a proven track record of activating sites and providing the necessary supporting infrastructure in tandem with development, in high quality schemes.
- States that as the plan period is only three years, it is considered necessary that other sites capable of delivering housing in the short-term are brought forward to allow residential development in the Proposed Variation No. 3 to ensure these targets can be met.
- Submits that the landowner has a proven track record of activating sites and providing the necessary supporting infrastructure in tandem with development, in high quality schemes.
- Contends that only with the delivery of all the potential additional dwellings in the short and medium term as listed in Table 2.8A, including those which are dependent on Settlement Plans to be prepared and the potential additional dwellings of the site identified for long-term delivery through various mechanisms such as Masterplans and Urban Development Zones which are also yet to be prepared, would the target of an additional 7,826 dwellings within the lifetime of the plan be delivered.
- States that as the plan period is only three years, it is considered necessary that other sites capable of delivering housing in the short-term are brought forward to allow residential development in the Proposed Variation No. 3 to ensure these targets can be met.

Naas South Lands

The submission seeks the rezoning of lands (circa 12.4 ha) at Naas South from 'I: Agriculture and 'F: Open Space' and Amenity to 'C: New Residential' to facilitate a potential 343 no. dwelling units and include the lands in Table 2.8A as Tier 1 lands to support the change of zoning either as a settlement plan or in a subsequent update to the LAP – see figures below:



Regarding this request, the submission outlines the following:

- States that the subject lands are located sequentially adjacent to the footprint of Naas, to the south of Elsemore/Whitethorn (by Cairn), north west of Broadfield View and Rathasker Lane/Road and South East of Castlefarm.
- States that permission was granted for a permanent fourth arm on the Southern Ring Road/Devoy Link Road Roundabout providing access to the site and includes cycle and pedestrian facilities and links to Naas Town Centre and surrounding amenities.
- Subject site is located within Flood Zone C, which is classified as low risk.
- Site meets the 2022 Guidelines suitability criteria in respect of road access, pedestrian and cycle access, foul sewerage, water supply, surface water and the subject site benefits from community facilities in close proximity.

Maynooth West Lands

The submission seeks the rezoning of circa 8 ha of a 39 ha landbank at Maynooth West from SR: Strategic Reserve to C: New Residential to facilitate a potential 310 – 350 no. units and be included in Table 2.8A as Tier 1 lands to support the change of zoning either as a settlement plan or in a subsequent update to the LAP.



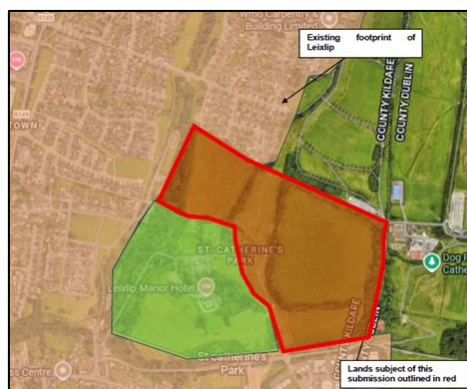
The submission outlines the following points in support of their request:

- Rezone to include the remainder of the landbank as a 'Long Term Strategic and Sustainable Development Site' (proposed Phases 2-4) so as to allow for phased development of the lands in tandem with the delivery of the MOOR and Maynooth Train Station, the location of which is on Cairn lands.

- States that Cairn own circa 39 hectares of greenfield land within the Newtown area to the south-west of the town. The lands lie to the west of existing residential development in Newtown and are situated approximately 1.2km from the town centre. Notes the surrounding area characterised by a mix of low-density rural dwellings, agricultural fields and established housing estates.
- Contends that the time is now appropriate for an initial phase of these 'Strategic Reserve' lands of c.8 hectares to come forward for development, with the appropriate development framework in place to facilitate the development of a sustainable new residential community between (310 and 350 units) in tandem with a creche and high quality public open spaces.
- Refers to the Maynooth Joint Plan and the proposal for Transport Oriented Development on lands within the Maynooth West Masterplan, which will be required to be phased.
- The subject lands are considered to be 'Tier 1: Serviced Lands' as the lands are able to connect to existing development services (i.e. roads, foul drainage, surface water drainage and water supply, etc) and the lands are located contiguous to existing development lands. States they also meet the 2022 Guidelines suitability criteria based on road access, pedestrian and cycle access, foul sewerage, water supply, surface water and community facilities.
- States that the subject lands are ideally located to contribute to the increase in the requirements for residential zoned land/core strategy review and requests a meeting with KCC in relation to this proposed rezoning request at the earliest convenience.
- Submission includes a Vision for the lands prepared by MCORM architects and urban designers which outlines a design concept for the area and illustrates phased development of the lands with Phase 1 being located in the southeast of the site.

Black Lane Lands, Leixlip

The submission requests that lands at Black Lane, Leixlip be rezoned from F: Open Space and Amenity to C: New Residential and include the lands in Table 2.8A as Tier 1 lands to support the change of zoning either as a settlement plan or in a subsequent update to the LAP.



The submission raises the following to support this request:

- The submission states that such a zoning would facilitate approximately 440 no. units, creche and circa 3.81 hectares of high quality public open spaces

- Requests that the subject lands be re-assigned their Key Development Area status as per the provisions of the Draft Leixlip Local Area Plan.
- States that the greenfield site extends to circa 16 hectares and is located to the east and south and north of the built envelope of Leixlip, c.700m from the main town centre and 1 km from the train station.
- States that Cairn has the resources to overcome the previously indicated issues with access and therefore the lands should be considered Tier 1 (Serviced).
- States that the lands are contiguous with existing residential development to the east and are in close proximity to local schools and community infrastructure adjacent.
- Contends that due to the unavailability/non-activation of existing residentially zoned lands, the subject lands present themselves as the next logical and sequentially preferable step in the orderly development of Leixlip by a developer who is active on the adjoining land and has a track record of delivering high-quality dwellings.
- Contends that the lands (net area circa 10 hectares) can contribute to the future residential needs of the town of Leixlip, taking advantage of potential Transport-Oriented Development opportunities.
- States that the subject lands meet the 2022 Guidelines suitability criteria and can be connected to existing proposed development services such as road, footpath access and public lighting and there is capacity for foul sewer drainage, surface water drainage and water supply.
- States that the current provision of social services and community amenities in the area can accommodate the future prospective residents of the future development of the lands.
- Submission includes a concept proposal of a residential scheme on the lands, illustrating the layout of the development and access arrangements and connections.

Sub Ref No: 042

Name: McGreevy Construction/Enterprises

Issues Raised:

This submission has been prepared by Hughes Planning and Development Consultants on behalf of landowners McGreevy Construction/Enterprises in respect of lands to the east of Blackberry Lane and Morrinstown Road in Newbridge.



The submission refers to both Proposed Variation No. 3 and Proposed Variation No. 2 (Newbridge Settlement Plan). The submission notes additional zoned lands have been selected following consultation with the Office of the Planning Regulator and while this is welcomed, the submission considers that Newbridge would benefit from additional zoned land.

The submission contends that the subject site was zoned agricultural in the previous Newbridge LAP and that the Newbridge town boundary under Proposed Variation No. 3 and Proposed Variation No. 2 has been moved to omit part of the subject site and rezones another part as Strategic Reserve. The submission notes the land zoning proposal for the subject site is under Proposed Material Alteration No. 58 of Variation No. 2 (Newbridge Settlement Plan) to provide a consolidated land bank. The submission considers the proposal to be misinformed given the strategic location of the site regarding public transport, services and the town centre. The submission considers that zoning the whole site as '*New Residential – Phase 2*' would allow continuous development of the entire site given it is in single ownership and its location immediately adjacent to existing residential land uses and given the proposed route for a new road through the lands. The submission considers '*New Residential – Phase 2*' zoning would achieve the same goals as the proposed strategic reserve zoning objective.

The submission considers the lands meet the criteria set out in Section 28 Guidelines as they are serviced with direct access to two roads, water and wastewater infrastructure, are located 800m from the train station, and can facilitate upgrade works on Morrinstown Road bridge over the rail line allowing for safe pedestrian access and increased permeability.

The submission considers additional housing unit numbers are required in Newbridge based on existing demand, ongoing population growth and backlog of unmet housing need and requests the Council to consider the inclusion of the subject site to increase the supply of residential development land.

Sub Ref No:	043
Name:	Cllr Pádraig McEvoy

Issues Raised:
Proposed Material Alteration No. 11
 The submission relates to the proposed amendment to Objective BI O26. The submission refers to recent engagement with local Tidy Town committees, biodiversity groups and environmental organisations who raise concerns regarding the proposed amendment, noting their participation in the development of Local Biodiversity Action Plans supported by the Council, which now form the framework for biodiversity protection and climate action across local communities.

The submission states the proposed amendment to BI O26 would change the existing policy framework which governs the retention and removal of hedgerows. The submission refers to Item 145 of the Meeting Report on the Chief Executive's Proposed Material Alterations and Motions received (January 22nd, 2026), noting the recommendation of no change in response to the proposed alteration highlighting the critical role hedgerows play in the landscape.

The submission refers to the Kildare Hedgerow Survey (2022) which revisited the same locations originally surveyed in 2006 and notes the following findings:

- Total hedgerow length declined from 121.2 km to 114.3 km.
- Annual loss rate of 0.5% which exceeds national estimates.
- Woody shrub diversity declined from 3.62 to 2.96 species per 30 metres.
- Proportion of hedges with only one woody shrub species increased from 6% to 12.4%.
- Increased fragmentation with 19.2% of hedgerows no longer linking to other semi-natural habitats.

The submission states the original wording of BI O26 establishes a clear framework for development management, whilst the proposed alteration changes and lowers both the evidential threshold for removal of hedgerows and the ecological standard for mitigation planting. It notes such changes to the development management process will give rise to many small removals of hedgerows which is the principal mechanism through which hedgerow networks typically decline.

The submission notes the proposed material alterations were assessed through the Strategic Environmental Assessment (SEA) Screening process. However, it states an SEA requires consideration of the cumulative and indirect environmental effects such as the incremental removal associated with development proposals, fragmentation of ecological corridors and mitigation planting that does not replicate existing habitat structures. It states these effects occur incrementally over time through plan led policy decisions rather than single development proposals.

The submission refers to Article 10 of the Habitats Directive which recognises hedgerows as important for migration and dispersal of species across the wider countryside. The submission refers to the Council's decision to declare a Climate and Biodiversity Emergency in 2019. It also includes a supporting letter (attachment) highlighting the Council's decision to join the EU Covenant of Mayors for Climate and Energy in September 2019, illustrating the Council's commitment to strengthening climate resilience and reduce greenhouse gas emissions by at least 40% by 2030. It further states the conservation and protection of hedgerows contribute directly to these objectives outlined.

The submission refers to Section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended) which requires public bodies to perform their statutory functions in line with national climate policy. It states retaining ecological infrastructure such as hedgerows is more consistent with these statutory obligations rather than weakening the safeguards governing their removal.

The submission recommends Proposed Material Alteration No.11 and amendment to BI O26 is not adopted with the existing objective retained in full having regard to issues and evidence outlined. It further states the proposed alteration will weaken the existing framework without any requirement from national planning policy or by the housing growth requirements and variation process with which this has arisen.

Sub Ref No:	044
Name:	Ballymore Group

Issues Raised:

The submission provides the following comments in relation to the Proposed Material Alterations (PMA):

PMA No. 1: The submission states that Part 3 of the Planning and Development Act 2024 (2024 Act) commenced on the 31st December 2025, with Section 81 of the 2024 Act now in effect. It is stated that Section 81(1) ensures that active LAPs continue to have effect for the Plan period and that Section 81(6) provides that:

“A planning authority may, during the period that a local area plan made by it remains in force by virtue of subsection (1), amend that plan.”

Accordingly, the submission suggests that the Naas LAP 2021 – 2027 be amended under Section 81(6) of the 2024 Act to integrate the Northwest Quadrant Masterplan for the avoidance of doubt and ambiguity, rather than amending the County Development Plan as provided in PMA No. 1.

The submission also requests that the planning authority extend the Naas LAP 2021 – 2027 and the Leixlip LAP 2020 – 2026 (incorporating the Confey Masterplan) to coincide with the expiry of the County Development Plan in 2029 under Section 81(2) of the 2024 Act, which states the following:

“The members of a planning authority may, by resolution for the purposes of ensuring the effective operation of this Part, extend for such period as they consider appropriate, the period for which a local area plan continued in force under subsection (1) is to remain in force provided that a new development plan has not been made under Chapter 5 in respect of the functional area to which the plan relates.”

Accordingly, the Confey Masterplan could also be amended through the Leixlip LAP under Section 81(6) of the 2024 Act, following the extension of its lifetime, should the Planning Authority consider it necessary.

Considering the above, the following text amendments (deletions in ~~strikethrough red~~ and additions in *italics red*) to the additional housing delivery mechanism no. 4 in PMA No. 1 are proposed:

- Northwest Quadrant, Naas. A variation to integrate the completed Masterplan (in progress) and related zoning provisions and objectives into the **County Development Plan Naas Local Area Plan** will be published in 2026, prior to the commencement of the UDZ process.
- Confey, Leixlip. **A variation to integrate the masterplan and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process. The period for which the Leixlip LAP will continue to be in force will be extended under S81(2) of the Act until a new County Development Plan is made.**

In addition, the submission suggests that the final paragraph in PMA No. 1, contained in the box below is rephrased.

Kildare County Council will have regard to the provisions of any expired Local Area Plan when considering proposals for new development until such time as that plan is replaced, revoked or integrated into the County Development Plan.*

** 'Provisions' refers to all aspects of the plan including Land Use Zoning objectives but excluding Core Strategy allocation which is contained in the County Development Plan.*

Suggested rephrasing (in italics red):

As of 31st December 2025, Part 3 of the Planning and Development Act 2024 commenced. On that date, the local area plans for Maynooth and Environs, Kildare Town, Naas, Athy and Leixlip were in force. Accordingly, under S81(1) of the Act, these local area plans continue to be in force. The Planning Authority will extend the period for which these plans remain in force under S81(2), and amend the plans under S81(6), as appropriate.

Settlement plans for Kilcullen and Newbridge were adopted under Variation Nos 1 and 2 of the County Development Plan respectively and these settlement plans also remain in force.

The Planning Authority has commenced the preparation of settlement plans for Kilcock, Monasterevin and Sallins and these will be brought forward for incorporation into the County Development Plan later in 2026 by way of proposed Variations. Settlement plans for Celbridge and Clane will follow. In the interim, when determining planning applications in these towns, the Planning Authority will have regard to;

- the previously adopted local area plans for these settlements, including the land use zonings contained therein, and*
- the population target for that settlement contained in the Core Strategy Table of the County Development Plan.*

PMA No. 3: The submission requests that footnote 16 be amended to accord with the proposed recommended alterations to PMA No. 1.

PMA No. 5: The submission requests that CS O32 be amended as follows (with new text in *red italics*):

Initiate the process for the designation of candidate Urban Development Zones (UDZ), in accordance with the provisions of the Planning and Development Act 2024 (once commenced), at the following locations as included in Table 2.8B:

- Northwest Quadrant, Naas as identified in Map V3-2.5, and
- Confey, Leixlip as identified in Map V3-2.6.

Prior to the initiation of the UDZ process a *Variation of the Naas LAP will be brought forward to integrate the Northwest Quadrant Masterplan into the plan under S81(6) of the Act and the period for which the Leixlip LAP will continue in force will be extended under S81(2) of the Act.*

PMA No. 8: The submission requests that the bullet point regarding SuDS in PMA No. 8 be replaced with the following text (in *red italics*) to reflect policy set out in the Council's guidance document published in December 2024:

- *Sustainable Urban Drainage Systems (SuDS) are recognised for their potential to contribute in a significant and positive way to the design and quality of open space. They provide a holistic approach to surface water management, offering significant environmental, social, and economic benefits beyond simple flood control. The Council will encourage all open space to have a role in surface water management and the promotion of biodiversity, from a single tree pit to large kickabout spaces and open parkland. High quality landscaping that integrates surface water management with active and passive recreation and maximises biodiversity through the creation of a range of habitats will be encouraged. The Planning Authority will have regard to Kildare Council's Sustainable Urban Drainage Systems Guidance Document (December 2024) and DMURS Advice Note 5: Roads and Streets Drainage using Nature Based Solutions (June 2023) in assessing planning applications.*

AA Screening and SEA Screening

The submission requests the following amendments (additional text in *red italics*, deleted text in ~~*strikethrough italics blue*~~) to both the Appropriate Assessment Screening Addendum and the SEA Screening Addendum for the Proposed Material Alterations to Proposed Variation No. 3:

Par 2. (page 2) of AA Screening of the Proposed Material Alterations:

The Proposed Material Alterations (PMAs) to the Proposed Variation No. 3 provides new objectives, text amendments and text removal in addition to amendments to maps ~~contained within the proposed Variation No. 3 (Newbridge Settlement Plan)~~ in Volume 2, Parts 1 and 2 of the County Development Plan and the Kilcullen Settlement Plan.

Par 2. (page 2) of SEA Screening of the Proposed Material Alterations:

The Proposed Material Alterations (PMAs) to the Proposed Variation No. 3 provides new objectives, text amendments and text removal in addition to amendments to maps contained ~~within the Proposed Variation No. 3.~~ in Volume 2, Parts 1 and 2 of the County Development Plan and the Kilcullen Settlement Plan.

Sub Ref No:	045
Name:	Cllr. Mark Leigh and Labour Party colleagues

Issues Raised:

Proposed Material Alteration No. 11

The submission refers to Proposed Material Alteration No.11 and proposed changes to Objective BI O26 relating to hedgerow protection. The submission refers to the Chief Executive's report on Proposed Material Alterations and the recommendation to not change the existing objective, but it is noted that this recommendation forms part of a response (Item 145) in the Meeting Report on the Chief Executive's Proposed Material Alterations and Motions received on Proposed Variation No. 3 dated January 22nd, 2026.

The submission refers to the Kildare Hedgerow Survey (2022) which indicates measurable loss and deterioration in the county's hedgerow network. It notes the following findings:

- 9.6km of hedgerow was removed over a 16 year period which is equivalent to an annual loss rate of 0.5%. This is higher than the EPA estimate of 0.16% – 0.3%.
- Average woody shrub species per 30 metre strip has fallen from 3.62 to 2.96, while the proportion of hedges containing single woody shrub species increased from 6% to 12.4%.
- Increased fragmentation with 19.2% of hedgerows no longer linking to other semi-natural habitats, including a sharp decline in the proportion of complete hedges.

The submission states the proposed amendment, and re-wording would replace the existing retention first framework with a more permissive formulation with the use of 'avoid' rather than 'prevent'. It further states the proposed change will reduce the evidential threshold for hedgerow removal and lower the ecological standard for mitigation planting.

The submission notes the importance of development plan objectives and their role in guiding development management decisions. It states changes to the strength or clarity of such objectives can potentially give rise to incremental and cumulative environmental effects during the assessment of planning applications. It recognises the important role hedgerows play as part of the county's green infrastructure network, where the loss or simplification reduces not only biodiversity value, but also the ecosystem services that support landscape resilience and climate adaptation.

The submission notes Kildare County Council's resolution to declare a Climate and Biodiversity Emergency (June 2019), recognising the need for strengthened responses to climate change and biodiversity loss, emphasising the importance of climate proofing Council policies and engaging with local communities. It further notes the Council's commitment to climate mitigation and resilience through participation in the EU Covenant of Mayor for Climate and Energy.

The submission notes the amendment of development plans must have regard to the Climate Action and Low Carbon Development Act 2015 (as amended), which requires public bodies to perform their functions consistent with national climate policy. It further states the importance of maintaining a retention first policy to manage the continuing loss and fragmentation of the hedgerow network, ensuring consistency with biodiversity, ecological and climate resilience principles within national and regional policy.

The submission recommends the Chief Executive's Recommendation under Item 145 is followed and proposed amendment to Objective BI O26 is not adopted having regard to wider planning and environmental policy.

Sub Ref No: 046

Name: Lorraine Benson

Issues Raised:

Proposed Material Alteration No. 11

The submission outlines concerns relating to proposed changes to Objective BI O26 stating the replacement text is unacceptable as it runs counter to EU and

national policy relating to biodiversity and nature restoration. The submission notes Ireland's limited native woodland and the important role hedgerows play in sustaining biodiversity and ecosystem stability, in addition to providing wildlife corridors and habitat for nesting birds, bats, pollinators and a range of bee and bumble bee species who are dependent on such vegetation for survival.

The submission states that since the publication of the Kildare County Development Plan 2023-2029 (as varied), biodiversity indicators have trended downwards. It further states there is now strong argument to review and strengthen all aspects of existing policy to ensure the further protection of nature and our environment. It concludes that future suggestions to weaken the existing provisions in the CDP should be resisted.

Sub Ref No: 047

Name: Ballymore Beef Limited

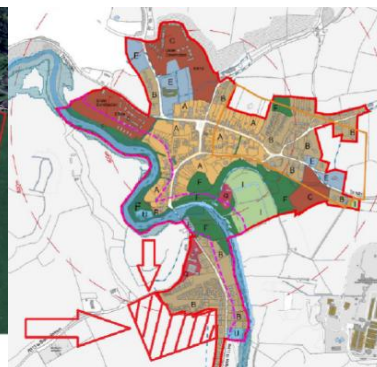
Issues Raised:

The submission by Ballymore Beef Limited welcomes and supports the proposed alterations and amendments as they pertain to the townland of Ballymore Eustace. Submits that Ballymore Eustace can accommodate additional housing and requests that consideration be given to their submission sent to the council in November 2025 in response to the publication of Proposed Variation No. 3.

This submission relates to the requested rezoning of agricultural lands extending to 12.8 acres at Ballymore Eustace to 'C': New Residential (see maps below highlighting lands outlined in red/red hashing). The submission notes that the lands were previously zoned and consideration should be given to zone this land again given it is fully serviced and connected to an existing residential development within the town. Submits that the development of the lands will result in public gain through the delivery a much-needed pedestrian bridge.



Subject site – Adjacent to Liffey Heights in Ballymore Eustace – 5.18 Hectares/12.8 acres



The submission states that the original submission has been attached to this submission. This outlines the following in support of their request:

- States that the lands should now revert to the former residential zoning as the lands represent the next logical location for residential development in Ballymore Eustace and if the site is rezoned to residential, it is the intention of the landowner to progress immediately with a planning application.
- The submission includes a sample scheme layout which shows the potential for approximately 100-110 homes to include 20% social and affordable housing including a creche and a local retail unit.

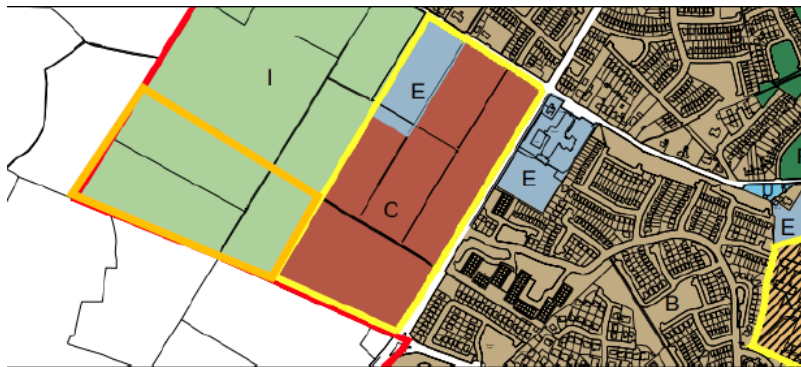
- The submission includes an 'Indicative scheme layout' of a potential residential scheme which this differs somewhat from the 'sample residential development' layout which was included as part of the submission to Proposed Variation No. 3 (dated 25th November 2025).
- States that the site is serviced and Uisce Éireann has provided a confirmation of feasibility for the lands.
- Contends that the subject lands are highly connected, located within close proximity to the Main Street, the village square, River Liffey and local amenities.
- States that the lands represent a logical infill and consolidation opportunity, promoting compact urban growth in accordance with national, regional and local planning policy.
- States that the last two significant sites in Ballymore Eustace have been completed and that there is no development land of substance available for residential development in the village.
- Reiterates that the objective to add a pedestrian access to the Ballymore Bridge could be advanced immediately with appropriate support and levies from development sites and lands benefited by the new pedestrian bridge and states that a fully costed exercise has been carried out in relation to the development of the boardwalk, which can be shared with KCC.
- Refers to the provisions of the NPF Implementation – Housing Growth Requirements (2025). States that the site is in single ownership with capacity to build in the short term.

Sub Ref No: 048

Name: Helen O'Brien, Elizabeth Donovan and Hugh Donovan

Issues Raised:

This submission has been prepared by Hughes Planning and Development Consultants on behalf of Helen O'Brien, Elizabeth Donovan and Hugh Donovan in respect of zoning request for lands to the west of Shackleton Road Kildare from 'I: Agricultural' to 'C: New Residential' (see Map below of lands outlined in orange).



The submission welcomes the provision of additional zoned lands in the revised Proposed Variation No. 3 following consultation with the Office of the Planning Regulator. However, the submission considers that Celbridge, identified as a Self-Sustaining Town in the Development Plan, could benefit from additional zoned lands as it is one of Kildare's largest towns and employment centres.

The submission requests the Council to consider the rezoning of the subject site to residential use based on its location approximately 1 km from Celbridge Town Centre and as it is directly adjacent to existing residential development ensuring compact and sequential development consistent with national planning policy. It is submitted that the subject site is serviceable and well connected to existing infrastructure including roads, utilities and public transport links, which would facilitate the delivery of housing in the short term. The submission considers the request supports the objectives of the revised NPF and housing growth requirements guidelines.

It is noted that the submission includes an attached appendix entitled 'Rezoning Submission' (November 2025) prepared by Hughes Planning and Development Consultants on behalf of Helen O'Brien, Elizabeth Donovan and Hugh Donovan which appears to be a copy of their previous submission at Draft Proposed Variation No. 3 public consultation stage (KCC Consultation Portal Reference No. KCC-C418-129). It is noted that page 2 of this appendix appears to have been edited since their original submission to update the subject site's location which was stated as "our client's lands at Blackberry Lane and Morrinstown Road, Newbridge, Co. Kildare" in their previous submission and is now stated as "our client's lands at Shackleton Road, Celbridge, Co. Kildare".

The appendix includes a rezoning request for the 8.5 6ha subject site and is made in consideration of the following:

- National, regional and local planning policy informing the submission on the proposed Variation are outlined.
- It is stated the clear intention of the NPF Implementation guidelines is to bring forward land capable of delivering houses in the short term. It is submitted that the current Core Strategy as set out in the Proposed Variation does not adequately allow for the development of Celbridge and this is contrary to the NPF Implementation guidelines intention.
- It is noted the subject site is immediately adjacent to the existing built-up area of Celbridge, is readily available for development and can be quickly released for residential use in line with the guidelines.
- It is stated the subject site is located c.1km from Celbridge town centre and various services, community amenities and public transport bus routes.
- It is noted there is no relevant planning history on the subject site.
- It is stated the subject site has potential to comprise between 299 to 428 dwellings based on Metropolitan Towns (>1,500 population) – Suburban/Urban Extension density range, as set out in Compact Settlements guidelines.
- The submission considers the subject site would better suit being zoned as New Residential to form a consolidated parcel of residential lands on the town's western boundary, would be consistent with the Compact Settlements guidelines and would address housing demand in Celbridge.
- The proposed rezoning is aligned with NPF's strategic goals, notably NPO 7 and NPO 10 regarding compact growth and transport-oriented development.
- The submission highlights revised future population projections in the NPF and notes that Kildare has been identified as one of the fastest growing population centres in the country. It is stated that it is imperative that further lands are appropriately zoned to future proof the delivery of housing.

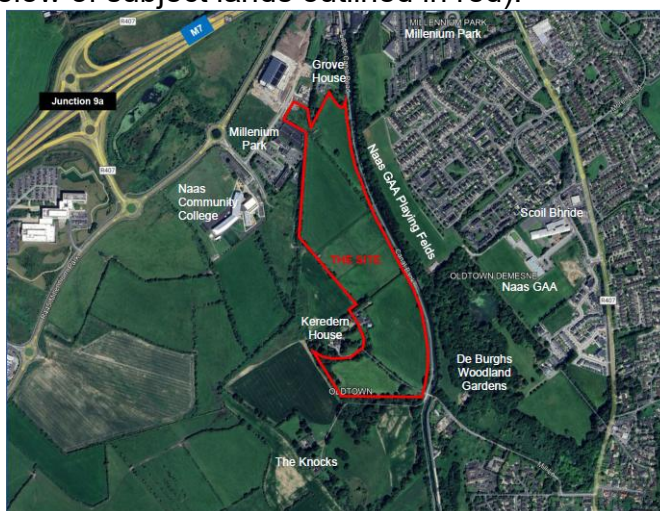
- The subject site will be served by the Shackleton Road providing direct access to the existing street network and water, sewage and telecoms infrastructure.

Sub Ref No: 049

Name: Aravonian Limited

Issues Raised:

This submission has been prepared by John Spain Associates on behalf of landowner Aravonian Limited in respect of lands at Oldtown (Northwest Quadrant), Naas (see map below of subject lands outlined in red).



The submission refers to a previous submission (Ref. No. KCC-C418-65a) to the public consultation process for Proposed Variation No. 3 (dated 26th November 2025) which is appended (Appendix 1) to this submission. The submission begins by highlighting the following key points of the original submission and initial rezoning request:

- Proposed Variation No. 3 and revised housing targets are welcomed, including the continued recognition of the Northwest Quadrant (NWQ) for housing delivery.
- It notes that all sites/locations identified in Table 2.8A and Table 2.8B of Proposed Variation No. 3 are brought forward for development in the short term to ensure the revised target of 7,826 additional dwellings are delivered within the lifetime of the plan.
- It welcomes CS O32 and the designation of NWQ as a future Urban Development Zone (UDZ), but requests that the NWQ Masterplan be brought forward and adopted as a variation as soon as practicable.
- It requests that planning applications may be brought forward on the subject lands when the NWQ Masterplan is adopted, and not contingent upon the UDZ designation.
- It requests that an updated zoning map for the Naas LAP 2021-2027 is incorporated to reflect the adopted NWQ Masterplan and amended land use zoning objectives to allow housing brought forward in the short term.
- It states the subject lands are currently serviced with connections to existing roads and necessary utility infrastructure, including the ability to provide new pedestrian and cycle infrastructure and new connections whilst conforming to the sequential development of the town.

Proposed Material Alteration No. 1

The submission supports and welcomes the proposed change to Table 2.8B which identifies the subject site as a Short to Long Term Strategic Development Site which indicates planning applications can be brought forward in the NWQ subject to the adoption of the Masterplan. The submission also supports the proposed changes to Item No.4 under the Delivery Mechanisms which confirms the NWQ Masterplan will be published in 2026 and adopted by way of variation to the County Development Plan. The submission requests that the masterplan is integrated as soon as practicable, whilst identifying the subject lands as a suitable location for development in the short term. The submission requests further clarity and textual changes to the caveat/footnote under Revised Proposed Amendment No.12, stating the NWQ Masterplan and zonings when adopted will supersede the Naas LAP whether active or expired, and that the caveat outlined in relation to expired LAP's will not apply to the NWQ lands.

Proposed Material Alteration No. 3

The submission expresses concern with the proposed amendment associated with Table 2.8A and Table 2.8B which has reduced the additional housing growth allocation in the NWQ from 1,294 to 543 units for the remaining plan period. The submission notes if multiple landowners bring forward applications within the NWQ in the short term, dwelling numbers could exceed the 543 allocation which will result in a further period of time for an additional allocation and planning framework to be realised and applied. The submission requests that the original housing allocation of 1,294 units remains, and if the prescribed number is adopted, that it is not treated as a ceiling by the Planning Authority.

The submission refers to 'The General Scheme of the Planning and Development (Amendment) (No.2) Bill 2025', which includes a provision for Planning Authorities to postpone the review of the Development Plan by up to 30 months to allow for Regional Spatial Economic Strategies to be updated. It notes that any delay in the preparation of the County Development Plan review may result in a delay of additional allocation to the NWQ, emphasising the importance of ensuring the allocation of units in Table 2.8B are not treated as a maximum, which will hamper housing delivery. Furthermore, the submission requests that a provision is included in Table 2.8B which states the housing allocation for the NWQ will not be interpreted as a ceiling by the Planning Authority.

Proposed Material Alteration No. 5

The submission supports the proposed changes to CS O32 as they clarify that the NWQ Masterplan will be brought forward prior to the UDZ process, allowing planning applications to come forward which are not contingent on the UDZ designation.

Appendix 1: Submission to Proposed Variation No. 3 of the Kildare County Development Plan 2023-2029 (as varied), November 26th, 2025

A summary of Appendix 1 (Submission KCC-C418-65a) is provided below which raises the following points for consideration in respect of the rezoning of land from 'SR – Strategic Reserve and 'I – Agricultural' to 'C – New Residential':

- The subject lands are irregular in shape and are bound by existing dwellings and farmhouses to the north and south, with the canal bank road running along the eastern boundary of the lands.
- A small portion of the lands currently bound a hardstanding parking area of Millenium Park to the northwest, located off the R455 which can provide a sufficient access point to the lands.
- The lands are currently greenfield/agricultural in nature which includes an existing pressured sewer line that traverses the site in an east to west direction discharging at the Osberstown WWTP.
- Refers to national and local policy context with reference to existing land use zonings and associated movement and transport objectives relevant to the subject lands and their connectivity to the town centre and surrounding amenities.
- Refers to Policy NWQ1 of the Naas LAP and pending masterplan framework for the Northwest Quadrant lands which states no development shall take place on lands identified 'SR – Strategic Reserve' until such time as a masterplan is prepared and integrated by statutory amendment to the local area plan.
- The submission notes the subject lands are in an area identified for the delivery of housing in the long term, contingent upon the publication of a pending masterplan variation, including a proposed Urban Development Zone (UDZ) designation which is an even longer-term objective.
- Refers to the remaining three years of the current development plan and states the subject lands can contribute to the short-term housing targets set out for Kildare.
- The submission generally supports Objective CS O32 of Draft Variation No. 3. and recommends the pending masterplan framework for the Northwest Quadrant is brought forward as a variation and adopted as soon as practicable.
- The submission proposes the change of 'SR – Strategic Reserve' zoning to 'C – New Residential' to allow planning applications to be considered on these strategic lands in the short term, increasing housing delivery during the lifetime of the development plan.
- The submission also proposes the rezoning of lands zoned 'I – Agricultural' to 'C – New Residential' to align with the aims and objectives of Draft Variation No. 3 to provide housing in the Northwest Quadrant. This includes both the northern portion of the site and portion of the site adjacent Keredern House where existing farm buildings are not protected structures.
- The submission generally welcomes the future UDZ designation as this can promote the delivery of critical infrastructure in the new urban quarter. However, it states the adoption of the masterplan framework for the area or the rezoning of the lands is considered crucial for housing delivery on these lands in the short term.
- The submission states the subject lands are considered 'Tier 1 – Serviced Zoned Land' with appropriate access points and excellent connectivity to the town centre and wider area.
- States the lands benefit from its proximity to the canal with the potential for future residential development to connect to the canal bank road and potential future active travel links that can enhance the sites connectivity with the town centre.

- States the northwestern portion of the lands have access to mains water, gas and electricity connections, including sufficient sewerage capacity due to the completion of the Osberstown sewer line running through the site.
- Refers to existing pedestrian and cycle link objectives identified under the Naas LAP which are relevant to the subject lands. States the landowner is happy to facilitate these important links including a proposed active travel bridge which can facilitate and enhance access to the rezoned lands.
- Refers to an identified greenway objective in the Naas LAP which runs along the eastern site boundary adjacent the canal and which is currently zoned 'F – Open Space and Amenity'. States the existing zoning provides a 40m set back approximately from the canal edge which is more than sufficient for the development of a potential greenway route and subsequent future building lines.
- Refers to recent residential developments at Finlay Park and Sarto Park which have adopted similar if not lesser setbacks from the canal edge as outlined in map exert below.



- The submission requests an updated zoning map for Naas to be incorporated into the CDP via the proposed variation which includes the rezoning of the 'SR – Strategic Reserve' and 'I – Agricultural' zoned lands to 'C – New Residential' to align with the aim of delivering housing on these strategic lands in the short term.
- States the above requests are considered appropriate due to the lands Tier 1 designation and ability to support the sequential development and compact growth of the town.

Appendix 2: Existing Services to NW of Site

The submission includes supporting map excerpts (Appendix 2) which illustrates the existing watermain (Sheet 1), wastewater (Sheet 2) and surface water drainage (Sheet 3) services to the northwest of the site, noting it's suitability for short term development.

Sub Ref No:	050
Name:	Glenveagh Homes Ltd.
Issues Raised:	
This submission has been prepared by John Spain Associates on behalf of landowner Glenveagh Homes Ltd. in respect of lands at Millennium Park,	

Northwest Quadrant (NWQ), Naas and Kiladoon, Celbridge (see map excerpts below of subject lands outlined in red).

Millennium Park, Naas



Kiladoon, Celbridge



The submission questions the decision of allocating additional housing growth to lower order rural settlements creating unsustainable travel patterns, rather than focusing growth at locations where social and economic opportunities exist. The submission agrees with comments from the Office of the Planning Regulator (OPR) which recommends options for short term housing delivery, including the zoning of additional lands and the release of all Phase 2 lands in certain settlements is actioned and delivered. The submission welcomes the increased core strategy numbers; however, it requests that a further additional provision is allocated in Table 2.8A which includes Celbridge, Naas and Sallins.

The submission notes the following key points for consideration:

- The strategy of dispersing 1,000 units to smaller settlements is unsustainable as growth should be allocated to higher order settlements proximate to services, employment and public transport.
- Requests the reinstatement of unit allocation in the NWQ from 543 to the original 1,294, considering the subject lands can deliver housing in the short term and are not constrained by any infrastructural deficits.
- Recommends that the Celbridge LAP is reviewed and published in 2026.

Proposed Material Alteration No. 1

The submission requests that the timeframe (point no. 3) for the preparation of the Settlement Plan for Celbridge and Athy is clarified as being within 2026 with further

amendments to the proposed text which removes reference to 2027 (alterations to the text *~~in bold, underlined blue strikethrough~~*), as follows;

The allocation of additional housing growth to Athy and Celbridge, together with the identification of strategic sites in Athy and Celbridge for future housing delivery to be integrated into inform new settlement plans in 2026/2027, t . The zoning for which of the strategic sites will be determined during the plan making process having regard to strategic flood risk assessment and other environmental assessments.

The submission states the proposed sites included in Table 2.8A will not deliver housing in the lifetime of the plan and therefore alternative sites such as the subject lands in Celbridge should be included as a feasible solution with the potential to deliver 366 units. The submission includes a supporting table which includes a list of suitability criteria illustrating the sites serviceability, stating the lands are considered to be 'Tier 1 – Serviced Lands'.

The submission recommends a number of textual changes to point no.4 (PMA No.1) which emphasises the importance of integrating the NWQ Masterplan into the County Development Plan as soon as practicable, including the reinstatement of the original 1,294 units proposed for the masterplan area and zoning of serviceable 'Tier 1' land to support short term delivery.

In order to provide further clarity and certainty in respect of the above text, the submission requests the following additional text in ***bold underlined purple***:

4. The progression of strategic sites in the short term to medium, which given their scale, also form long-term Urban Development Zones (UDZ), as provided for in the Planning and Development Act 2024, at two locations as follows:

- Northwest Quadrant, Naas. A variation to integrate the completed Masterplan (in progress) and related zoning provisions and objectives into the County Development Plan will be published in 2026, **as soon as practicable**, prior to the commencement of the UDZ process. **"In order to facilitate the development of 1,294 dwellings within the NWQ in the lifetime of the current County Development Plan the Naas Local Area Plan 2021 – 2027 should be amended immediately following the passing of the Proposed Variation to designate lands Tier 1 and zone 'New Residential' lands within the NWQ."***
- Confey, Leixlip. A variation to integrate the masterplan and related zoning provisions and objectives into the County Development Plan will be published in 2026, prior to the commencement of the UDZ process.*

The submission seeks the removal of point No.5 (PMA No.1) stating no supporting assessment has been carried out in each of the settlements to understand the available capacity and necessary servicing requirements which is inconsistent with the methodology outlined in 'Development Plans Guidelines for Planning Authorities'. It further states that the proposed allocation to smaller rural settlements may not have the ability to cater such growth which contradicts the overarching objective of sustainable development. It strongly urges that this proposed allocation is re-directed to higher order settlements such as Naas, Celbridge and Sallins and the subject lands identified which have the capacity to cater such growth.

The submission supports point No.6 (PMA No.1) and the pro-active approach taken by the Council which will allow for sufficient flexibility. The submission also supports the additional text (caveat) included in PMA No.1 which provides clarity in respect of provisions (land use zoning objectives) contained in expired LAP's when considering proposals for new development until such time as that plan is replaced, revoked or integrated into the CDP.

Proposed Material Alteration No. 2

The submission refers to the proposed re-allocation of 1,000 units (Table 2.8) to lower order rural settlements which it states is unsustainable. The submission refers to Appendix 1: Submission to Proposed Variation No. 3 of the Kildare County Development Plan 2023-2029 (Submission KCC-C418-88a) which identifies two sites in Naas and Celbridge that have the potential to deliver high density housing of scale. The submission states the subject sites have been assessed and demonstrate appropriate access to existing social and community infrastructure, including access to water and wastewater connections. The submission refers to Sallins and lands which can be made available to support a further increase in unit allocation and which can assist in the delivery of a significant Transport Oriented Development (TOD). The submission strongly recommends that the identified sites and higher order settlements are put forward as alternative options for delivery under Table 2.8, rather than allocating this growth to rural settlements.

Proposed Material Alteration No. 3

The submission questions the reduction in the proposed allocation within the NWQ from 1,294 to 543. It requests that the subject lands could be fast tracked for development in for short term development in Table 2.8B, noting the precedent set in 2021 where development at Finley Park was allowed to come forward in advance of the preparation of the NWQ Masterplan. It states the development of these lands in the short term have the capacity to deliver 450-500 units and not prejudice the key principles and public transport/movement objectives of the NWQ. The submission does not agree with the revised approach of the Council to re-direct growth towards lower order settlements which does not support national or strategic policy. It further states that without allocating additional growth to Celbridge, Salins and Naas (NWQ), housing growth and delivery will be significantly constrained for the remainder of the plan period. The submission concludes that the Supplementary Table 2.8A should be revised to reflect the above settlements, including the reinstatement of the original 1,294 unit allocation identified for the NWQ.

Proposed Material Alteration No. 5

The submission requests the inclusion of additional text to Objective CS O31 which clarifies that settlement plans will be prepared for Celbridge in 2026, Clane in 2027 and integrated into the CDP by way of statutory variation, as follows (additional text in **bold underlined purple**):

CS O31 Prepare settlement plans for Monasterevin, Kilcock and Sallins to include the additional housing growth requirement included in Table 2.8 and Table 2.8A on serviced or serviceable lands to be informed by infrastructural and environmental assessments and publish Draft Settlement Plans for these towns as Variations to

the County Development Plan in Q1/Q2 2026. Settlement Plans for Celbridge and Clane will also be prepared in 2026 for Celbridge and subsequently 2027 for Clane, and integrated into the County Development Plan by way of a statutory variation, including the additional housing growth requirement included in Table 2.8 and 2.8A on serviced lands to be informed by infrastructural and environmental assessments.

It further states that Celbridge should be prioritised in the short term, specifically the subject lands at Kiladoon which can deliver much needed housing.

The submission also requests the inclusion of additional text to Objective CS O32 to provide more certainty that the NWQ Masterplan be incorporated into the current Kildare CDP by variation as a matter of priority (additional text in **bold underlined purple**), as follows:

CS O32: Initiate the process for the designation of candidate Urban Development Zones (UDZ), in accordance with the provisions of the Planning and Development Act 2024 (once commenced), at the following locations as included in Table 2.8B:

- 1. Northwest Quadrant, Naas as identified in Map V3-2.5, and*
- 2. Confey, Leixlip as identified in Map V3-2.6.*

*Prior to the initiation of the UDZ process, ~~On completion of the Northwest Quadrant Masterplan~~, a County Development Plan Variation ~~may~~ will be brought forward to integrate the Northwest Quadrant Masterplan, related zoning provisions and objectives into Volume 2 the County Development Plan in 2026, **as soon as practicable**, prior to the commencement of the UDZ process.*

~~A subsequent~~ Prior to the initiation of the UDZ process, a County Development Plan Variation will be brought forward to integrate the Confey Masterplan, related zoning provisions and objectives into Volume 2 of the County Development Plan in 2026 to safeguard the planning framework for Confey providing continuity between the current Local Area Plan and the future UDZ process.

Proposed Material Alterations Nos. 12 – 30

The submission recommends that proposed changes and additional housing growth allocated to the relevant rural settlements outlined in PMA No.12 to PMA No. 30 (inclusive) should be omitted from the final variation.

The submission concludes that Proposed Variation No. 3 including Proposed Material Alterations are a significant lost opportunity to properly provide for the sustainable development of Kildare through the lack of serviceable sites identified in higher order settlements such as Celbridge, Sallins and Naas (NWQ). It does not agree with the Council's decision to redistribute growth to lower order rural settlements which is inherently unsustainable and may exacerbate the housing need due to a lack of services and infrastructure available at these locations. Furthermore, it urges the Council to revise Table 2.8A and redirect growth towards high order settlements such as Celbridge, Sallins and Naas due to their existing capacities to facilitate significant delivery.

Appendix 1: Submission to Proposed Variation No. 3 of the Kildare County Development Plan 2023-2029 (as varied), November 27th, 2025

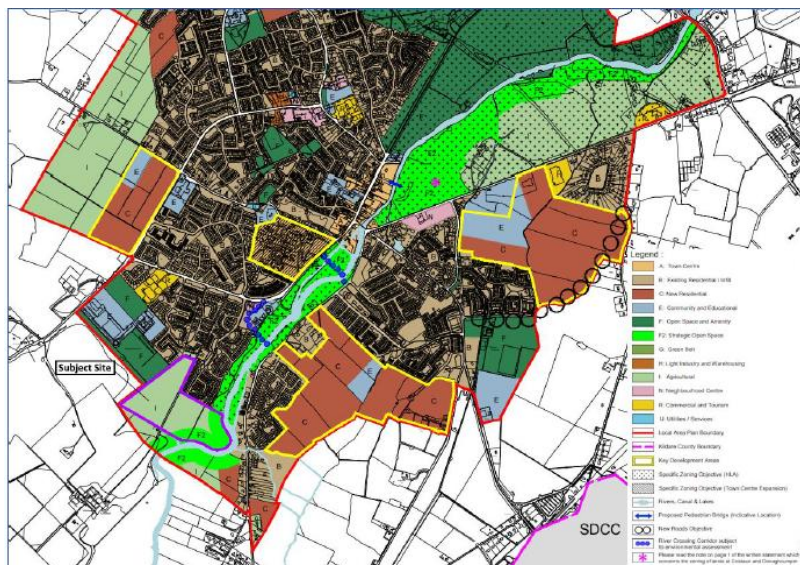
A summary of Appendix 1 (Submission KCC-C418-88a) is provided below which raises the following points for consideration in respect of the rezoning of lands at Killadoon, Celbridge and Millennium Park (NWQ), Naas to 'C: New Residential' (see map excerpts above of the subject sites outlined in red):

The submission includes a supporting document which outlines the rationale for this request, as follows:

- States it is imperative to focus on sites which can deliver housing in the short term as the remaining plan period is only three years.
- Variation No. 3 identifies some sites which can deliver medium to long term housing.
- Asserts there shouldn't be an undue reliance on locations which will deliver housing outside the remainder of the plan period.
- Delivering the current core strategy will be difficult for Kildare due to the lack of zoned sites within the higher order towns.
- Housing growth requirement for Kildare increased from 1,524 to 2,755 per year (increase of nearly 81% or 1,231 dwellings per year).
- It is a policy and objective of the Ministerial Guidelines that an 'additional provision' of up to 50% over and above is reflected in the Development Plan.
- Contends that the additional 7,826 dwellings identified by KCC are not capable of being delivered over the remainder of the Plan period – a fact confirmed by the Tier 2 designation applied to some sites in Tables 2.8A and Table 2.8B.
- States Page 10 of the NPF Implementation Guidelines and reliance of KCC on such Tier 2 sites (long term development sites) is contrary to the correct application of the guidelines which states these sites may be considered as further additional provision – over and above the baseline housing growth requirements.
- Urges KCC to take the opportunity to rectify the core strategy numbers and identify additional sites, noting Glenveagh's track record of activating sites and providing supporting infrastructure in high quality schemes.
- Notes the Housing Commission Report and Housing Plan 'Delivering Homes, Building Communities', stating the Planning Authority needs to ensure that a "sufficient pipeline of suitable zoned land is available for housing development."

Killadoon, Celbridge

- c. 16.14 hectares – c. 10 hectares developable (draft layout at lands could deliver 366 dwellings with density of 36 dph)
- Zoned '1 – Agricultural' and F2 – Strategic Open Space' in expired Celbridge Local Area Plan 2017-2023 as shown below with purple outline:



- States the proposed variation has identified Celbridge as suitable for an additional 2,000 units but notes the lands identified have been zoned for an extended period and allocated to lands indicated as 'Tier 2' zoned lands.
- Submits transportation and movement deficits for both sites identified.
- Asserts additional lands should be included over and above the historical legacy of zoned lands.
- Subject lands are 'Tier 1 - Serviced Lands' and located sequential to the built envelope of Celbridge.
- Located immediately adjacent to 'Abbey Farm' residential estate and 1.5km from the town centre.
- Asserts the lands have the ability to connect to following available infrastructure and servicing:
- Road access – direct via Kiladoon Lane and central aspects of sites via R403
- Pedestrian and cycle access – opportunities at R403 and link to existing estates
- Foul sewerage – can be serviced and connected to existing infrastructure.
- Water supply - can be serviced and connected to existing infrastructure.
- Surface water – attenuation and discharge possible.
- Community facilities – in close proximity to the retail district of Celbridge.
- Submits the subject lands are brought forward for development and included as zoned Tier 1 lands, so core strategy numbers can be delivered over the life of Plan.

- It notes the lands have the ability to connect to the following available infrastructure:
 - Road access – direct via R445.
 - Pedestrian and cycle access – opportunities on R445.
 - Foul sewerage – can be serviced and connected to existing infrastructure.
 - Water supply - can be serviced and connected to existing infrastructure.
 - Surface Water – several watercourses/ditches in vicinity of the site.
 - Community Facilities – close proximity to retail district of Monread and Naas Town Centre.
 - Educational Facilities - well served by Naas Community College (Post Primary School) and Scoil Bhríde (Primary School).
- Requests the lands should be zoned for residential rather than classed as Tier 2, noting it meets the suitability criteria of the 2022 Guidelines.
- Asserts the provisions of the variation with regard to the Masterplan for the NWQ, and the Urban Development Zone (UDZ) designation means there are additional unnecessary obstacles to the delivery of housing in the short term.
- Recommends the following objective is included in the Development Plan:
“In order to facilitate the development of 1,294 dwellings within the NWQ in the lifetime of the current County Development Plan the Naas Local Area Plan 2021 – 2027 should be amended immediately following the passing of the Proposed Variation to designate lands Tier 1 and zone ‘New Residential’ lands within the NWQ.”
- Submits the proposed variation fails to support the zoning of lands which are serviced to enable development to proceed now, whilst noting the lands were originally identified for development 20 years ago as part of the IFPLUT 2024. Asserts a masterplan was completed in 2007, preparation of a recent masterplan commenced in 2024 (as per the objective of the Naas LAP adopted 4 years ago) and there has been minimal engagement in progressing these strategic lands.
- Understands that other landowners within the NWQ in close proximity to the subject lands have the ability to deliver new housing within the lifetime of the plan.
- Raises concern regarding the uncertainty when legislation is in place to allow for the initiation of a UDZ and when it will be prepared and adopted – including the risk that the inclusion of this objective as currently phrased will delay and hinder the provision of housing on lands which are Tier 1 and can accommodate housing now.
- Recommends the following text be added at the end of CS O32:
“Prior to the completion of the Northwest Quadrant Masterplan and its integration into Volume 2 the County Development Plan the Naas Local Area Plan 2021 – 2027 should be amended to allow for the immediate zoning of additional lands within the NWQ for residential development.”

Sallins

- Supports that Sallins is identified as an area that can facilitate additional housing growth required within the remaining Plan period.
- Supports recognition of TOD opportunities in supporting the delivery of new and sustainable residential communities.

- Notes the additional 250 no. units and that PMA No. 12 and PMA No. 14, identifies Sallins for additional short-medium term growth with location and zoning to be determined through a new Settlement Plan.
- It is submitted that a further addition to the proposed unit allocation to Sallins should be considered to take advantage of unique TOD opportunities in the area.

Sub Ref No: 051

Name: Pat Toolan

Issues Raised:

The submission by Hughes Planning and Development Consultants on behalf of Pat Toolan relates to lands comprising 0.61 ha at Distillery Lane in Leixlip which are currently zoned F: Open Space and Amenity for which it is requested be zoned for residential development, with an objective to provide community facilities further west along the river as part of the current review of the County Development Plan (CDP). The submission refers to the Proposed Material Alterations which have selected additional lands for rezoning following consultation. States that whilst the additional zoned land is welcomed, it is considered that Leixlip could benefit from additional zoned land.



The submission outlines the locational attributes and overall suitability of the site in terms of its potential to accommodate residential development and states that its fully serviced and accessible. Submits that the subject lands present a deliverable and shovel-ready opportunity to contribute to meeting housing targets and deal with the persistent backlog of unmet housing need.

This submission attaches their previous submission to Proposed Variation No. 3, made in November 2025, which outlines the following:

- The submission notes the intent of the Proposed Variation to align the County Development Plan with the NPF Implementation Housing Growth Requirements Guidelines.
- The Government has clearly articulated the need for local government to unlock land for housing and accelerate delivery through the above Guidelines, the NPF – First Revision, the establishment of the Housing Activation Office and by a Ministerial directive.
- The submission states that there is significant unmet housing demand in the Eastern and Midlands Region and that the demand for housing is acute in areas that are experiencing strong economic and population growth.
- The submission notes that Kildare is one of the fastest growing population centres in the country and that Leixlip is within the Dublin Metropolitan Area.

The settlement benefits from national transport links. Accordingly, it is imperative that further lands are zoned to future proof the delivery of housing in the area.

- The submission gives an overview of the strategic location of the lands, being proximate to the town centre (including associated community amenities) and existing / planned public transport options, including 3 no. bus stops that have services to Dublin and other areas. The lands are also stated to be within walking distance of 2 no. train stations (Leixlip - Confey and Leixlip - Louisa Bridge).
- Bus services in Leixlip are anticipated to be enhanced through the delivery of a Bus Connects route to Dublin. Improvements to public transport will result in further housing demand, which current zoned lands cannot facilitate.
- The submission provides an overview of the planning history of the subject lands and surrounding lands, stating that it is evident that Leixlip has a demand for housing.
- The land is accessible to the surrounding road network from Captain's Hill via Distillery Lane.
- The subject lands are currently underutilised, are serviced by essential infrastructure and can deliver housing at pace. Development on these lands will assist in meeting housing delivery targets, aligned with the objectives of the NPF – First Revision and the servicing criteria stated by the Minister.
- The immediate surrounding area is urban in nature, defined by residential development. The submission details how development on the subject lands would align with various National Strategic Outcomes (NSO) and National Policy Objectives (NPOs) of the NPF – First Revision. The lands will contribute to compact growth within an existing settlement (NPO 7) that is served by public transport options (NPO 10) in a sequential manner.
- The submission recognises that zoned lands in Leixlip are outside the township and would face delays in the short to medium term. In comparison, the subject lands could be brought forward swiftly to meet housing needs during the lifetime of the County Development Plan.
- Estimates that the lands could accommodate 20 no. dwellings.
- Zoning of the lands for residential development represents a realistic, policy-consistent, strategically located and shovel ready solution to the current housing crisis

Sub Ref No:	052
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Name:	Bridget Loughlin
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Issues Raised:

Proposed Material Alteration No. 11

The submission refers to the proposed amendment of Objective BI O26, stating the minor word changes represent a material weakening of the policy and operating structure by reducing the strength of protection, removing key evidential requirements and weakening ecological standards.

The submission refers to county level evidence demonstrating ongoing hedgerow loss and fragmentation, noting national, regional and European policy frameworks which increasingly emphasise biodiversity protection, ecological connectivity and ecosystem restoration. It further states the proposed amendment is not required

under national policy or the recent housing growth requirements guidelines which represents a discretionary weakening of environmental protection within the Development Plan.

The submission asserts the proposed amendment and re-wording from “Prevent” to “Avoid” removes the establishment of a clear directive and retention first framework by introducing discretion which weakens the policy’s enforceability during the development management process.

The submission states the proposed amendment will remove the essential threshold to demonstrate unavoidable removal of hedgerows, reducing the planning authority’s ability to challenge ecological loss and unnecessary removal. The proposed amendment also removes the requirement to keep hedgerow removal to an absolute minimum which is a core environmental mitigation practise that safeguards incremental loss. The removal of this requirement increases the risk of cumulative fragmentation of the hedgerow network.

The submission states the proposed amendment weakens biodiversity mitigation standards and the ecological function of mature hedgerows by removing the requirement to ensure replacement planting is of similar length, species composition and local provenance. It also states the proposed changes remove the deterrent against hedgerow clearance prior to application stage, weakening the local authority’s enforcement capacity.

Further states the proposed amendment conflicts national biodiversity and climate action policies, including wider national and European frameworks which emphasises the importance of protecting existing habitats and restoring ecological corridors. It notes concern with the weakening of existing policy protection considering the findings of the Kildare Hedgerow Survey (2022) which highlights measurable loss of hedgerow length, increase fragmentation and declining species diversity.

The submission refers to the Strategic Environmental Assessment (SEA) screening report which concludes the proposed amendment does not significantly alter the meaning of the objective. However, the submission states the proposed changes will have cumulative environmental effects and implications in development management decision making which merits clearer justification within the SEA screening process. It further notes that changes to environmental policy frameworks are normally considered at the Development Plan review stage supported by comprehensive environmental assessment.

The submission recommends not to adopt the proposed amendment to Objective BI O26, ensuring continued alignment with national, regional and local policy frameworks, where any such alteration would represent a significant step backwards in environmental protection.

Sub Ref No: 053

Name: Office of the Planning Regulator

See Section 3 of the Chief Executive’s Report for the submission received from the Office of the Planning Regulator.

Sub Ref No:	054
Name:	Maynooth Tidy Towns
<p>Issues Raised:</p> <p>Proposed Material Alteration No. 11</p> <p>The submission objects to proposed changes to Objective BI O26, noting the Chief Executive's recommendation not to adopt the proposed amendment. The submission notes the critical role hedgerows play in maintaining biodiversity habitats and ecological corridors, including their ability to sequester carbon and mitigate against climate change.</p> <p>The submission further notes recent hedgerow surveys undertaken by Kildare County Council which shows cumulative loss, simplification and fragmentation of existing hedgerows. Reference is made to the Council's resolution in declaring a climate and biodiversity emergency in 2019 to preserve and protect the little hedgerow left in the county. The submission questions why public representatives are not making every effort to protect struggling biodiversity and natural habitats, rather than proposing to further erode them.</p>	
Sub Ref No:	055
Name:	Brian McElvaney
<p>Issues Raised:</p> <p>Proposed Material Alteration No. 11</p> <p>The submission strongly objects to proposed changes to Objective BI O26 which will weaken the protection and conservation of hedgerows in the county, noting the importance for biodiversity, landscape character, climate resilience and ecological connectivity.</p> <p>The submission states biodiversity loss is often framed as a matter of heritage, amenity or landscape character, something that is nice to have and regrettable to lose. It asserts this framing is misleading and increasingly dangerous, noting biodiversity loss is a material risk. The degradation of ecosystems and biodiversity loss are widely recognised as material risks and when these systems are weakened, the consequences are practical, cumulative and costly rather than abstract or sentimental. It further states this interpretation is reflected in international, European and national policy which is grounded in scientific research.</p> <p>The submission refers to the United Nations 2030 Agenda for Sustainable Development which commits signatory states to halting biodiversity loss recognising that environmental degradation undermines climate resilience, food systems and economic stability. At European level, the recently adopted EU Nature Restoration Regulation marks a decisive shift from viewing the protection as optional, towards treating ecosystem integrity as critical infrastructure requiring active protection.</p> <p>The submission refers to national policy and the adoption of Ireland's 4th National Biodiversity Action Plan (2023-2030) which places obligations on local authorities to integrate biodiversity protection into decision making demonstrating clear consistent policy. It states the proposed amendments to BI O26 are inconsistent with prevailing international, European, national and local policy objectives.</p>	

The submission acknowledges the current housing crisis; however, housing delivery and biodiversity should not be competing priorities and conflicting agendas. The removal of mature hedgerows in housing developments can create long term environmental issues including flood risk, reduced amenity, poor environmental quality and infrastructure costs. It further states that weakening biodiversity protections at development plan level risks embedding environmental harm into future development patterns.

The submission highlights the vital role and benefits of hedgerows in Kildare, noting these benefits are continually degrading with existing protections under pressure due to a lack of overly restrictive policy measures in place at local level. It further states the proposed amendment and use of the word 'avoid' removes the burden to prove the necessity of removal to the Planning Authority. The removal of the 'absolute minimum' requirement will also reduce mitigation standards to nonsense by omitting references to composition, provenance and enforcement consequences. It states these changes will collectively lower the strength of the policy when stronger safeguards are needed.

The submission states the proposed amendment will place increased reliance on mitigation planting as a response to mature hedgerow removal which does not compensate for the ecological loss, insisting this must remain as a last resort rather than an assumed trade off. It also expresses concern with weakening of the requirement for mitigation planting to match species composition and local provenance. It states the proposed revision and framing treats hedgerows primarily as landscape features rather than elements of biological ecosystems specific to their environment. Furthermore, it states that while a hedge species may appear visually green, its function and ecological value may provide little meaningful habitat or food resource representing a net loss of biodiversity.

The submission concludes the proposed material alteration should not be adopted, with the existing wording of BI O26 retained in full or strengthened further. It further states that protecting hedgerows is not an obstacle to sustainable development and any such changes to the existing policy would be an embarrassing backward step by the Council.

Sub Ref No:	056
Name:	Evonne Boland

Issues Raised:
Proposed Material Alteration No. 11
 The submission objects to proposed changes to Objective BI O26 which will significantly weaken biodiversity protection at a time when Kildare's own hedgerow survey shows ongoing decline in hedgerow extent and quality.

It states the existing objective and current wording safeguards wildlife corridors and landscape character, where the proposed amendment is softer and insufficient in preventing further hedgerow loss which undermines the existing green infrastructure strategy. The submission requests the original objective and 'no net loss' standard be retained in full.

Sub Ref No:	057
Name:	Green Project Management
Issues Raised:	
<p>Submission outlines the rationale and spatial planning context behind Proposed Variation No. 3 and notes the provisions of Proposed Material Alteration No. 1. The submitter highlights lands within their ownership forming a 10-ha landholding located on Kilcullen Road, Naas. States that this includes a 2.6 ha portion of the lands identified as “<i>SITE 1 Kilcullen Road</i>” on Map V3 2.1 in Proposed Variation No. 3, corresponding to lands identified as Site C5 in the Naas LAP 2021–2027.</p> <p>The submission welcomes the proposed designation of the 2.6 ha <i>SITE 1</i> as “<i>C: New Residential</i>” and wishes to reaffirm their intention to actively progress residential development on these lands, noting that a design team has been appointed and preliminary design work is underway with a view to preparing a planning application.</p> <p>Notes the locational attributes and characteristics of the larger 10 ha landholding stating that they are located within the existing built-up area of Naas and benefit from access to established infrastructure and services of the town. States that the lands have received a positive feasibility confirmation from Uisce Éireann, confirming the capacity to accommodate approximately 290 residential units. across the landholding. Submits that Table 2.8 be amended to include the additional 178 Units which can be delivered on the remaining 7.8 ha of the lands.</p> <p>Contends that the 7.8 ha balance of lands within the submitter’s ownership presents an opportunity (as part of a masterplanning exercise in collaboration with the Council) to support the coordinated delivery of active recreation and community infrastructure which would benefit the wider settlement. Submission concludes by referring to their original submission (Ref. No.: KCC-C418-121) to the Proposed Variation.</p>	
Sub Ref No:	058
Name:	Vanessa Mack
Issues Raised:	
<p>Proposed Material Alteration No. 11</p> <p>The submission objects to proposed changes to Objective BI O26 which will weaken the protection and conservation of hedgerows in the county. It states the use of the word ‘avoid’ will lead to subjective decisions on the removal of hedgerows due to housing delivery pressures, where shortcuts may be taken over the importance of existing native hedgerows for biodiversity, climate resilience, ecosystem services and human health.</p> <p>The submission states the proposal to remove the requirement for replacement similar species of local provenance is a big blow in preserving unique ecological habitats in a county that has no native woodland cover. It further states the removal of the condition not to remove any hedgerow prior to submitting a planning application will allow developers to remove hedgerow with no accountability.</p>	

The submission encourages the Council to dismiss the proposed amendment and retain the original wording of BI O26, stating the proposed changes contradict national and regional policy and are counter intuitive in the common effort to preserve and protect biodiversity.