

Chief Executive's Report on Submissions/Observations received to the Proposed Material Alterations of the Draft Kildare Town Local Area Plan 2023-2029

21st September 2023





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Appendix 2 Summary of Submissions / Observations Received
Appendix 3 List of Proposed Material Alterations

1. Introduction

This report relates to the submissions and observations received from members of the public, prescribed bodies and key stakeholders following the publication of the Proposed Material Alterations No. 1 – 114, in respect of the Draft Kildare Town Local Area Plan 2023-2029. The Proposed Material Alterations (PMAs) were published pursuant to Section 20 of the Planning and Development Act 2000 (as amended).

1.1. Legislative Requirements

Pursuant to Section 20(3)(k) of the Planning and Development Act 2000 (as amended), the Chief Executive is required to prepare a report on any submissions or observations and submit the report to the members of the authority for their consideration.

The report shall:

- List the persons who made submissions or observations.
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator.
- Summarise the submissions and observations made by any other persons.
- Contain the opinion of the Chief Executive in relation to the issues raised and the recommendations to the proposed material alterations, including any change to the proposed material alteration considered appropriate, taking account of 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.

1.2. Public Consultation

The Proposed Material Alterations to the Draft Kildare Town Local Area Plan 2023-2029 were placed on public display on Friday 4th August 2023 until Monday 4th September 2023. A public notice was placed in the Irish Independent on the 4th August and a copy of this notice in the Nationalist on the 8th August. Submissions and observations were invited during the public consultation period.

The Proposed Material Alterations (alongside accompanying documents) were available to view on Kildare County Council's Consultation Portal: <https://consult.kildarecoco.ie/en/browse>. Copies were also made available for inspection at the public counter of Planning Department in Áras Chill Dara, Devoy Park, Naas.

The following documents were published for inspection and public consultation:

- Proposed Material Alterations to the Draft Kildare Town Local Area Plan 2023-2029 and to the Strategic Flood Risk Assessment.
- Addendum to the SEA Environmental 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 Report for the purposes of Appropriate Assessment (AA) 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.

Copies of the Proposed Material Alterations, associated documents and public notice were issued to the prescribed authorities and environmental authorities, including Government Departments and other agencies, as required by the Planning and Development Act 2000 (as amended). Groups registered with the Kildare Public Participation Network were also notified of the publication of the Proposed Material Alterations and the associated public consultation period. Kildare County Council Social Media channels were used as mechanism to promote awareness of the public consultation period.

1.3. Content of the Chief Executive's Report

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

Section 1: Background 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.

Section 4: Submissions from Prescribed Authorities or Public Bodies.

Section 5: Submissions from all other persons or organisations themed by Chapter and Proposed Material Alteration.

Section 6: Noting of submissions/observations which do not (or partially) relate to a particular Proposed Material Alteration, to which no opinion or recommendation have been made.

Section 7: Overview of Chief Executive's Recommendations.

Appendix 1: Submission from the Office of the Planning Regulator.

Appendix 2: Summary of all submissions/observations received.

1.4. Next Steps

Within six weeks of receiving the Chief Executive's Report, the Elected Members of the Kildare Newbridge Municipal District must consider the Proposed Material Alterations and the Chief Executive's Report and decide whether to make the Kildare Town Local Area Plan with all, some or none of the Material Alterations as published.

A further modification to the Material Alteration 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 to the Material Alteration may **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.

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

Section 20(3)(r) of the Planning and Development Acts 2000 (as amended) states that the Members of the Council are restricted to considering:

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

The 'statutory obligations' of the local authority includes the obligation to ensure that the local area plan is consistent with:

- The objectives of the development plan.
- The national and regional planning objectives specified in the National Planning Framework (2018) and the Regional Spatial and Economic Strategy 2019 - 2031; and
- Specific Planning Policy Requirements specified in guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended).

2. List of Persons or Bodies Who Made Submissions

During the public consultation period a total of 45 submissions and observations were received. The list of persons, prescribed bodies, groups and stakeholders who made submissions is listed in Table 2.1. Kildare County Council would like to take the opportunity to thank those who made written submissions during the public consultation period.

Table 2-1 Person / Organisation Who Made Submissions or Observations

Ref. No ¹ .	Name/Organisation
1	Tony Bonnie
2	Martina Slattery
3	Malcolm Haig
4	Sebastian Vencken
5	Environmental Protection Agency (EPA)
6	Collette Kershaw
7	Shirley Flanagan
8	Kevin Byrne
9	Curragh Finn Residents Association
10	Mark Murphy
11	Chris Geoghegan
12	Kevin Doyle
13	Dublin Airport Authority (DAA)
14	John Spencer
15	Sinead Hanbury
16	Owen Kennedy
17	Patricia Kennedy
18	Stephen Stafford
19	Meath County Council
20	Richard and Sinead Doyle
21	Transport Infrastructure Ireland (TII)
22	Bill McDonald
23	Cunnaberry Hill Residents Association
24	Judith Boyle
25	Pousterle Ltd.
26	Round Towers GAA Club, Kildare Town Athletic Club and Kildare Town AFC
27	Irish Water
28	Department of Education

¹ Each reference number associated with a submission or observation starts with KCC-C187 and the unique reference is the last digits which are reflected in Table 2-1.

Ref. No¹.	Name/Organisation
29	Ann Grogan
30	Lynda and Shane Geraghty
31	Office of Public Works (OPW)
32	Irish National Stud
33	National Transport Authority (NTA)
34	Friends of the Irish Environment
35	Value Retail Dublin Ltd.
36	Sean O'Fearthail
37	Tom Blennerhassett
38	Denise and John Spencer
39	RSR Kildare (Ireland) Ltd.
40	An Taisce
41	Office of the Planning Regulator (OPR)
42	Colbid
43	Eoin Leavy
44	St. Brigid's Primary School
45	MRP Oakland Ltd.

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 the Draft Kildare Town Local Area Plan 2023-2029. The Chief Executive's opinion and recommendation is also provided.

Recommended deletions to the Draft Local Area Plan are shown ~~in strikethrough blue~~ and recommended new text is shown *in italics red* as per the Proposed Material Alterations Report. Further minor changes are shown *in green italics*. Original text from the Draft Plan where no amendment has been made remains in black.

3.1. Office of the Planning Regulator (Ref. No. 041)

Issues Raised

The OPR is generally satisfied with the alterations proposed to address the matters raised in the Recommendation (one) and Observation (one) made on the Draft Plan. PMA 114 addresses Recommendation No. 1 and PMA 44, 48 and 55 address Observation No. 1.

The Office has assessed the various Material Alterations relating to residential development and has concluded that the majority are on balance acceptable with the exception of PMA 8 (b).

The Office is concerned that a number of MAs propose to expand the town's urban footprint to areas on the south of the M7 motorway, remote from the town centre and public transport and in some cases encroaching into the green belt. The OPR state that these are not consistent with the Plan's vision and key strategic development principles which promote compact and sustainable growth and sustainable travel.

The OPR is also of the view that the proposal to zone undeveloped land for employment and other uses in close proximity to the M7 and to expand the Plan boundary to accommodate future employment uses is not in accordance with national and regional policy for national roads and securing compact and sustainable growth. The OPR also state that these MAs are not consistent with Objective RE O15 and RE O39 in the CDP, which seek to locate economic development that is urban in nature in urban areas.

In relation to the tourism objective under MA 104 it is stated that it has the potential to facilitate development that is more appropriately located in the existing built-up area and its proximity to Junction 13 of the M7 motorway is also of concern.

The OPR notes the proposal to remove a number of permeability and cycling measures, located at strategic locations which have the potential to be used by significant numbers of people to walk and cycle within the town. The OPR state that these will play an important role in reducing car trips, greenhouse gas emissions and improving air quality and should not be removed. The OPR also note the inclusion of an outer relief road on undeveloped land.

Recommendations and Observations

The OPR have made three Recommendations and one Observation on the PMAs. It is stated that Recommendations relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Proposed Material Alteration No. 89 – Strategic Reserve (Employment)

The OPR states that the subject lands have an area of approx. 50 ha, located to the southwest of the town outside the current LAP and draft LAP boundary, immediately south of the M7 motorway and more than 2 km from the train station. The submission states the land is in agricultural use and was not considered in the Settlement Capacity Audit.

The OPR state they have concerns regarding the alignment of this proposal with policy objectives for an evidence-based approach to securing compact and sustainable development. There is no evidential basis or strategic justification to support the identification of these lands for Strategic Reserve (Employment), which is contrary to the Development Plan Guidelines (Section 6.2.5). Furthermore, the PMA provides policy support for future greenfield development outside the boundary on lands that are remote from high-capacity public transport, which is not considered to represent compact growth (NSO 1), sustainable settlement patterns (RSO 1) or integrated transport and land use (RSO 6). The OPR also state the lands are in close proximity to an intersection on the M7 motorway and have the potential to undermine the strategic transport function of the motorway. The OPR state it is not evident, that any consideration has been given to the potential impact on the safety, capacity, efficiency and strategic function of the M7, let alone whether the proposal satisfies the criteria in Section 2.7 of the National Roads Guidelines. The Kildare CDP gives clear objectives regarding locations suitable for economic development (Objective RE O15 and RE O39, refers).

MA Recommendation 1 – Strategic Reserve (Employment)

Having regard to:

- a) Section 6.2.5 of the *Development Plan Guidelines for Planning Authorities (2022)* that the evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature;
- b) Objective TM O62 of the Kildare County Development Plan 2023 – 2029 and section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* to protect the strategic transport function of national roads;
- c) Regional Strategic Outcomes for Compact Growth and Urban Regeneration (RSO 2) and Integrated Transport and Land Use (RSO 6) of the Regional Spatial and Economic Strategic for the Eastern and Midlands region; and

d) Objectives RE O15 and RE O39 of the Kildare County Development Plan 2023 -2029 regarding preferable locations for economic development, the planning authority is required to make the LAP without Material Alteration no. 89.

Proposed Material Alterations 8 (b), 104 and 112 (Green Belt)

The OPR note the location of the subject lands on the far side of the M7 motorway, remote from the town centre and public transport. The OPR are concerned over the alignment with policy objectives for securing compact and sustainable development and protecting the special character of the Curragh Plains and green belt area.

PMA 8(b) must be considered in the context of the PMA 104 and 112. PMA 104 has a rural character and is in agricultural use like the adjoining land to the east and is largely undeveloped except for a rural dwelling. The OPR notes the expired permission for a hotel but also states that they agree with the Chief Executive's response to submission No. 69 (on the Draft Plan) *'that planning policy in Ireland has changed significantly since the 2012 LAP was prepared and adopted, and that the focus on plan-making now is towards compact sequential growth and sustainable mobility'*. The OPR also agrees with the Chief Executive's response on the principal differences between the subject land and the lands zoned for Industry and Warehousing on the western side of the R415 which stated that *'it was considered appropriate to contain development to the south of the motorway and west of the regional road, and to prevent further sprawled development south of the motorway east of the regional road. The land east of the regional road is of a different character and functions as a Green Belt...'*

The OPR also note that the SCA determine the subject lands as 'No Development' and refers to NPO 72(c) that such land should not be zoned for development. They also note that the CDP contains tourism objectives (RE O106 and RE O104) which support tourism in town and village locations and consider a tourism zoning objective at a location that is remote from the town centre as inconsistent.

In respect of the three land parcels relating to PMA 112 the OPR states there is no strategic planning justification for rezoning lands for further open space at this location. The OPR note the lands are removed from established and future residential with the exception of Grey Abbey View. They also note the strategic open space provided for under PMA 91, 92 and 111. The OPR states that PMA 112 needs to be considered in the context of PMA 8(b) and 104 which would expand the footprint of the town into a largely undeveloped rural area which forms the green belt. The OPR highlight the policy context which supports the Green Belt, such as the land use zoning objective, Objective HCO 1.4 and Section 9.8 of the Draft Plan in respect of the special character of the Curragh Plains. The OPR also state that the Draft Plan's Vision is to develop the town in a 'compact, permeable and sequential manner'. The OPR also point to Objective CSO 1.3 which is to *'support and facilitate the compact growth of Kildare Town through the sustainable and sequential land use development objectives which consolidate the town centre, commercial uses and established residential areas'*. The OPR point out that this is consistent with CS 05 and CS 07 of the Kildare CDP.

MA Recommendation 2 – Material Alterations affecting green belt area

Having regard to:

- a) Regional Strategic Outcomes for Compact Growth and Urban Regeneration (RSO 2) and Integrated Transport and Land Use (RSO 6) of the Regional Spatial and Economic Strategic for the Eastern and Midlands region;
- b) Key overarching principles of the Kildare County Development Plan 2023 – 2029 which includes compact growth;
- c) Tourism objectives RE O106 and RE O104 from the Kildare County Development Plan 2023 – 2029;
- d) The vision and strategic development principles of the draft Kildare Town Local Area Plan 2023 – 2029 for sustainable and sequential land use development objectives which consolidate the town centre, commercial uses and established residential areas;
- e) Objective CSO 1.3 (compact growth) and section 9.8 (special character of the Curragh Plains) of the draft Kildare Town Local Area Plan 2023 – 2029; and
- f) NPO 72a-c and the co-ordination of land use zoning, infrastructure and services

the planning authority is required to make the LAP without the following material Alterations:

- (i) Material Alteration no. 8 (b) New Residential * zoning on land southeast of the junction of Grey Abbey Road and the R415, and retain the National Stud / Green Belt zoning;
- (ii) Material Alteration no. 104 Tourism zoning on land between Grey Abbey Road and the M7, and retain the National Stud / Green Belt zoning;
- (iii) Material Alteration no. 112 Open Space and Amenity zoning on land southeast of Grey Abbey Road and south of the M7, and retain the National Stud / Green Belt zoning;
- (iv) Material Alteration no.112 Open Space and Amenity zoning on land east of French Furze Road and south of the M7, and retain the National Stud / Green Belt zoning; and
- (v) Material Alteration no.112 Open Space and Amenity zoning on land east of French Furze Road and north of the M7 and retain the Equine Industry zoning.

Proposed Material Alterations 43, 48 and 64 (Transport Infrastructure)

In respect of the permeability and cycling measures proposed to be removed under PMA 43 and 48 the OPR note these were recommended in the Kildare Town Transport Strategy. It is also noted that these will help achieve the walking and cycling targets set out in the CDP. The OPR state the removal of the measures would undermine the overarching vision and development principle in the Draft Plan and other policy objectives such as Objective MTO 1.1.

The OPR refer to PMA 64 which relates to the outer relief road and are concerned that the indicative route passes through undeveloped lands largely zoned for Agriculture and National Stud / Green Belt for a distance of approx. 5km. The OPR

state that no clear justification for the current road proposal is evident from either the spatial pattern of growth planned for in the draft LAP or the transport strategy prepared to inform the draft LAP. The submission states that the proposed outer relief would lead to a substantial expansion of the town's urban footprint into undeveloped lands zoned primarily for Agriculture and National Stud / Green Belt and encourage car borne forms of development contrary to compact growth (RSO 2) and integrated land use and transport (RSO 6).

MA Recommendation 3 – Sustainable Transport and Active Travel

Having regard to:

- (a) Regional Strategic Outcomes for Compact Growth and Urban Regeneration (RSO 2) and Integrated Transport and Land Use (RSO 6) of the Regional Spatial and Economic Strategic for the Eastern and Midlands region;
- (b) Objective CS O2 (resilience to climate change and greenhouse gas emissions reductions) and Target TM T1 (under Section 5.4 – Sustainable Movement) of the Kildare County Development Plan 2023 – 2029;
- (c) the LAP's vision and strategic development principle – creating compact and connected communities;
- (d) Objective MTO 1.1 of the draft LAP which promotes the use of sustainable active transport modes; and
- (e) the Kildare Town Transport Strategy (Table 13.3 - Permeability Strategy Measures and Table 13.4 – Cycle Network Strategy Measures);

the planning authority is required to make the plan without Material Alterations 43 and 48 and to reinstate the following permeability and cycling measures into the draft LAP:

- (f) Measure 9 as it would provide better connectivity between R401 - Dunmurray Road and R415 - Rathbride Road;
- (g) Measures 23 and 24 as they would connect a number of cul de sacs within an existing housing estate accessed from R413 - Melitta Road to the R445 - Dublin Road;
- (h) Measures 34 and 41 as they connect the Oaktree estate to the Kildare Primary Care Centre on the R445 and into the proposed pedestrian links in Cherry Avenue Park2 (measure 38);
- (i) The measures 35 and 39 as they relate to the undeveloped Enterprise and Employment lands and form part of the future link road connecting the R445 to the R415 (opposite the Kildare Retail Outlet);
- (j) Cycle 35, Cycle 37 and Cycle 38 as they all connect with each other and various streets in the town centre zoned area; and
- (k) Cycle 46 and Cycle 58 as they connect the Oaktree estate to the Kildare Primary Care Centre on the R445 and into the proposed pedestrian links in Cherry Avenue Park (measure 38). The measures also traverse the undeveloped K – Commercial zoned lands.

The planning authority is also required to make the LAP without Material Alteration no. 64:

- (l) Objective MTO 3.7 and related text in section 7.5.1; and

(m) Indicative route alignment for outer relief road on map ref. 7.4.

Material Alterations 85, 91, 92 and 111 (Southgreen Key Development Area)

The OPR note the insertion of the KDA relation to a strategic open space extending northwards to the Draft Plan boundary and the rezoning of the three areas of the land. It is also noted that the three areas are proposed to include a site-specific objective F (1). The OPR note that the open space extends from 800m to 1.6km from the train station. The OPR note access to same is via a county road with no footpath or public lighting.

The OPR consider that PMA 91, 92 and 111 are acceptable. They are also generally satisfied with the Southgreen KDA.

However, the OPR state the planning authority are requested to provide clarity in relation to the need for further permeability and cycling measures.

Observation 1 – Southgreen KDA– sustainable transport measures

Having regard to:

- (a) the intent in section 11.2 to provide for an area of strategic open space along Southgreen Road;
- (b) the design framework for the Southgreen Key Development Area (Material Alteration no. 85);
- (c) the active travel measures for permeability and cycling included in section 7.3 of the draft LAP; and
- (d) Objective MTO 1.1 of the draft LAP,

the planning authority is requested to provide clarity in relation to the need for further permeability and cycling measures to better connect the northern areas of the KDA lands to the town.

Concluding Remarks

The OPR states that where the Planning Authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations of the Office, under the provisions of section 31AO(5) of the Act the chief executive must inform the Office accordingly and state the reasons for the decision of the planning authority.

Chief Executive's Opinion

Recommendation 1 – Strategic Reserve (Employment)

The recommendation to make the Plan without PMA 89 is noted and accepted. It should be noted the Chief Executive's Opinion at the Special Meeting on the Draft Kildare Town Local Area Plan 2023-2029 stated that the subject lands should not form part of the Development Strategy for the town, given their remote location and the lack of an evidence base for their inclusion. However, the Elected Members resolved to place this material alteration to the Draft Plan on public display. Therefore, it is agreed that the removal of the subject lands is acceptable and appropriate.

Recommendation 2 – Material Alterations affecting Green Belt area

The recommendation to make the Plan without PMA No. 8 (b), PMA 104, PMA 112(a), PMA 112(b), PMA 112(c) is noted. As expressed at the Special Meeting on the Draft Kildare Local Area Plan 2023-2029, the subject lands are appropriately zoned within the Draft Plan in order to protect and enhance the operation and development of the Irish National Stud and established agricultural/ bloodstock uses including the equine industry. However, the Elected Members resolved to place this material alteration to the Draft Plan on public display. Therefore, it is agreed that the subject lands should not form part of the Development Strategy for the town.

Recommendation 3 – Sustainable Transport and Active Travel

The recommendation to make the Plan without PMA No. 43, 48 and 64 is noted. It is important to note that the Chief Executive's Opinion at the Special Meeting on the Draft Kildare Local Area Plan 2023-2029 was that the proposed permeability and cycling measures formed part of an overall network of measures and no measures should be removed. However, the Elected Members resolved to place this material alteration to the Draft Plan on public display.

In the context of the outer relief road, the road measures identified in the Draft Plan are based on evidence-based transport modelling assessment that was carried out to inform the Transport Strategy. An Outer Orbital Route was not proposed as part of the Kildare Town Transport Strategy. The Chief Executive's Opinion at the Special Meeting on the Draft Kildare Local Area Plan 2023-2029 considered the Outer Relief Road should not form part of the Development Strategy for the town given the lack of evidence to support the measure. However, the Elected Members resolved to place this material alteration to the Draft Plan on public display. Therefore, it is agreed that the removal of the route is acceptable and appropriate.

Observation 1 – Southgreen KDA– sustainable transport measures

The observation to provide clarity in relation to the need for further permeability and cycling measures to better connect the northern areas of the subject lands to the town is noted. It is the recommendation of the Chief Executive that PMA 91 is not adopted into the Plan. It is considered that given the significant distance of the northern-most part of the landholding from the built-up area of the town, it is not appropriate to extend the land use to this point as it would give rise to sprawl and longer travel times from the existing built-up area. While it is noted there are existing GAA playing pitches located on the lands, they do not have the benefit of planning permission. It is the Chief Executive's Opinion that in order to promote compact, consolidated growth, and to ensure that future amenities are in reasonable walking and cycling distance from existing and permitted residential areas, that the lands proposed to be zoned under PMA 92 and PMA 111 given their location and size can sufficiently deliver strategic open space.

Chief Executive's Recommendation

Recommendation 1

It is recommended that Proposed Material Alteration No. 89 should not be adopted by the Elected Members as there is no evidence base or justification to support the objective.

Recommendation 2

It is recommended that Proposed Material Alteration No. 8 (b), should not be adopted by the Elected Members in order to protect the Green Belt and it is contrary to national, regional and local policy.

It is recommended that Proposed Material Alteration No. 104, should not be adopted by the Elected Members as further development of land south of the motorway does not represent consolidation of the existing built urban form.

It is recommended that Proposed Material Alteration No. 112(a), 112(b), and 112(c) should not be adopted by the Elected Members as there is sufficient land zoned for Open Space and Amenity that represent sequential growth of the town.

Recommendation 3

It is recommended that Proposed Material Alteration No. 43 should not be adopted by the Elected Members to create a compact and connected communities by promoting the use of sustainable active transport modes.

It is recommended that Proposed Material Alteration No. 48 should not be adopted by the Elected Members to create a compact and connected communities by promoting the use of sustainable active transport modes.

It is recommended that Proposed Material Alteration No. 64 should not be adopted by the Elected Members as there is no evidence base or justification to support the objective.

Observation 1

It is recommended that Proposed Material Alteration No. 91 should not be adopted by the Elected Members as there is sufficient land zoned for Open Space and Amenity that represent sequential growth of the town.

4. Submission from Prescribed Authorities or Public Bodies

This section of the report summarises the issues raised in the eight submissions or observations received in respect of the Proposed Material Alterations to the Draft Kildare Town Local Area Plan 2023-2029 from prescribed authorities and public bodies (in addition to the OPR).

The relevant submissions are as follows:

Submission 005	Environmental Protection Agency
Submission 013	Dublin Airport Authority
Submission 019	Meath County Council
Submission 021	Transport Infrastructure Ireland
Submission 027	Uisce Éireann
Submission 028	Department of Education
Submission 031	Office of Public Works
Submission 033	National Transport Authority

The Chief Executive's opinion and recommendation is set out under each submission.

Recommended deletions to the Draft Local Area Plan are shown ~~in strikethrough blue~~ and recommended new text is shown *in italics red* as per the Proposed Material Alterations Report. Further minor changes are shown *in green italics*. Original text from the Draft Plan where no amendment has been made remains in black.

4.1. Environmental Protection Agency (Ref. No. 005)

Issues Raised

Proposed SEA Determination

The submission from the EPA notes the determination regarding the need for Strategic Environmental Assessment (SEA) of the Alterations. The submission states that for land use plans at a county and local level the EPA provide a self-service approach through the guidance document '*SEA and Local Authority Land-Use Plans – EPA Recommendations and Resources*' and should be considered as appropriate and relevant to the alterations.

Sustainable Development

Kildare County Council should ensure that the Plan, as amended, is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.

The Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

The Council should ensure the Plan is consistent with key relevant higher-level plans and programmes.

Future Modifications to the Draft Plan – Where further changes are proposed, these should be screened for likely significant effects in accordance with SEA Regulations.

SEA Statement – Information on the Decision – The submission sets out a summary of what should be contained in the SEA statement once the Plan has been made, a copy of which should be sent to any environmental authority consulted during the process.

Environmental Authorities – The submission outlines the bodies that should be consulted under the SEA Regulations.

Chief Executive's Opinion

The contents of the submission received from the EPA are noted.

Kildare County Council in accordance with Section 20 of the Planning and Development Act 2000 (as amended), has screened the Proposed Material Alterations and determined that a Strategic Environmental Assessment (SEA) was required with respect to eight of the Proposed Material Alterations (No.'s 8, 31, 85, 91, 92, 110, 111 and 106,) which have the potential to result in significant environmental effects. The SEA Addendum report provided an assessment with respect to the proposed material alterations and a SEA Screening Report, SEA Screening Determination and SEA Environmental Report pursuant to the SEA Directive and Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011 were prepared.

The Addendum Report detailed considered that the mitigation measures set out in Chapter 9 of the SEA Environmental Report will work to avoid or reduce any potential negative environmental effects identified in this Addendum and should be complied with. Further, in accordance with environmental legislation, where the potential for significant environmental effects exist, site-specific environmental assessment will be carried out, as required. These assessments will include the incorporation of site-specific detailed mitigation measures to ameliorate the potential for significant environmental effects.

An SEA Statement (with Non-technical Summary) will be prepared upon the final adoption of the Local Area Plan.

Chief Executive's Recommendation

No further change recommended.

4.2. DAA (Ref. No. 013)

Issues Raised

The DAA have no comment to make other than to recommend consultation with the IAA and IAA-ANSP (now AirNav Ireland).

Chief Executive's Opinion

The contents of the submission received from the DAA are noted.

Chief Executive's Recommendation

No further change recommended.

4.3. Meath County Council (Ref. No. 019)

Issues Raised

Meath County Council have no comments to make in relation to the Proposed Material Alterations.

Chief Executive's Opinion

The contents of the submission received from Meath County Council are noted.

Chief Executive's Recommendation

No further change recommended.

4.4. Transport Infrastructure Ireland (TII) (Ref. No. 021)

Issues Raised

TII states that their observation seeks to address the safety, capacity, and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outlined in Project Ireland 2040, Spatial Planning and National Roads Guidelines (2012), the RSES and the Transport Strategy for the GDA 2022 – 2042.

TII reiterates that the Spatial Planning and National Roads Guidelines indicate that planning authorities must make sure that development can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users. In this context TII note a number of the PMAs relate to land use zoning changes in the immediate vicinity of the M7 which could negatively impact the function of the motorway.

Proposed Material Alteration No. 89

TII refers to the proposed Strategic Reserve [Employment] (SR*) lands and reiterates that already existing are future year capacity constraints at Junction 13. These constraints have been identified through Traffic and Transport Assessments for Grey Abbey and Phase 3 of the KTOV. The TII state that the constraints already require careful event traffic management that includes measures such as the utilisation of traffic counting requirements and VMS services on part of the motorway at this location.

TII state that the inclusion of the Strategic Reserve [Employment] (SR*) lands is at variance with national, regional, and local policy related to national roads in particular:

- Section 2.7 of the National Road Guidelines in relation to development at Interchanges and Junctions. TII state that the land use zoning would create an adverse impact on the national road and associated junctions, at variance with national policy.
- RSES in respect of the Guiding Principles of the Integration of land use and Transportation states that the 'strategic transport function of national roads and associated junctions should be maintained and protected (RPO 8.1, refers)."
- RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management.
- RPO 8.3 requires future development to be planned and designed in a manner that inter alia maximises the efficiency and protects the strategic capacity of the metropolitan area transport network both existing and planned and further protects and maintains regional accessibility.
- NTA GDA Strategy 2022-2024, Measure ROAD2 – 'the primary function of national roads is to cater for strategic traffic and this function must be protected".
- Kildare CDP 2023-2029 Objective TM O62 'ensure the protection of the strategic transport function of national roads, including motorways and their associated junctions, by maintaining and protecting their safety, capacity, efficiency, and strategic function, in line with national policy as set out in the Spatial Planning and National Road Guidelines for Planning Authorities (2012)."

TII Recommendation PMA 89

PMA 89 should not be made, it would create an adverse impact on the M7 and Junction 13 and be at variance to national, regional and local planning policy.

Proposed Material Alteration No. 97

The submission notes that Conference / Exhibition Centre is proposed to be included in the Land Use Zoning Matrix, and in particular, that the use will be 'Open to Consideration' at the Q lands northwest of the M7 Junction 13. TII state that having regard to the future year capacity issues already experienced at Junction 13 and the potential for significant private car dependent use and traffic volumes associated with a destination Conference / Exhibition Centre use, they are seriously concerned that a proposed Conference / Exhibition Centre could be permitted in the vicinity of Junction 13.

TII note that the capacity constraints of Junction 13 have been identified through Traffic and Transport Assessments for Grey Abbey, south of Junction 13 and KTOV Phase 3. These constraints already require careful event traffic management that includes measures such as the utilisation of traffic counting requirements and VMS services on part of the motorway at this location. TII consider that a Conference / Exhibition Centre use due to its character, nature and location would be inappropriate and further erode the existing capacity at Junction 13 of the M7 and potentially the mainline M7.

TII state that the inclusion of the PMA in respect of the Q lands is at variance with national, regional, and local policy related to national roads in particular; Spatial Planning and National Roads Guidelines (Section 2.7) as it would create an adverse impact on the national road and junction, RPO 8.1, 8.2, 8.3 in the RSES, ROAD2 of the GDA Transport Strategy and Objective TMO62 of the KCDP.

TII Recommendation PMA 97

The proposed land use material alteration no. 97 footnote, if included, would create an adverse impact on the M7 national road and associated junction 13 and would be at variance with the foregoing national, regional and local planning policy. TII recommends the removal of the proposed material alteration no. 97 for land use zoning objective 'Q'.

Proposed Material Alteration No. 104

The TII note the proposed M: Tourism zoning and the associated zoning objective southeast of Junction 13. They also note the uses permitted in Principle and 'Open to Consideration' across the proposed land use zoning objective. They note that permission for a significant larger development across the lands under 04/2974 for a mixed-use development including a hotel, extended under 16/1360 which expired in 2022. It is stated by TII that the 'lands cannot therefore in TII's opinion be developed under that now expired permission'. They also note the extension of duration application was not referred to statutory consultees. The original permission was granted in advance of the Spatial Planning and National Roads Guidelines, Project Ireland 2040 and the GDA Transport Strategy. TII state that is their opinion that the statutory national and regional planning and sustainable development policy with respect to the locality had substantially and significantly changed when the extension of duration was being assessed and should have been considered by the planning authority. TII reiterate the future year constraints in respect of Junction 13.

TII highlight that Junction 13 is a motorway interchange that is maintained as part of MMarC² Area C. The indicated land use zoning alteration proposed appears to extend into the MMarC maintained area.

TII state that the inclusion of the PMA is at variance with national, regional, and local policy related to national roads in particular; Section 2.7 of the Spatial Planning and National Roads Guidelines as the land use zoning would create an adverse impact on the national road and junction. It is also at variance to RPO 8.1, 8.2, 8.3 and ROAD 2 of the GDA Transport Strategy and Objective TM O62 of the KCDP.

TII Recommendation PMA 104

The proposed material alteration no. 104, if included, would create an adverse impact on the M7 national road and associated junction 13 and would, in the TII's opinion, be at variance with national regional and local planning policy. TII recommend that proposed material alteration no. 104 not be made.

² Motorway Maintenance Renewal Contract (MmaRC).

Proposed Material Alteration No. 08(b)

TII is aware that there exists a significant landbank designated for 'New Residential' development in the immediate vicinity of the lands for PMA 08(b) whose development would represent incremental denudation of lands currently designated for rural land use 'G' and for which development of a 'dwelling' may be secured subject to the local authority Rural Housing Policy. TII state that the lands are inappropriate for redesignation alone, or in combination with other PMAs in the vicinity, as it will have an impact of the local road network which is in the immediate vicinity of M7 Junction 13 that already experiences future year capacity constraints.

TII consider that the PMA is entirely inappropriate at a motorway interchange and is contrary to the safe and efficient operation of the national road network.

TII state that the inclusion of the PMA is at variance with national, regional, and local policy related to national roads in particular; Spatial Planning and National Roads Guidelines as it would create an adverse impact, RPO 8.1, 8.2, 8.3 of the RSES, ROAD 2 of the GDA Transport Strategy and Objective TM O62 of the KCDP.

TII Recommendation PMA 08(b)

TII recommend that PMA 08(b) not be made having regard existing and planned development in the vicinity of M7 Junction 13 that is already subject to future year capacity constraints.

Proposed Material Alteration No. 112(a)

TII note that the PMA relates to three land use zoning changes to F: Open Space and Amenity. The submission is in respect of PMA 112(a). The TII state that the zoning objective 'F' may give rise to greater levels of development and activity on lands that are currently designated as land use zoning objective 'G' that is retained in the current Draft LAP.

TII state that increased activity on these lands will increase the utilisation of Junction 13 of the M7 which is contrary to the operation of the safety and efficiency of the national road network where the junction is already experiencing future year capacity constraints in the context of built and planned development.

TII state that the inclusion of the PMA is at variance with national, regional, and local policy related to national roads in particular; Spatial Planning and National Roads Guidelines as it would create an adverse impact, RPO 8.1, 8.2, 8.3 of the RSES, ROAD 2 of the GDA Transport Strategy and Objective TM O62 of the KCDP.

TII Recommendation PMA 112(a)

PMA 112(a), if included, would create an adverse impact on the M7 national road and associated junction 13 and would, in TII's opinion, be at variance with national, regional, and local planning policy. TII recommend that proposed material alteration no. 112(a) not be made having regard existing and planned development in the vicinity of M7 Junction 13 that is already subject to future year capacity constraints.

Chief Executive's Opinion

Proposed Material Alteration No. 89

The recommendation to remove PMA 89 is noted. The Draft Plan has been informed by a comprehensive evidence base, which included the Kildare Town Transport Strategy. The Transport Strategy provides an evidence-base for the integration of land use and transport planning, which is at the centre of the plan-making process for Kildare Town. The subject lands did not form part of this study given their location removed from the built-up area and it is considered the development of the land bank on the periphery of the town, would be heavily reliant on the road network for access with limited access via public transport, cycle and walking. Furthermore, sufficient lands have been zoned for economic development within the Draft Plan to provide for the additional jobs referred to under Section 5.4 of the Draft Plan (Appendix B, also refers).

It should be noted that the Chief Executive's Opinion at the Special Meeting on the Draft Kildare Local Area Plan was that the subject lands should not form part of the Development Strategy for the town, and it is agreed that the removal of the subject lands is acceptable and appropriate.

Proposed Material Alteration No. 97

The comments made by the TII are noted. The County Development Plan has designated Kildare Town as a National Tourism Hub (Objective RE O133, refers). The Draft Plan under Objective EDO 2.1 is supportive of new tourism activities/facilities including supporting infrastructure that respect, respond and enhance their physical locations, environmental quality and community setting. It is considered that a Conference /Exhibition Centre on the subject lands are 'Open to Consideration', as these uses are not considered acceptable in principle but rather need to be in the interest of the proper planning and sustainable development of the area. In this regard any application would need to consider the impact on the national road network.

Proposed Material Alteration No. 104

The comments made by the TII are noted. The Chief Executive's Report (June 2023) highlighted that planning policy in Ireland has changed significantly since the 2012 LAP was prepared and adopted, most notably with the publication of the National Planning Framework (2018), the Regional Spatial and Economic Strategy 2019-2031, the Kildare County Development Plan 2023-2029 and Section 28 Ministerial Guidelines in relation to Local Area Plans (2013) and Development Plans (2022), where the focus on plan making now is towards compact sequential growth and sustainable mobility, moving towards a low carbon future. It is considered that the proposed land use zoning at this location does not represent consolidation of the existing built urban form and it is agreed that the removal of the subject lands is acceptable and appropriate.

Proposed Material Alteration No. 08(b)

The comments made by the TII are noted. The Chief Executive's Report (June 2023) stated that the subject lands are located outside the CSO defined Built-Up Area and therefore do not represent the sequential, consolidated growth of the urban area, but instead would contribute to urban sprawl, at variance to National Strategic Outcome (NSO) No. 1 of the NPF. Similarly, the provision of low-density

housing is at variance to Sustainable Residential Development Guidelines (2009) and the Urban Development and Building Heights Guidelines (2018).

Furthermore, the Chief Executive's Report highlighted that no further additional lands are required for development in the Draft Plan to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified for development.

Therefore, it is agreed that the removal of the subject lands is acceptable and appropriate.

Proposed Material Alteration No. 112(a)

The comments made by the TII are noted. It is considered that the subject lands are appropriately zoned within the Draft Plan in order to protect and enhance the operation and development of the Irish National Stud and established agricultural/ bloodstock uses. Therefore, it is agreed that the subject lands should not form part of the Development Strategy for the town, as there is sufficient land zoned for Open Space and Amenity that represent sequential growth of the town in the Draft Plan and across other Proposed Material Alterations concerning land within Southgreen. Therefore, it is agreed that the removal of the subject lands is acceptable and appropriate.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 89 should not be adopted by the Elected Members as there is no evidence base or justification to support the objective.

It is recommended that Proposed Material Alteration No. 97 should be adopted by the Elected Members.

It is recommended that Proposed Material Alteration No. 104 should not be adopted by the Elected Members as further development of land south of the motorway does not represent consolidation of the existing built urban form.

It is recommended that Proposed Material Alteration No. 08(b) should not be adopted by the Elected Members as it is contrary to national, regional and local policy.

It is recommended that Proposed Material Alteration No. 112 should not be adopted by the Elected Members as there is sufficient land zoned for Open Space and Amenity that represent sequential growth of the town.

4.5. Uisce Éireann (Ref. No. 027)

Issues Raised

UÉ welcome PMA 79 and 86.

They make the following comments in relation to the re-zoning proposals:

PMA No.	Site Reference	Observation
07(a)	CP2	This site is not currently serviced and will need deeper investigation. Capacity of downstream sewers, pumping station and pumped main and railway crossing will need to be assessed.
08(a)	Adjacent to Grey Abbey	There is no Drainage Area Plan available for this area at present. The Pumping Station and downstream sewers will need to be assessed. An upgraded or new pumping station will most likely be required.
89	Strategic Reserve	Not serviced.
108	CP2	This site is not currently serviced and will need deeper investigation. Capacity of downstream sewers, pumping station and pumped main and railway crossing will need to be assessed.
110	Between Old Rd / South Green Road	As site - Site CP2 above.

Chief Executive's Opinion

The comments from Uisce Éireann are noted.

Chief Executive's Recommendation

No further change recommended.

4.6. Department of Education (Ref. No. 028)

Issues Raised

The submission notes the update from the Census 2016 to the Census 2022 figures in respect of Table 3.3. It is stated that the proposed changes do not alter the projected growth figure and the Department re-confirms the projected school place requirements as per the submission made on the Draft Plan.

The Department notes the insertion of the proposed new Objective MTO 4.9 in relation to the De La Salle school site under PMA 68.

The Department acknowledges PMA 114 that identifies the Community School at Crockanure Glebe as a 'potential pluvial flood risk location' in the SFRA.

The Department notes the Typographical Error No. 23 in the Chief Executive's Report which relates to Table 6.3 of the Draft Plan which mistakenly marked the potential Magee Barracks school site as zoned 'E' and not 'T'. The Department note that this is to be rectified and including the adopted plan. However, the Department would like it noted that this error in Table 6.3 had ramifications in respect of the Departments of Education's submission in May. Had the correct zoning of 'T' appeared in the text in Table 6.3 the Department would have both the opportunity and the option to request the zoning be changed to 'E' to reflect the potential future use of the site for a school. The Department had assumed based on what was in the Draft Plan that the site was zoned 'E'. The Department accepts the correct zoning of 'T' must now be applied and believe this is an unfortunate outcome resulting from the Typographical Error No. 23.

Chief Executive's Opinion

The comments in relation to the Census update, PMA 68 and PMA 114 are noted.

In respect of Typographical Error No. 23 in the Chief Executive's Report (June 2023) the comments made are noted. Map 11.1 Land Use Zoning of the Draft Plan identified the potential site for a new school as T: Mixed Use. As per Table 11-6 Land Use Zoning Matrix a school is 'Permitted in Principle' in both the 'T' Mixed Use' and 'E' Community and Education' zoned lands. The T: Mixed-use zoning is to provide for commercial, educational, residential and community uses.

The subject lands are an integral part of the future development of the Former Magee Barrack Settlement Consolidation Site as per the Design Framework under Figure 11-2 of the Draft Plan. Objective HCO 1.1 and the Site-Specific Objective under Table 11-4, requires the development of the Former Magee Barracks site in accordance with the Urban Design Framework, in order to provide for a co-ordinated approach to the overall development of the site.

Chief Executive's Recommendation

No further change recommended.

4.7. Office of Public Works (Ref. No. 031)

Issues Raised

The OPW welcome the opportunity to comment on the Proposed Material Alterations.

The OPW welcomes PMA 114 which addresses the OPW commentary on the Draft Plan.

Chief Executive's Opinion

The comments made by the OPW are noted.

Chief Executive's Recommendation

No further change recommended.

National Transport Authority (NTA) (Ref. No. 033)

Issues Raised

Proposed Material Alteration No. 42

The NTA welcome the reduction in car dependency in the town by putting measures in place to encourage modal shift. They state that as a result of the implementation of the cycling and permeability measures, in combination with behavioural change measures, education trips by car could reduce even more significantly.

NTA Recommendation – a more ambitious modal shift target for education trips in Kildare to be set in the LAP, which would reflect the potential combined impacts of infrastructural investment and behaviour change measures, in particular for trips within the town, and would be available for consultation in this regard.

Proposed Material Alteration No. 43 and 48

The NTA note the proposed removal of ten Permeability Measures and seven Cycling Measures. They state that in the context of the Plan's aims and objectives to reduce car dependency in the town and to encourage modal shift, the implementation of the measures is critical in order to meet these targets.

- PERM 23 and 24 – have the potential to significantly reduce trip lengths for residents in the two large residential estates of Ruanbeg and Coolaghknock.
- Cycle 37 and 38 - are both identified as feeder routes in the Cycle Network Plan for the GDA.
- The Cycle Network Plan identifies a feeder route between Tully Road and the Dublin Road. Cycle 59 proposes a connection from Tully Road to Cherry Avenue Park only. It is suggested that this is modified to also include a link to the Dublin Road.
- The Cycle Network Plan identifies the R415 Rathbride Rd as a secondary route. A section of the R415 over the railway bridge has not been identified as a cycle link in the Draft LAP. This is a crucial link for residents north of the railway to access the town centre. It is suggested that this should be included.

NTA Recommendation – PMA 43 and 48 should not proceed and the measures should remain part of the Plan. Cycle 59 should be amended to include a link to the Dublin Road and that the R415 cycle scheme should include a link over the railway bridge.

Proposed Material Alteration No. 64

The NTA note the insertion of a new subsection relating to the Outer Relief Road and also the new objective MTO 3.7 relating to same. The NTA notes that it is a long-term objective, but questions how the proposal will meet the current criteria set out in the National Investment Framework for Transport in Ireland (NIFTI) which includes an intervention hierarchy of 1. Maintain, 2. Optimise, 3. Improve and 4 New.

The NTA also highlight that the ROAD1 of the Transport Strategy states that a proposed road scheme will only proceed where it has been satisfactorily demonstrated that:

- (a) Alternative solutions, such as public transport provision, traffic management and/or demand management measures, cannot effectively address the circumstances prompting the proposed road scheme or
- (b) That these alternative solutions are not applicable or appropriate in the particular circumstances.

NTA Recommendation – The NTA recommends that PMA 64 is not included as its inclusion would not be consistent with the GDA Transport Strategy, specifically the circumstances for the progress of road schemes as set out in Measure ROAD1.

Proposed Material Alteration No. 89

The NTA note the Strategic Reserve (employment) land use zoning and that it lies outside the current LAP boundary and in close proximity to Junction 13 on the M7. The NTA consider the development of the lands are at variance with regional transport policy and not warranted for inclusion in the Plan at this time. The GDA Transport Strategy ROAD2 states that ‘the primary function of national roads is to cater for strategic traffic and this function must be protected’.

NTA Recommendation – The NTA recommends that PMA 89 is not made at this time as it has the potential to impact on the primary function of a national road and is therefore at variance with the Transport Strategy, specifically measure ROAD2.

Proposed Material Alteration No. 104

The NTA note the new ‘M’: Tourism zoning which provides for further development south of the motorway. The proposal would have the potential to facilitate and encourage development to spread south of the M7, which creates challenges for providing sustainable modes of transport to serve the lands and connect it with the town. The NTA refer again to ROAD2.

NTA Recommendation - The NTA recommends that PMA 104 is not made at this time as it has the potential to impact on the primary function of a national road and is therefore at variance with the Transport Strategy, specifically Measure ROAD2.

Proposed Material Alteration No. 112

The NTA note the proposed zoning changes to F: Open Space and Amenity. They note the revised zoning would facilitate urban development in the form of Community / Recreational / Sports Buildings, Culture and Tourism, and certain Housing types.

The NTA wishes to comment only on PMA 112(a) on lands very close and serviced by Junction 13 of the M7. The NTA considers that the development of these lands for high traffic generating uses, which could be facilitated by this rezoning, would not accord with Measure Plan2 and Measure ROAD2 the GDA Transport Strategy.

Measure PLAN2 – *Consolidated Development In accordance with the NPF and RSES, the NTA will only support development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the*

demand for long-distance travel and maximising the use of existing transport infrastructure and services. Peripheral development will only be considered in exceptional circumstances – on an evidence-based planned approach – and for specific land uses that cannot be accommodated in town and city centres.

Measure ROAD2 – *“The primary function of national roads is to cater for strategic traffic and this function must be protected”*.

Chief Executive's Opinion

Proposed Material Alteration No. 42

The comments in relation to the mode shift targets are noted. It is considered as the Climate Action Plan 2023 (CAP 2023) provides for a 19% reduction in daily mode share for cars by 2030 this should be included in the Plan. A minor modification to PMA 42 is therefore recommended.

Proposed Material Alteration No. 43 and 48

The comments in relation to PMA 43 and 48 are noted and agreed. It is important to note that the Chief Executive's Opinion at the Special Meeting on the Draft Kildare Local Area Plan 2023-2029 was that the proposed permeability and cycling measures formed part of an overall network of measures and no measures should be removed. However, the Elected Members resolved to place this material alteration to the Draft Plan on public display.

The permeability and cycling strategy of the Draft Plan was informed by the Kildare Town Transport Strategy, which seeks to create convenient, efficient routes to key destinations such as the train stations, bus stops, schools, in order to reduce walking trip distances to give non-motorised modes a competitive advantage over private cars. The permeability links form an overall network within the town which will make it easier to move from private car to sustainable modes of transport. This is particularly important given the Climate Action Plan 2023 (CAP 23) targets for carbon emission reductions in the transport sector (50% reduction by 2030).

In respect of the feeder route between Tully Road and the Dublin Road it is important to note that PMA 45 provides for an active route from Tully Road to Hospital Street, as part of the proposed road measure south of Cunnaberry Hill.

The comments made that the Cycle Network Plan identifies the R415 Rathbride Road as a secondary route and the section of the R415 over the railway bridge has not been identified as a cycle link in the Draft Plan is noted. However, as these comments don't relate to specific Proposed Material Alteration no modification to Map 7.2 can be made in this regard.

Proposed Material Alteration No. 64

The comments in relation to PMA 64 are noted and agreed. The road measures identified in the Draft Plan are based on evidence-based transport modelling assessment that was carried out to inform the Transport Strategy. An Outer Orbital Route was not proposed as part of the Kildare Town Transport Strategy. Furthermore, the Draft Plan includes the Northern Link Street scheme, which is (RD 2) which provides a north-south route.

The Chief Executive's Opinion at the Special Meeting on the Draft Kildare Local Area Plan was that the Outer Relief Road should not form part of the Development Strategy for the town, and it is agreed that the removal of the route is acceptable and appropriate.

Proposed Material Alteration No. 89

The comments in relation to PMA 89 are noted and agreed. The Draft Plan has been informed by a comprehensive evidence base, which included the Kildare Town Transport Strategy. The Transport Strategy provides an evidence-base for the integration of land use and transport planning, which is at the centre of the plan-making process for Kildare Town. The subject lands did not form part of this study given their location removed from the built-up area and it is considered the development of the land bank on the periphery of the town, would be heavily reliant on the road network for access with limited access via public transport, cycle and walking. Furthermore, sufficient lands have been zoned for economic development within the Draft Plan to provide for the additional jobs referred to under Section 5.4 of the Draft Plan (Appendix B, also refers).

The Chief Executive's Opinion at the Special Meeting on the Draft Kildare Local Area Plan was that the subject lands should not form part of the Development Strategy for the town, and it is agreed that the removal of the subject lands is acceptable and appropriate.

Proposed Material Alteration No. 104

The comments made by the NTA are noted and agreed. The Chief Executive's Report (June 2023) highlighted that planning policy in Ireland has changed significantly since the 2012 LAP was prepared and adopted, most notably with the publication of the National Planning Framework (2018), the Regional Spatial and Economic Strategy 2019-2031, the Kildare County Development Plan 2023-2029 and Section 28 Ministerial Guidelines in relation to Local Area Plans (2013) and Development Plans (2022), where the focus on plan making now is towards compact sequential growth and sustainable mobility, moving towards a low carbon future. It is considered that the proposed land use zoning at this location does not represent consolidation of the existing built urban form and it is agreed that the removal of the subject lands is acceptable and appropriate.

Proposed Material Alteration No. 112

The comments made by the NTA are noted and agreed. It is considered that the subject lands are appropriately zoned within the Draft Plan in order to protect and enhance the development of the Irish National Stud and established agricultural/ bloodstock uses. Therefore, it is agreed that the subject lands should not form part of the Development Strategy for the town, as there is sufficient land zoned for Open Space and Amenity that represent sequential growth of the town in the Draft Plan and across other Proposed Material Alterations concerning land within Southgreen. Therefore, it is agreed that the removal of the subject lands is acceptable and appropriate.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 42 should be adopted by the Elected Members with the following minor modification.

Include minor Amendment to PMA No. 42 Chapter 7 Movement and Transportation, insert additional text and associated footnote, at the end of 7.1.2. Achieving a Modal Shift, as follows:

The measures proposed in this Plan (as detailed in the following Sections) in respect of improving infrastructure for active travel and public transport will endeavour to move towards achieving the targets set out in the County Plan to reduce car journey and increase trips by walking, cycling, bus and train. *It is considered that a 10% reduction in private motor vehicle use for work trips and a 5% reduction in private motor vehicle use for education trips by Census 2036⁷ that the modal shift targets should also be aligned to the Climate Action Plan 2023 targets of a 19% reduction in daily mode share for cars by 2023. These would be challenging modal shift targets for Kildare Town. If these modal split targets are achieved, then car dependency for work trips would reduce to 64.1% and education trips car dependency would fall to less than half of trips at 49.4%*

It is recommended that Proposed Material Alteration No. 43 should not be adopted by the Elected Members as the Permeability Measures form an overall network which will make it easier to shift to more sustainable modes of transport.

It is recommended that Proposed Material Alteration No. 48 should not be adopted by the Elected Members as the Cycling Measures form an overall network which will make it easier to shift to more sustainable modes of transport.

It is recommended that Proposed Material Alteration No. 64 should not be adopted by the Elected Members as there is no evidence base to support an Outer Relief Road.

It is recommended that Proposed Material Alteration No. 89 should not be adopted by the Elected Members as there is no evidence base or justification to support the objective.

It is recommended that Proposed Material Alteration No. 104 should not be adopted by the Elected Members as further development of land south of the motorway does not represent consolidation of the existing built urban form.

It is recommended that Proposed Material Alteration No. 112 should not be adopted by the Elected Members as there is sufficient land zoned for Open Space and Amenity that represent sequential growth of the town.

5. Submissions Themed by Chapter and Proposed Material Alteration

This section of the report groups the submissions received in respect of each Proposed Material Alteration. The Chief Executive's opinion and recommendation is provided in respect of the issues raised pertaining to the proposed material alterations.

Recommended deletions to the Draft Local Area Plan are shown ~~in strikethrough blue~~ and recommended new text are shown *in italics red* as per the Proposed Material Alterations. Further minor changes recommended in response to the issues raised in the submissions are shown *in green italics*. Original text where no amendment has been made remains in black.

Chapter 1 Introduction and Context

Proposed Material Alteration No. 1

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 1.
024 Judith Boyle	Appendix D 1 Building Use - Town Centre Ground Floor- The building at R51TV08 is marked as only a retail unit this is incorrect, the building is mixed use, hospitality and retail. The business occupying it is a public house with an off-licence at the front. In Appendix D 2 Building Use - Town Centre First Floor- The building at R51TV08 first floor is marked as vacant which is incorrect.

Chief Executive's Opinion

The comments in relation to the incorrect labelling on the maps are noted. It is considered acceptable to change the maps to reflect Food and Hospitality on the ground and first floor with retail at the front.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 1 should be adopted by the Elected Members with a minor modification relating to site (Eircode R51TV08) on Map BU-001, BU-002, and BU-004.

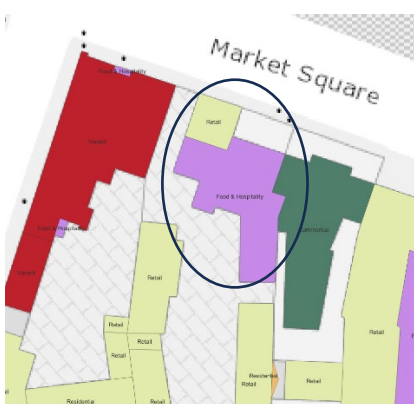
As per PMA



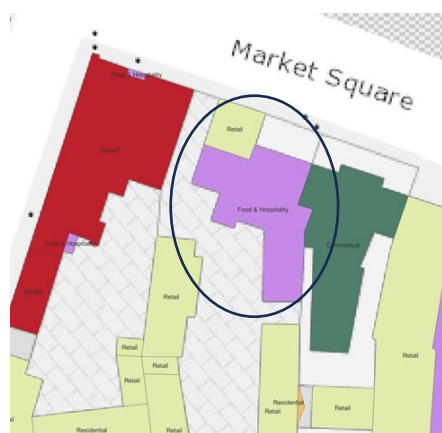
As per PMA



Minor Modification



Minor Modificaiton



Chapter 2 Spatial Planning Context and Vision for Kildare Town

Proposed Material Alteration No. 2

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 2.

Chief Executive's Opinion

The support in relation to PMA 2 is noted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 2 should be adopted by the Elected Members.

Proposed Material Alteration No. 3 and 4

No submission / observation has been received in respect of PMA 3 and 4.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 3 and 4 should be adopted by the Elected Members.

Proposed Material Alteration No. 5

Submission	Summary of Issue
024 Judith Boyle	Welcome PMA 5 as in keeping with the Town Centre First Approach

Chief Executive's Opinion

The support in relation to PMA 5 is noted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 5 should be adopted by the Elected Members.

Proposed Material Alteration No. 6

No submission / observation has been received in respect of PMA 6.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 6 should be adopted by the Elected Members.

Chapter 3 Compliance with the Kildare County Core Strategy

Proposed Material Alteration No. 7

No submission / observation has been received in respect of PMA 7.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 7 should be adopted by the Elected Members.

Proposed Material Alteration No. 8 (a)

No submission / observation has been received in respect of PMA 8(a).

Chief Executive's Opinion

The subject lands did not form part of the Settlement Capacity Audit which is required under the NPF to apply a tiered approach to residential land zoning. Lands immediately north were subjected to a SCA and failed to meet the required criteria; however, they were subsequently zoned due to an active planning permission.

The subject lands are located outside the CSO defined Built-Up Area and therefore do not represent the sequential, consolidated growth of the urban area, but instead would contribute to an uncoordinated pattern of urban sprawl.

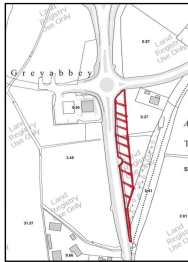
Furthermore, no further additional lands are required for development to meet the requirements of the CDP Core Strategy, as sufficient lands have been identified. Notwithstanding core strategy allocations, this site does not present well in terms of promoting compact growth and would compound urban sprawl at this location.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 8(a) should not be adopted by the Elected Members as there is no identified 'need' in accordance with the Core Strategy, evidence base to support the land use zoning and the development of the subject lands would not represent sequential consolidated growth.

Proposed Material Alteration No. 8(b)

Submission	Summary of Issue
034 Friends of the Irish Environment	Friends of the Irish Environment submitted that PMA No. 89, PMA No. 97, PMA No. 104, PMA No. 08(b) and PMA No. 112(a) should not be made and states that if these PMAs are included it would create an adverse impact on the M7 national road and associated Junction 13 and would be at variance with national, regional, and local planning policy. Regional policy objectives RPO 8.1, RPO 8.2 and RPO 8.3 are specifically referenced in relation to PMA No. 112(a).
040 An Taisce	Zonings near the M7 The submission notes a number of PMAs relate to zoning changes near the M7 which would increase dependence on private car use, increase transport emissions, overload the already capacity-

	<p>constrained Junction 13, and be contrary to proper planning and sustainable development in line with the hierarchy of planning policies. In this context An Taisce recommend that PMA 8(b) is not adopted.</p>
<p>043 Eoin Leavy</p>	<p>The submission relates to lands at Grey Abbey which extend to 0.899 ha. and request an increase in zoning at the subject lands as shown on the map.</p>  <p>It is stated the site has the potential to provide a streetscape on the Slí na Sláinte and the entranceway to the town and allow the development to make full use of the pedestrian facilities.</p> <p>The subject land offers an opportunity to broaden the range of housing typologies in the town and an opportunity for intergenerational living opportunities. It would also provide an opportunity for a modest scheme in number compared to the large developments completed recently. The extension of the residential zoning on the subject lands would allow for better pedestrian access to the bus stop (PMA 55) and increase the number of houses within 500m of a bus stop, supporting the sustainable transport network.</p>

Chief Executive's Opinion

The comments in relation to PMA 8(b) are noted. The OPR in their submission make a Recommendation in respect of lands affecting the green belt area. In this context they recommend that the Draft Plan is made without Material Alteration no. 8 (b) and the National Stud / Green Belt zoning is retained.

Transport Infrastructure Ireland (TII) in their submission also recommend that PMA 08(b) not be made having regard to the existing and planned development in the vicinity of M7 Junction 13, that is already subject to future year capacity constraints.

The Chief Executive at the Special Meeting on the Draft Kildare Local Area Plan considered that the subject lands are appropriately zoned within the Draft Plan in order to protect and enhance the development of the Irish National Stud and established agricultural/ bloodstock uses. Therefore, it is recommended that the proposed material alteration should not be adopted in the interest of proper planning and sustainable development.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 8(b) should not be adopted by the Elected Members.

Proposed Material Alteration No. 8(c)

No submission / observation has been received in respect of PMA 8 (c).

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 8(c) should be adopted by the Elected Members given its location immediately adjacent to the built-up area of the town.

Chapter 4 Consolidation of the Town Centre

Proposed Material Alteration No. 9

No submission / observation has been received in respect of PMA 9.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 9 should be adopted by the Elected Members.

Proposed Material Alteration No. 10

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 10.

Chief Executive's Opinion

The support in relation to PMA 10 is noted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 10 should be adopted by the Elected Members.

Proposed Material Alteration No. 11

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 11.
024 Judith Boyle	The submission states that they encourage the proposal under TCO 1.3 in respect of the re-use of vacant units for alternative functions. However, they are concerned over parking in the town centre as the proposal will be a hindrance to the viability of existing enterprises. Nowhere in the proposal is there mention of loading bays or accesses to businesses for orders and deliveries in the town centre which is a serious oversight.

Chief Executive's Opinion

The support in respect of PMA 11 is noted. In respect of additional car-parking it is not envisaged to increase parking supply in order to encourage more sustainable travel modes. However, in respect of loading bays, it is important to note that a complimentary parking measure in the Kildare Town Transport Strategy is the review of HGV loading bays. The Strategy notes, that it will be necessary in the future to review the HGV loading bays used throughout Kildare Town to optimise the operation of heavy vehicle traffic in the town and support the proposals of the Transport Strategy. These measures are an operational matter for the Area Engineer and outside the remit of the strategic nature of a land use plan.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 11 should be adopted by the Elected Members.

Proposed Material Alteration No. 12, 13, 14 and 15

No submission / observation has been received in respect of PMA 12, 13, 14 and 15.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 12, 13, 14 and 15 should be adopted by the Elected Members.

Chapter 5 Economic Development

Proposed Material Alteration No.16

No submission / observation has been received in respect of PMA 16.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 16 should be adopted by the Elected Members.

Proposed Material Alteration No. 17

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 17.

Chief Executive's Opinion

The support in relation to PMA 17 is noted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 17 should be adopted by the Elected Members.

Proposed Material Alteration No. 18 and 19

No submission / observation has been received in respect of PMA 18 and 19.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 18 and 19 should be adopted by the Elected Members.

Proposed Material Alteration No. 20

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 20.

Chief Executive's Opinion

The support in relation to PMA 20 is noted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 20 should be adopted by the Elected Members.

Proposed Material Alteration No. 21

No submission / observation has been received in respect of PMA 21.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 21 should be adopted by the Elected Members.

Proposed Material Alteration No. 22

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 22.
024 Judith Boyle	The submission states that the PMA is most welcome especially the reference to toilets. It is stated that public toilets are an issue as tourist, visitors and commuters do not have access to public toilets this puts huge financial and moral pressures on businesses inside the town centre to provide these facilities, which also has security and safety risks.

Chief Executive's Opinion

The support in relation to PMA 22 is 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. 23

No submission / observation has been received in respect of PMA 23.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 23 should be adopted by the Elected Members.

Proposed Material Alteration No. 24

Submission	Summary of Issue
004 Sebastian Vencken	The submission is strongly against PMA No. 24.
024 Judith Boyle	Welcome PMA 24 as it is in keeping with the Town Centre First Approach.

Chief Executive's Opinion

The comments in respect of PMA 24 are noted. Section 5.6. of the Draft Plan states that the 'provision of additional accommodation capacity within Kildare Town has the potential to boost economic growth by enabling a larger number of visitors to stay and spend, moving away from Kildare being a day trip destination and increasing footfall across the town for longer periods'. The proposed Objective would support the use of vacant units for tourist accommodation within the town centre.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 24 should be adopted by the Elected Members.

Proposed Material Alteration No. 25 and 26

No submission / observation has been received in respect of PMA 25 and 26.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 25 and 26 should be adopted by the Elected Members.

Proposed Material Alteration No. 27

Submission	Summary of Issue
<p>035 Value Retail Dublin Ltd.</p>	<p>Proposed Material Alteration No. 27 The submission welcomes the change which seeks to 'protect and support' the KTOV however would consider it more appropriate that Objective EDO 3.6 is omitted.</p> <p>The submission states that reference to the outlet centre is outdated and changing retail trends, changing consumer behaviour, innovative forms of retailing and visitor /tourist attraction should be supported in the context of the KTOV. The submission also references the Retail Planning Guidelines in respect of recognising the need for flexibility and a plan led approach that can respond to changing needs.</p>

Chief Executive's Opinion

The comments raised in respect of PMA 27 are noted. The Retail Planning: Guidelines for Planning Authorities (2012) continue to be the policy parameter for local authority plan making and development management processes under Section 28 of the Planning and Development Act.

Furthermore, the parent permissions which govern the three phases of the Kildare Tourist Outlet Village relate to 'outlet retail'. As detailed in the Chief Executive's Report (June 2023) the Retail Impact Assessment which formed part of the Environmental Impact Statement (EIS) of Phase 2 of the KTOV (Planning Ref. 12/61) submitted by the applicant, discusses how the outlet village concept is distinctive and unique within the retail market. Furthermore, Section 12.1.4 of the Report stated that 'the specialised comparison nature and tourist function of the KTOV is very different to a conventional retail function'. Therefore, it is considered in keeping with the planning permissions it was necessary to apply a land use zoning objective which clearly relates to the long-established planning history of the overall development as 'Retail Outlet Centre'.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 27 should be adopted by the Elected Members.

Proposed Material Alteration No. 28

Submission	Summary of Issue
<p>035 Value Retail Dublin Ltd.</p>	<p>Proposed Material Alteration No. 28</p> <p>The submission states in respect of the new objective that while understandable in some circumstances, due to its restrictive emphasis, it may not recognise where such an offer can make a positive contribution. It is stated that there is no evidence based rational but assumes it is to avoid them locating in a haphazard/ad hoc fashion. The submission states that standalone food and beverage offers, coffee stands and kiosks do serve a purpose and are often welcomed by consumers when provided in an appropriate format and location. In this regard, in circumstances where it can be demonstrated that the facility would operate in a controlled environment that would not give rise to traffic issues, cause littering, antisocial behaviour, pose a health and safety risk or affect the character of an area then it should be something to consider rather than restrict.</p> <p>It is requested in the submission that 'restrict' is replaced with 'consider'.</p>

Chief Executive's Opinion

The comments raised in respect of PMA 28 are noted. It is considered warranted to amend the Objective from 'restrict' to 'consider' as the objective already provides criteria where the impact of 'standalone coffee / fast food kiosks' will be considered to ensure piecemeal development does not impact negatively on the primacy of the town centre.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 28 should be adopted by the Elected Members with the following minor alteration.

Chapter 5: Economic Development, insert additional Retailing Objective, with a minor alteration as follows:

EDO 3.8 *To ~~restrict~~ consider the development of standalone coffee / fast food kiosks having regard to impacts on the amenity and character of the area, traffic, clustering of similar uses and impact on the primacy of the town centre.*

Chapter 6 Homes and Communities

Proposed Material Alteration No. 29 and 30

No submission / observation has been received in respect of PMA 29 and 30.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 29 and 30 should be adopted by the Elected Members.

Proposed Material Alteration No. 31

Submission	Summary of Issue
004 Sebastian Vencken	The submission is strongly against PMA No. 31.

Chief Executive's Opinion

The comment in relation to PMA 31 is noted. No Recommendation or Observation was made by the Office of the Planning Regulator in respect of the proposed Objective HCO 2.6. The OPR raised concerns over one of the identified sites, PMA 8(b), given its potential to impact negatively on the carrying capacity of the M7 motorway, remote from the town centre and also the encroachment into the Green Belt. Furthermore, the Council consider the site identified as C(a)* and C(b)* should not be adopted by the Elected Members as the sites do not represent the sequential, consolidated growth of the urban area, but instead would contribute to an uncoordinated pattern of urban sprawl.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 31 should be adopted by the Elected Members in respect of the site identified as PMA No. 8 (c) only.

Proposed Material Alteration No. 32, 33 and 34

No submission / observation has been received in respect of PMA 32, 33 and 34.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 32, 33 and 34 should be adopted by the Elected Members.

Proposed Material Alteration No. 35

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 35.

Chief Executive's Opinion

The support in relation to PMA 35 is noted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 35 should be adopted by the Elected Members.

Proposed Material Alteration No. 36, 37, 38 and 39

No submission / observation has been received in respect of PMA 36, 37, 38 and 39.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 36, 37, 38 and 39 should be adopted by the Elected Members.

Chapter 7 Movement and Transport

Proposed Material Alteration No. 40

No submission / observation has been received in respect of PMA 40.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 40 should be adopted by the Elected Members.

Proposed Material Alteration No. 41

No submission / observation has been received in respect of PMA 41.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 41 should be adopted by the Elected Members.

Proposed Material Alteration No. 42

Submission	Summary of Issue
024 Judith Boyle	The modal shift targets focus on travel to work and to education yet does not consider that people still travel by car for shopping trips and tourism activities with children. According to the National Household Travel Survey 2023, 17% of trips were to complete shopping activities. This should be considered, and it is worth noting that the removal of public transport from the town centre is a huge impediment to using public transport to commute to work or education.
034 Friends of the Irish Environment	PMA 42 presents an issue of consistency with the national budgets to target the abatement of emissions. It is stated that it's particularly concerning the PMA lists 2036 as a census year on the time horizon to reflect an assessment of targets that should have been met by 2025 or 2030.
040 An Taisce	In respect of PMA 42 which adds specific modal shift targets it is stated that setting the target year at 2036 for these reductions puts the Draft Plan LAP out of alignment with the carbon budget cycles, particularly the stringent targets for emissions reduction in the transport sector. Targets need to be coordinated across sectors. The submission recommends the PMA is changed to align with 2021-2025 and 2026-2030 budget periods and the targets in the most recent Climate Action Plan.

Chief Executive's Opinion

The comments raised in the submissions are noted. In respect of the comments regarding trips for shopping and visiting tourist attractions, it is important to note that as part of the Census all workers resident in Ireland are coded to their place of work and all students are coded to their place of school/college. Information on the origin and destination of their journeys are then made available for analysis. This data is then used by the Council to establish a clearer understanding of the mode of

transport used for students and workers. Unfortunately, the CSO do not provide data on trips for shopping and to tourist attractions.

In respect of the comments on the modal shift targets, the Climate Action Plan 2023 (CAP 2023) was published after the preparation of the Kildare Town Transport Strategy. The CAP 23 provides for a 19% reduction in daily mode share for cars by 2030 but does not distinguish between trips for education or work. However, in response to the submission from the National Transport Authority, PMA 42 is proposed to be modified to align with the CAP 23 target.

The concern raised that Census 2036 would be the time horizon to reflect an assessment of targets is noted. Census 2036 was chosen as it was considered that if the extent of the strategy was implemented as planned most measures would be in place by Census 2036. However, as stated PMA 42 has been amended to align with the CAP 23 target.

It is also important to note the Draft Plan does not propose to remove public transport from the town centre, rather it supports the improvement of bus stops and the frequency of services.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 42 should be adopted by the Elected Members with the following minor modification.

Chapter 7 Movement and Transportation, insert additional text and associated footnote, at the end of 7.1.2. Achieving a Modal Shift, as follows:

The measures proposed in this Plan (as detailed in the following Sections) in respect of improving infrastructure for active travel and public transport will endeavour to move towards achieving the targets set out in the County Plan to reduce car journey and increase trips by walking, cycling, bus and train. *It is considered that a 10% reduction in private motor vehicle use for work trips and a 5% reduction in private motor vehicle use for education trips by Census 2036⁷ that the modal shift targets should also be aligned to the Climate Action Plan 2023 targets of a 19% reduction in daily mode share for cars by 2023. These ; would be challenging modal shift targets for Kildare Town. If these modal split targets are achieved, then car dependency for work trips would reduce to 64.1% and education trips car dependency would fall to less than half of trips at 49.4%*

Proposed Material Alteration No. 43

PMA No. 43 refers to the removal of 10 no. measures from Table 7.1 Permeability Measures of the Draft Plan (PERM 7, 8, 9, 23, 24, 25, 34, 35, 39 and 41). PERM 2 and PERM 4 do not form part of the Proposed Material Alteration.

Several submissions have been received in respect of Permeability Measures, a number of which relate to measures which are not the subject of a Proposed Material Alteration. However, as some submissions refer to permeability measures in a particular area, all submission relating to permeability measures will be discussed under PMA 43 and are therefore not included in Section 6 of the report which relates to submissions / observations which do not relate to a particular Proposed Material Alteration.

Submission	Summary of Issue
<p>001 Tony Bonnie</p>	<p>PERM 2 The submission refers to a permeability measure proposed in the Draft Plan at Rathbride Abbey. It is stated that the residential estate is a mature area, and no one sought, requested or supports the measure. It is considered an unwelcome proposal and it is requested that it be removed from the Plan. A number of images have been attached to the submission showing the location of the proposed link within the housing estate.</p>
<p>003 Malcolm Haig</p>	<p>PERM 4 The submission refers to the inclusion of Perm 4 and the exclusion of Perm 8 as part of the Proposed Material Alterations. It is stated that the objections of the residents have been overlooked in respect of PERM 4. The submission questions the rational to diverting traffic down through the entire street. Concerns are raised in respect of maintaining the current safe, trouble-free pathway. It is stated there is massive opposition to the permeability measure. The submission reminds the Council of obligations to provide a safe and secure environment. Reference is made to the freedom of movement of those with criminal intent and the difficulty of policing where open access is provided in a town, especially in the context of the current Garda staffing issues.</p>
<p>004 Sebastian Vencken</p>	<p>The submission is strongly against PMA No. 43.</p>
<p>006 Colette Kershaw</p>	<p>(PMA 43 PERM 8) The submitter is opposed to opening up a walkway from Drumcree Court to Curragh Finn. Concerns are raised that children will no longer be able to play on the green area if a walkway is out there. Concerns are also raised that it will bring too much traffic and also potential trouble if it is</p>

	opened up. The measure is strongly opposed and should be removed from the plan.
007 Shirley Flanagan	<p>PERM 4 Opposed to the LAP as PERM 4 has not been cancelled. The submitter notes that PERM 8 has been excluded but no explanation why PERM 4 was not excluded. It does not make sense to allow traffic up through the whole estate. As a resident there is a right to safety and PERM 4 should be cancelled and removed totally never to appear in another LAP going forward.</p>
008 Kevin Byrne	<p>Opposed to PERM 2.</p> <p>Minimal reduction in walking distance The measure will not reduce reliance on private car usage. A difference of merely 150 metres to the existing exit will not be a defining difference in car usage overactive methods to school travel. The location of PERM 2 is within 1km of KTCS, 1.6 km of Educate Together and 2.2 km of St. Brigid's Primary school. PERM 2 reduces walking/cycling distances to KTCS by 300m, Educate Together by 100m and St. Brigid's Primary School by 100m. Walking distance to the train station is not improved either.</p> <p>Removal of other permeability measures PMA 43 removes PERM 7, 8, and 9 which diminished the goal to improve the catchment area to the train station for houses north of the rail line.</p> <p>Wasteful use of resources Considerable engineering works will be required which is wasteful to spend, for such little effect.</p> <p>Safety The access point opens up onto a busy road. This is a danger to small children, takes them out of sight of parents. It also opens the estate to an influx of foot traffic which given the increase in crime in Kildare will make it easier for people to get access to properties directly adjacent to the exit.</p>
009 Curragh Finn Residents	<p>The Residents of Curragh Finn are completely opposed to PERM 7, 8 and 9, as do the rest of Drumcree Court. They object on the grounds of child safety, increased and unwanted pedestrian traffic, additional cars parking in the estate. It is not wanted, and residents would face a loss in value to their houses.</p>
010 Mark Murphy	<p>Opposed to PERM 7, 8 and 9, as do the rest of Drumcree Court. They object on the grounds of child safety, increased and unwanted pedestrian traffic, additional cars parking in the estate.</p>

	<p>It is not wanted, and residents would face a loss in value to their houses.</p>
<p>011 Chris Geoghegan</p>	<p>The submitter is against any pathway between Curragh Finn and any other estate. They have a safe enclosed area that kids can safely play. Increased footfall, bikes, scooters would be dangerous. The walkway could bring anti-social behaviour.</p> <p>The proposal was already raised and rejected, and I find it ridiculous that it has been reworded and put out again.</p> <p>An auctioneer has stated that the walkway would devalue houses. If the walkway goes through the it is stated that legal advice in terms of house devaluation will be sought.</p>
<p>012 Kevin Doyle</p>	<p>(PERM 4 and PERM 8 are in Drumcree) Drumcree Court is a quiet estate where everyone knows each other.</p> <p>Opening up foot and cycle access between Rathbride Close and Drumcree Court would turn Drumcree Court into a rat-run. Concerns over security, littering, anti-social behaviour. Creating access between estates has caused problems historically and the Council should know better.</p> <p>If Minister Ryan wants to increase usage of the trains without filling the train car park then perhaps he should consider putting on shuttle buses to bring people to and from the train station.</p>
<p>014 John Spencer</p>	<p>PERM 4 Object to PERM 4. The fact that PERM 8 was removed completely invalidates what the planners were originally trying to achieve. It must now be removed as should all PERMs through estates within the town.</p> <p>The fact that walkways in other town have been created and then closed calls into question the capabilities of the planners involved. It also shows a complete disregard for residents.</p> <p>The needs of the town are educational and medical facilities to support new builds that the Council have approved.</p>
<p>015 Sinéad Hanbury</p>	<p>(PERM 4 and PERM 8 are in Drumcree) Drumcree Court is a small estate and the scale of the various estates proposed to connect to Drumcree Court there could be a large imbalance in the footfall through the estate.</p> <p>Concerns over the lack of privacy, increase in noise, felling of mature trees, impact on safety, security, vandalism and anti-social behaviour.</p> <p>The access points could become shortcuts to avoid Garda detection and the Plan does not contain security measures for the increase in people passing the houses day and night.</p> <p>The submission is also concerned that the access measure would increase non-residents parking in the area, to avoid paying for the rail car park, which will increase traffic in the area too. There is</p>

	<p>also a concern that the parked cars could obstruct entry and exit for residents and also service vehicles.</p> <p>The submission requests that KCC engage with the residents before any decision or action is taken. The age profile of the area should be considered as many are elderly or retired which don't need this worry.</p> <p>'Breaking-open' of estates is counterproductive to efficient traffic management, path, and road maintenance, and introduces unnecessary pedestrian and vehicle traffic to otherwise safe, secure, and well-maintained areas. The submission asks that the peacefulness, safety and ambience of the estate is maintained.</p>
016 Owen Kennedy	<p>The submission relates to PERM 4 on the Draft Plan and the proposed demolition of the wall between Drumcree Court and Rathbride Close. It is submitted that the permeability measure will lead to anti-social behaviour and opportunistic crime.</p> <p>It is noted that PERM 8 is removed but PERM 4 remains. It makes no sense; it adds nothing to the local area and rat run is being created. The rat run in Elm Park was closed and the green area in Rathbride Abbey was fenced off. Common sense should prevail and PERM 4 removed to allow residents live in quiet estate.</p> <p>Investment in social and medical facilities are needed rather than silly plans that offer no advantages to residents.</p>
017 Patricia Kennedy	<p>Object to access measure PERM 4 in Drumcree Court. No longer feel safe in my home and would need to upgrade security for fear of anti-social behaviour.</p> <p>Birch trees would be destroyed to facilitate the plan.</p> <p>Cannot understand why PERM 4 was left in and other routes were scrapped. Leaving PERM 4 in the absence of other interlinked routes defeats the purpose.</p>
018 Stephen Stafford	<p>Object to PERM 4. In light of the removal of PERM 8, the retention of PERM 4 makes absolutely no sense, and I have to believe that its retention was an oversight.</p> <p>The submission states that they trust that this will be rectified at the next review.</p>
020 Richard and Sinead Doyle	<p>The submission relates to PERM 4 and 8. Drumcree Court is a small-slae development with a secluded cul-de-sac layout. The walkway threatens to disrupt the sense of privacy and safety in terms of unwanted foot traffic, anti-social behaviour and unwanted disturbances.</p> <p>The needs of the community should not be overshadowed.</p>
022 Bill McDonald	<p>The submission opposes PERM 4. The estate has more than adequate access to the Rathbride Road. Considering the scale of the various estates proposed to connect to Drumcree Court there would be a serious imbalance in the footfall through the estate.</p> <p>The concerns are:</p>

	<ul style="list-style-type: none"> - The green area would become unsafe to play on. - Additional parking of vehicles from commuters using the train station. - Routes become the focus of anti-social behaviour and short cuts to avoid Garda detection. The estate has in the recent past experienced vandalism and extreme anti-social behaviour that has affected residents, which required the installation of CCTV. - Impact on property value. <p>Removal of mature trees and destroy established wildlife.</p>
<p>023 Cunnaberry Hill, Oaktree Residents Association</p>	<p>PMA 43 and PMA 48 The Residents Association welcomes the 'proposed deletions', in particular; Cycle 32, Cycle 46, Cycle 58, Cycle 58, PERM 34, PERM 41, and PA 3.</p>
<p>029 Ann Grogan</p>	<p>PERM 4 and PERM 8 There is no benefit for Drumcree residents for this lane. Drumcree court is a small estate with strong neighbourhood watch culture. Additional pedestrians would weaken security as it would provide more escape/entry opportunities for individuals with criminal intent.</p>
<p>030 Lynda & Shane Geraghty</p>	<p>PERM 2 The submission states that they are extremely disappointed that PERM 2 was not included under PMA 43. The measure is non-sensical and there are serious safety concerns with opening an access to a very busy road especially for young children.</p> <p>There is currently a large entrance to Rathbride Abbey that is more than adequate, creating a further entrance circa 150m away from the existing entrance is a waste of taxpayers' money and will put lives at risk.</p> <p>The security of the estate will be impacted by PERM 2 make it easier for robberies. Call off the bad idea and remove PERM 2.</p>
<p>034 Friends of the Irish Environment</p>	<p>In respect of the Proposed Material Alterations, Friends of the Irish Environment calls for the Elected Members not to delete PERM 7, PERM 8, PERM 9, PERM 23, PERM 24, PERM 25, PERM 34, PERM 35, PERM 39, PERM 41 in the Draft Plan.</p> <p>Greenhouse gas emissions attributed to the transport sector have increased by 130% due, in part, to car-dependent and car-prioritised development policies and decisions.</p> <p>The Draft Kildare Town Local Area Plan should be made to serve the common good by adherence to statutory requirements including, inter alia, s.9 (6), s.10 (2), s.19 (2, 2A, 2B), of the Planning and Development Act, 2000 (as amended) and s.15 (1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).</p>

	<p>Changes in Public Attitudes to Address Climate Action The submission references various facts which highlight the impact of climate change, the urgency to respond to climate change challenges and the impact of switching car trips with walking, cycling, or scooting.</p> <p>Prioritising Climate Action and Societal Wellbeing The submission highlights Irelands obligations under international agreements and frameworks, the findings of the UN Environment Programme Emissions Gap Report 2022, reports from the World Meteorological Organization on rising temperatures in Europe and the “Climate Change 2023: Synthesis Report” published by the IPCC on the rapidly closing window of opportunity to secure a liveable and sustainable future for all.</p> <p>Acceleration of Climate Change Various sources are referenced which highlight the acceleration of climate change and states prompt actions are needed to avoid worsening outcomes.</p> <p>Legislation and Policy for Planning, Development and Climate Action The submission references Section 9(6), Section 10(2)(n)(i)(ii) and Section 19(2)(a)(b)(2A)(2B) of the Planning and Development Act, 2000 (as amended) and Section 15(1)(a)(b)(c)(d)(e) of the Climate Action and Low Carbon Development Act, 2015 (as amended).</p> <p>Planning Policies for Mitigating Climate Change The submission highlights specific National Policy Objectives (NPO 27 and NPO 64) and National Strategic Outcomes (NSO 1, NSO 2 and NSO 7) around sustainable mobility and states that planning authorities have a pivotal role in the decarbonisation transition. It also states that the Proposed Material Alterations should be informed by the Climate Change Advisory Council’s “Council Paper Working Series”.</p> <p>Eastern and Midland Region Spatial and Economic Strategy 2019-2031 (RSES) In relation to the RSES the submission highlights the following:</p> <ul style="list-style-type: none"> • The growth enablers to be considered by local authorities, in developing their core strategies and settlement hierarchies, specifically healthy placemaking and climate action. • The guiding principles for ‘Integration of Land Use and Transport’. • Regional Policy Objectives RPO 8.1 and RPO 8.4. • The walking and cycling objectives to guide investment in the EMRA. <p>Transport Strategy for Greater Dublin Area 2022-2042</p>
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	<p>The submission highlights Section 8.3 'The Road User Hierarchy', Section 8.8 'Filtered Permeability' including Measure PLAN9, and Section 14.7 'Low-Traffic Neighbourhoods' including Measure TM6.</p> <p>Kildare County Development Plan 2023 – 2029 The submission referenced the aim of Chapter 5 '<i>Sustainable Mobility & Transport</i>', Section 5.4 '<i>Sustainable Movement</i>' and the following policies, objectives and targets of the Plan: RE P12, TM P1, TM P2, TM P3, TM T2, TM T3, SC O24, SC O25, SC O30, SC O46, SC O68, SC O69, SC O70, SC O89, SC O103, TM O7, TM O12, TM O20, TM O21, TM O23, TM A2, TM A3, TM A5, TM A12, TM A13, TM A18.</p> <p>Climate Action Plan 2023 (CAP23) In relation to the CAP23 the submission highlights the following:</p> <ul style="list-style-type: none"> • Ireland's ambition of halving greenhouse gas emission by 2030 and of putting Ireland on course to becoming carbon neutral by 2050. • The roles and responsibilities of Local Authorities and the design and delivery phases of LA CAPs as set out in Section 10.3.5 of the CAP23. • The findings and recommendations of a report undertaken by the OECD and the Irish Climate Change Advisory Council, 'Redesigning Ireland's Transport for Net Zero: Towards systems that work for people and the planet'. • The Avoid-Shift-Improve approach to transport decarbonisation as set out in the CAP23. • Key Actions to deliver emissions abatement in transport for the period 2023-2025 <p>The Local Government Climate Action Key Performance Indicators report is referenced which local authorities should consider using in key thematic areas, including transport.</p> <p>Local Authority Climate Action Plan Guidelines The submission references a transport focus sector example of the guidelines which highlights the significant potential of local authorities to directly support national climate action.</p> <p>County Kildare Integration Strategy 2020 – 2026 The consultation process of this strategy and the findings in relation to transport and car dependency issues are highlighted. It also references literature which highlights the benefits of walkable neighbourhoods.</p> <p>Draft County Kildare Local Economic and Community Plan 2023-2029 The preparation stage of the Draft Kildare LECP, the key active travel points considered following data gathering and the published</p>
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	<p>Draft High-Level Goals (HLG 1 to HLG 4) are all highlighted in the submission.</p> <p>Strategic Environmental Assessment - Guidelines for Regional Assemblies and Planning Authorities [50] The submission highlights Section 7.1 of the guidelines which outlines the stages of plan-making after the period of public consultation to determine if any proposed amendments in response to the consultation pose likely significant effects on the environment and warrant mitigation measures.</p> <p>Draft Kildare Town Local Area Plan 2023-2029 - Written Statement The submission references objectives CSO 1.11, MTO 1.1, MTO 1.4, MTO 1.5, MTO 1.8 and MTO 1.9 of the Draft Plan.</p>
<p>036 Seán O’Feargháil</p>	<p>Permeability and Walkways The submission supports the submissions made in respect of through ways or walkways being opened between estates and particularly those made by the residents of Drumcree Court, Rathbride Close and Curragh Finn. It is stated that throughout Kildare walkways are requested to be closed and it is stated that to open new ones in the face of this experience is sheer and absolute lunacy.</p>
<p>037 Tom Blennerhassett</p>	<p>Opposed to PERM 4 and considered there is no logical reason for it to remain as other have been revoked.</p> <p>The Rathbride road is considerable wide to cater for segregated cycle lanes and high-quality walkways, as well as the normal road for vehicular traffic, which could be safer, easier to maintain, less of a risk for anti-social behaviour.</p> <p>Concerns are raised in respect of e-bikes and scooters to travelling at speed, safety concerns, litter noise, anti-social behaviour, routes for burglaries, and dealing drugs. It should be struck out. illogical to destroy mature plantings and wildlife by bulldozing a pathway.</p>
<p>038 Denise and John Spencer</p>	<p>Opposed to of Perm 4 through Drumcree Court.</p> <p>The concerns raised are that it threatens to ruin the beautiful mature green area, safety especially for children and the elderly, impact freedom of children to play, impact on wildlife habitat, and antisocial behaviour.</p> <p>The submission states that similar openings in other neighbouring areas caused anti-social behaviour.</p>

	<p>Addressing housing, schools and recreational facilities should take precedent over these proposals.</p>
<p>040 An Taisce</p>	<p>The submission provides an introductory overview on the Obligations for KCC under the Climate Action and Low Carbon Development (amendment) Act 2021 and the carbon budget situation in respect of analysis carried out by An Taisce, which are that the percentage reductions required by 2023 will be much greater than 51%.</p> <p>In respect of the Proposed Material Alterations An Taisce recommend the retention of PERM 7, PERM 8, PERM 9, PERM 23, PERM 24, PERM 25, PERM 34, PERM 35, PERM 39, PERM 41, Cycle 32, Cycle 34, Cycle 35, Cycle 37, Cycle 38, Cycle 46, and Cycle 58 in the Draft Plan. The removal accounts for almost 25% of the permeability objectives in the Draft Plan and should not be deleted. The measures are crucial to reducing transport emissions and facilitates simpler and faster access to local services, amenities and public transport via routes not open to cars. It also facilitates the realisation of the 10-minute concept which is supported by planning policy and the CDP.</p> <p>Consistency Across the Planning Policy Hierarchy The submission highlights that in accordance with the Planning and Development Act (Section 19(2)) that and LAP needs to be consistent with higher tier plans and the deletions would be consistent with the planning policy hierarchy. The submission considers the deletion of the measures would be contrary to RE P12, UD O3, TM P1, TM P2, TM T2, TM T3, TM O7, TM O20, TM O23, TM A2, TM A3, TM A5, TM A12 and TM A13 of the Kildare CDP 2023-2029. Furthermore, it would be at variance to RPO 4.41, RPO 8.1, RPO 8.4 and RPO 9.10 of the RSES and the overarching National Strategic Outcomes NSO 1, 2, 4, 7, 8 as well as NPO 27, 54 and 64 of the NPF.</p> <p>It is also stated that the removal of the measures is not consistent with the GDA Transport Strategy 2022-2042, to which an LAP is required to be consistent under Section 19(2A) of the Planning Act. The submission also considers that removing the permeability measures are inconsistent with the National Sustainable Mobility Policy and the Programme for Government.</p> <p>The submission request that in order to align the Draft Plan with the CDP, the RSES and the NPF permeability and cycle measures should be reinstated.</p>

Chief Executive's Opinion

The comments raised in respect of the Permeability Measures the subject of Proposed Material Alteration No. 43 are noted.

It was the Chief Executive's Opinion at the Special Meeting (July 2023) on the Draft Kildare Local Area Plan 2023-2029 that the proposed permeability and cycling measures formed part of an overall network of measures and no measures should be removed. The Elected Members were advised that the permeability strategy of the Draft Plan, which was informed by the Kildare Town Transport Strategy, which seeks to create convenient, efficient routes to key destinations such as the train stations, bus stops, schools, in order to reduce walking trip distances to give non-motorised modes a competitive advantage over private cars.

It was highlighted that this is particularly important given the Climate Action Plan 2023 (CAP 23) targets for carbon emission reductions in the transport sector (50% reduction by 2030). The permeability links form an overall network within the town which will make it easier to move from private car to sustainable modes of transport. While at first glance they may appear to be 'connecting estates' they actually form a larger network of links to reduce walking distances to key attractors, thereby it is important to keep in mind the 'bigger picture' rather than looking at a measure in isolation. However, the Elected Members resolved to place the proposed material alteration to the Draft Plan on public display.

The Office of the Planning Regulator has made a Recommendation in respect of PMA 43 which states that the Plan is required to be made without Proposed Material Alteration 43. The OPR in their submission states that where an authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations of the Office, under the provisions of section 31AO(5) of the Act the chief executive must inform the Office accordingly and state the reasons for the decision of the planning authority.

Similarly, the National Transport Authority in their submission note the proposed removal of ten Permeability Measures. They state that in the context of the Plan's aims and objectives to reduce car dependency in the town and to encourage modal shift, the implementation of the measures is critical in order to meet these targets. The NTA also recommend that PMA 43 should not proceed and the measures should remain part of the Plan.

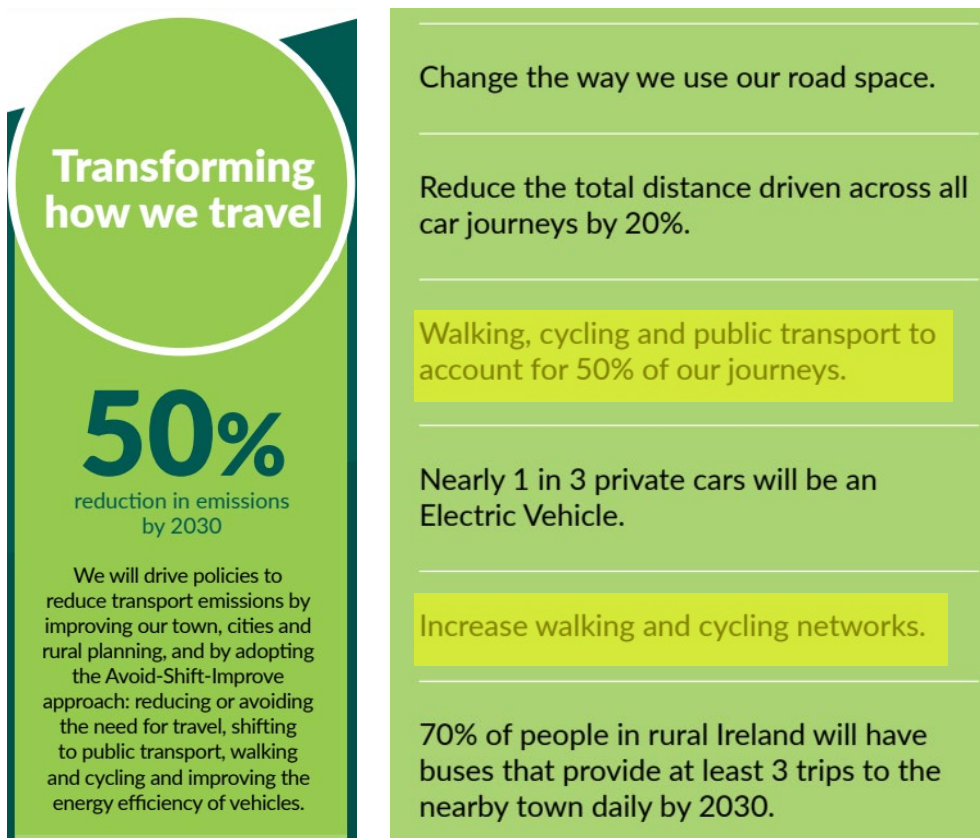
The Chief Executive would like to state the following in respect of PMA 43:

The transport sector in Ireland is undergoing a transformation to a low-carbon future. This is non-negotiable.

CAP 23 outlines that we have to achieve a 50% reduction in transport related emissions by 2030 – i.e., **we have to cut transport emissions in half**. Figure 1 illustrates the CAP 23 requirements for transport. Two of these major targets relate directly to active travel and are highlighted in yellow. Not only does CAP 23 stipulate that we have to increase walking and cycling networks – it states that by 2030 **half of all trips are to be via active travel or public transport**.

Implementing a **cohesive** walking and cycling travel network in our towns is not a nicety – it is a requirement and we are bound to these targets. Recent extreme weather events in Ireland only underscore the urgency of this situation.

Figure 1 Summary of CAP 23 Transport Related Requirements



In addition to the CAP 23 document, there are numerous other national policy documents advocating for active travel, including retrofitting permeability links into existing built-up areas. Some highlights from these documents are included in Table 1 below for context.

1. GDA Transport Strategy 2022 – 2042

Section 8.7: Filtered Permeability

“Facilitating movement by walking and cycling is a critical element of neighbourhood planning. In particular, the concept of filtered permeability, whereby pedestrians and cyclists can travel through areas and motorised traffic cannot, is important in conferring an advantage on these modes making them safer and more attractive than the car for short trips to local services. This concept has been applied in multiple locations across the GDA, both in new developments and via retrofitting of new links into existing areas.

In existing urban and suburban areas which are defined by cul-de-sacs and boundary walls which segregate neighbourhoods – often along social class

lines – the “breaking through” of these barriers to allow access for pedestrians and cyclists, including connections to nearby public transport can be problematic. Many schemes, however, have been successfully realised by the local authorities in the GDA, in collaboration with the NTA.”

The extract below illustrates measure PLAN7 of the Strategy. Emphasis has been added.

Measure PLAN7 - Filtered Permeability

Development Plans, SDZ Planning Schemes and Local Area Plans in the GDA should ensure that the road and street networks in new development areas are designed on the basis of providing for filtered permeability, and should incorporate measures which deliver filtered permeability in existing neighbourhoods.

2. NTA Permeability Best Practice Guidelines

“People need to access services and workplaces on a daily basis. An approach to urban development which creates choice in this regard is therefore required. This guidance note seeks to provide a basis for the delivery of this choice in existing built-up areas by promoting permeability for pedestrians and cyclists, thereby addressing the legacy of severance built-in to recent expansions of Irish towns and cities.”

“A permeable district can contribute to a range of planning objectives related to design, social integration and transport. Permeability can enhance the attractiveness of a neighbourhood through the provision of additional useable open space; can increase social interactions by facilitating more activity in the public realm and can maximise the potential for walking and cycling to a range of services.”

3. National Planning Framework

National Strategic Outcome 4 – Sustainable Mobility

“Develop a comprehensive network of safe cycling routes in metropolitan areas to address travel needs and to provide similar facilities in towns and villages where appropriate”.

National Strategic Outcome 7 - Amenities and Heritage

“Implementation of planning and transport strategies for the five cities and other urban areas will be progressed with a major focus on improving walking and cycling routes, including continuous greenway networks and targeted measures to enhance permeability and connectivity.”

4. Kildare County Development Plan

TM A3: *“Identify filtered permeability measures including, home zones and low-traffic neighbourhoods in all towns throughout the county in order to reduce*

greenhouse gas emissions and promote a more sustainable, connected way of life for the citizens of the county.

TM O21: *“Ensure site layout proposals detail present and possible 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 A12: *“Seek funding to develop Local Permeability Schemes in conjunction with the NTA in order to maximise access to town centres, local shops, schools, public transport services and other amenities.”*

TM O41: *“Generate additional demand for public transport services by strengthening development around existing and planned high-capacity transport routes and interchanges and by reducing walking and cycling distances through the implementation of local permeability improvement and improving access to public transport as part of road improvement projects where possible.”*

From the above, the following points are clear:

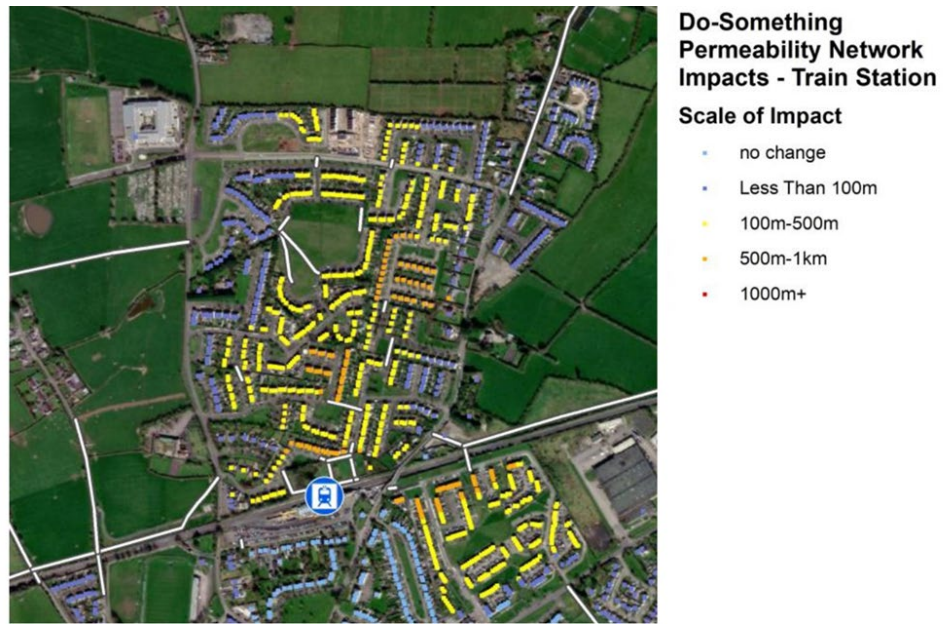
1. There is an urgency to decarbonise the transport sector in Ireland and permeability is a key link in this process.
2. A cohesive walking network with permeability links working together to create routes to key destinations is the way forward. Missing links within the network undermine the benefits of the whole.
3. Permeability and cycling links are both supported by various policy documents and are a requirement to achieve our CAP 23 targets.

In the context of Kildare Town, the first step to achieving this low-carbon future is to make a plan – hence the Kildare Town Transport Strategy. This multi-pronged transport plan underwent several rounds of consultation with the Public, Elected Members and other key stakeholders. The permeability measures included in the Draft were derived from this evidence-based study. As noted in the Draft Plan the measures are a broad reckoning which indicates they are suitable for inclusion, the progression in the future of the measures will include detailed design, where many of the concerns raised can be mitigated.

Proposed Material Alteration No. 43 relates to ten of the Permeability Measures detailed under Table 7-1 and Map 7.1 of the Draft Plan. The following details the specific benefits of the links proposed to be removed. The Permeability Measures that received submissions that did not form part of the Proposed Material Alterations are also discussed.

PERM Measure	Details on the importance of the specific measure
<p>PERM 7, 8 and 9.</p> <p>PERM 2 and PERM 4 (not the subject of a PMA)</p>	<p>PERM 7, PERM 8 and PERM 9 are interconnected and cannot be assessed individually. Furthermore, PERM 2 and PERM 4 which received several submissions are also included in the same “bundle” of measures, as the rationale also holds for these two measures.</p> <p>These permeability measures were designed with the purpose of providing residential areas north of the train line easier access to the train station through a new northern entrance. They work as a network – removing some will undermine the entire point of this bundle of links. This is particularly true of links 4, 7, 8 and 9 – in the middle of the permeability network north of the train station.</p> <p>Currently, walking or cycle access to the train station from these northern estates requires people to travel out onto either the R401 or R415, south of the train line and then back up into the train station. Either route requires travelling under or over a narrow bridge.</p> <p>An analysis of the benefits of these links was included in the Kildare Town Transport Strategy. Of particular interest is an analysis of the reduction in walking distance to the train station for estates to the north of the station. Please see Figure 2 which illustrates this benefit.</p> <p>It is clear from this figure that all of the houses to the north benefit from the new permeability measures. This has been quantified and shown that 11% of homes will have a massive 500m – 1km reduction in walking distance to the train station from these new links specifically. A further 61% will have a 100m – 500m reduction and the remaining 28% will have up to a 100m reduction. It is important to note that every single home in the vicinity of these links will see a reduction in walking distance to the train station.</p>

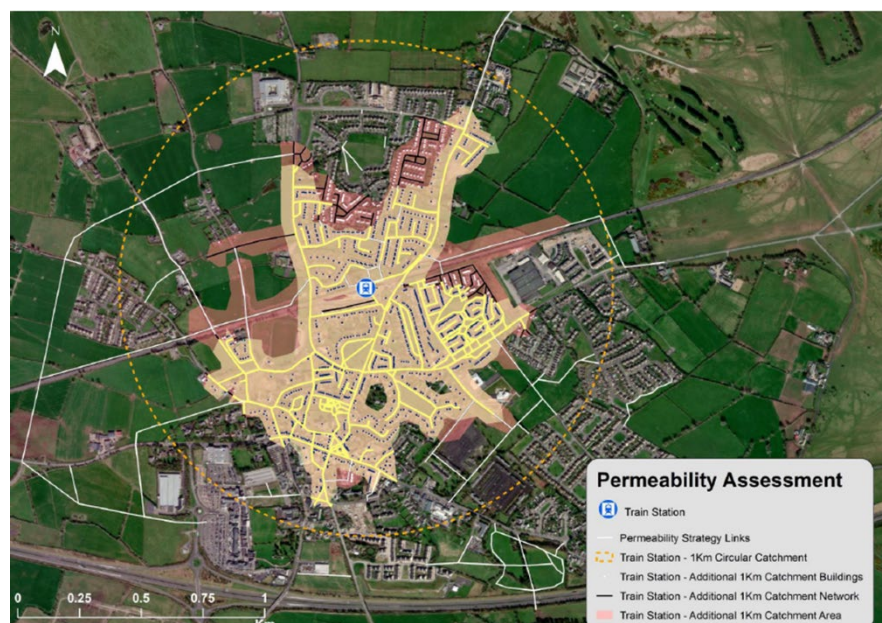
Figure 2 Reduction in Walking Distance to the Train Station




The benefits of these links can be further illustrated by looking at the increased 1km catchment to the train station. Please see Figure 2 below. It can be seen in this figure that many of the homes in the northern estates in Kildare Town would fall within a 1km walk to the train station as a direct result of the new permeability links.

The benefits of these links can be further illustrated by looking at the increased 1km catchment to the train station (Figure 3, refers). It is evident that many of the homes in the northern estates in Kildare Town would fall within a 1km walk to the train station as a direct result of the new permeability measures.

Figure 3 Increased 1km Catchment to the Train Station



	<p>It is important to note that the OPR in their submission specifically referenced PERM 9 and stated that the measure would provide better connectivity between the R401 Dunmurray Road the R415 Rathbride Road.</p>
<p>PERM 23</p>	<p>PERM 23 proposes to formalise an informal path in the green area adjacent to Coolaghknock estate. There is a path worn into the grass along this proposed route. This will improve usability and safety for the benefit of people using this walking route. This measure will not require breaking through any barriers, there is already full access at the end of each hammer head into the green area, but rather it will provide universal access for all.</p> <p style="text-align: center;">Figure 4 Details of PERM 23</p>  <p>It is important to note that both the OPR and the NTA made specific comments in respect of PERM 23 (and PERM24). The OPR stated that the two measures would connect a number of cul de sacs within an existing housing estate accessed from R413 - Melitta Road to the R445 - Dublin Road. The NTA stated that the two measures have the potential to significantly reduce trip lengths for residents in the two large residential estates of Ruanbeg and Coolaghknock and should be included in the Plan.</p>
<p>PERM 24</p>	<p>PERM 24 is proposed to connect Coolaghknock Gardens to Runabeg, thereby improving access to the schools' campus located on the Former Magee Barracks site. Furthermore, this measure will also improve access to amenities on the R445 such as the Primary Care Centre and the future Cherry Avenue Park.</p> <p>It important to note that both the OPR and the NTA made specific comments in respect of PERM 23 and PERM 24. The OPR stated that the two measures would connect a number of cul de sacs within an existing housing estate accessed from R413 - Melitta Road to the R445 - Dublin Road. The NTA stated that the two measures have the potential to significantly reduce trip lengths for residents in the two large residential estates of Ruanbeg and Coolaghknock.</p>

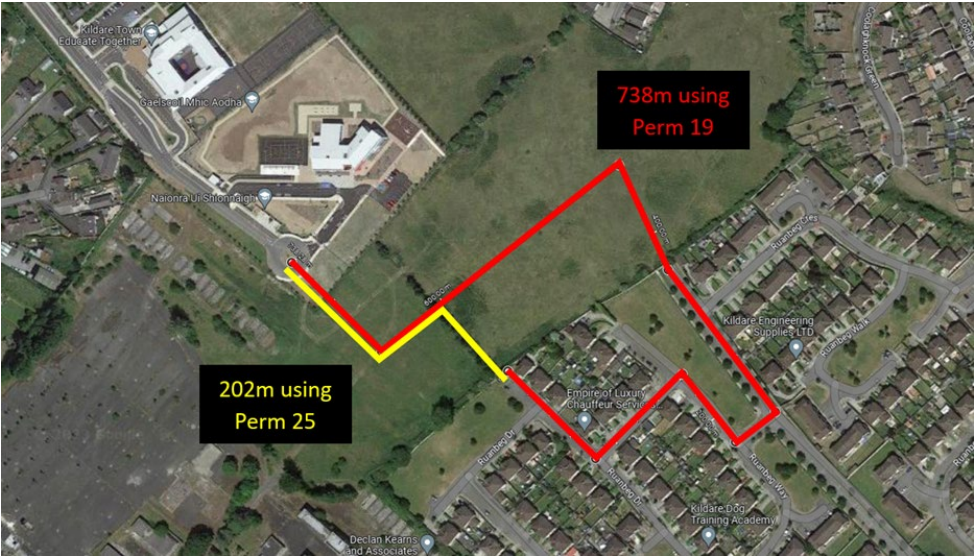
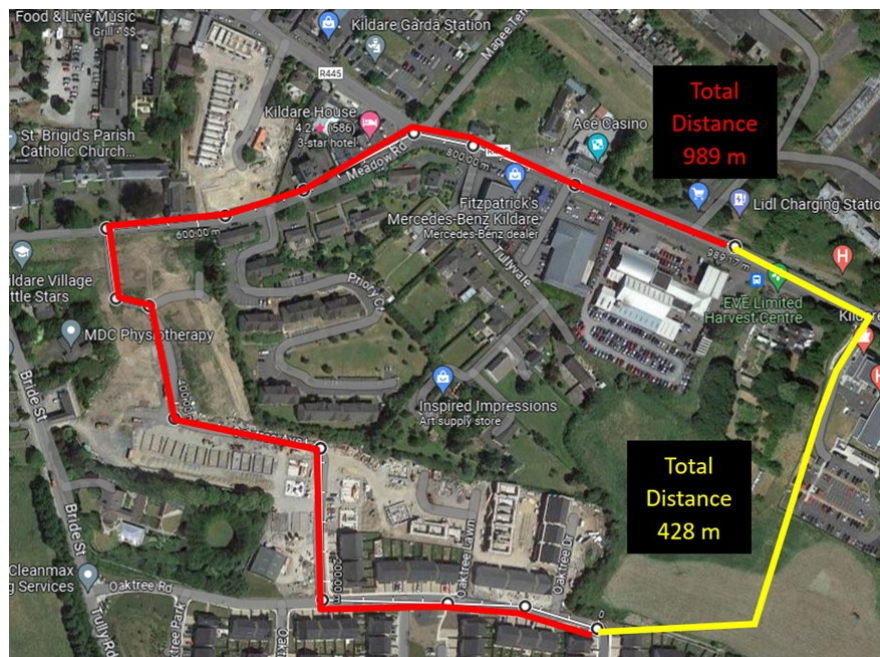
<p>PERM 25</p>	<p>PERM 25 is beneficial as it provides easy access for children of the Ruanbeg estate to directly access the schools' campus. While it could be argued that Perm 19 will provide the same benefit, PERM 25 provides a much more circuitous route for many. Using Perm 25 instead of Perm 19 would save a school child in Ruanbeg Drive 536 m, almost 7 minutes walking. This is illustrated in the image provided. It must be emphasised that PERM 25 proposes a walking / cycling link only, it is not a road objective to be used by cars.</p> <p>Figure 5 Distance Saved Using PERM 25 from Ruanbeg Drive to the School Campus</p> 
<p>PERM 34</p>	<p>PERM 34 is an active travel route only, pedestrians and cyclists only. The Road Measure PA 3 is proposed to be removed under PMA 62. PERM 34 will predominately benefit the residents of Oaktree Estate, by providing much improved access to the primary care centre, the Lidl on the R445 and bus stops on the R445. It will also provide a better route up to the schools' campus south of the Melitta road once phase 2 of the Former Magee Barracks project is complete.</p> <p>As an example, the reduction in distance from Oaktree estate to the bus stop on the R445 has been calculated to highlight the benefits of this link, Figures 6 illustrates the calculation. The distance saved is 561 m – this equates to almost 7 minutes reduction in walking time.</p>

Figure 6 Current Distance to the bus stop on the R445 Versus with PERM 34



It is important to note that the OPR under their Recommendation No. 3 not to remove any of the permeability measures, specifically refers to PERM 34 and states that the measure in conjunction with PERM 41 will connect the Oaktree estate to the Kildare Primary Care Centre on the R445 and into the proposed pedestrian links in Cherry Avenue Park (measure 38).

PERM 35

PERM 35 is associated with a new vehicular road objective (Modus Link Road). It is unfeasible to build a new road in this area and not include a footpath. The new road will by necessity include ample provision for active travel be it by walking or cycling.

Under Planning File Reference 17/1261 (granted – Figure 7) and the most recent planning application 23/102 (at further information stage – Figure 8) included details for footpaths and cycle tracks.

Figure 7 Planning File 17/1261 Section of New Road

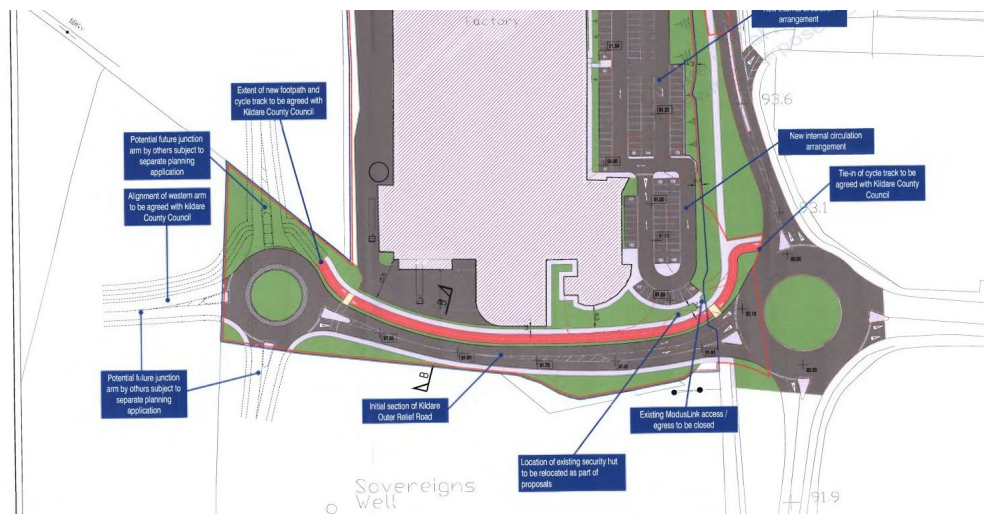
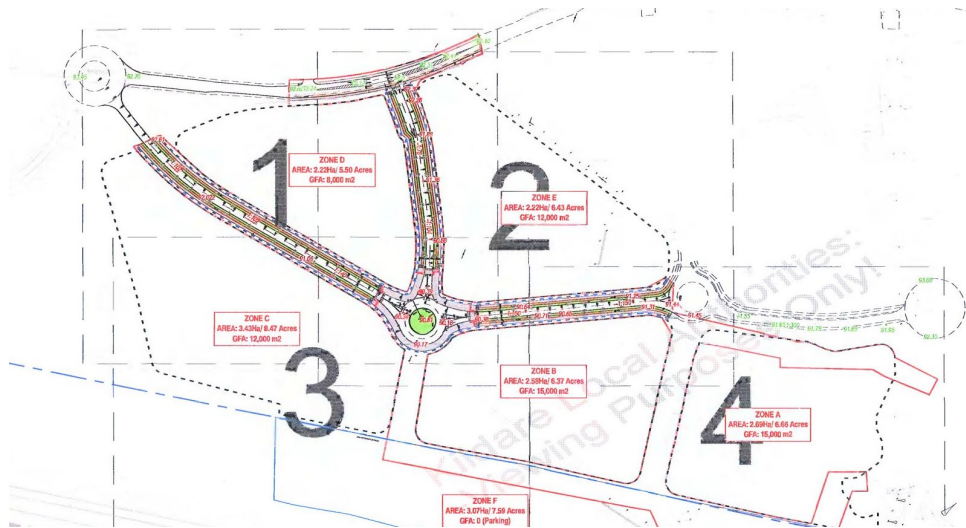


Figure 8 Planning File 23/102 Section of New Road



It is important to note the OPR in their submission specifically referenced PERM 35 and stated that measure 35 and 39 relate to the undeveloped Enterprise and Employment lands and form part of the future link road connecting the R445 to the R415 (opposite the Kildare Retail Outlet).

PERM 39

PERM 39 it an important permeability measure linking the Loughlion Green estate to the new Modus Link Road for pedestrian and cyclists only. A pedestrian link from the estate to the new road will provide improved accessibility for the residents of Loughlion Estate to Kildare Village (saving approximately **421m**). This equates to a walking time reduction of approximately **5 minutes** (see illustration below).

Even more importantly, it will also provide access to the bus stops on the R415 (south of the Modus Link Roundabout) (Figure 9, refers).

Furthermore, once permeability measure 5 (new greenway from Monasterevin Road all the way north to the R401) is complete, this permeability link will provide improved access to this greenway, in particular for residents in the southern section of the Loughlione Green estate.

Figure 9 Distance to Kildare Village with and without PERM 39

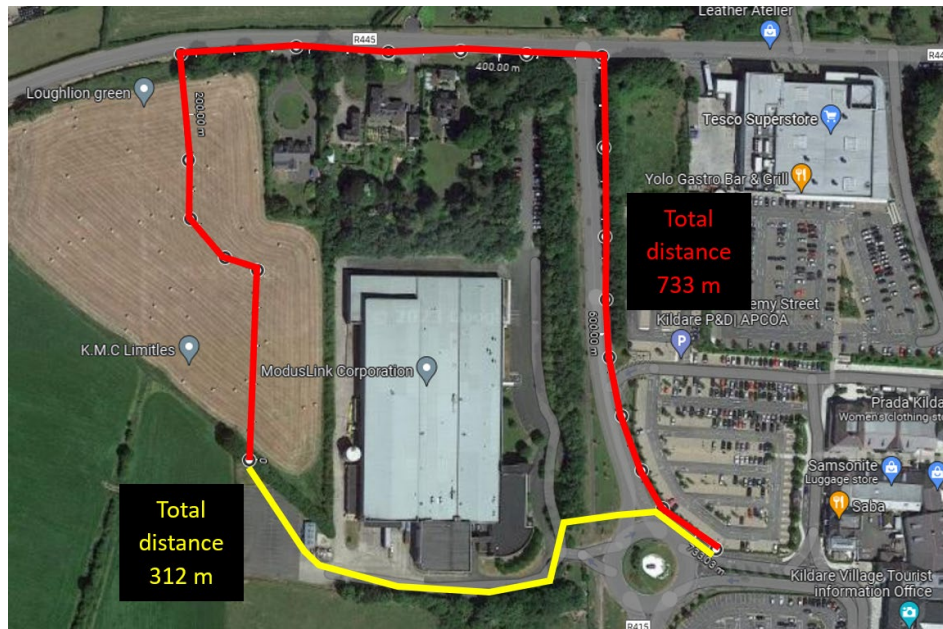
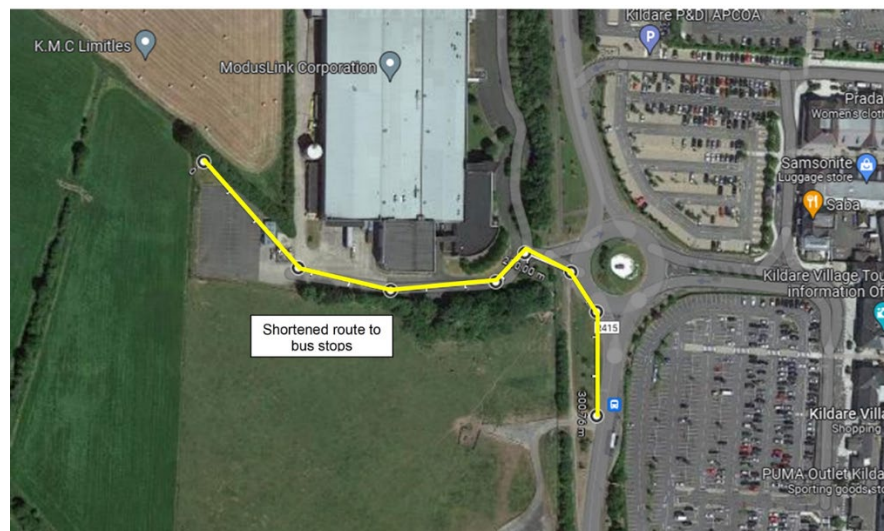



Figure 10 New Improved Walking Link to Bus Stop on R415



It is also important to note that the OPR in Recommendation No. 3 state that measure 35 and 39 relate to the undeveloped Enterprise and Employment lands and form part of the future link road connecting the R445 to the R415 (opposite the Kildare Retail Outlet). It is their recommendation that PMA 43 should not be adopted.

	<p>In the interests of clarity, it is considered that a minor modification should be made to PERM 39 as detailed in the Draft Plan, by re-drawing the measure on the Permeability Measures Map 7.1 such that it follows the existing Loughlion Green estate footpaths.</p>
<p>PERM 41</p>	<p>PERM 41 is predicated on the delivery of PERM 34 (please refer to prior discussion on PERM 34). This proposed PERM 41 would provide a direct and convenient link to the new planned Cherry Avenue Park to the west of Oaktree Estate. This will provide a fantastic amenity to the local residents. While it could be argued that PERM 34 will also provide access to the new park, PERM 41 will shorten the distance to the park and remove the need for pedestrians to walk along the busy R445 to get to the park. The distance saved by including PERM 41 to the new park is approximately 327 m. That's almost 4 minutes time saved walking. See Figure 1 below.</p> <p>Figure 11 Distance to Cherry Avenue Park with or without PERM 41</p>  <p>It is important to note that the OPR under Recommendation No. 3 in state that PERM 34 and 41 connect the Oaktree estate to the Kildare Primary Care Centre on the R445 and into the proposed pedestrian links in Cherry Avenue Park2 (measure 38). The OPR Recommend that PMA 43 is not adopted.</p>

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 43 should not be adopted by the Elected Members for the reasons outlined above, in order to create compact and connected communities by promoting the use of sustainable active transport modes.

A minor modification should be made to PERM 39 which re-draws the measure to follow the existing Loughlion Green estate footpaths.

Proposed Material Alteration No. 44

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 44.
024 Judith Boyle	With the proposed one-way system and road closures in the town centre this will make this a very busy road out towards the M7 motorway as traffic will be unable to go towards N7 to Dublin.

Chief Executive's Opinion

The support in relation to PMA 44 is noted. The comment in relation to the active travel route being busy is also noted. As stated in the Draft Plan (Section 7.3.2.) the exact degree of segregation to be provided is best determined at detailed design stage, the overall objective is to ensure that to the greatest extent possible, the degree of protection provided from vehicular traffic ensures a high level of perceived, as well as actual, safety.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 44 should be adopted by the Elected Members.

Proposed Material Alteration No. 45

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 45.
023 Cunnaberry Hill, Oaktree Residents Association	PMA 45 is welcome subject to the proposed link not altering the existing berm between Cunnaberry Hill and the M7, due to noise impact.

Chief Executive's Opinion

The support in relation to PMA 45 is noted. The comment in relation to the existing berm between Cunnaberry Hill and the M7 motorway is also noted. Any noise attenuation which has been provided to reduce the impact of the motorway on residents of the town will be considered as part of the detailed design of the permeability measure.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 45 should be adopted by the Elected Members.

Proposed Material Alteration No. 46

Submission	Summary of Issue
004 Sebastian Vencken	The submission supports PMA No. 46.

Chief Executive's Opinion

The support in relation to PMA 46 is noted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 46 should be adopted by the Elected Members.

Proposed Material Alteration No. 47

No submission / observation has been received in respect of PMA 47.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 47 should be adopted by the Elected Members.

Proposed Material Alteration No. 48

Submission	Summary of Issue
004 Sebastian Vencken	The submission is strongly against PMA No. 48.
023 Cunnaberry Hill, Oaktree Residents Association	The Residents Association welcomes the 'proposed deletions', in particular; Cycle 32, Cycle 46, Cycle 58, Cycle 58, PERM 34, PERM 41, and PA 3.
034 Friends of the Irish Environment	<p>In respect of the Proposed Material Alterations, Friends of the Irish Environment calls for the Elected Members not to delete Cycle 32, Cycle 34, Cycle 35, Cycle 37, Cycle 38, Cycle 46, and Cycle 58 in the Draft Plan.</p> <p>Greenhouse gas emissions attributed to the transport sector have increased by 130% due, in part, to car-dependent and car-prioritised development policies and decisions.</p> <p>The Draft Kildare Town Local Area Plan should be made to serve the common good by adherence to statutory requirements including, inter alia, s.9 (6), s.10 (2), s.19 (2, 2A, 2B), of the Planning and Development Act, 2000 (as amended) and s.15 (1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).</p>

	<p>Changes in Public Attitudes to Address Climate Action The submission references various facts which highlight the impact of climate change, the urgency to respond to climate change challenges and the impact of switching car trips with walking, cycling, or scooting.</p> <p>Prioritising Climate Action and Societal Wellbeing The submission highlights Irelands obligations under international agreements and frameworks, the findings of the UN Environment Programme Emissions Gap Report 2022, reports from the World Meteorological Organization on rising temperatures in Europe and the “Climate Change 2023: Synthesis Report” published by the IPCC on the rapidly closing window of opportunity to secure a liveable and sustainable future for all.</p> <p>Acceleration of Climate Change Various sources are referenced which highlight the acceleration of climate change and states prompt actions are needed to avoid worsening outcomes.</p> <p>Legislation and Policy for Planning, Development and Climate Action The submission references Section 9(6), Section 10(2)(n)(i)(ii) and Section 19(2)(a)(b)(2A)(2B) of the Planning and Development Act, 2000 (as amended) and Section 15(1)(a)(b)(c)(d)(e) of the Climate Action and Low Carbon Development Act, 2015 (as amended).</p> <p>Planning Policies for Mitigating Climate Change The submission highlights specific National Policy Objectives (NPO 27 and NPO 64) and National Strategic Outcomes (NSO 1, NSO 2 and NSO 7) around sustainable mobility and states that planning authorities have a pivotal role in the decarbonisation transition. It also states that the Proposed Material Alterations should be informed by the Climate Change Advisory Council’s “Council Paper Working Series”.</p> <p>Eastern and Midland Region Spatial and Economic Strategy 2019-2031 (RSES) In relation to the RSES the submission highlights the following:</p> <ul style="list-style-type: none"> • The growth enablers to be considered by local authorities, in developing their core strategies and settlement hierarchies, specifically healthy placemaking and climate action. • The guiding principles for ‘Integration of Land Use and Transport’. • Regional Policy Objectives RPO 8.1 and RPO 8.4. • The walking and cycling objectives to guide investment in the EMRA. <p>Transport Strategy for Greater Dublin Area 2022-2042</p>
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	<p>The submission highlights Section 8.3 'The Road User Hierarchy', Section 8.8 'Filtered Permeability' including Measure PLAN9, and Section 14.7 'Low-Traffic Neighbourhoods' including Measure TM6.</p> <p>Kildare County Development Plan 2023 – 2029 The submission referenced the aim of Chapter 5 '<i>Sustainable Mobility & Transport</i>', Section 5.4 '<i>Sustainable Movement</i>' and the following policies, objectives and targets of the Plan: RE P12, TM P1, TM P2, TM P3, TM T2, TM T3, SC O24, SC O25, SC O30, SC O46, SC O68, SC O69, SC O70, SC O89, SC O103, TM O7, TM O12, TM O20, TM O21, TM O23, TM A2, TM A3, TM A5, TM A12, TM A13, TM A18.</p> <p>Climate Action Plan 2023 (CAP 23) In relation to the CAP23 the submission highlights the following:</p> <ul style="list-style-type: none"> • Irelands ambition of halving greenhouse gas emission by 2030 and of putting Ireland on course to becoming carbon neutral by 2050. • The roles and responsibilities of Local Authorities and the design and delivery phases of LA CAPs as set out in Section 10.3.5 of the CAP23. • The findings and recommendations of a report undertaken by the OECD and the Irish Climate Change Advisory Council, 'Redesigning Ireland's Transport for Net Zero: Towards systems that work for people and the planet'. • The Avoid-Shift-Improve approach to transport decarbonisation as set out in the CAP23. • Key Actions to deliver emissions abatement in transport for the period 2023-2025 <p>The Local Government Climate Action Key Performance Indicators report is referenced which local authorities should consider using in key thematic areas, including transport.</p> <p>Local Authority Climate Action Plan Guidelines The submission references a transport focus sector example of the guidelines which highlights the significant potential of local authorities to directly support national climate action.</p> <p>County Kildare Integration Strategy 2020 – 2026 The consultation process of this strategy and the findings in relation to transport and car dependency issues are highlighted. It also references literature which highlights the benefits of walkable neighbourhoods.</p> <p>Draft County Kildare Local Economic and Community Plan 2023-2029 The preparation stage of the Draft Kildare LECP, the key active travel points considered following data gathering and the published</p>
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	<p>Draft High-Level Goals (HLG 1 to HLG 4) are all highlighted in the submission.</p> <p>Strategic Environmental Assessment - Guidelines for Regional Assemblies and Planning Authorities [50] The submission highlights Section 7.1 of the guidelines which outlines the stages of plan-making after the period of public consultation to determine if any proposed amendments in response to the consultation pose likely significant effects on the environment and warrant mitigation measures.</p> <p>Draft Kildare Town Local Area Plan 2023-2029 - Written Statement The submission references objectives CSO 1.11, MTO 1.1, MTO 1.4, MTO 1.5, MTO 1.8 and MTO 1.9 of the Draft Plan.</p>
<p>040 An Taisce</p>	<p>The submission provides an introductory overview on the Obligations for KCC under the Climate Action and Low Carbon Development (amendment) Act 2021 and the carbon budget situation in respect of analysis carried out by An Taisce, which are that the percentage reductions required by 2023 will be much greater than 51%.</p> <p>In respect of the Proposed Material Alterations An Taisce recommend the retention of PERM 7, PERM 8, PERM 9, PERM 23, PERM 24, PERM 25, PERM 34, PERM 35, PERM 39, PERM 41, Cycle 32, Cycle 34, Cycle 35, Cycle 37, Cycle 38, Cycle 46, and Cycle 58 in the Draft Plan. The removal accounts for almost 25% of the permeability objectives in the Draft Plan and should not be deleted. The measures are crucial to reducing transport emissions and facilitates simpler and faster access to local services, amenities and public transport via routes not open to cars. It also facilitates the realisation of the 10-minute concept which is supported by planning policy and the CDP.</p> <p>Consistency Across the Planning Policy Hierarchy The submission highlights that in accordance with the Planning and Development Act (Section 19(2)) that and LAP needs to be consistent with higher tier plans and the deletions would be consistent with the planning policy hierarchy. The submission considers the deletion of the measures would be contrary to RE P12, UD O3, TM P1, TM P2, TM T2, TM T3, TM O7, TM O20, TM O23, TM A2, TM A3, TM A5, TM A12 and TM A13 of the Kildare CDP 2023-2029. Furthermore, it would be at variance to RPO 4.41, RPO 8.1, RPO 8.4 and RPO 9.10 of the RSES and the overarching National Strategic Outcomes NSO 1, 2, 4, 7, 8 as well as NPO 27, 54 and 64 of the NPF.</p> <p>It is also stated that the removal of the measures is not consistent with the GDA Transport Strategy 2022-2042, to which an LAP is</p>

	<p>required to be consistent under Section 19(2A) of the Planning Act. The submission also considers that removing the permeability measures are inconsistent with the National Sustainable Mobility Policy and the Programme for Government.</p> <p>The submission request that in order to align the Draft Plan with the CDP, the RSES and the NPF permeability and cycle measures should be reinstated.</p>
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Chief Executive’s Opinion

The comments raised in respect of the Cycling Measures to be removed under the Proposed Material Alteration No. 48 are noted.

It was the Chief Executive’s Opinion at the Special Meeting (July 2023) on the Draft Kildare Local Area Plan 2023-2029 that the proposed permeability and cycling measures formed part of an overall network of measures and no measures should be removed. The Elected Members were advised that the cycling strategy contained in the Draft Plan, was informed by the Kildare Town Transport Strategy, which seeks to create convenient, efficient routes to key destinations such as the train stations, bus stops, schools, in order to reduce walking trip distances to give non-motorised modes a competitive advantage over private cars. It was highlighted that this is particularly important given the Climate Action Plan 2023 (CAP 23) targets for carbon emission reductions in the transport sector (50% reduction by 2030).

The permeability and cycling measures form an overall network within the town which will make it easier to move from private car to sustainable modes of transport. While at first glance they may appear to be ‘connecting estates’ they actually form a larger network of links to reduce walking distances to key attractors, thereby it is important to keep in mind the ‘bigger picture’ rather than looking at a measure in isolation. However, the Elected Members resolved to place the proposed material alteration to the Draft Plan on public display.

The Office of the Planning Regulator has made a Recommendation in respect of PMA 48 which states that the Plan is required to be made without Proposed Material Alteration 48. The OPR in their submission states that where an authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations of the Office, under the provisions of section 31AO(5) of the Act the chief executive must inform the Office accordingly and state the reasons for the decision of the planning authority.

Similarly, the National Transport Authority in their submission note the proposed removal of seven Cycling Measures. They state that in the context of the Plan’s aims and objectives to reduce car dependency in the town and to encourage modal shift, the implementation of the measures is critical in order to meet these targets. The NTA also recommend that PMA 48 should not proceed and the measures should remain part of the Plan.

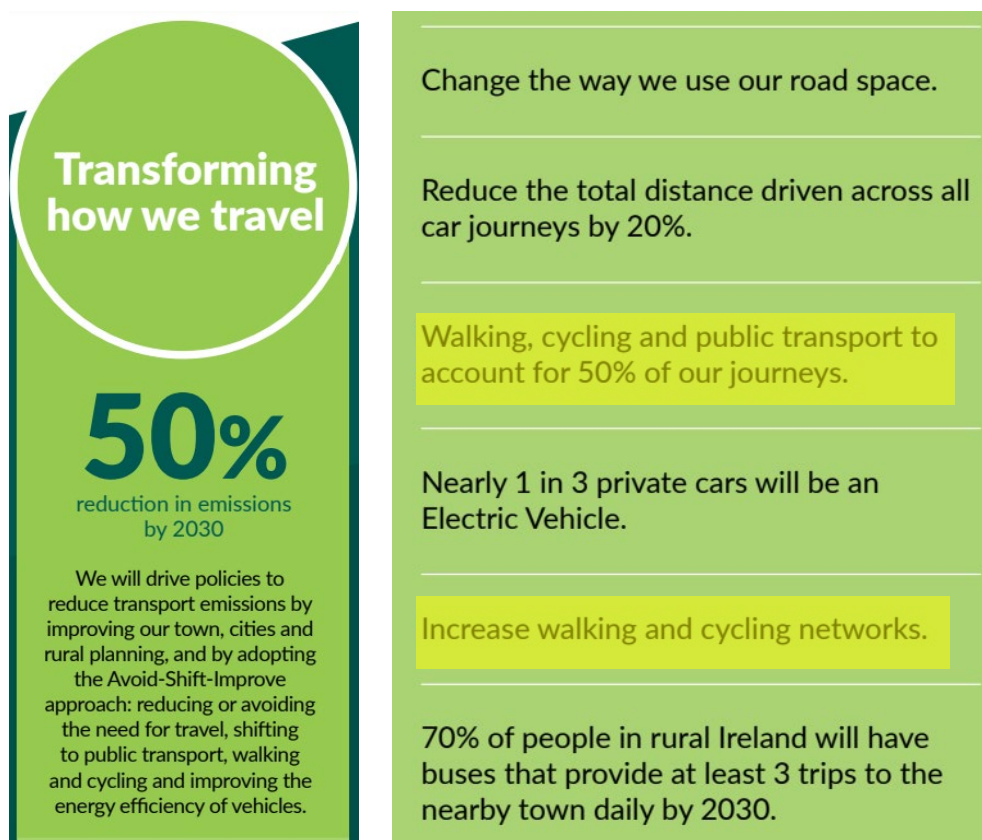
The Chief Executive would like to state the following in respect of PMA 48:

The transport sector in Ireland is undergoing a transformation to a low-carbon future. This is non-negotiable.

CAP 23 outlines that we have to achieve a 50% reduction in transport related emissions by 2030 – i.e. **we have to cut transport emissions in half**. Figure 12 illustrates the CAP 23 requirements for transport. Two of these major targets relate directly to active travel and are highlighted in yellow. Not only does CAP 23 stipulate that we have to increase walking and cycling networks – it states that by 2030 **half of all trips are to be via active travel or public transport**.

Implementing a **cohesive** walking and cycling travel network in our towns is not a nicety – it's a requirement and we are bound to these targets. Recent extreme weather events in Ireland only underscore the urgency of this situation.

Figure 12 Summary of CAP 23 Transport Related Requirements



In addition to the CAP 23 document, there are numerous other national policy documents advocating for active travel, including retrofitting permeability links into existing built-up areas. Some highlights from these documents are detailed below for context.

5. GDA Transport Strategy 2022 – 2042

Section 8.7: Filtered Permeability

“Facilitating movement by walking and cycling is a critical element of neighbourhood planning. In particular, the concept of filtered permeability, whereby pedestrians and cyclists can travel through areas and motorised traffic cannot, is important in conferring an advantage on these modes making them safer and more attractive than the car for short trips to local services. This concept has been applied in multiple locations across the GDA, both in new developments and via retrofitting of new links into existing areas.

In existing urban and suburban areas which are defined by cul-de-sacs and boundary walls which segregate neighbourhoods – often along social class lines – the “breaking through” of these barriers to allow access for pedestrians and cyclists, including connections to nearby public transport can be problematic. Many schemes, however, have been successfully realised by the local authorities in the GDA, in collaboration with the NTA.”

The extract below illustrates measure PLAN7 of the Strategy. Emphasis has been added.

Measure PLAN7 – Filtered Permeability

Development Plans, SDZ Planning Schemes and Local Area Plans in the GDA should ensure that the road and street networks in new development areas are designed on the basis of providing for filtered permeability, and should incorporate measures which deliver filtered permeability in existing neighbourhoods.

6. NTA Permeability Best Practice Guidelines

“People need to access services and workplaces on a daily basis. An approach to urban development which creates choice in this regard is therefore required. This guidance note seeks to provide a basis for the delivery of this choice in existing built-up areas by promoting permeability for pedestrians and cyclists, thereby addressing the legacy of severance built-in to recent expansions of Irish towns and cities.”

“A permeable district can contribute to a range of planning objectives related to design, social integration and transport. Permeability can enhance the attractiveness of a neighbourhood through the provision of additional useable open space; can increase social interactions by facilitating more activity in the public realm and can maximise the potential for walking and cycling to a range of services.”

7. National Planning Framework

National Strategic Outcome 4 – Sustainable Mobility

“Develop a comprehensive network of safe cycling routes in metropolitan areas to address travel needs and to provide similar facilities in towns and villages where appropriate”.

National Strategic Outcome 7 - Amenities and Heritage

“Implementation of planning and transport strategies for the five cities and other urban areas will be progressed with a major focus on improving walking and cycling routes, including continuous greenway networks and targeted measures to enhance permeability and connectivity.”

8. Kildare County Development Plan

TM A3: *“Identify filtered permeability measures including, home zones and low-traffic neighbourhoods in all towns throughout the county in order to reduce greenhouse gas emissions and promote a more sustainable, connected way of life for the citizens of the county.*

TM O21: *“Ensure site layout proposals detail present and possible 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 A12: *“Seek funding to develop Local Permeability Schemes in conjunction with the NTA in order to maximise access to town centres, local shops, schools, public transport services and other amenities.”*

TM O41: *“Generate additional demand for public transport services by strengthening development around existing and planned high-capacity transport routes and interchanges and by reducing walking and cycling distances through the implementation of local permeability improvement and improving access to public transport as part of road improvement projects where possible.”*

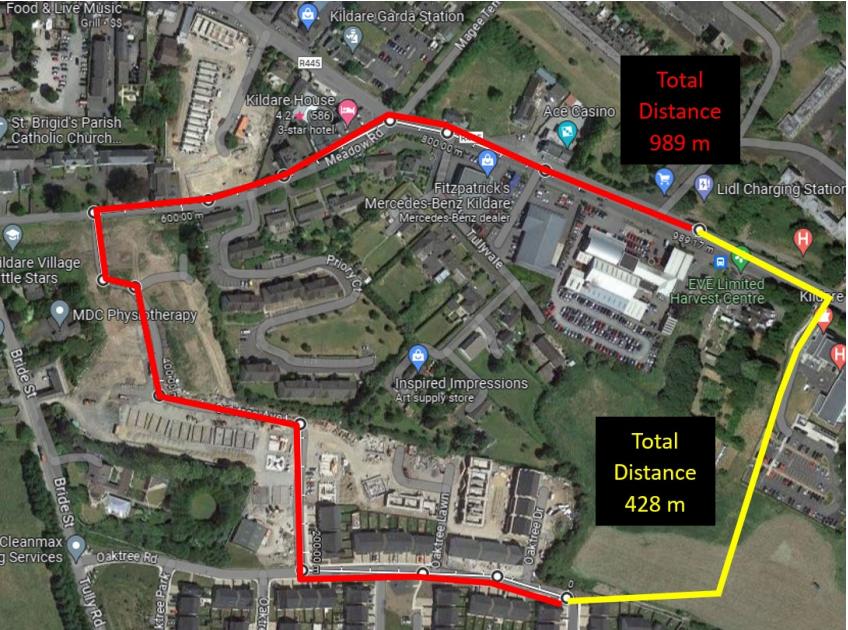
From the above, the following points are clear:

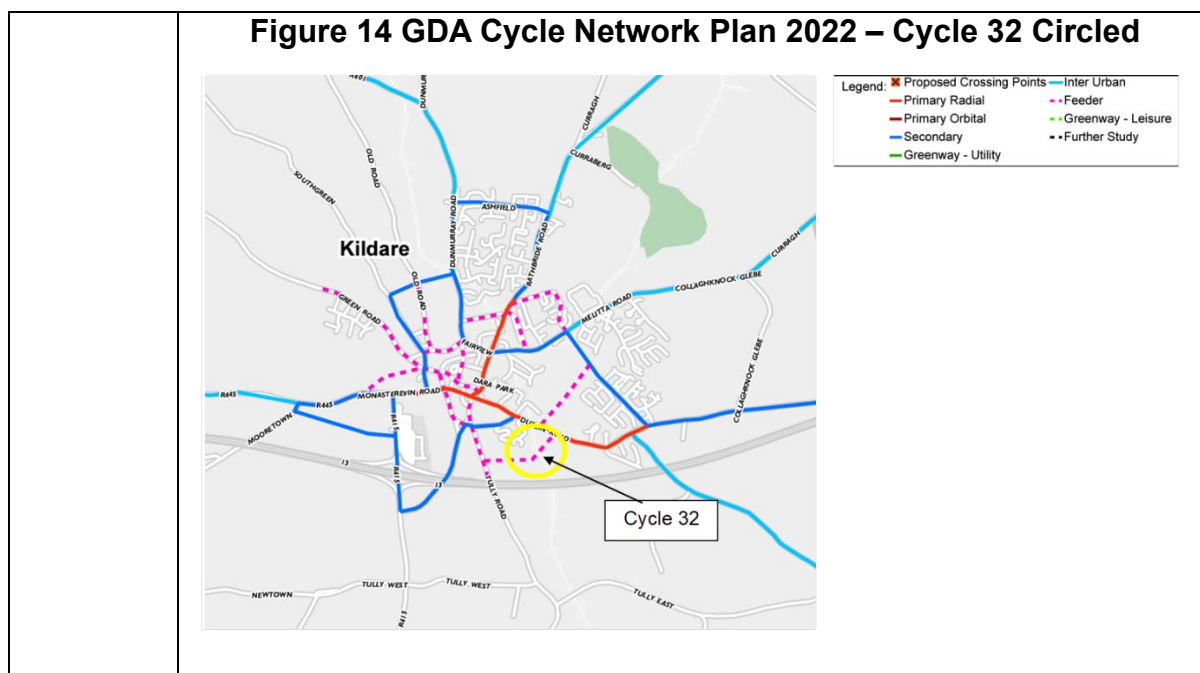
1. There is an urgency to decarbonise the transport sector in Ireland and permeability is a key link in this process.
2. A cohesive walking network with permeability links working together to create routes to key destinations is the way forward. Missing links within the network undermine the benefits of the whole.
3. Permeability and cycling links are both supported by various policy documents and are a requirement to achieve our CAP 23 targets.

In the context of Kildare Town, the first step to achieving this low-carbon future is to make a plan – hence the Kildare Town Transport Strategy. This multi-pronged transport plan underwent several rounds of consultation with the Public, Elected Members and other key stakeholders. The cycling measures included in the Draft were derived from this evidence-based study. As noted in the Draft Plan the

measures are a broad reckoning which indicates they are suitable for inclusion, the progression in the future of the measures will include detailed design, where many of the concerns raised can be mitigated.

Proposed Material Alteration No. 48 relates to seven of the Cycling Measures detailed under Table 7-2 and Map 7.2 of the Draft Plan. The following details the specific benefits of the links proposed to be removed.

Cycle Measure	Details on the importance of the specific measure
<p>Cycle 32</p>	<p>Cycle 32 coincides with Permeability Measure 34 (please refer to details relating to PERM 34 under PMA No. 43). The proposed measure is for pedestrian / cyclist only, the road objective (PA 3) is proposed to be removed under PMA 62. The cycle measure will provide much improved access to the primary care centre, the Lidl on the R445 and bus stops on the R445. It will also provide a better route up to the schools' campus south of the Melitta Road once phase 2 of the Former Magee Barracks project is complete. The benefits of the measure will predominately benefit the residents of Oaktree Estate. As an example, the reduction in distance from Oaktree estate to the bus stop on the R445 has been calculated to highlight the benefits of this link. Figure 1 below illustrate this calculation. The distance saved is 561 m.</p> <p>Figure 13 Distance to Bus Stop on R445 with or without PERM 34</p>  <p>Furthermore, Cycle 32 is also identified as a feeder cycle link in the Greater Dublin Area (GDA) Cycle Network Plan 2022, therefore removal from the Kildare Plan is unrealistic as it is already set out in national policy.</p>

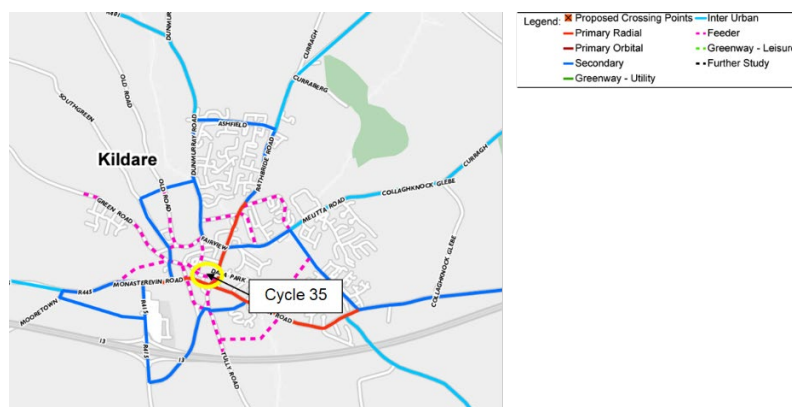


Cycle 34 Cycle 34 proposes to create a local access only street, allowing provision for active mode priority. It does not propose to ban vehicles entirely and residents will still have access. This will be highly beneficial to the residents along this link. It is considered that the implementation of the measure will stop this lane being used as a rat run from Chapel Lane to the R401 and will force traffic to use the new proposed Northern Link Street Road (Road Measures Map 7.4, refers).

Cycle 35 This cycle measure proposes creating a local access only street, allowing provision for active mode priority. There is no proposal to ban vehicles entirely and residents will still have access. This will be highly beneficial to the residents along this link and will provide a safer route for cyclists into the town centre.

Furthermore, Cycle 35 is identified as a feeder cycle link in the Greater Dublin Area (GDA) Cycle Network Plan 2022, therefore removal from the Kildare Plan is unrealistic as it is already set out in national policy.

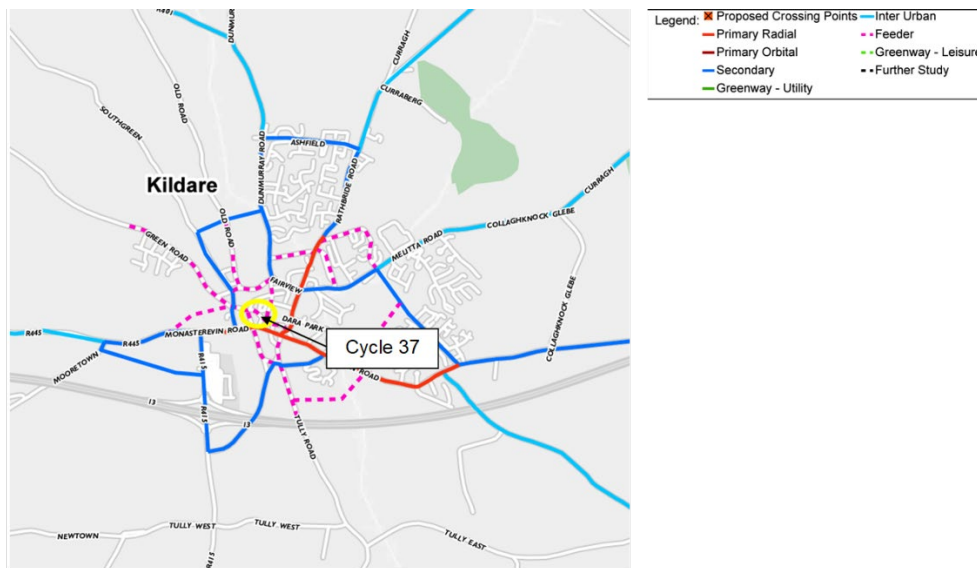
Figure 15 GDA Cycle Network Plan 2022 - Cycle 35 circled



Cycle 37

Cycle 37 is identified as a feeder cycle link in the Greater Dublin Area (GDA) Cycle Network Plan 2022, therefore removal from the Kildare Plan is unrealistic as it is already set out in national policy. The exact type of cycling infrastructure for this link will be determined at detailed design stage. Removing this link reduces the options available to cyclists accessing the town centre.

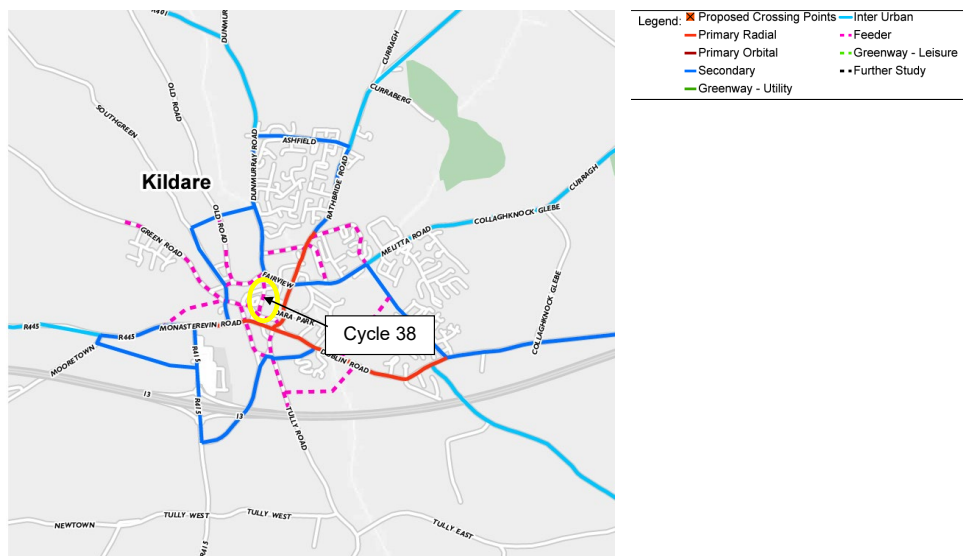
Figure 16 GDA Cycle Network Plan 2022 - Cycle 37 circled



Cycle 38

Cycle 38 is identified as a feeder cycle link in the Greater Dublin Area (GDA) Cycle Network plan 2022, therefore removal from the Kildare Plan is unrealistic as it is already set out in national policy. The exact type of cycling infrastructure for this link will be determined at detailed design stage. Removing this link reduces the options available to cyclists accessing the town centre.

Figure 17 GDA Cycle Network Plan - Cycle 38 circled



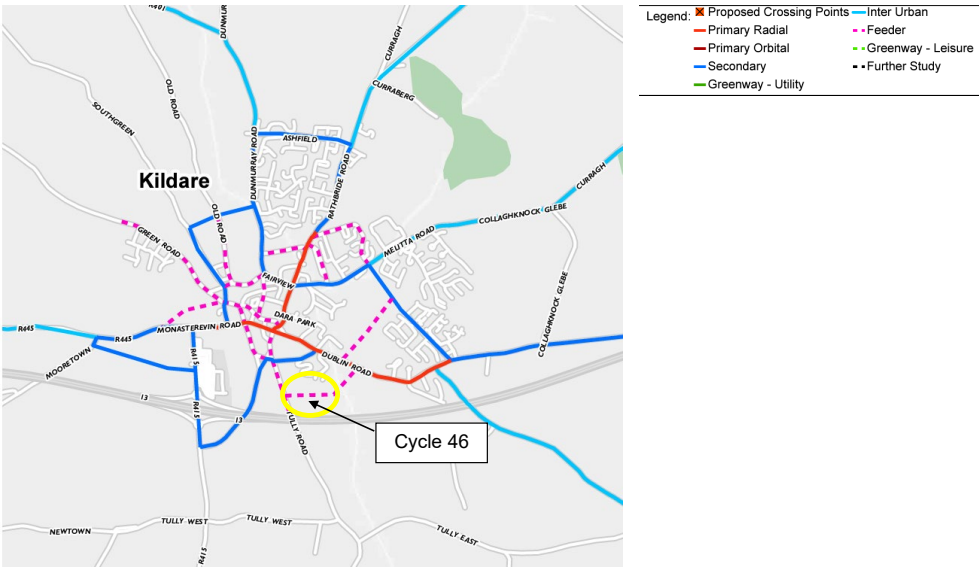
<p>Cycle 46</p>	<p>Cycle 46 is identified as a feeder cycle link in the Greater Dublin Area (GDA) Cycle Network Plan 2022, therefore removal from the Kildare Plan is unrealistic as it is already set out in national policy.</p> <p style="text-align: center;">Figure 18 GDA Cycle Network Plan 2022 - Cycle 46 Circled</p> 
<p>Cycle 58</p>	<p>Cycle 58 coincides with PERM 41 (please refer to details relating to PERM 041 under PMA No. 43). The measure is predicated on the delivery of Cycle 32, which will provide much improved access to the primary care centre, the Lidl on the R445 and bus stops on the R445.</p> <p>This proposed Cycle link 58 would provide a direct and convenient link to the new planned Cherry Avenue Park to the west of Oaktree Estate. This will provide a fantastic amenity to the local residents. While it could be argued that cycle link 32 will also provide access to the new park, Cycle 58 will shorten the distance to the park and remove the need for cyclists to travel along the busy R445 to get to the park. The distance saved by including link 58 to the new park is approximately 327 m (as below).</p>

Figure 19 Distance to Cherry Avenue Park with or without Cycle 58



Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 48 should not be adopted by the Elected Members to create a compact and connected communities by promoting the use of sustainable active transport modes.

Proposed Material Alteration No. 49

No submission / observation has been received in respect of PMA 49.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 49 should be adopted by the Elected Members.

Proposed Material Alteration No. 50

Submission	Summary of Issue
023 Cunnaberry Hill, Oaktree Residents Association	PMA 50 – the Draft Plan on Map 7.2 showed a blue line as a link road. The number associated with the link is 46. It is stated that link road through the development of Cunnaberry Hill shall be strongly contested by the residents.

Chief Executive's Opinion

Map 7.2 of the Draft Plan relates to Cycling Measures that are provided for under Table 7-2 of the Plan. Cycle 46 as indicated by the blue line of the map provides for Oaktree Road improvement, the proposed link type to be determined by detailed study. This proposed cycle measure has been proposed to be removed under PMA 48. However, the OPR have recommended that the Plan be made without the inclusion of PMA 48.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 50 should be adopted by the Elected Members.

Proposed Material Alteration No. 51, 52, 53 and 54

No submission / observation has been received in respect of PMA 51, 52, 53 and 54.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 51, 52, 53 and 54 should be adopted by the Elected Members.

Proposed Material Alteration No. 55

Submission	Summary of Issue
043 Eoin Leavy	The introduction of a new bus stop under PMA 55 is welcome.

Chief Executive's Opinion

The support in relation to PMA 55 is noted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 55 should be adopted by the Elected Members.

Proposed Material Alteration No. 56

Submission	Summary of Issue
024 Judith Boyle	<p>PMA 56</p> <p>The provision of coach parking is noted; however, it is stated that the Plan does not account for the loss of parking in the main street and no loading bays are planned. They are concerned that town centre businesses will be in direct competition with businesses that have ample parking close to their shops, adding to the uncompetitive location of being in the town centre and going against the plan to rejuvenate the town centre.</p> <p>The submission also refers to PMA 29 in the context of parking in the town centre, that an ageing population need to be able to access the town centre and have a safe well-lit parking area close to the town centre.</p>
036 Seán O'Feargháil	<p>Car Parking</p> <p>The submission refers to land to the rear of Cunningham's and Bank of Ireland for parking. It is suggested that the Council should develop a low-rise style/ two-storey carpark facility to meet the needs of the town.</p>

Chief Executive's Opinion

The comments in relation parking and loading bays are noted. The car parking measures under Table 7-5 propose to create a new or upgraded town centre off-street car park (PK 3, refers). One of the possible locations is at the Bride Street location which is the subject of the Proposed Material Alteration 56. As detailed in the Kildare Town Transport Strategy it is not envisaged to increase parking supply in order to encourage more sustainable travel modes but rather to off-set the loss of spaces from Market Square.

In respect of loading bays, it is important to note that a complimentary parking measure in the Kildare Town Transport Strategy is the review of HGV loading bays. The Strategy notes, it will be necessary in the future to review the HGV loading bays used throughout Kildare Town to optimise the operation of heavy vehicle traffic in the town and support the proposals of the Transport Strategy. These measures are an operational matter for the Area Engineer and therefore, outside the remit of the strategic land use plan.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 56 should be adopted by the Elected Members.

Proposed Material Alteration No. 57, 58, 59, 60 and 61

No submission / observation has been received in respect of PMA 57, 58, 59, 60 and 61.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 57, 58, 59, 60 and 61 should be adopted by the Elected Members.

Proposed Material Alteration No. 62

Submission	Summary of Issue
024 Judith Boyle	<p>PMA 62</p> <p>The submission states in respect of the changes to RD4 and the insertion of RD 6, that by making Meadow Road one way will direct all traffic on to Grey Abbey Road towards the M7 and Junction 13 which is at variance with national, regional and local planning policy.</p> <p>Grey Abbey Road is already blocked with traffic to schools and the KTOV. The junction at the parish church is extremely dangerous, sightlines are not clear, and cars travel too fast. It will essentially cut them off from medical facilities and shopping on the Dublin Road and have an undesired effect to encourage them to use the M7 to access nearby towns instead of staying in their locality.</p>
023 Cunnaberry Hill, Oaktree	<p>The Residents Association welcomes the 'proposed deletions', in particular; PA 3</p>

Residents Association	
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Chief Executive's Opinion

The concerns raised in the submission are noted. As detailed under the proposed material alteration the one-way system will be trailed and in the event that the trails are not successful the potential future link RD 6 will be investigated to support the implementation of the one-way system on Meadow Road.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 62 should be adopted by the Elected Members.

Proposed Material Alteration No. 63

No submission / observation has been received in respect of PMA 63.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 63 should be adopted by the Elected Members.

Proposed Material Alteration No. 64

No general submission / observation has been received in respect of PMA 64. The OPR and the NTA referred to PMA 64 in their submissions.

The OPR also Recommend making the Plan without PMA 64. The OPR state there is no clear justification for the current road proposal evident from either the spatial pattern of growth planned for in the draft Plan or the transport strategy prepared to inform the draft Plan. The NTA recommends that PMA 64 is not included as its inclusion would not be considered to be consistent with the Transport Strategy, specifically the circumstances for the progress of road schemes as set out in Measure ROAD1.

The Chief Executive's Opinion at the Special Meeting on the Draft Kildare Local Area Plan 2023-2029 considered the Outer Relief Road should not form part of the Development Strategy for the town given the lack of evidence to support the measure. However, the Elected Members resolved to place this material alteration to the Draft Plan on public display.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 64 should not be adopted by the Elected Members (see Section 3 of this Report).

Proposed Material Alteration No. 65

Submission	Summary of Issue
024 Judith Boyle	PMA 65 In respect of the changes to MTO 3.6 to make Nugent Street one way and to close Bride Street will hinder movement, travel times will increase, it will hinder access from one side of the town to the train station going against making a commute to work and

	education easier. The submission also refers to the HGV ban as part of Objective MTO 3.6 and they note while good in theory these is issues with deliveries and there are no loading bays, this will make the town centre unattractive to commercial and tourist activities.
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Chief Executive's Opinion

The concerns raised in the submission are noted. The objective is to 'investigate the possibility' of a one-way system on Nugent Street and also the 'possibility' of a future HGV ban. The Council are cognisant of the potential impact that the proposed measures could have on the town centre but are aware of the benefits too.

Therefore, the objective to support the measures warrants inclusion in the Plan in order to investigate their feasibility during the lifetime of the Plan.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 65 should be adopted by the Elected Members.

Proposed Material Alteration No. 66 and 67

No submissions / observations have been received in respect of PMA 66 and 67.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 66 and 67 and should be adopted by the Elected Members.

Proposed Material Alteration No. 68

Submission	Summary of Issue
024 Judith Boyle	The submission welcomes the use of the school car park however states that this will not help the traffic or parking issues when children are collected and dropped off and these are significant times where extra parking required.
036 Seán O'Feargháil	In respect of the De LA Salle school car park it is stated that agreement is need with the school and Board of Management and in its absence is premature.
044 St Brigid's Primary School	PMA 68 inserts a new objective relating to the De La Salle school. The submission states that while the Board of St. Brigid's Primary School is happy to support KCC no plan or agreement for the use of school premises for public parking or use is in place or is envisaged as feasible or practical in the future.

Chief Executive's Opinion

The concerns raised in the submission are noted. It is acknowledged that no agreement is in place with the school to use the premises outside of the school term or operating hours. However, subject to the agreement with the school given the

location of the site in close proximity to the town centre the provision of public parking on the site would be a benefit to the town.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 68 should be adopted by the Elected Members.

Chapter 8 Built Heritage

Proposed Material Alteration No. 69, 70, 71, 72, 73, 74 and 75

No submissions / observations have been received in respect of PMA 69, 70, 71, 72, 73, 74 and 75.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 69, 70, 71, 72, 73, 74 and 75 should be adopted by the Elected Members.

Chapter 9 Natural Heritage and Green Infrastructure

Proposed Material Alteration No. 76

No submission / observation has been received in respect of PMA 76.

Chief Executive's Opinion

The Strategic Environmental Assessment (SEA) Addendum Report which was placed on public display alongside the Proposed Material Alteration Report recommended that the proposed bee-hive initiative contained in PMA 76 be removed in subsequent alterations. It has been advised that the use of honeybee hives is not an evidence-based measure for the benefit of biodiversity and could result in unintended negative impacts on native bee species³. Therefore, it is recommended that the proposal for a "local bee-hive initiative" be removed from objective NHO 2.4.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 76 should be adopted by the Elected Members with a minor modification.

Chapter 9 Natural Heritage and Green Infrastructure amend Objective NHO 2.4 as follows:

- NHO 2.4** Support the preparation of a Biodiversity Action Plan for Kildare Town including the development of a Community Biodiversity Toolkit, *a Tree Planting Programme and local Bee-hive Initiative*, in line with all national policy documents that relate to biodiversity.

Proposed Material Alteration No. 77

No submissions / observations have been received in respect of PMA 77.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 77 should be adopted by the Elected Members.

Proposed Material Alteration No. 78

No submission / observation has been received in respect of PMA 78.

Chief Executive's Opinion

Following consultation with the Council's Biodiversity Officer, reference to 'specimen' oak in Objective NHO 4.2 should be removed. While the benefit of a specimen oak tree providing a focal point is noted, it is considered that in a development where green space is limited the provision of 'specimen oak' may result in the planting of a lone tree where a small pocket of woodland planting would be better for biodiversity.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 78 should be adopted by the Elected Members with a minor modification.

³ [Beekeeping is important, but getting honey bee hives is not an action that is helping the All-Ireland Pollinator Plan » All-Ireland Pollinator Plan \(pollinators.ie\)](#)

Chapter 9 Natural Heritage and Green Infrastructure, amend NHO 4.2 as follows:

- NHO 4.2** Require all new residential developments (of 10 units or more) and commercial developments (on sites 0.5ha or larger) to include *mixed native* tree-planting proposals, to include *specimen Oak*, in the range of 1-5% site coverage, depending on the nature of the proposed use and function of associated open spaces.

Chapter 10 Infrastructure and Environmental Services

Proposed Material Alteration No. 79, 80 and 81

No submissions / observations have been received in respect of PMA 79, 80 and 81.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 79, 80 and 81 should be adopted by the Elected Members.

Proposed Material Alteration No. 82

Submission	Summary of Issue
<p>045 MRP Oakland Ltd</p>	<p>Map 10.2 – Proposed Material Alteration No. 82 PMA 82 related to a revised pluvial flooding map. The submission notes that the relevant flood report that guided this map has not been provided so it is not possible to directly assess the origin of the flooding indicated.</p> <p>Two assumption scenarios have been provided as to the reasons behind the pluvial flooding associated with the subject lands.</p> <div data-bbox="730 1010 1098 1352" data-label="Image"> </div> <p>Assumption Scenario 1: Development Site Pluvial Flooding Pluvial flooding may have been determined to accumulate as a result of development at the proposed development site. In response to this it is stated that it should be noted that the proposed development at the site would be required to accommodate its own drainage with design to 1 in 100 year with suitable climate change and urban creep in accordance with the Kildare CDP.</p> <p>Assumption Scenario 2: Overland Flow Directed from Neighbouring Site Pluvial flooding may have been determined to flow overland from a neighbouring site, directly to the south. The submission contends that the flood zone indicated on the development site results directly from the incorrect interpretation of the surface water runoff and associated flood risk in the area. It is believed that the pluvial flooding assessment has been based on a high-</p>

	<p>level review of aerial imagery and that the lands in question have been incorrectly identified as impermeable hard standing material, e.g., concrete or pavement. It is also stated that the area assumed to discharge to the development site currently consists of an exercise arena for horses with a permeable sand-based surface and does not provide an increase in runoff to the development site.</p> <p>The submission queries the validity and accuracy of this flood extent as the extent of pluvial flooding appears unreasonably large compared to the area assumed to drain to it.</p> <p>The proposed development will provide a wall along the boundary, so any surcharge drainage routes from the neighbouring site would be blocked and thus would require the adjacent site to manage their own drainage within their own site.</p>
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Chief Executive's Opinion

The comments raised in the submission is noted. The submission appears to only examine PMA 82 and not PMA 114 (Strategic Flood Risk Assessment). There was a note on page 40 under PMA 82 of the Report that PMA 114 should also be viewed. As stated under PMA 114 a pluvial model was developed to inform the identification of areas within the LAP area that may be susceptible to surface water flooding. It is stated in the revised SFRA that a 'two-dimensional 'rain-on-grid' flood model was built in AutoDesk Infoworks ICM and included 5m photogrammetric DTM, Spatially Varying Manning's Roughness, building representation, Met Eireann depth duration frequency rainfall, design rainfall event hyetographs and an allowance for infiltration and urban drainage losses'.

Pluvial flood risk to the site is demonstrated through the overland flow path identified within Sub-catchment 03 of the Surface Water Study and the pluvial model summarised in PMA 114. Neither assumption Scenario 1 or Scenario 2 presented in the submission recognises the relevant potential for overland flow paths entering the site from the north leading to potential surface water flooding to the site.

It is important to note that the revised Map 10.2 presents a 'Pluvial Flood Risk Assessment Zone' which identifies site locations which will be required to undertake a site-specific flood risk assessment. The submission misrepresents Map 10.2 as illustrating a 'flood extent'.

In respect of the 'proposed boundary wall' as referred to in the submission it is a requirement of the Plan's SFRA that 'development should not impede existing flow paths or cause flood risk impacts to surrounding areas'.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 82 should be adopted by the Elected Members.

Chapter 11 Implementation

Proposed Material Alteration No. 83 and 84

No submissions / observations have been received in respect of PMA 83 and 84.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 83 and 84 should be adopted by the Elected Members.

Proposed Material Alteration No. 85

Submission	Summary of Issue
025 Pouterle Limited	The submission supports the newly defined Southgreen Key Development Area and the complementary uses, of which a significant portion is part of the landholding owned by Pouterle Ltd. However, they request that the SR: Strategic Reserve zoning be retained.
026 Round Tower GAA Club, Kildare Town Athletics Club and Kildare Town AFC	<p>The submission relates to sport facilities and open space in Southgreen KDA. The submission states, as a representative of the majority of those engaged in recreational sport in the town fully supports efforts of the landholder, Pouterle Ltd, to retain zoning SR: Strategic Reserve on a southern portion of lands as originally proposed in the Draft Plan, as the requirements for a sports campus are met fully in the lands zoned F.</p> <p>In respect of PMA 85 it is stated a large quantum of the KDA has capacity to facilitate a new sports campus and is fully supported. The submission reference an indicative drawing that has been submitted with the submission which relates to 13.36 ha of the subject lands and has the ability to facilitate the provision of a community sports campus that includes a sports hall/ community hall, play area, multipurpose pitches, athletic track, GAA pitches and parking.</p> <p>The submission states the merits of the site are that it is 19 mins walk from the train station and town centre, a contiguous parcel of land, close to the post-primary school, easy extension of active routes, free draining soil and flat topography, benefit integrated community development, close to existing and proposed residential units and the northern part is used as GAA pitches on a temporary basis.</p> <p>The submission also wishes to highlight the distance between the location proposed and the PMA is only 250m / 3 mins.</p>



Chief Executive's Opinion

The comments in relation to the subject lands are noted. As detailed under Section 3 of the report in response to the OPR submission, it is the recommendation of the Chief Executive that PMA 91 is not adopted into the Plan. It is considered that the given the significant distance of the northern-most part of the landholding from the built-up area of the town, it is not appropriate to extend the land use to this point. While it is noted there are existing GAA playing pitches located on the lands, permission have not been granted for same. It is the Chief Executive's Opinion that to promote compact, consolidated growth, and to ensure that future amenities are in reasonable walking and cycling distance from existing and permitted residential areas, that the lands proposed to be zoned under PMA 92 and PMA 111 given their location and size can sufficiently deliver strategic open space. Therefore, the removal of lands to the north of the Southgreen Key Development Area (PMA 91 refers) should be removed from the proposed design framework.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 85 should be adopted by the Elected Members with a minor modification.

Chapter 11 Implementation, Figure 11-3 Southgreen Key Development Area Design Framework, delete the portion of the KDA outlined in red:



Proposed Material Alteration No. 86

No submissions / observations have been received in respect of PMA 86.

The submission from Uisce Éireann considered in Section 4 of this report refers also.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 86 should be adopted by the Elected Members.

Proposed Material Alteration No. 87

Submission	Summary of Issue
<p>035 Value Retail Dublin Ltd.</p>	<p>Proposed Material Alteration No. 87</p> <p>The submission refers to the importance of ancillary food and beverage to the operation of the KTOV, and states that it is something visitors expect and have formed part of the three phases of planning applications. However, they do not feel there is a need to include any reference to café/restaurant/eateries in the zoning objective. The submission does not support the PMA and consider it does not align with national level guidelines, is anti-competitive and not appropriate to a zoning objective.</p> <p>The submission refers to the Chief Executive's report on the submission on the Draft and believes the recommendation of the Chief Executive's Report is considered more suitable than the wording put forward in PMA 87.</p> <p>The submission revisited the issue raised on the Draft Plan regarding the use of a 'Retail Outlet Centre' zoning and considers it strange that the PMA focuses more on café/restaurant/eateries than retailing in an Outlet. The submission questions whether the change is contrary to national level guidance and inappropriate given the use is ancillary to the overall retail use.</p> <p>In this context, the submission refers to the Development Plan Guidelines 2022 where it is stated that '<i>certain zoning objectives can also be overly specific or narrowly devised, which is not appropriate to the general purpose of land-use zoning</i>'. In this context the submission states that the detailed focus on café/restaurant/eateries as part of the Retail Outlet Centre zoning objective is contrary to these Guidelines. The submission also refers to the Guidelines where it is stated that '<i>the planning authority should exercise care and caution in drafting development plan objectives, as the quality of the wording and content will have an impact on the realisation or otherwise of the objective</i>'.</p> <p>It is submitted that the unintended consequence of the PMA relates to competition and anti-competition issues which Section 2.5.3 of the RPGS are very clear as follows:</p>

	<p><i>The planning system should not be used to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting and implementing these Guidelines, planning authorities and An Bord Pleanála should avoid taking actions which would adversely affect competition in the retail market. In particular, when the issue of trade diversion is being considered in the assessment of a proposed retail development, planning authorities and An Bord Pleanála should assess the likelihood of any adverse impacts on the vitality and viability of the city or town centre as a whole, and not on existing traders.</i></p> <p>The submission noted this text is in the context of 'retail' but can apply to café/restaurant/eateries, particularly as the PMA makes it part of a 'retail' zoning objective. The submission raises the issue of anti-competitive issues with no 'assessment', as it is stated that no assessment has been carried out to provide evidence that café/restaurant/eateries in the KTOV will impact on the vitality and viability of the town centre. Reference is made to the Draft Plan being evidence based but the PMA has not been prepared on foot of clear evidence but rather through motions. In this regard the submission refers to another aspect of the DPGs as follows:</p> <p><i>'Ensuring that the economic or employment strategy of the development plan is translated into the appropriate land-use zoning proposals is an important consideration in the plan preparation process. The evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature'.</i></p> <p>The submission states that while the Local Authority have evidence and a rationale for the strategic need to support the 'Outlet Centre', there is no evidence to warrant any reference to café/restaurant/eateries in the 'zoning objective', a matter of detail best left to planning applications. It is stated there is no evidence to support a restriction on café/restaurant /eateries on the subject lands and only these lands in the town of Kildare. The submission uses the following from the DPGs in this context:</p> <p><i>'As development planning becomes more data-driven, the value of spatial data is critical to the planning process in supporting transparent and evidence-based decision making. From the core strategy to zoning decisions, to planning permission and commencement of construction, the planning system must incorporate data collection and analysis at all stages'.</i></p> <p>The submission states that no evidence base has been presented that has formed the basis of the focus on café/restaurant/eateries at KTOV or how the results of such evidence and analysis show that</p>
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	<p>the restrictions that would be placed on food and beverage sales at KTOV, if the material alterations were to be adopted, are necessary in order to protect the primacy of the town centre.</p> <p>The submission refers to how it supports trade in the town centre in terms of bed space for overnight guests as a result of marketing promotions between local hotel sand the KTOV and also clients engage with food operators in the town. The submission quotes the owners of Firecastle, Hartes, Cunningham's Bar and Silken Thomas on how the KTOV positively impacts their businesses in the town.</p> <p>The submission requests the removal of any reference to "café/restaurant/eateries" which would result in the complete deletion of all text in the last paragraph of 'D: Retail Outlet Centre' zoning objective'.</p> <p>The submission in respect of the PMA notwithstanding the content of the submission but if the PMA is to be adopted suggests that <i>'new additional floorspace for'</i> café/restaurant/eateries, is added as a minor change to the PMA.</p> <p>The submission includes a table in Annex 1 where the Development Plan Guidelines require clear evidence to allow policies, zonings and objectives to be included in the Plan.</p>
<p>036 Seán O'Fearghail</p>	<p>PMA 87 Kildare Village</p> <p>No additional restrictions on its ability to trade or the nature of its offer should be included in the Plan.</p> <p>Very careful monitoring of the hospitality provision at the Village is required to ensure hospitality facilities onsite do not negatively impact those which are available in Kildare Town.</p> <p>Connections between the town and Kildare Village should be strengthened and further developed.</p>

Chief Executive's Opinion

The comments raised in the submission are noted. In recognition of the important role the KTOV plays in Kildare Town, and also the importance of the provision of café/restaurant/eateries within the overall complex, it is considered warranted to provide a clear framework for such uses within the overall land use zoning objective. Reference to 10% of the total permitted gross floor area under PMA 87 fully acknowledges that ancillary food and beverage formed part of the three phases of planning applications.

These uses are 'Permitted in Principle' only within the town centre land use zoning in the Draft Plan. However, under the Draft Plan restaurant was 'Not Normally Permitted' within the Retail Outlet Centre land use zoning, this is proposed to be amended under PMA 98. To ensure that the principal use of a 'retail outlet' village is

maintained, the growth of café/restaurant/eateries is confined to 10% of the permitted gross floor area across the three phases of the KTOV. This revision also provides flexibility in terms of the re-location of existing permitted café/restaurant/eateries within the overall KTOV. The permitted gross floor area attributed to café/restaurant/eateries currently represents less than 10% thereby allowing for growth within pre-determined parameters as detailed in the land use zoning objective.

The comments in relation to the additional text to refer to ‘*new additional floorspace for*’ café/restaurant/eateries as a minor modification are noted and accepted,

Chief Executive’s Recommendation

It is recommended that Proposed Material Alteration No. 87 should be adopted by the Elected Members with a minor modification.

Chapter 11, Implementation, under Section 11.3. Table 11-4, amend (delete and replace) last paragraph of ‘D: Retail Outlet Centre’ zoning objective, as follows:

~~Limited provision of Café/Restaurant uses shall be considered on a case-by-case basis, having regard to the principal function of the KTOV as a Retail Outlet Centre and to the primacy of Kildare Town Centre for town centre activities.~~

In the context of enhancing the overall offer of Kildare Town as a visitor and tourist destination, while protecting the primacy of Kildare Town Centre for town centre activities, the Council will consider the limited provision of new additional floorspace café/restaurant/eateries on a case-by-case basis, having regard to:

- the principal function of the KTOV as a Retail Outlet Centre,*
- the permitted public operating hours of KTOV which such uses shall operate within.*

The total level of café/restaurant/eateries within the KTOV shall not exceed 10% of the total permitted gross floor area of the KTOV. Any planning application for additional café/restaurant use must be accompanied by detailed justification to demonstrate compliance with this objective.

Proposed Material Alteration No. 88

Submission	Summary of Issue
<p>039 RSR Kildare (Ireland) Ltd.</p>	<p>Proposed Material Alteration 88 The submission relates to the Bothair Na gCorp site and it is stated the site has remained derelict and undeveloped for decades and represent a significant under-utilised area of infill land within the town boundary and the proposed zoning prevents any viable development. It is also stated that KCC deliberately excluded the serviced infill site from the Settlement Capacity Audit.</p>

	<p>Social Infrastructure Audit</p> <p>The submission refers to the Chief Executive's Report (June 2023) referencing the SIA in the context of the zoning on the site in relation to the site and states the SIA <i>'is set forth to support the assertion that the site at issue is "ideal" for "a range of community and education uses"'</i>. It is also states that this was why the site was deliberately excluded from the SCA.</p> <p>The submission argues that the exclusion from the SCA is contrary to wider planning policy which supports the inclusion of significant infill sites. The submission states that it 'could be objectively stated that the site is in fact ideal for residential and or mixed-use development', reference is made to this being 'independently affirmed by An Bord Pleanála'.</p> <p>The submission notes with reference to the Planning Act that KCC has a clear legal obligation to provide zoning for community and education. It references S7.2 of the DPGs regarding a 'clear evidence-base for amenity policies' which could be provided through audits. Reference to S7.3 relating to an 'evidence-based approach' is also referred to.</p> <p>The submission states that the Draft Plan did not specify any particular community or education use or offer any material evidence of the specific need for the same on the site.</p> <p>E1 Specific Zoning</p> <p>The submission references the proposed change under PMA 88 and states this specific zoning for a nursing home reverts to the zoning already designated in the 2012 Plan. It states the SIA does not substantiate this designated zoning. It is also stated there is no material evidence to support any specific community uses on the site and identifiable need for education or other community uses are provided for in extant permissions or located on other specifically stated areas.</p> <p>It is further stated that HSE data does not provide any material evidence coupled with the fact the site has been vacant all this time. It is stated that the HIQA reports on the existing three nursing homes refer to capacity exceeding demand. There is no evidence for sheltered social housing need for elderly also. There is nothing to substantiate the entire site being designated E1.</p> <p>Settlement Capacity Audit</p> <p>It was predetermined by KCC before conducting and producing the SCA that the significant serviced site in the town would be deliberately excluded from the SCA. The DPGs refer to the potential for brownfield / infill must be identified and estimated, contrary to this the subject lands were excluded with no explanation in law or fact.</p>
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	<p>The submission references the NPF's 30% target of residential development to be within the town boundary, underutilised sites and buildings to be brought into residential use. The submission considered the site would be described as such and therefore should have been included.</p> <p>Extant Planning Permission and Additional Provision</p> <p>The submission states that the Chief Executive's report stated that <i>'due to extant planning permission within the CSO town boundary, the NPF required minimum of 30% of new residential zoned land to be located within the boundary was complied with without the site at issue being zoned in whole or part residential'</i>. The submission refers to the Guidelines on extant permissions which states <i>'permissions represent potential housing delivery over the plan period but cannot be considered in isolation to the wider issues involved in the preparation of the core strategy'</i>.</p> <p>The submission points out as a result of the PMAs there are now significant additional sites including unserviced greenfield sites being proposed for residential zoning. In this regard it is stated the calculation of the minimum 30% will need to be updated to reflect the additional provision.</p> <p>In conclusion the submission reiterates that there is a lack of a rational evidence-based approach to the site and asks that the designated zoning be reconsidered in accordance with law and substantiated with material evidence. It is stated that the onus was on the Council to consider every landholding for new residential zonings rather than those which were under a previous Plan.</p>
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Chief Executive's Opinion

The comments made in the submission are noted. The Development Plan Guidelines 2022 state that the Settlement Capacity Audit:

'requires consideration of existing zoned land in the first instance in accordance with development plan core strategy requirements set out in Section 10(2A)(c) of the Planning Act and may extend to lands that are not zoned in consideration of lands that may be proposed to be zoned in accordance with Section 10(2A)(d) of the Act'.

The subject lands were not zoned for residential development in the 2012 Plan and were therefore not included in the Settlement Capacity Audit in the first instance. As detailed under Table 3-2 Population and Housing Targets, 502 additional units (extended to 628 units with additional provision Table 3-6, refers) are required over the lifetime of the Plan. As stated under Section 3.8. the Plan was prepared in the context of extant permission which are in excess of the target unit allocation required for the lifetime of the Plan. Therefore, the Settlement Capacity Audit was not required to 'extend to lands that are not zoned' residential in the first instance, notwithstanding

whether they were suitable for residential development or not, as no additional housing units were required, above that provided for on previously zoned land.

The CDP under Policy SC P6 states it is the policy of the Council to facilitate the provision of continuing care facilities for older persons, such as own homes (designed to meet the needs of older persons), sheltered housing, day-care facilities, nursing homes, step down care centres, and specialised care units at appropriate locations throughout the county. Furthermore, it is an objective under SC O40 to adopt the ethos of McAuley Place, Naas as a recognised model of excellence for Positive Aging and best practice in Ireland in planning and delivering services to older people and aim to emulate this model within each of the five municipal districts in Kildare, at appropriate and sustainable locations. In this context the subject lands have been identified for such uses. The 'Housing Options for Our Ageing Population Policy Statement⁴', supports the development of housing and services on centrally located sites within urban areas as research shows that good quality, well connected, urban centres with a range and choice of housing tenures and types actively supports ageing in place. Therefore, as acknowledged in the submission the subject lands represent a significant under-utilised area of infill land within the town boundary, thereby considered an appropriate location to realise these policy and objectives of the CDP.

The Social Infrastructures Audit identified that health practises in Kildare Town are currently oversubscribed which requires adequate land is zoned for Community purposes. In this context it is considered that a minor modification should be made to the objective for medical facilities.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 88 should be adopted by the Elected Members with a minor modification.

Chapter 11, Implementation, under Section 11.3. Table 11-4 Land Use Zoning Objectives, include a site-specific objective and amend Map 11.1 Land Use Zoning by including reference to E (1) on the map regarding the site outlined in red below.

E (1) This site-specific zoning objective provides for the development of individual housing units and/or a nursing home facility to provide for the needs of the elderly, in accordance with Policy SC P6 and Objectives SC O40 and SC O41 of the County Development Plan, in addition to the provision of a childcare facility and/or medical / health care facility.

⁴ Jointly published in 2020 by the Department of Housing Planning and Local Government and the Department of Health.

Proposed Material Alteration No. 89

Submission	Summary of Issue
034 Friends of the Irish Environment	Friends of the Irish Environment submitted that PMA No. 89, PMA No. 97, PMA No. 104, PMA No. 08(b) and PMA No. 112(a) should not be made and states that if these PMAs are included it would create an adverse impact on the M7 national road and associated Junction 13 and would be at variance with national, regional, and local planning policy. Regional policy objectives RPO 8.1, RPO 8.2 and RPO 8.3 are specifically referenced in relation to PMA No. 112(a).
040 An Taisce	Zonings near the M7 The submission notes a number of PMAs relate to zoning changes near the M7 which would increase dependence on private car use, increase transport emissions, overload the already capacity-constrained Junction 13, and be contrary to proper planning and sustainable development in line with the hierarchy of planning policies. In this context An Taisce recommend that PMA 89 is not adopted.

Chief Executive's Opinion

The OPR in their submission (Section 3, refers) MA Recommendation 1 – Strategic Reserve (Employment) has made a recommendation in respect of the Strategic Reserve [Employment] (SR*) lands under PMA 89. The OPR require the Plan to be made without the lands as there is no evidence and rationale underpinning the zoning of land for employment purposes, the development of the lands is contrary to Objective TM O62 of the Kildare CDP and the National Roads Guidelines (2012) to protect the strategic transport function of national roads; also the PMA is at variance to RSO 3 and RSO 6 of the RSES and Objectives RE O15 and RE O39 of the Kildare CDP regarding preferable locations for economic development.

Similarly, the TII in their submission recommend that PMA 89 should not be made, as it would create an adverse impact on the M7 and Junction 13 and be at variance to national, regional and local planning policy.

It should be noted the Chief Executive's Opinion at the Special Meeting on the Draft Kildare Local Area Plan was that the subject lands should not form part of the Development Strategy for the town, and it is agreed that the removal of the subject lands is acceptable and appropriate.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 89 should not be adopted by the Elected Members as there is no evidence base or justification to support the objective.

Proposed Material Alteration No. 90

No submissions / observations have been received in respect of PMA 90.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 90 should be adopted by the Elected Members.

Proposed Material Alteration No. 91

Submission	Summary of Issue
026 Round Tower GAA Club, Kildare Town Athletics Club and Kildare Town AFC	Round Towers GAA Club, Kildare Town Athletics Club and Kildare Town AFC collectively welcome that the need for provision of a sports campus was recognised. The zoning amendment under PMA 91, 85 and 111 are welcomed.

Chief Executive's Opinion

It is the recommendation of the Chief Executive that PMA 91 is not adopted into the Plan. It is considered that given the significant distance of the northern-most part of the landholding from the built-up area of the town, it is not appropriate to extend the land use to this point as it would give rise to sprawl and longer travel times from the existing built-up area. While it is noted there are existing GAA playing pitches located on the lands, it does not have the benefit of a planning permission. It is the Chief Executive's Opinion that to promote compact, consolidated growth, and to ensure that future amenities are in reasonable walking and cycling distance from existing and permitted residential areas, that the lands proposed to be zoned under PMA 92 and PMA 111 given their location and size can sufficiently deliver strategic open space.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 91 should not be adopted by the Elected Members as there is sufficient land zoned for Open Space and Amenity that represent sequential growth of the town.

Proposed Material Alteration No. 92

No general submissions / observations have been received in respect of PMA 92. The submission from the OPR had no concerns in relation to the proposed land use zoning change.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 92 should be adopted by the Elected Members.

Proposed Material Alteration No. 93, 94, 95 and 96

No submissions / observations have been received in respect of PMA 93, 94, 95 and 96.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 93, 94, 95 and 96. should be adopted by the Elected Members.

Proposed Material Alteration No. 97

Submission	Summary of Issue
040 An Taisce	Zonings near the M7 The submission notes a number of PMAs relate to zoning changes near the M7 which would increase dependence on private car use, increase transport emissions, overload the already capacity-constrained Junction 13, and be contrary to proper planning and sustainable development in line with the hierarchy of planning policies. In this context An Taisce recommend that PMA 8(b), PMA 89, PMA 97 , PMA 104 and PMA 112(a) are not adopted.
034 Friends of the Irish Environment	Friends of the Irish Environment submitted that PMA No. 89, PMA No. 97, PMA No. 104, PMA No. 08(b) and PMA No. 112(a) should not be made and states that if these PMAs are included it would create an adverse impact on the M7 national road and associated Junction 13 and would be at variance with national, regional, and local planning policy. Regional policy objectives RPO 8.1, RPO 8.2 and RPO 8.3 are specifically referenced in relation to PMA No. 112(a).

Chief Executive's Opinion

The comments made are noted. Section 4 of the report outlined similar concerns made by the TII in respect of PMA 97.

The County Development Plan has designated Kildare Town as a National Tourism Hub (Objective RE O133, refers). The Draft Plan under Objective EDO 2.1 is supportive of new tourism activities/facilities including supporting infrastructure that respect, respond and enhance their physical locations, environmental quality and community setting. It is considered that a Conference /Exhibition Centre on the subject lands are 'Open to Consideration', as these uses are not considered acceptable in principle but rather need to be considered in the interest of the proper planning and sustainable development of the area. In this regard any application would need to consider the impact on the national road network.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 97 should be adopted by the Elected Members.

Proposed Material Alteration No. 98, 99, 100, 101, 102 and 103

No submissions / observations have been received in respect of PMA 99, 100, 101, 102 and 103.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 98, 99, 100, 101, 102 and 103 should be adopted by the Elected Members.

Proposed Material Alteration No. 104

Submission	Summary of Issue
040 An Taisce	Zonings near the M7 The submission notes a number of PMAs relate to zoning changes near the M7 which would increase dependence on private car use, increase transport emissions, overload the already capacity-constrained Junction 13, and be contrary to proper planning and sustainable development in line with the hierarchy of planning policies. In this context An Taisce recommend that PMA 8(b), PMA 89, PMA 97, PMA 104 and PMA 112(a) are not adopted.
034 Friends of the Irish Environment	Friends of the Irish Environment submitted that PMA No. 89, PMA No. 97, PMA No. 104, PMA No. 08(b) and PMA No. 112(a) should not be made and states that if these PMAs are included it would create an adverse impact on the M7 national road and associated Junction 13 and would be at variance with national, regional, and local planning policy. Regional policy objectives RPO 8.1, RPO 8.2 and RPO 8.3 are specifically referenced in relation to PMA No. 112(a).

Chief Executive's Opinion

The comments made by An Taisce are noted. Similar concerns were raised by the OPR and the TII in their submissions who both recommend the PMA is not adopted.

The Chief Executive's Report (June 2023) noted that the proposed zoning is contrary to national policy which focuses on compact sequential growth and sustainable mobility, moving towards a low carbon future. The proposed land use zoning at this location does not represent consolidation of the existing built urban form and should not be adopted.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 104, should not be adopted by the Elected Members as further development of land south of the motorway does not represent consolidation of the existing built urban form.

Map 11.1 Proposed Changes to the Land Use Zoning Map

Proposed Material Alteration No. 105

Submission	Summary of Issue
<p>045 MRP Oakland Ltd</p>	<p>Proposed Material Alteration No. 105 The submission refers to the previous submission made on the Draft Plan and that PMA 105 proposes the rezoning of the Industrial/warehousing site to Residential (albeit C: Phase 2 New Residential). It is stated that rezoning is welcome but the Phase 2 zoning along with the remainder of the site is unsupported and will be counter-productive and will contribute to the significant under provision of housing.</p> <p>It is requested that the lands are zoned (Phase 1) New Residential. It is stated that the development of the lands would facilitate the development of the Council's lands at Collaghknock which rely on the open space to provide the NBMA to serve the Council's lands.</p>

Chief Executive's Opinion

It is important to clarify that PMA 105 refers to the amendment of ca. 0.7 ha of land from 'H: Industry and Warehousing' to 'E: Community and Education', as per page 57 of the Proposed Material Alteration Report.

As stated in the Chief Executive's Report (June 2023), no further additional lands are required for the lifetime of the Plan to meet the requirements of the CDP Core Strategy. Sufficient lands have been identified for development, many of which had secured planning permission prior to the preparation of the Draft Plan. The Land Use Zoning Objectives are defined in Table 11-4 of the Draft Plan.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 105 should be adopted by the Elected Members.

Proposed Material Alteration No. 106, 107, 108, 109 and 110


No submissions / observations have been received in respect of PMA 106, 107, 108, 109 and 110.


Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 106, 107, 108, 109 and 110 should be adopted by the Elected Members.

Proposed Material Alteration No. 111

Submission	Summary of Issue
<p>025 Pousterle Limited</p>	<p>The submission supports the newly defined Southgreen Key Development Area and the complementary uses, of which a significant portion is part of the landholding owned by Pousterle Ltd. However, they request that the SR: Strategic Reserve zoning be retained.</p> <div data-bbox="619 533 1206 887" data-label="Figure"> </div> <p style="text-align: center;"><small>Figure 1 - Requested Zoning</small></p> <p>The submission noted the SCA determined the subject lands as No Development, whereas the applicant would consider the lands as Tier 2. It is considered that key points for consideration to retain the zoning as per the Draft Plan are as follows:</p> <ul style="list-style-type: none"> - Strategic location within 15-minutes of school, town centre and travel hubs reaffirm the site's designation as a strategic residential area as per the 2012 Plan. Residential development at this location is considered a natural extension of the town. - Key infrastructure was front loaded such as the wastewater treatment plant and pumping station and the Southern Internal Link Road at a cost of €5 million to Pousterle Ltd. - Welcome the proposed social infrastructure, recreational and sport facilities and is ready to provide them, however, this development has to be justified by provision of satisfactory amount of residentially zoned land. - The subject site was zoned Phase 2 residential in the 2012 LAP. - The submission states that Census 2022 data released in 2022 showed faster growth than originally estimated and further strategic development areas should be reserved to accommodate projected population growth beyond lifespan of the LAP. - Strategic Reserve will not contradict the overall vision set for the Southgreen KDA. - The subject site has a potential for future development which should be not compromised by F: Open Space and Amenities zoning.

	<p>Rational for Open Space and Amenities Provision</p> <p>The submission considers that an area of c. 13.36 is sufficient for the provision of Community Sports Campus on Old Road. Appendix B of the submission contains an illustration of how this could be laid out to include sports hall/ community hall, play area, multipurpose pitches, athletic track, GAA pitches and parking. The submission references the Chief Executive's report that argued that 'the northern part of the subject lands is a significant distance from the town centre and are agricultural in nature'. In this context the submission stated that the accessibility of the site and its suitability for a campus of the nature proposed. It is stated that the distance difference between the location marked in the PMA's and the location requested by the client is only c 250 m / 3 min walk which is stated as a negligible difference.</p> <p>The submission states the merits of the site are what makes it ideal to develop a state-of-the-art sports facility; contiguous parcel of lands, to the post-primary school and new primary school site, easy extension of active transportation routes, good soil and topography, integrated community development, expanding area with proposed and existing units, northern part already used as GAA pitches and support Kildare Sports Partnership. The requirement for the sports campus can be met in Figure 1.</p> 
<p>026 Round Tower GAA Club, Kildare Town Athletics Club and Kildare Town AFC</p>	<p>The submission relates to sport facilities and open space in Southgreen KDA. The submission states, as a representative of the majority of those engaged in recreational sport in the town fully supports efforts of the landholder, Pousterle Ltd, to retain zoning SR: Strategic Reserve on a southern portion of lands as originally proposed in the Draft Plan, as the requirements for a sports campus are met fully in the lands zoned F.</p>

	 <p data-bbox="646 750 1157 772">Figure 3 – Proposed Alteration to Figure 11-3 Southgreen Key Development Area Design Framework</p> <p data-bbox="438 806 1372 963">Round Towers GAA Club, Kildare Town Athletics Club and Kildare Town AFC collectively welcome that the need for provision of a sports campus was recognised. The zoning amendment under PMA 91, 85 and 111 are welcomed.</p>
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Chief Executive's Opinion

The comments made in the submissions are noted. The Proposed Material Alteration Report provides for a number of significant changes within the South Green area. The most noteworthy of those are south of the subject lands under PMA 7 and PMA 110. The adoption of PMA 7 will result in ca. 158 additional units within the Southgreen area. Similarly, the adoption of PMA 110 could result in the provision of ca. 164 units (35 uph on 5.2 ha) in the event there is significant unmet social housing demand in the area (Footnote 74, refers). Therefore, to ensure compact sequential growth the zoning of the subject lands as Open Space and Amenity in close proximity to potential residential areas would be considered in line with the proper planning and sustainable development of the area.

It is also important to note that the Chief Executive recommends PMA 91 is not adopted into the Plan. It is considered that given the significant distance of the northern-most part of the landholding from the built-up area of the town, it is not appropriate to extend the land use to this point as it would give rise to sprawl and longer travel times from the existing built-up area. While it is noted there are existing GAA playing pitches located on the lands, they do not have the benefit of permission. It is the Chief Executive's Opinion that to promote compact, consolidated growth, and to ensure that future amenities are in reasonable walking and cycling distance from existing and permitted residential areas, that the lands proposed to be zoned under PMA 92 and PMA 111 given their location and size can sufficiently deliver strategic open space.


Furthermore, the OPR in their submission highlighted the need for further permeability and cycling measures to better connect the northern areas (PMA 91). The subject lands under PMA 111 are better located in close proximity to existing and

potential new residential development and the Open Space and Amenity zoning would contribute to the '10-minute settlement' principle by providing for a range of complementary land uses; residential and open space within walkable distance of a centrally located neighbourhood centre and adjacent primary school site.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 111 should be adopted by the Elected Members.

Proposed Material Alteration No. 112

Submission	Summary of Issue
<p>032 Irish National Stud</p>	<p>The submission relates to PMA 112 (a) and (b) on land owned by the Irish National Stud who are opposed against the proposed change from G: National Stud and Greenbelt to F: Open Space and Amenity. The lands are in equine use and there is no intention to change this long term established use. The Irish National Stud want to retain the National Stud and Greenbelt zoning objective. The lands are zoned National Stud / Greenbelt in the 2012 Plan, the objective of which is to protect the INS.</p> <p>The submission notes that the PMA is against the advice of the Chief Executive of KCC.</p> <p>The submission states the proposed change is unsuitable as the lands are in private ownership, vital to the current operation of the Irish National Stud, detached from the town by the motorway, sport use would not be compatible with the stud on noise and security grounds, removed from residential areas, the two land parcels are not connected, there is a town park planned and residents already have the benefits of the Curragh Plains.</p>  <p>The land parcels measure c. 16 ha and c. 13.8 ha. and are in use by the INS which is a thoroughbred horse breeding facility. They are in use for grazing mares, foaling mares, isolation for international and domestic horses from the main herd, all of which are vital components of the biosecurity measures.</p> <p>The Kildare CDP places a strong emphasis on the equine industry including the Irish National Stud. The submission references a</p>

	<p>number of policies and objectives in this context. Similarly, reference is made to the Draft Plan in respect of Section 9.8 which references the INS.</p> <p>The Chief Executive's report is referenced in the submission where it was the opinion that the lands are geographically detached and inappropriate for open space use.</p> <p>PMA 112</p> <ul style="list-style-type: none"> - The Movement and Transportation maps do not show any proposed routes through the Stud lands. The bridge over the M7 is noted but this will not provide access to the subject lands. - No justification has been provided as to why these lands are being considered. - Lands are in private ownership and is used by the INS for equine related activities. - Agricultural buildings are 'Not Permitted' in the F: Open Space and Amenity zoning. - Geographically detached. - Lack of connection between the two land parcels measuring 1.5km. - The Cherry Avenue Park located on the north side of the town would meet the needs of the town. - Residents have direct access to the Curragh Plains for open space/recreational space. - The revised zoning would result in the full extent of the INS lands not being zoned as National Stud (Greenbelt) which would be misleading and confusing. - Lands north of the rail line are most suitable for open space and amenity as they are near new residential development.
<p>034 Friends of the Irish Environment</p>	<p>Friends of the Irish Environment submitted that PMA No. 89, PMA No. 97, PMA No. 104, PMA No. 08(b) and PMA No. 112(a) should not be made and states that if these PMAs are included it would create an adverse impact on the M7 national road and associated Junction 13 and would be at variance with national, regional, and local planning policy. Regional policy objectives RPO 8.1, RPO 8.2 and RPO 8.3 are specifically referenced in relation to PMA No. 112(a).</p>
<p>Seán O'Feargháil</p>	<p>The National Stud</p> <p>Grave concerns and opposed over proposed changes to the Irish National Stud lands. The Stud have not requested the change and no consultation has taken place with the Stud. The Stud needs to be valued, treasured and protected and not zoned for Recreation and Amenity.</p> <p>Land severed from the National Stud at Cherry Avenue have been earmarked for development as a recreational and park area for the</p>

	town and if delivered would be a major attraction. The submission states it is arrant nonsense to talk about developing further lands when not a sod has been turned on this project.
040 An Taisce	Zonings near the M7 The submission notes a number of PMAs relate to zoning changes near the M7 which would increase dependence on private car use, increase transport emissions, overload the already capacity-constrained Junction 13, and be contrary to proper planning and sustainable development in line with the hierarchy of planning policies. In this context An Taisce recommend that PMA 8(b), PMA 89, PMA 97, PMA 104 and PMA 112(a) are not adopted.

Chief Executive's Opinion

The issues raised in the submissions are noted. It should be noted the Chief Executive's Opinion at the Special Meeting on the Draft Kildare Town Local Area Plan 2023-2029 stated that given the character of the two areas, separated from the town and the defined built-up area by the motorway the subject lands would represent the development of a significant land bank on undeveloped land on the periphery of Kildare Town. However, the Elected Members resolved to place this material alteration to the Draft Plan on public display. It is considered that the National Stud and Green Belt zoning in the Draft Plan which is to protect and enhance the development of the Irish National Stud and established agricultural/ bloodstock uses and should be retained.

Furthermore, the OPR in their submission have made a Recommendation that the Draft Plan should be made without PMA 112.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 112 should not be adopted by the Elected Members as it would result in the erosion of the green belt.

Census 2022 Update

Proposed Material Alteration No. 113

No submissions / observations have been received in respect of PMA 113.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 113 should be adopted by the Elected Members.

Strategic Flood Risk Assessment

Proposed Material Alteration No. 114

No submissions / observations have been received in respect of PMA 114.

Chief Executive's Recommendation

It is recommended that Proposed Material Alteration No. 114 should be adopted by the Elected Members.

Strategic Environmental Assessment Addendum

Submission	Summary of Issue
040 An Taisce	<p>Strategic Environmental Assessment</p> <p>The submission noted in the SEA Addendum Report in respect of the removal of permeability measures that no further assessment is required on foot of the removal of the measures. However, An Taisce would consider that further assessment is in fact required as the deletions are inconsistent with higher level plans and evaluation of the potential changes in direct, indirect and cumulative impacts to air quality, climate and human health resulting from the reduction in permeability and active travel infrastructure is required. It is also stated that the deletions may reduce the emissions mitigation potential of the LAP. An Taisce recommend and updated assessment to be carried out and the Environmental Report be updated.</p>

Chief Executive's Opinion

The comment made by An Taisce are noted. It is considered that where a Material Alterations is proposed to be removed from the Draft Plan, the baseline environment is reverted to for strategic environmental assessment purposes. There is no requirement in the legislation for an assessment of the material alterations against the provisions of the Draft Plan. Until the plan is finalised, the baseline environment remains 'as existing'.

On adoption of the Plan, an updated assessment of alternatives will be included within the SEA environmental statement. This assessment will include the evaluation of the plan including reference to the material alterations.

Chief Executive's Recommendation

No further change recommended.

6. Submissions / Observations which do not relate to a particular Proposed Material Alteration

Section 20(3)(j)(ii) of the Planning and Development Act 2000 (as amended) states that written submissions or observations with respect to the proposed material alterations of the draft local area plan may be made to the planning authority within the stated period and shall be taken into consideration before the making of any material alteration.


Having regard to the legislation, the public notice relating to the public consultation of 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) can be taken into consideration before the making of any material alteration to the draft Local Area Plan. Submissions or observations in relation to any other aspects of the draft Local Area Plan cannot be considered at this stage in the process.

The following is a list of submissions and the issues raised that did not relate to a specific Proposed Material Alteration and therefore were not provided with a Chief Executive's Opinion and Recommendation. In some instances, submissions or observations referred to a range of issues, some which related to a Proposed Material Alteration and parts which did not, the part relating to a proposed material alteration **have been** considered (Section 5., refers).

Several submissions have been received in respect of Permeability Measures, a number of which relate to measures which are not the subject of a Proposed Material Alteration. However, as some submissions refer to permeability measures in a particular area, all submissions relating to permeability measures are discussed under PMA 43 and are therefore not included in this section of the report.

Furthermore, the submissions/observations which cannot be considered have also been summarised in their entirety in Appendix 2.

Submission	Summary of Issue
002 Martina Slattery	The submission states that they are looking for housing in Kildare or Naas. Their existing accommodation is not suitable.
023 Cunnaberry Hill, Oaktree Residents Association	The submission states that the playground which was previously published in the Draft Plan Section 6.5.1.5. Sports and Recreation does not appear to be published in the amended report. As of 16 th August, the Resident's Association received email correspondence in respect of KCC-153265 which stated that the estate has not been taking in charge and the estate would be a matter for the developer. In this context the submission states that the playground is in a complete state of disrepair and should not have been initially published by Kildare County Council if the area is not within their remit.

<p>036 Seán O'Feargháil</p>	<p>The Carmelite Lands The submission refers to the submission made on the Draft Plan where it was stated the lands should be developed for housing purposes specifically for supported living or trading down opportunities for older people. It is also stated that a need exists for executive type large houses. It is requested to remove the educational zoning and replace it would something more practical like housing close to the town centre.</p> <p>Kildare Village Connections between the town and Kildare Village should be strengthened and further developed.</p>
<p>042 Colbid Investment Holdings</p>	<p>The submission states that currently zoned lands are not subject to the same archaeological concerns for the present purpose of Community and Education Zoning. It is stated that 'there are presently no plans to provide comparable, eligible Community and Education uses on alternative suitable sites.</p> <p>Two reports have been included with the submission, titled an Archaeological Review of lands Proposed for Community and Educational Zoning⁵.</p> <p>Archaeological Review of lands Proposed for Community and Educational Zoning, prepared by IAC (Archaeology & Conservation Consultants). The subject lands are located in Brallistown, adjacent to the Lourdesville Nursing Home⁶ are greenfield and extend to 4.765 ha.</p>  <p>Figure 1: Location of Colbid lands showing nearby archaeology</p>

⁵ A comparison was made of the two reports and the same information is contained in each report.

⁶ The subject lands as indicated in the submission are not located within the boundary of the Draft Kildare Town Local Area Plan 2023-2029. Furthermore, there is no Proposed Material Alteration that relates to the subject lands.

	<p>The submission states there are no recorded monuments, no previous excavations and no features or structures of archaeological or built heritage significance present. Aerial imagery was also consulted, and no previously unidentified archaeological sites or features were visible.</p> <p>Lands Proposed for Community and Education Zoning, Hospital Street</p> <p>The submission notes that the Draft Plan shows additional lands proposed for Community and Education zoning to the west of the HSE Primary Care Centre , a review of the Excavations Bulletin (1970–2023) has revealed that there was a burial ground discovered during the construction of this facility of the primary care centre KD022-11, disarticulated material indicated that at least 49 individuals may have been buried there, but some evidence suggest there may be additional burial there. The report states that the site should be viewed as a high archaeological potential with the risk of further development works disturbing additional burials.</p> <p>Lands Proposed for Community and Education Zoning, Melitta Road</p> <p>The submission refers to lands located adjacent to Kildare Educate Together and Gaelscoil Mhic Aodha on the Melitta Road which lie within the Kildare (Magee) Military Barracks and any development within the lands proposed for zoning will have a negative impact on the remains of the barracks that survive below the existing ground level.</p> <p>Conclusion</p> <p>The land owned by Colbid Investment Holdings contain no known archaeological sites or monuments, whereas the development of the two sites previously mentioned could negatively impact archaeology.</p>
<p>044 St Brigid's Primary School</p>	<p>The submission also states that in respect of the walkway from Kildare Village to Kildare Town Centre, the Board of Management does not support any walkway / access from Kildare Village through the school premises which compromises the safety and operation of the school.</p>

7. Overview of Chief Executive's Recommendations

Having regard to all submissions 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 4th of August 2023: Proposed Material Alteration No. 2, 3, 4, 5, 6, 7, 8 (c), 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 29, 30, 31⁷, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 44, 45, 46, 47, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 77, 79, 80, 81, 82, 83, 84, 86, 90, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 105, 106, 107, 108, 109, 110, 111, 113 and 114.
- (ii) That the following Proposed Material Alterations be adopted with **minor amendments** as detailed in this report: Proposed Material Alteration No. 1, 28, 42, 76, 78, 85, 87 and 88.
- (iii) That the following Proposed Material Alterations **should not be adopted** for the reasons outlined in this report and under Table 7-1: Proposed Material Alteration Not to be Adopted; No. 8 (a), 8 (b), 43, 48, 64, 89, 91, 104, 112 (a), 112 (b) and 112 (c).

A minor modification should be made to PERM 39 which re-draws the measure to follow the existing Loughlion Green estate footpaths.

Table 7-1 PMAs Not to be Adopted.

PMA Ref.	Summary of Reasons Not to Adopt (see Section 3 and 4 of this Report)
8 (a) (Zoning for New Residential*)	Proposed Material Alteration No. 8(a) <u>should not be</u> adopted as there is no identified 'need' in accordance with the Core Strategy or evidence base to support the land use zoning, and the development of the subject lands would not represent sequential consolidated growth of the settlement.
8 (b) (Zoning for New Residential*)	It is a recommendation of the OPR that the Planning Authority is required to make the Plan without PMA 8 (b) in order to retain the National Stud / Green Belt zoning. This PMA, in addition to PMA 104 and 112, does not comply with compact growth and sequential land use objectives from the Regional Strategy (RSES), County Development Plan (CDP) and the Draft LAP. TII recommends that PMA 08(b) not be made having regard to existing and planned development in the vicinity of M7 Junction 13 that is already subject to future year capacity constraints. It is at

⁷ As this relates to Site 8(C)* only

	variance with national, regional and local policy related to national roads and, in particular, to Section 28 Ministerial Guidelines.
43 (Removal of Permeability measures)	<p>It is a recommendation of the OPR that the Planning Authority is required to make the plan without Material Alteration 43. This PMA does not comply with integrated transport and land use objectives from the Regional Strategy (RSES), with climate change objectives and targets from the County Development Plan (CDP), the vision and strategic principles (<i>'Creating compact and connected communities'</i>) of the Draft LAP or the Kildare Town Transport Strategy.</p> <p>The NTA recommends that Proposed Material Alterations No. 43 should not proceed, and the cycling and permeability measures should remain part of the Plan.</p>
48 (Removal of Cycling Measures)	<p>It is a recommendation of the OPR that the Planning Authority is required to make the plan without Material Alterations 48. This PMA does not comply with integrated transport and land use objectives from the Regional Strategy (RSES), with climate change objectives and targets from the County Development Plan (CDP), the vision and strategic principles (<i>'Creating compact and connected communities'</i>) of the Draft LAP or the Kildare Town Transport Strategy.</p> <p>The NTA recommends that the Proposed Material Alterations No. 48 should not proceed, and the cycling and permeability measures should remain part of the Plan.</p>
64 (Outer Relief Road)	<p>It is a recommendation of the OPR that the Planning Authority is required to make the plan without Material Alteration 64. This PMA does not comply with integrated transport and land use objectives from the Regional Strategy (RSES), with climate change objectives and targets from the County Development Plan (CDP), the vision and strategic principles (<i>'Creating compact and connected communities'</i>) of the Draft LAP or the Kildare Town Transport Strategy.</p> <p>The NTA recommends that Proposed Material Alteration No. 64 is not included, as its inclusion would not be considered consistent with the Transport Strategy, specifically the circumstances for the progress of road schemes as set out in Measure ROAD1.</p>
89 (Strategic Reserve Employment)	<p>It is a recommendation of the OPR that the Planning Authority is required to make the plan without Material Alteration 89. This PMA would support unsustainable car-dependant development at a greenfield location remote from high-capacity public transport and in close proximity to a junction on the national road network. It is contrary to Section 28 Ministerial Guidelines⁸ which require a clear and strategic rationale for the zoning of employment land; Section 28 Ministerial Guidelines⁹ which require the protection of the</p>

⁸ Development Plan Guidelines for Planning Authorities (2022);

⁹ Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

	<p>strategic transport function of national roads; regional strategic outcomes for compact growth and integrated transport and land use objectives from the Regional Strategy (RSES), development plan policy regarding preferable locations for economic development.</p> <p>TII recommends that proposed material alteration no. 89 not be made. The proposed zoning, if included, would create an adverse impact on the M7 national road and associated Junction 13 and would, in the Authority's opinion, be at variance with the foregoing national regional and local planning policy.</p> <p>NTA recommends that Proposed Material Alteration No. 89 is not made at this time as it has the potential to impact on the primary function of a national road and is therefore at variance with the Transport Strategy, specifically measure ROAD2.</p>
<p>91 (Zoning for Open Space, Southgreen)</p>	<p>It is the recommendation of the Chief Executive that PMA 91 is not adopted into the Plan. It is considered that given the significant distance of the northern-most part of the landholding from the built-up area of the town, it is not appropriate to extend the land use to this point as it would give rise to sprawl and longer travel times from the existing built-up area. The lands proposed to be zoned under PMA 92 and PMA 111 given their location and size can sufficiently deliver strategic open space that represent better sequential growth of the town.</p>
<p>104 (‘Tourism’ zoning for Hotel)</p>	<p>It is a recommendation of the OPR that the Planning Authority is required to make the plan without Material Alteration 104 (and 112) together as they would expand the footprint of the town into a largely undeveloped rural area which forms part of the green belt. PMA 104 (and 8 (b) and 114) are contrary to the draft LAP’s vision, strategic development principles and objective CSO 1.3 which promote the compact and sequential development of the town and would undermine the achievement of RSO 2 – Compact Growth and Urban Regeneration and RSO 6 – Integrated Transport and Land Use. The planning authority is required to make the Plan without Proposed Material Alteration 104.</p> <p>NTA recommends that Proposed Material Alteration 104 is not made at this time as it has the potential to impact on the primary function of a national road and is therefore at variance with the Transport Strategy, specifically Measure ROAD2.</p> <p>TII recommends that the proposed material alteration 104, if included, would create an adverse impact on the M7 national road and associated junction 13 and would, in the Authority's opinion, be at variance with national regional and local planning policy.</p>
<p>112 (a) (Zoning for Open Space)</p>	<p>It is a recommendation of the OPR that the Planning Authority is required to make the plan without Material Alteration PMA 112 (in addition to 8 (b) and 104) as these sites are located on the far</p>

<p>south of motorway)</p>	<p>side of the M7 motorway, remote from the town centre and public transport, and the Office has a number of concerns regarding the alignment of the proposals with policy objectives for securing compact and sustainable development and protecting the special character of the Curragh Plains and green belt area.</p> <p>NTA recommends that Proposed Material Alteration No. 112(a), as is currently set out, is not made at this time as it has the potential to impact on the primary function of a national road and may compromise the consolidation of Kildare Town.</p> <p>TII recommends that, if included, this would create an adverse impact on the M7 national road and associated Junction 13 and would, in the Authority's opinion, be at variance with national, regional, and local planning policy. TII recommend that proposed material alteration no. 112(a) not be made having regard to existing and planned development in the vicinity of M7 Junction 13 that is already subject to future year capacity constraints.</p>
<p>112 (b) (Zoning for Open Space south of motorway)</p>	<p>It is a recommendation of the OPR that the Planning Authority is required to make the plan without Material Alteration 112 (and 8 (b and 104) as these sites are located on the far side of the M7 motorway, remote from the town centre and public transport, and the Office has a number of concerns regarding the alignment of the proposals with policy objectives for securing compact and sustainable development and protecting the special character of the Curragh Plains and green belt area.</p>
<p>112 (c) (Zoning for Open Space north of motorway)</p>	<p>It is a recommendation of the OPR that the Planning Authority is required to make the plan without Material Alteration 112 (and 8 (b) and 104) which are located on the far side of the M7 motorway, remote from the town centre and public transport, and the Office has a number of concerns regarding the alignment of the proposals with policy objectives for securing compact and sustainable development and protecting the special character of the Curragh Plains and green belt area. The planning authority is required to make the Plan without PMA 112.</p>

7.1. Conclusion

The Elected Members are advised that resolving to make approving the Proposed Material Alterations which the Chief Executive has recommended should **not** be adopted would not be in accordance with the proper planning and sustainable development of the area and their statutory obligations in accordance with Section 20 (3) (r) of the Planning and Development Act 2000 (as amended).

Specifically, it should be noted that Section 20(3)(r) of the Act states that in performing their functions at this stage of the Local Area Plan process, ‘the members of the planning 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.'

As per the provisions of Section 20(5) of the Act 'statutory obligations' include, 'in relation to a local authority, the obligation to ensure that the local area plan is consistent with —

- (a) the objectives of the development plan,
- (b) the national and regional development objectives specified in— (i) the National Planning Framework, and (ii) the regional spatial and economic strategy, and
- (c) specific planning policy requirements specified in guidelines under subsection (1) of section 28.'

Accordingly, should the Members decide not to accept the Chief Executive's recommendation in relation to any proposed material alteration, the Members must give their reasons for each decision in writing, having regard to the provisions of Section 20(4)(r) and Section 20(5) of the Act.

Appendix 1 – Submission from the Office of the Planning Regulator



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

OPR Ref: MA-013-23

4th September 2023

Senior Executive Officer,
Planning Department,
Kildare County Council,
Áras Chill Dara,
Devoy Park, Naas,
County Kildare

Re: Material Alterations to the Draft Kildare Town Local Area Plan 2023 - 2029

A chara,

Thank you for your authority's work in preparing the proposed Material Alterations (the proposed material alterations) to the draft Kildare Town Local Area Plan 2023 - 2029 (the LAP).

As your authority is aware, a core function of the Office of the Planning Regulator (the Office) is the strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. This includes a requirement to make submissions on statutory plans, including any observations or recommendations the Office considers necessary to ensure the effective co-ordination of national, regional and local planning requirements.

The Office has evaluated and assessed the proposed material alterations under the provisions of sections 31AO(1) and 31AO(2) of the *Planning and Development Act 2000*, as amended (the Act) and within the context of the Office's earlier recommendations and observations.



The Office's evaluation and assessment of the proposed material alterations has had regard to the current Kildare County Development Plan 2023 – 2029 (the Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland region (EMRA), and relevant section 28 guidelines.

Overview

As outlined in the Office's submission to the draft LAP, the Office concluded that draft LAP is generally consistent with the objectives of the Development Plan and the regional policy objectives contained in the RSES.

The submission contained one recommendation (strategic flood risk assessment) and one observation (sustainable transport measures), and the Office is generally satisfied with the Alterations proposed to address these matters.

The Office had also commended the planning authority for the evidence-based approach informing the draft LAP and for the clear policy direction to achieve the LAP's vision and which also relates to National Strategic Outcomes of the *Project Ireland 2040: National Planning Framework* (NPF).

The LAP's vision is to promote the development of the town '*...in a compact, permeable and sequential manner*' which will be achieved through key strategic development principles including '*creating compact and connected communities*'. This in turn is supported by objectives for compact growth (CSO 1.3), sustainable active transport (MTO 1.1) and sustainable economic development (EDO 1.1) and various measures and initiatives such as the permeability measures in table 7-1 and town renewal projects in table 4-1.

The Office has assessed the various material Alterations relating to residential development and has concluded that the majority are on balance acceptable with the exception of material alteration 8 (b) which is addressed below.

The Office is however also concerned that a number of further proposed material Alterations also propose to expand the town's urban footprint to areas on the far side of the M7 motorway, remote from the town centre and public transport and in some



cases encroaching into the green belt. These Alterations are not consistent with the LAP's vision and key strategic development principles which promote compact and sustainable growth and sustainable travel.

In particular, the Office is of the view that the material Alterations which propose to zone undeveloped land for employment and other uses in close proximity to the M7 and to expand the LAP boundary to accommodate future employment uses are not in accordance with national and regional policy for national roads and securing compact and sustainable growth.

Further, these Material Alterations are not consistent with Development Plan objectives RE O15 and RE O39 which seek to locate economic development that is urban in nature in urban areas.

The tourism zoning objection Material Alteration no. 104 also has the potential to facilitate development that is more appropriately located in the existing built up area of the town. The proximity to junction 13 of the M7 motorway is also of concern.

The Office notes that a number of material Alterations also propose to remove a number of permeability / cycling measures recommended in the Kildare Town Transport Strategy and include an objective for an outer relief road on undeveloped lands zoned for Agriculture and Green Belt inside the LAP's northern boundary. A number of these Alterations are however located at strategic locations which have the potential to be used by significant numbers of people to walk and cycle within the town. These will play an important role in reducing car trips, greenhouse gas emissions and improving air quality. For these reasons, the Office is of the view that these specific proposals should not be removed from the adopted Plan.



It is within this context the submission below sets out three (3) recommendations and one (1) observation under the following six (6) themes:

Key theme	Recommendation	Observation
Recommendation 1 of the Office's submission to the draft LAP	-	-
Observation 1 of the Office's submission to the draft LAP	-	-
Proposed material Alteration no. 89 – Strategic Reserve (Employment)	Recommendation 1	-
Proposed material Alterations 8 (b), 104 and 112 (Green Belt)	Recommendation 2	-
Proposed material Alterations 43, 48 and 64 (Transport Infrastructure)	Recommendation 3	-
Proposed material Alterations 85, 91, 92 and 111 (Southgreen Key Development Area)	-	Observation 1

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues



that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

1. Recommendation 1 of the Office's submission to the draft LAP (3rd May 2023)

Recommendation 1 of the Office's submission to the draft LAP required the planning authority to review the Strategic Flood Risk Assessment (SFRA) for the draft LAP to include a flood risk assessment of the Armour Stream.

Material Alteration no. 114 includes a number of Alterations to the SFRA to address Recommendation 1 of the Office's submission to the draft LAP.

The Office has reviewed the proposed Alterations to the SFRA and considers that the matters raised in Recommendation 1 have been addressed.

2. Observation 1 of the Office's submission to the draft LAP (3rd May 2023)

Observation 1 of the Office's submission requested the planning authority to investigate measures to promote use of public transport and active travel for the undeveloped lands zoned Enterprise and Employment west of the Kildare Village Outlet Centre, and zoned Industry and Warehousing and New Residential south of the M7.

Material Alterations no. 44, 48 and 55 include measures to improve permeability, cycling and public transport connectivity along the R415 and Grey Abbey Road.

The Office has reviewed the proposed Alterations and considers that the matters raised in Observation 1 of the Office's submission to the draft LAP have been addressed.



3. Proposed Material Alteration no. 89 – Strategic Reserve (Employment)

Material Alteration no. 89 proposes to include a site-specific objective SR*: Strategic Reserve (Employment) and amend Map 11.1 Land Use Zoning by including reference to SR* on the map for the site outlined with the broken red line.

The site specific objective states –

To protect the integrity of the lands to provide for the future strategic expansion of the town for employment purposes (if required). The development of the lands is a long-term vision and does not form part of the Development Strategy of Kildare Town during the lifetime of this Plan....

The land has an area of approximately 50 hectares and is located to the southwest of Kildare Town outside the current LAP and draft LAP boundary. The land is immediately south of the M7 motorway and more than 2 km from the train station. The land is in agricultural use and was not considered in the Settlement Capacity Audit prepared for the draft LAP.

The Office has a number of concerns regarding the alignment of this proposal with policy objectives for an evidence based approach to securing compact and sustainable development.

Firstly, there appears to be no evidential basis or strategic justification to support the identification of these lands for Strategic Reserve (Employment). Section 6.2.5 of the Development Plan Guidelines for Planning Authorities states that ‘...*the evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature*’.

Secondly, the material Alteration provides policy support for future greenfield development outside the boundary on lands that are remote from high capacity public transport. This approach to development is not consistent with the National Strategic Objective for compact growth (NSO1) and the Regional Strategic Outcomes for sustainable settlement patterns (RSO1) or integrated transport and land use (RSO6).



Consistent with national and regional policy, the Development Plan 2023 – 2029 includes objectives such as CS O13 and RE O35 for the promotion of sustainable settlement and transportation strategies consistent with section 10 (2) (n) of the Act. This is further reinforced in the vision, key strategic development principles and objectives of the draft LAP.

Finally, the lands are in close proximity to an intersection on the M7 motorway and have the potential to undermine the strategic transport function of the motorway.

One of the key principles in section 1.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) (National Roads Guidelines) is that development should be plan led which means that

... in preparing development and local area plans, planning authorities must assess the trip generation aspects of any land use zoning objectives and how such trip generation is to be catered for, promoting the use of sustainable modes, while protecting the strategic function of the national roads network.

Section 2.7 of the 2012 guidelines states

...planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.

Objective TM O62 of the Development Plan seeks to

*Ensure the protection of the strategic transport function of national roads, including motorways and their associated junctions, by maintaining and protecting their safety, capacity, efficiency and strategic function, in line with national policy as set out in the *Spatial Planning and National Road Guidelines for Planning Authorities* (2012).*

The RSES (page 187) also sets out guiding principles for the integration of land use and transport including the following:



'The strategic transport function of national roads and associated junctions should be maintained and protected.'

It is not evident, however, that any consideration has been given to the potential impact on the safety, capacity, efficiency and strategic function of the M7, let alone that the proposal satisfies the criteria in section 2.7 of the National Roads Guidelines.

The Development Plan contains clear objectives regarding locations suitable for economic development. In this regard, objectives RE O15 and RE O39 seek to:

Ensure that economic development that is urban in nature should be located in urban areas and will not be permitted to re-locate to the countryside or to un-serviced rural areas.

Encourage economic development that is urban in nature to locate on appropriately zoned lands within urban areas in the first instance.

In summary, the Office considers that the site specific objective and related Alteration to the land use zoning map is contrary to compact growth and integrated land use and transport, development plan policy and would support unsustainable car dependant development at a greenfield location remote from high capacity public transport and in close proximity to a junction on the national road network.

MA Recommendation 1 – Strategic Reserve (Employment)

Having regard to :

- (a) section 6.2.5 of the *Development Plan Guidelines for Planning Authorities* (2022) that the evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature;
- (b) Objective TM O62 of the Kildare County Development Plan 2023 – 2029 and section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) to protect the strategic transport function of national roads;



- (c) Regional Strategic Outcomes for Compact Growth and Urban Regeneration (RSO 2) and Integrated Transport and Land Use (RSO 6) of the Regional Spatial and Economic Strategic for the Eastern and Midlands region; and
- (d) Objectives RE O15 and RE O39 of the Kildare County Development Plan 2023 -2029 regarding preferable locations for economic development, the planning authority is required to make the LAP without Material Alteration no. 89.

4. Proposed material Alterations 8 (b), 104 and 112 (Green Belt)

Material Alterations 8 (b), 104 and 112 primarily relate to lands south of the M7 motorway and zoned National Stud / Green Belt in the draft LAP.

These lands are located on the far side of the M7 motorway, remote from the town centre and public transport, and the Office has a number of concerns regarding the alignment of the proposals with policy objectives for securing compact and sustainable development and protecting the special character of the Curragh Plans and green belt area.

Section 1.8.1 of the Development Plan contains the key overarching principles, which includes *'To ensure the compact growth and regeneration of lands within all settlements across the Settlement Hierarchy'*.

Material Alteration 8 (b) proposes to zone a rural property inside the defined greenbelt area to New Residential * and includes objective HCO 2.6 and a specific objective to provide for self-build houses at a low residential density. The draft LAP retains the National Stud / Green Belt zoning from the Kildare Town Local Area Plan 2012 – 2018. The land is approximately 1.5 km from the train station. The land to the east has an open rural character in contrast to the land on the western side of the R415.



Material Alteration no. 8 (b) must also be considered in the context of Material Alterations 104 and 112 which also propose to rezone lands east of the R415 and south of the M7 which are zoned National Stud / Green Belt in the draft LAP.

Material Alteration no. 104 proposes to insert an additional land use zoning M – Tourism and zone lands for Tourism between Grey Abbey Road and junction 13 of the M7 motorway. The land has a rural character and is in agricultural use like the adjoining land to the east and is largely undeveloped except for a rural dwelling.

The land is zoned Industry and Warehousing (Phase 1) in the current LAP and National Stud / Green Belt in the draft LAP. While it is acknowledged that the land had planning permission (now expired) for a hotel and other commercial uses, the Office agrees with the Chief Executive's (CE's) response to submission no. 69¹ which states that planning policy in Ireland has changed significantly since the 2012 LAP was prepared and adopted, and that the focus on plan-making now is towards compact sequential growth and sustainable mobility. The Office also agrees with the CE's comments on the principal differences between the subject land and the lands zoned for Industry and Warehousing on the western side of the R415, which states –

...It was considered appropriate to contain development to the south of the motorway and west of the regional road, and to prevent further sprawled development south of the motorway east of the regional road. The land east of the regional road is of a different character and functions as a Green Belt...

The Settlement Capacity Audit categorises the subject Site L (Grey Abbey Road) as Low - No Development in terms of serviceability. Sect. 5.1 of the audit explains the categorisation of sites including No Development:

...Lands which scored poorly and didn't pass a pre-determined threshold demonstrated a poor level of serviceability. Therefore, these sites cannot be categorised as either Tier 1 lands or Tier 2 lands and therefore are not

¹ Page 213 of the Chief Executive's Report on submissions to the draft Kildare Town Local Area Plan 2023 - 2029



developable within the plan period. As per Appendix 3 of the National Planning Framework such lands should not be zoned for development...

NPO72 (c) states *'When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.'* (Emphasis added)

Furthermore, the tourism objectives RE O106 and RE O104 in the Development Plan seek to *'Encourage the clustering of tourism enterprise in town and village centres'* and *'Direct the provision of tourist related facilities such as Tourist Information Centres, self-service brochure units, kiosks, and cultural centres, into town and village locations'* respectively.

These objectives acknowledge the benefits of locating tourism development in existing town centres, and the inclusion of a tourism zoning objective at a location that is remote from the town centre is inconsistent with the aforementioned tourism objectives.

In addition, Material Alteration no. 112 proposes to rezone three parcels of land as follows:

- National Stud / Green Belt to Open Space and Amenity (east of Grey Abbey Road and south of M7).
- National Stud / Green Belt to Open Space and Amenity (east of French Furze Road and south of M7).
- Equine Industry to Open Space and Amenity (east of French Furze Road and north of M7).

There appears to be no strategic planning justification for rezoning lands for further open space at this location. The lands are removed from the established and future residential areas of the town except for the Grey Abbey Views development under construction to the west of the R415. Further, the council is proposing to zone land along Southgreen Road within the northwest growth corridor to provide for an area of strategic open space. (Material Alterations 91, 92 and 111 refer.)



Material Alteration no. 112 needs to be considered in the context of Material Alterations 8 (b) and 104 in particular which together would expand the footprint of the town into a largely undeveloped rural area which forms part of the green belt.

The G – National Stud / Green Belt zoning has the following objective:

To protect and enhance the development of the Irish National Stud and established agricultural / bloodstock uses while also protecting the physical, environmental, natural and heritage resources such as the Curragh.

Section 6.3 of the draft LAP includes the following residential development objective:

HCO 1.4

To manage the provision of one-off housing on lands zoned as 'I: Agricultural' and 'G: National Stud and Green Belt'. Limited one-off housing will be permitted in this zone subject to compliance with the rural housing policy of the Kildare County Development Plan and all other normal siting and design considerations.

Section 9.8 Kildare Town and The Curragh Plains of the draft LAP states the following in respect of the special character of the Curragh Plains to the east and south of Kildare Town.

...An important part of this Plan is ensuring that the development of Kildare Town does not impinge upon this special character of the Curragh Plains. To clearly differentiate the transition from the town to the Curragh, a Green Belt is included on the Land Use Zoning Map (Map 11.1, refers) to the east and south of the town to protect physical, environmental, natural and heritage resources, whilst enhancing the development of the Irish National Stud and established agricultural/bloodstock uses with the National Stud and Green Belt land use zone... (Emphasis added)

Therefore, the policy intent for the green belt and Curragh Plains and rationale for its inclusion on lands to the east and south of the town is clearly set out in section 9.8.

The draft LAP's vision for Kildare Town is *'To promote the social, economic and physical development of Kildare Town as a self-sustaining growth town in a compact, permeable and sequential manner...'* which will be achieved by strategic development principles including Creating Compact and Connected Communities.

Pages 25 and 26 of the draft LAP set out objectives for compliance with the core strategy objectives including objective CSO 1.3:

Support and facilitate the compact growth of Kildare Town through the sustainable and sequential land use development objectives which consolidate the town centre, commercial uses and established residential areas.

This is consistent with the core and settlement strategy objectives of the Development Plan such as objectives CS O5 and CS O7.

It is considered that Material Alterations 8 (b), 104 and 114 are contrary to the draft LAP's vision, strategic development principles and objective CSO 1.3 which promote the compact and sequential development of the town and would undermine the achievement of RSO 2 – Compact Growth and Urban Regeneration and RSO 6 – Integrated Transport and Land Use. Further, these zonings would erode part of the town's green belt contrary to the policy intent for the special character of the Curragh Plans and green belt area in section 9.8 of the draft LAP.

MA Recommendation 2 – Material Alterations affecting green belt area

Having regard to:

- (a) Regional Strategic Outcomes for Compact Growth and Urban Regeneration (RSO 2) and Integrated Transport and Land Use (RSO 6) of the Regional Spatial and Economic Strategic for the Eastern and Midlands region;
- (b) key overarching principles of the Kildare County Development Plan 2023 – 2029 which includes compact growth;
- (c) tourism objectives RE O106 and RE O104 from the Kildare County Development Plan 2023 – 2029;



- (d) the vision and strategic development principles of the draft Kildare Town Local Area Plan 2023 – 2029 for sustainable and sequential land use development objectives which consolidate the town centre, commercial uses and established residential areas;
- (e) Objective CSO 1.3 (compact growth) and section 9.8 (special character of the Curragh Plains) of the draft Kildare Town Local Area Plan 2023 – 2029; and
- (f) NPO 72a-c and the co-ordination of land use zoning, infrastructure and services

the planning authority is required to make the LAP without the following material Alterations:

- (i) Material Alteration no. 8 (b) New Residential * zoning on land southeast of the junction of Grey Abbey Road and the R415, and retain the National Stud / Green Belt zoning;
- (ii) Material Alteration no. 104 Tourism zoning on land between Grey Abbey Road and the M7, and retain the National Stud / Green Belt zoning;
- (iii) Material Alteration no. 112 Open Space and Amenity zoning on land southeast of Grey Abbey Road and south of the M7, and retain the National Stud / Green Belt zoning;
- (iv) Material Alteration no.112 Open Space and Amenity zoning on land east of French Furze Road and south of the M7, and retain the National Stud / Green Belt zoning; and
- (v) Material Alteration no.112 Open Space and Amenity zoning on land east of French Furze Road and north of the M7, and retain the Equine Industry zoning.



5. Proposed material Alterations 43, 48 and 64 (Transport Infrastructure)

Material Alteration no. 43 proposes to remove permeability measures 7, 8, 9, 23, 24, 25, 34, 35, 39 and 41 which are included in table 7-1 of the draft LAP.

Material Alterations no. 48 proposes to remove cycling measures 32, 34, 35, 37, 38, 46 and 58 which are included in table 7-2 of the draft LAP.

The Office notes that these permeability and cycling measures are recommended in the Kildare Town Transport Strategy (sections 11.1 and 11.2) which informs the draft LAP, and will provide safe and convenient walking and cycling options to help achieve the targets set out in the Development Plan.

In this regard, the Office notes that the Development Plan outlines ambitious targets to reduce car-based trips to work from 74% to 50% and the car-based trips to education from 50% to 40% during the lifetime of the Development Plan (specific target TM T1 in section 5.4 – Sustainable Movement of the Development Plan relating to objective CS O2).

Having regard to the draft LAP's vision and strategic development principle – creating compact and connected communities and MTO 1.1 to *'Support and promote the use of sustainable active transport modes in Kildare Town and seek to implement a connected network of walking and cycling infrastructure in the town...'*, it is considered that the removal of permeability measures 9, 23, 24, 34, 35, 39 and 41 and cycle measures 35, 37, 38, 46 and 58 would undermine the overarching vision and development principles in the draft LAP and other policy objectives for sustainable transport such as MTO 1.1.

The Office also has concerns regarding Material Alteration no. 64 which proposes to include an objective for an outer relief road connecting from the junction of the R445 (Monasterevin Road) and L3004 (Kildangan Road) to the R413 (Melitta Road). The indicative road alignment Map Ref. 7.4 passes through undeveloped lands largely zoned for Agriculture and National Stud / Green Belt close to the draft LAP boundary for a distance of approximately 5 km. It is noted that the current LAP includes an



objective for an outer relief road, but without the section from the R415 Kilbride Road to the R413.

However, no clear justification for the current road proposal is evident from either the spatial pattern of growth planned for in the draft LAP or the transport strategy prepared to inform the draft LAP.

It is noted that Sect. 9.8.5 of the Kildare Town Transport Strategy addressed Protected Road Corridors for Future Development which are identified in the 2012-2018 LAP. Section 9.8.5 provides the following comment in relation to the outer relief road:

...It was determined that a continuous orbital corridor extending from the west of the town on the R445, across the north of the town, to the east of the town on Melitta Road; was not required due to the lack of zoned development in the north-east. In the future, most of the growth in Kildare Town will occur in the north-west between the R445 and the R401; with these protected corridors designed to provide a future orbital route which links these areas with the existing urban area. There is no need to designate a protected road corridor from the R415 to Melitta Road because the land-use zoning for the majority of land in the north-east is 'green belt' which will remain undeveloped and will not require a road.

It is considered that the proposed outer relief would lead to a substantial expansion of the town's urban footprint into undeveloped lands zoned primarily for Agriculture and National Stud / Green Belt and encourage car borne forms of development contrary to compact growth (RSO 2) and integrated land use and transport (RSO 6).



MA Recommendation 3 – Sustainable Transport and Active Travel

Having regard to:

- (a) Regional Strategic Outcomes for Compact Growth and Urban Regeneration (RSO 2) and Integrated Transport and Land Use (RSO 6) of the Regional Spatial and Economic Strategic for the Eastern and Midlands region;
- (b) Objective CS O2 (resilience to climate change and greenhouse gas emissions reductions) and Target TM T1 (under Section 5.4 – Sustainable Movement) of the Kildare County Development Plan 2023 – 2029;
- (c) the LAP's vision and strategic development principle – creating compact and connected communities;
- (d) Objective MTO 1.1 of the draft LAP which promotes the use of sustainable active transport modes; and
- (e) the Kildare Town Transport Strategy (Table 13.3 - Permeability Strategy Measures and Table 13.4 – Cycle Network Strategy Measures);

the planning authority is required to make the plan without Material Alterations 43 and 48 and to reinstate the following permeability and cycling measures into the draft LAP:

- (f) Measure 9 as it would provide better connectivity between R401 - Dunmurray Road and R415 - Rathbride Road;
- (g) Measures 23 and 24 as they would connect a number of cul de sacs within an existing housing estate accessed from R413 - Melitta Road to the R445 - Dublin Road;
- (h) Measures 34 and 41 as they connect the Oaktree estate to the Kildare Primary Care Centre on the R445 and into the proposed pedestrian links in Cherry Avenue Park² (measure 38);

² Development Plan action LR A24 relates

- (i) Measures 35 and 39 as they relate to the undeveloped Enterprise and Employment lands and form part of the future link road connecting the R445 to the R415 (opposite the Kildare Retail Outlet);
- (j) Cycle 35, Cycle 37 and Cycle 38 as they all connect with each other and various streets in the town centre zoned area; and
- (k) Cycle 46 and Cycle 58 as they connect the Oaktree estate to the Kildare Primary Care Centre on the R445 and into the proposed pedestrian links in Cherry Avenue Park (measure 38). The measures also traverse the undeveloped K – Commercial zoned lands.

The planning authority is also required to make the LAP without Material Alteration no. 64:

- (l) Objective MTO 3.7 and related text in section 7.5.1; and
- (m) Indicative route alignment for outer relief road on map ref. 7.4.

6. Proposed material Alterations 85, 91, 92 and 111 (Southgreen Key Development Area)

Material Alteration no. 85 proposes to insert a new Sub-section 11.2 - Southgreen Key Development Area and insert Figure 11-3 Southgreen Key Development Area Design Framework. The latter identifies an area of strategic open space extending northwards to the draft LAP boundary.

Material Alterations 91, 92 and 93 propose to rezone three separate areas to Open Space and Amenity east of Southgreen Road at the northern periphery of the town.

The three rezoning Alterations also propose to include the same site specific objective under the zoning objective F (1).

The proposed Open Space and Amenity zoning extends from approximately 800 metres to 1.6 km from the train station. The land is undeveloped and extends from the urban fringe to the open countryside to the north of the town. It is noted that part



of the land (approximately 7 ha) on Old Road inside the LAP boundary is currently used for GAA playing pitches.

The land subject to Material Alterations 91, 92 and 111 is accessible from Southgreen Road to the west and Old Road to the east. Both Southgreen Road and Old Road are narrow country roads with no footpaths or public lighting at this location. It is noted that permeability measure 6 extend footpaths along Southgreen Road north of the Train Line to connecting with the Greenway proposed under PERM 5 only extends as far as the southern end of the SR – Strategic Reserve zoning in the draft LAP.

The land subject to Material Alterations 92 and 111 is zoned for Open Space and Amenity in the current LAP. Having regard to the current zoning of the land the subject of Material Alteration no. 111, the Southgreen Key Development Area Design Framework, the CE's response³ that the said land '*...would be appropriate for open space purposes*' and its relationship to existing and future residential development and planned neighbourhood centre, it is considered that Material Alteration no. 111 is on balance acceptable.

The land the subject of Material Alteration no. 92 is a relatively narrow strip of land fronting Old Road. It makes planning sense to also rezone this land to Open Space and Amenity rather than leaving an isolated pocket of land zoned Agriculture.

The land subject to Material Alteration no. 91 is zoned Agriculture in the current LAP, however it is noted that the existing GAA club playing facilities occupy about 7 hectares of the land zoned Agriculture in the current LAP and draft LAP. Having regard to the current use of part of the land for playing pitches and the intent to develop the strategic open space amenity sequentially from the south, it is considered that rezoning Material Alteration no. 91 is, on balance, acceptable.

The Office is generally satisfied with the design framework for Southgreen Key Development Area which envisages an expanded residential community planned

³ Page 222 of the Chief Executive's Report on submissions to the draft Kildare Town Local Area Plan 2023 - 2029



around a future neighbourhood centre and primary school with a playground and playing pitches to the north.

Notwithstanding, the planning authority should be requested to provide clarity in relation to the need for further permeability and cycling measures in section 7.3 - Active Travel Walking and Cycling and which supports LAP objective MTO 1.1 which seeks to *‘Support and promote the use of sustainable active transport modes in Kildare Town and seek to implement a connected network of walking and cycling infrastructure in the town...’*.

MA Observation 1 – Southgreen Key Development Area – sustainable transport measures

Having regard to:

- (a) the intent in section 11.2 to provide for an area of strategic open space along Southgreen Road;
- (b) the design framework for the Southgreen Key Development Area (Material Alteration no. 85);
- (c) the active travel measures for permeability and cycling included in section 7.3 of the draft LAP; and
- (d) Objective MTO 1.1 of the draft LAP,

the planning authority is requested to provide clarity in relation to the need for further permeability and cycling measures to better connect the northern areas of the subject lands to the town.

In summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed.



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

OPR Ref: MA-013-23

At the end of the process, your authority is required to notify this Office within five working days of the decision of the planning authority in relation to the draft LAP. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations of the Office, under the provisions of section 31AO(5) of the Act the chief executive must inform the Office accordingly and state the reasons for the decision of the planning authority.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

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Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations

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Appendix 2 – Summary of Submissions Received

The submissions summarised in Appendix 1 **exclude** the following:

- The submission from the Office of the Planning Regulator (see Section 3 of the Chief Executive’s report).
- Submissions from Prescribed and Public Bodies (see Section 4 of the Chief Executive’s report).

Sub. No.	Name	Summary of Submission
001	Tony Bonnie	<p>The submission refers to a permeability measure proposed in the Draft Plan at Rathbride Abbey. It is stated that the residential estate is a mature area, and no one sought, requested or supports the measure. It is considered an unwelcome proposal and it is requested that it be removed from the Plan.</p> <p>A number of images have been attached to the submission showing the location of the proposed link within the housing estate.</p>
002	Martina Slattery	<p>The submission states that they are looking for housing in Kildare or Naas. There existing accommodation is not suitable.</p>
003	Malcolm Haig	<p>The submission refers to the inclusion of Perm 4 and the exclusion of Perm 8 as part of the Proposed Material Alterations. It is stated that the objections of the residents have been overlooked in respect of PERM 4. The submission questions the rational to diverting traffic down through the entire street. Concerns are raised in respect of maintaining the current safe, trouble-free pathway.</p> <p>It is stated there is massive opposition to the permeability measure. The submission reminds the Council of obligations to provide a safe and secure environment. Reference is made to the freedom of movement of those with criminal intent and the difficulty of policing where open access is provided in a town, especially in the context of the current Garda staffing issues.</p>
004	Sebastian Vencken	<p>The submission supports the following PMAs, 1, 2, 10, 11, 17, 20, 22, 35, 44, 45, 46.</p> <p>The submission is strongly against the following PMAs: 24, 31, 43, 48.</p>

Sub. No.	Name	Summary of Submission
		The submission states that any intention to reduce planned cycling infrastructure is unacceptable.
005	EPA	Please refer to Section 4 which relates to submissions from Prescribed Authorities or Public Bodies.
006	Colette Kershaw	<p>The submitter is opposed to opening up a walkway from Drumcree Court to Curragh Finn¹.</p> <p>Concerns are raised that children will no longer be able to play on the green area if a walkway is out there. Concerns are also raised that it will bring too much traffic and also potential trouble if it is opened up. The measure is strongly opposed and should be removed from the plan.</p>
007	Shirley Flanagan	<p>Opposed to the LAP as PERM 4 has not been cancelled.</p> <p>The submitter notes that PERM 8 has been excluded but no explanation why PERM 4 was not excluded. It does not make sense to allow traffic up through the whole estate.</p> <p>As a resident there is a right to safety and PERM 4 should be cancelled and removed totally never to appear in another LAP going forward.</p>
008	Kevin Byrne	<p>Opposed to PERM 2.</p> <p>Minimal reduction in walking distance</p> <p>The measure will not reduce reliance on private car usage. A difference of merely 150 metres to the existing exit will not be a defining difference in car usage over active methods to school travel. The location of PERM 2 is within 1km of KTCS, 1.6 km of Educate Together and 2.2 km of St. Brigid's Primary school. PERM 2 reduces walking/cycling distances to KTCS by 300m, Educate Together by 100m and St. Brigid's Primary School by 100m. Walking distance to the train station is not improved either.</p> <p>Removal of other permeability measures</p> <p>PMA 43 removes PERM 7, 8, and 9 which diminished the goal to improve the catchment area to the train station for houses north of the rail line.</p>

¹ PERM 8 Creation of a pedestrian/cyclist link connecting Drumcree Court with Curragh Finn. (PMA No 43, refers).

Sub. No.	Name	Summary of Submission
		<p>Wasteful use of resources Considerable engineering works will be required which is wasteful to spend, for such little effect.</p> <p>Safety The access point opens up onto a busy road. This is a danger to small children, takes them out of sight of parents. It also opens the estate to an influx of foot traffic which given the increase in crime in Kildare will make it easier for people to get access to properties directly adjacent to the exit.</p>
009	Curragh Finn Residents	<p>The Residents of Curragh Finn are completely opposed to PERM 7, 8 and 9, as do the rest of Drumcree Court.</p> <p>They object on the grounds of child safety, increased and unwanted pedestrian traffic, additional cars parking in the estate.</p> <p>It is not wanted, and residents would face a loss in value to their houses.</p>
010	Mark Murphy	<p>Opposed to PERM 7, 8 and 9, as do the rest of Drumcree Court.</p> <p>They object on the grounds of child safety, increased and unwanted pedestrian traffic, additional cars parking in the estate.</p> <p>It is not wanted, and residents would face a loss in value to their houses.</p>
011	Chris Geoghegan	<p>The submitter is against any pathway between Curragh Finn and any other estate. They have a safe enclosed area that kids can safely play. Increased footfall, bikes, scooters would be dangerous. The walkway could bring anti-social behaviour.</p> <p>The proposal was already raised and rejected, and I find it ridiculous that it has been reworded and put out again.</p>

Sub. No.	Name	Summary of Submission
		An auctioneer has stated that the walkway would devalue houses. If the walkway goes through the it is stated that legal advice in terms of house devaluation will be sought.
012	Kevin Doyle	<p>Drumcree Court is a quiet estate where everyone knows each other.</p> <p>Opening up foot and cycle access between Rathbride Close and Drumcree Court would turn Drumcree Court into a rat-run. Concerns over security, littering, anti-social behaviour. Creating access between estates has caused problems historically and the Council should know better.</p> <p>If Minister Ryan wants to increase usage of the trains without filling the train car park then perhaps he should consider putting on shuttle buses to bring people to and from the train station.</p>
013	DAA	Please refer to Section 4 which relates to submissions from Prescribed Authorities or Public Bodies.
014	John Spencer	<p>Object to PERM 4. The fact that PERM 8 was removed completely invalidates what the planners were originally trying to achieve. It must now be removed as should all PERMs through estates within the town.</p> <p>The fact that walkways in other town have been created and then closed calls into question the capabilities of the planners involved. It also shows a complete disregard for residents. The needs of the town are educational and medical facilities to support new builds that the Council have approved.</p>
015	Sinéad Hanbury	<p>Drumcree Court is a small estate and the scale of the various estates proposed to connect to Drumcree Court there could be a large imbalance in the footfall through the estate.</p> <p>Concerns over the lack of privacy, increase in noise, felling of mature trees, impact on safety, security, vandalism and anti-social behaviour.</p>

Sub. No.	Name	Summary of Submission
		<p>The access points could become shortcuts to avoid Garda detection and the Plan does not contain security measures for the increase in people passing the houses day and night.</p> <p>The submission is also concerned that the access measure would increase non-residents parking in the area, to avoid paying for the rail car park, which will increase traffic in the area too. There is also a concern that the parked cars could obstruct entry and exit for residents and also service vehicles. The submission requests that KCC engage with the residents before any decision or action is taken. The age profile of the area should be considered as many are elderly or retired which don't need this worry.</p> <p>'Breaking-open' of estates is counterproductive to efficient traffic management, path, and road maintenance, and introduces unnecessary pedestrian and vehicle traffic to otherwise safe, secure, and well-maintained areas. The submission asks that the peacefulness, safety and ambience of the estate is maintained.</p>
016	Owen Kennedy	<p>The submission relates to PERM 4 on the Draft Plan and the proposed demolition of the wall between Drumcree Court and Rathbride Close. It is submitted that the permeability measure will lead to anti-social behaviour and opportunistic crime.</p> <p>It is noted that PERM 8 is removed but PERM 4 remains. It makes no sense; it adds nothing to the local area and rat run is being created.</p> <p>The rat run in Elm Park was closed and the green area in Rathbride Abbey was fenced off. Common sense should prevail and PERM 4 removed to allow residents live in quiet estate.</p> <p>Investment in social and medical facilities are needed rather than silly plans that offer no advantages to residents.</p>
017	Patricia Kennedy	<p>Object to access measure PERM 4 in Drumcree Court. No longer feel safe in my home and would need to upgrade security for fear of anti-social behaviour.</p> <p>Birch trees would be destroyed to facilitate the plan.</p>

Sub. No.	Name	Summary of Submission
		Cannot understand why PERM 4 was left in and other routes were scrapped. Leaving PERM 4 in the absence of other interlinked routes defeats the purpose.
018	Stephen Stafford	Object to PERM 4. In light of the removal of PERM 8, the retention of PERM 4 makes absolutely no sense, and I have to believe that its retention was an oversight. The submission states that they trust that this will be rectified at the next review.
019	Meath County Council	Please refer to Section 4 which relates to submissions from Prescribed Authorities or Public Bodies.
020	Richard and Sinead Doyle	The submission relates to PERM 4 and 8. Drumcree Court is a small-scale development with a secluded cul-de-sac layout. The walkway threatens to disrupt the sense of privacy and safety in terms of unwanted foot traffic, anti-social behaviour and unwanted disturbances. The needs of the community should not be overshadowed.
021	Transport Infrastructure Ireland	Please refer to Section 4 which relates to submissions from Prescribed Authorities or Public Bodies.
022	Bill McDonald	The submission opposes PERM 4. The estate has more than adequate access to the Rathbride Road. Considering the scale of the various estates proposed to connect to Drumcree Court there would be a serious imbalance in the footfall through the estate. The concerns are: <ul style="list-style-type: none"> - The green area would become unsafe to play on. - Additional parking of vehicles from commuters using the train station.


Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> - Routes become the focus of anti-social behaviour and short cuts to avoid Garda detection. The estate has in the recent past experienced vandalism and extreme anti-social behaviour that has affected residents, which required the installation of CCTV. - Impact on property value. - Removal of mature trees and destroy established wildlife.
023	Cunnaberry Hill, Oaktree Residents Association	<p>The submission states that the playground which was previously published in the Draft Plan Section 6.5.1.5. Sports and Recreation does not appear to be published in the amended report. As of 16th August, the Resident’s Association received email correspondence in respect of KCC-153265 which stated that the estate has not been taking in charge and the estate would be a matter for the developer. In this context the submission states that the playground is in a complete state of disrepair and should not have been initially published by Kildare County Council if the area is not within their remit.</p> <p>The Residents Association welcomes the ‘proposed deletions’, in particular; Cycle 32, Cycle 46, Cycle 58, Cycle 58, PERM 34, PERM 41, and PA 3.</p> <p>PMA 45 is welcome subject to the proposed link not altering the existing berm between Cunnaberry Hill and the M7, due to noise impact.</p> <p>PMA 50 – the Draft Plan on Map 7.2 showed a blue line as a link road. The number associated with the link is 46. It is stated that link road through the development of Cunnaberry Hill shall be strongly contested by the residents.</p>
024	Judith Boyle	<p>PMA 5 and PMA 24 Welcome PMA 5 and PMA 24 as in keeping with the Town Centre First Approach.</p> <p>PMA 1 Appendix D 1 Building Use - Town Centre Ground Floor- The building at R51TV08 is marked as only a retail unit this is incorrect, the building is mixed use, hospitality and retail. The business occupying it is a public house with and off-licence at the front.</p>

Sub. No.	Name	Summary of Submission
		<p>In Appendix D 2 Building Use - Town Centre First Floor- The building at R51TV08 first floor is marked as vacant which is incorrect.</p> <p>PMA 11 The submission states that they encourage the proposal under TCO 1.3 in respect of the re-use of vacant units for alternative functions. However, they are concerned over parking in the town centre as the proposal will be a hindrance to the viability of existing enterprises. Nowhere on the proposal is there mention of loading bays or accesses to businesses for orders and deliveries in the town centre which is a serious oversight.</p> <p>PMA 56 They note the coach parking, but the Plan does not account for the loss of parking in the main street and no loading bays are planned. They are concerned that town centre businesses will be in direct competition with businesses that have ample parking close to their shops, adding to the uncompetitive location of being in the town centre and going against the plan to rejuvenate the town centre. The Submission also refers to PMA 29 in the context of parking in the town centre, that an ageing population need to be able to access the town centre and have a safe well-lit parking area close to the town centre.</p> <p>PMA 22 The submission states that the PMA is most welcome especially the reference to toilets. It is stated that public toilets are an issue as tourist, visitors and commuters do not have access to public toilets this puts huge financial and moral pressures on businesses inside the town centre to provide these facilities, which also has security and safety risks.</p> <p>PMA 42 The modal shift targets focus on travel to work and to education yet does not consider that people still travel by car for shopping trips and tourism activities with children. According to the National Household Travel Survey 2023 17% of trips were to complete shopping activities. This should be</p>

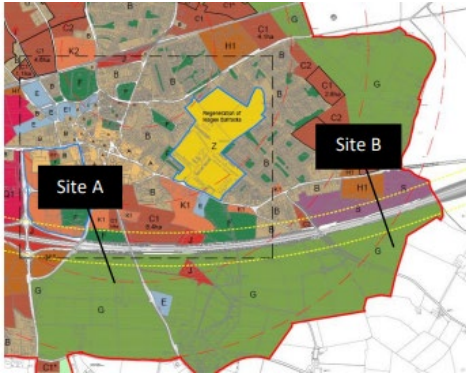
Sub. No.	Name	Summary of Submission
		<p>considered, and it is worth noting that the removal of public transport from the town centre is a huge impediment to using public transport to commute to work or education.</p> <p>PMA 44 With the proposed one-way system and road closures in the town centre this will make this a very busy road out towards the M7 motorway as traffic will be unable to go towards N7 to Dublin.</p> <p>PMA 62 The submission in respect of the changes to RD4 and the insertion of RD 6 states that by making Meadow Road one way will direct all traffic on to Grey Abbey Road towards the M7 and Junction 13 which is at variance with national, regional and local planning policy.</p> <p>Grey Abbey Road is already blocked with traffic to schools and the KTOV. The junction at the parish church is extremely dangerous, sightlines are not clear, and cars travel too fast. It will essentially cut them off from medical facilities and shopping on the Dublin Road and have an undesired effect to encourage them to use the M7 to access nearby towns instead of staying in their locality.</p> <p>PMA 65 In respect of the changes to MTO 3.6 to make Nugent Street one way and to close Bride Street will hinder movement, travel times will increase, it will hinder access from one side of the town to the train station going against making a commute to work and education easier. The submission also refers to the HGV ban as part of Objective MTO 3.6 and they note while good in theory these is issues with deliveries and there are no loading bays, this will make the town centre unattractive to commercial and tourist activities.</p> <p>PMA 68</p>

Sub. No.	Name	Summary of Submission
		The submission welcomes the use of the school car park however states that this will not help the traffic or parking issues when children are collected and dropped off and these are significant times where extra parking required.
025	Pousterle Limited	<p>The submission relates to PMA 85 and PMA 111.</p> <p>The submission supports the newly defined Southgreen Key Development Area and the complementary uses, of which a significant portion is part of the landholding owned by Pousterle Ltd. However, they request that the SR: Strategic Reserve zoning be retained. Appendix A of the submission includes a land holding map.</p> <div data-bbox="1032 651 1615 1007" data-label="Figure"> <p>The figure is a site plan map titled 'Figure 1 - Requested Zoning'. It shows a large area outlined in red, which is the subject of the submission. This area is divided into several zones: a large green area labeled 'F', a smaller green area labeled 'I', and a yellow area labeled 'SR'. Other zones shown include 'E', 'B', and 'C'. The map also indicates several 'Proposed Material Alterations' with callouts: 91, 92, 110, 108, 07, and 111. A north arrow is located in the top left corner of the map area.</p> </div> <p>The submission noted the SCA determined the subject lands as No Development, whereas the applicant would consider the lands as Tier 2. It is considered that key points for consideration to retain the zoning as per the Draft Plan are as follows:</p> <ul style="list-style-type: none"> - Strategic location within 15-minutes of school, town centre and travel hubs reaffirm the site's designation as a strategic residential area as per the 2012 Plan. Residential development at this location is considered a natural extension of the town. - Key infrastructure was front loaded such as the wastewater treatment plant and pumping station and the Southern Internal Link Road at a cost of €5 million to Pousterle Ltd.

Sub. No.	Name	Summary of Submission
		<ul style="list-style-type: none"> - Welcome the proposed social infrastructure, recreational and sport facilities and is ready to provide them, however, this development has to be justified by provision of satisfactory amount of residentially zoned land. - The subject site was zoned Phase 2 residential in the 2012 LAP. - The submission states that Census 2022 data released in 2022 showed faster growth than originally estimated and further strategic development areas should be reserved to accommodate projected population growth beyond lifespan of the LAP. - Strategic Reserve will not contradict the overall vision set for the Southgreen KDA. - The subject site has a potential for future development which should be not compromised by F: Open Space and Amenities zoning. <p>Rational for Open Space and Amenities Provision</p> <p>The submission considers that an area of c. 13.36 is sufficient for the provision of Community Sports Campus on Old Road. Appendix B of the submission contains an illustration of how this could be laid out to include sports hall/ community hall, play area, multipurpose pitches, athletic track, GAA pitches and parking. The submission references the Chief Executive’s report that argued that ‘the northern part of the subject lands is a significant distance from the town centre and are agricultural in nature’. In this context the submission stated that the accessibility of the site and its suitability for a campus of the nature proposed. It is stated that the distance difference between the location marked in the PMA’s and the location requested by the client is only c 250 m / 3 min walk which is stated as a negligible difference.</p> <p>The submission states the merits of the site are what makes it ideal to develop a state-of-the-art sports facility; contiguous parcel of lands, to the post-primary school and new primary school site, easy extension of active transportation routes, good soil and topography, integrated community development, expanding area with proposed and existing units, northern part already used as GAA pitches and support Kildare Sports Partnership. The requirement for the sports campus can be met in Figure 1.</p>
026	Round Tower GAA Club,	The submission relates to sport facilities and open space in Southgreen KDA. The submission states, as a representative of the majority of those engaged in recreational sport in the town fully

Sub. No.	Name	Summary of Submission
	<p>Kildare Town Athletics Club and Kildare Town AFC</p>	<p>supports efforts of the landholder, Pousterle Ltd, to retain zoning SR: Strategic Reserve on a southern portion of lands as originally proposed in the Draft Plan, as the requirements for a sports campus are met fully in the lands zoned F.</p>  <p>Figure 3 – Proposed Alteration to Figure 11-3 Southgreen Key Development Area Design Framework</p> <p>Round Towers GAA Club, Kildare Town Athletics Club and Kildare Town AFC collectively welcome that the need for provision of a sports campus was recognised. The zoning amendment under PMA 91, 85 and 111 are welcomed.</p> <p>In respect of PMA 85 it is stated a large quantum of the KDA has capacity to facilitate a new sports campus and is fully supported. The submission references an indicative drawing that has been submitted with the submission which relates to 13.36 ha of the subject lands and has the ability to facilitate the provision of a community sports campus that includes a sports hall/ community hall, play area, multipurpose pitches, athletic track, GAA pitches and parking.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission states the merits of the site are that it is 19 mins walk from the train station and town centre, a contiguous parcel of land, close to the post-primary school, easy extension of active routes, free draining soil and flat topography, benefit integrated community development, close to existing and proposed residential units and the northern part is used as GAA pitches on a temporary basis.</p> <p>The submission also wishes to highlight the distance between the location proposed and the PMA is only 250m / 3 mins.</p>
027	Uisce Éireann	Please refer to Section 4 which relates to submissions from Prescribed Authorities or Public Bodies.
028	Department of Education	Please refer to Section 4 which relates to submissions from Prescribed Authorities or Public Bodies.
029	Ann Grogan	There is no benefit for Drumcree residents for this lane. Drumcree court is a small estate with strong neighbourhood watch culture. Additional pedestrians would weaken security as it would provide more escape/entry opportunities for individuals with criminal intent.
030	Lynda & Shane Geraghty	<p>PMA 43</p> <p>The submission states that they are extremely disappointed that PERM 2 was not included under PMA 43. The measure is non-sensical and there are serious safety concerns with opening an access to a very busy road especially for young children.</p> <p>There is currently a large entrance to Rathbride Abbey that is more than adequate, creating a further entrance circa 150m away from the existing entrance is a waste of taxpayers' money and will put lives at risk.</p> <p>The security of the estate will be impacted by PERM 2 make it easier for robberies.</p>

Sub. No.	Name	Summary of Submission
		Call off the bad idea and remove PERM 2.
031	OPW	Please refer to Section 4 which relates to submissions from Prescribed Authorities or Public Bodies.
032	Irish National Stud	<p>The submission relates to PMA 112 (a) and (b) on land owned by the Irish National Stud who are opposed to the proposed change from G: National Stud and Greenbelt to F: Open Space and Amenity. The lands are in equine use and there is no intention to change this long term established use. The Irish National Stud want to retain the National Stud and Greenbelt zoning objective. The lands are zoned National Stud / Greenbelt in the 2012 Plan, the objective of which is to protect the INS.</p> <p>The submission notes that the PMA is against the advice of the Chief Executive of KCC.</p> <p>The submission states the proposed change is unsuitable as the lands are in private ownership, vital to the current operation, detached from the town by the motorway, sport use would not be compatible with the stud on noise and security grounds, removed from residential area, the two land parcels aren't connected, there is a town park planned and residents have already the benefits of the Curragh Plains.</p> 

Sub. No.	Name	Summary of Submission
		<p>The land parcels measure c. 16 ha and c. 13.8 ha. and used by the INS which is a thoroughbred horse breeding facility. They are in use for grazing mares, foaling mares, isolation for international and domestic horses from the main herd, which is a vital component of our biosecurity measures.</p> <p>The Kildare CDP places a strong emphasis on the equine industry including the Irish National Stud. The submission references a number of policies and objectives in this context. Similarly, reference is made to the Draft Plan in respect of Section 9.8 which references the INS.</p> <p>The Chief Executive's report is referenced in the submission where it was the opinion that the lands are geographically detached and inappropriate for open space use.</p> <p>PMA 112</p> <ul style="list-style-type: none"> - The Movement and Transportation maps do not show any proposed routes through the Stud lands. The bridge over the M7 is noted but this will not provide access to the subject lands. - No justification has been provided as to why these lands are being considered. - Lands are in private ownership and is used by the INS for equine related activities. - Agricultural buildings are 'Not Permitted' in the F: Open Space and Amenity zoning. - Geographically detached. - Lack of connection between the two land parcels measuring 1.5km. - The Cherry Avenue Park located on the north side of the town would meet the needs of the town. - Residents have direct access to the Curragh Plains for open space/recreational space. - The revised zoning would result in the full extent of the INS lands not being zoned as National Stud (Greenbelt) which would be misleading and confusing. - Lands north of the rail line are most suitable for open space and amenity as they are near new residential development.
033	NTA	<p>Please refer to Section 4 which relates to submissions from Prescribed Authorities or Public Bodies.</p>

Sub. No.	Name	Summary of Submission
034	Friends of the Irish Environment	<p>Greenhouse gas emissions attributed to the transport sector have increased by 130% due, in part, to car-dependent and car-prioritised development policies and decisions.</p> <p>The Draft Kildare Town Local Area Plan should be made to serve the common good by adherence to statutory requirements including, inter alia, s.9 (6), s.10 (2), s.19 (2, 2A, 2B), of the Planning and Development Act, 2000 (as amended) and s.15 (1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).</p> <p>In respect of the Proposed Material Alterations, Friends of the Irish Environment calls for the Elected Members not to delete PERM 7, PERM 8, PERM 9, PERM 23, PERM 24, PERM 25, PERM 34, PERM 35, PERM 39, PERM 41, Cycle 32, Cycle 34, Cycle 35, Cycle 37, Cycle 38, Cycle 46, and Cycle 58 in the Draft Plan.</p> <p>PMA 42 presents an issue of consistency with the national budgets to target the abatement of emissions. It is stated that it's particularly concerning the PMA lists 2036 as a census year on the time horizon to reflect an assessment of targets that should have been met by 2025 or 2030.</p> <p>Friends of the Irish Environment submitted that PMA No. 89, PMA No. 97, PMA No. 104, PMA No. 08(b) and PMA No. 112(a) should not be made and states that if these PMAs are included it would create an adverse impact on the M7 national road and associated Junction 13 and would be at variance with national, regional, and local planning policy. Regional policy objectives RPO 8.1, RPO 8.2 and RPO 8.3 are specifically referenced in relation to PMA No. 112(a).</p> <p>Changes in Public Attitudes to Address Climate Action The submission references various facts which highlight the impact of climate change, the urgency to respond to climate change challenges and the impact of switching car trips with walking, cycling, or scooting.</p> <p>Prioritising Climate Action and Societal Wellbeing The submission highlights Irelands obligations under international agreements and frameworks, the findings of the UN Environment Programme Emissions Gap Report 2022, reports from the World</p>

Sub. No.	Name	Summary of Submission
		<p>Meteorological Organization on rising temperatures in Europe and the “Climate Change 2023: Synthesis Report” published by the IPCC on the rapidly closing window of opportunity to secure a liveable and sustainable future for all.</p> <p>Acceleration of Climate Change Various sources are referenced which highlight the acceleration of climate change and states prompt actions are needed to avoid worsening outcomes.</p> <p>Legislation and Policy for Planning, Development and Climate Action The submission references Section 9(6), Section 10(2)(n)(i)(ii) and Section 19(2)(a)(b)(2A)(2B) of the Planning and Development Act, 2000 (as amended) and Section 15(1)(a)(b)(c)(d)(e) of the Climate Action and Low Carbon Development Act, 2015 (as amended).</p> <p>Planning Policies for Mitigating Climate Change The submission highlights specific National Policy Objectives (NPO 27 and NPO 64) and National Strategic Outcomes (NSO 1, NSO 2 and NSO 7) around sustainable mobility and states that planning authorities have a pivotal role in the decarbonisation transition. It also states that the Proposed Material Alterations should be informed by the Climate Change Advisory Council’s “Council Paper Working Series”.</p> <p>Eastern and Midland Region Spatial and Economic Strategy 2019-2031 (RSES) In relation to the RSES the submission highlights the following:</p> <ul style="list-style-type: none"> • The growth enablers to be considered by local authorities, in developing their core strategies and settlement hierarchies, specifically healthy placemaking and climate action. • The guiding principles for ‘Integration of Land Use and Transport’. • Regional Policy Objectives RPO 8.1 and RPO 8.4. • The walking and cycling objectives to guide investment in the EMRA. <p>Transport Strategy for Greater Dublin Area 2022-2042</p>

Sub. No.	Name	Summary of Submission
		<p>The submission highlights Section 8.3 'The Road User Hierarchy', Section 8.8 'Filtered Permeability' including Measure PLAN9, and Section 14.7 'Low-Traffic Neighbourhoods' including Measure TM6.</p> <p>Kildare County Development Plan 2023 – 2029 The submission referenced the aim of Chapter 5 '<i>Sustainable Mobility & Transport</i>', Section 5.4 '<i>Sustainable Movement</i>' and the following policies, objectives and targets of the Plan: RE P12, TM P1, TM P2, TM P3, TM T2, TM T3, SC O24, SC O25, SC O30, SC O46, SC O68, SC O69, SC O70, SC O89, SC O103, TM O7, TM O12, TM O20, TM O21, TM O23, TM A2, TM A3, TM A5, TM A12, TM A13, TM A18.</p> <p>Climate Action Plan 2023 (CAP23) In relation to the CAP23 the submission highlights the following:</p> <ul style="list-style-type: none"> • Irelands ambition of halving greenhouse gas emission by 2030 and of putting Ireland on course to becoming carbon neutral by 2050. • The roles and responsibilities of Local Authorities and the design and delivery phases of LA CAPs as set out in Section 10.3.5 of the CAP23. • The findings and recommendations of a report undertaken by the OECD and the Irish Climate Change Advisory Council, 'Redesigning Ireland's Transport for Net Zero: Towards systems that work for people and the planet'. • The Avoid-Shift-Improve approach to transport decarbonisation as set out in the CAP23. • Key Actions to deliver emissions abatement in transport for the period 2023-2025 <p>The Local Government Climate Action Key Performance Indicators report is referenced which local authorities should consider using in key thematic areas, including transport.</p> <p>Local Authority Climate Action Plan Guidelines The submission references a transport focus sector example of the guidelines which highlights the significant potential of local authorities to directly support national climate action.</p>

Sub. No.	Name	Summary of Submission
		<p>County Kildare Integration Strategy 2020 – 2026 The consultation process of this strategy and the findings in relation to transport and car dependency issues are highlighted. It also references literature which highlights the benefits of walkable neighbourhoods.</p> <p>Draft County Kildare Local Economic and Community Plan 2023-2029 The preparation stage of the Draft Kildare LECP, the key active travel points considered following data gathering and the published Draft High-Level Goals (HLG 1 to HLG 4) are all highlighted in the submission.</p> <p>Strategic Environmental Assessment - Guidelines for Regional Assemblies and Planning Authorities [50] The submission highlights Section 7.1 of the guidelines which outlines the stages of plan-making after the period of public consultation to determine if any proposed amendments in response to the consultation pose likely significant effects on the environment and warrant mitigation measures.</p> <p>Draft Kildare Town Local Area Plan 2023-2029 - Written Statement The submission references objectives CSO 1.11, MTO 1.1, MTO 1.4, MTO 1.5, MTO 1.8 and MTO 1.9 of the Draft Plan.</p> <p>Kildare Town SEA Report In relation to the Kildare Town SEA Report the submission highlights the following:</p> <ul style="list-style-type: none"> • The Current State of the Environment includes an assessment of sustainable travel modes. • Kildare Town Transport Strategy (KTTS) supports the preparation of the LAP with regards to improving movement and transport within Kildare Town. • The Summary of Potential Environmental Effects includes an Assessment of likely Significant Effects with respect to sustainable travel modes under Section 8.4.5. <p>The mitigation measure to ‘Facilitate sustainable transport modes and the use of walking, cycling and public transport.’ and the relevant County Development Plan objectives and Draft LAP objectives.</p>

Sub. No.	Name	Summary of Submission
035	Value Retail Dublin Ltd.	<p>Proposed Material Alteration No. 27 The submission welcomes the change which seeks to 'protect and support' the KTOV however would consider it more appropriate that Objective EDO 3.6 is omitted.</p> <p>The submission states that reference to the outlet centre is outdated and changing retail trends, changing consumer behaviour, innovative forms of retailing and visitor /tourist attraction should be supported in the context of the KTOV. The submission also references the RPGs in respect of recognising the need for flexibility and a plan led approach that can respond to changing needs.</p> <p>Proposed Material Alteration No. 28 The submission states in respect of the new objective that while understandable in some circumstances, due to its restrictive emphasis, it may not recognise where such an offer can make a positive contribution. It is stated that there is no evidence based rational but assumes it is to avoid them locating in a haphazard/ad hoc fashion. The submission states that standalone food and beverage offers, coffee stands and kiosks do serve a purpose and are often welcomed by consumers when provided in an appropriate format and location. In this regard, in circumstances where it can be demonstrated that the facility would operate in a controlled environment that would not give rise to traffic issues, cause littering, antisocial behaviour, pose a health and safety risk or affect the character of an area then it should be something to consider rather than restrict.</p> <p>It is requested in the submission that 'restrict' is replaced with 'consider'.</p> <p>Proposed Material Alteration No. 87 The submission refers to the importance of ancillary food and beverage to the operation of the KTOV, it is something visitors expect and have formed part of the three phases of planning applications. However, they do not feel there is a need to include any reference to café/restaurant/eateries in the zoning objective. The submission does not support the PMA and consider it doesn't align with national level guidelines, is anti-competitive and not appropriate to a zoning objective.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission refers to the Chief Executive's report on the submission on the Draft and believes the recommendation of the Chief Executive's Report is considered more suitable than the wording put forward in PMA 87.</p> <p>The submission revisited the issue raised on the Draft Plan regarding the use of a 'Retail Outlet Centre' zoning and considers it strange that the PMA focuses more on café/restaurant/eateries than retailing in an Outlet. The submission questions whether the change is contrary to national level guidance and inappropriate given the use is ancillary to the overall retail use.</p> <p>In this context, the submission makes reference to the Development Plan Guidelines 2022 where it is stated that <i>'certain zoning objectives can also be overly specific or narrowly devised, which is not appropriate to the general purpose of land-use zoning'</i>. In this context the submission states that the detailed focus on café/restaurant/eateries as part of the Retail Outlet Centre zoning objective is contrary to these Guidelines. The submission also refers to the Guidelines where it is stated that <i>'the planning authority should exercise care and caution in drafting development plan objectives, as the quality of the wording and content will have an impact on the realisation or otherwise of the objective'</i>.</p> <p>It is submitted that the unintended consequence of the PMA relates to competition and anti-competition issues which Section 2.5.3 of the RPGS are very clear as follows:</p> <p><i>The planning system should not be used to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting and implementing these Guidelines, planning authorities and An Bord Pleanála should avoid taking actions which would adversely affect competition in the retail market. In particular, when the issue of trade diversion is being considered in the assessment of a proposed retail development, planning authorities and An Bord Pleanála should assess the likelihood of any adverse impacts on the vitality and viability of the city or town centre as a whole, and not on existing traders.</i></p>

Sub. No.	Name	Summary of Submission
		<p>The submission noted this text is in the context of 'retail' but can apply to café/restaurant/eateries, particularly as the PMA makes it part of a 'retail' zoning objective. The submission raises the issue of anti-competitive issues with no 'assessment', as it is stated that no assessment has been carried out to provide evidence that café/restaurant/eateries in the KTOV will impact on the vitality and viability of the town centre. Reference is made to the Draft Plan being evidence based but the PMA has not been prepared on foot of clear evidence but rather through motions. In this regard the submission refers to another aspect of the DPGs as follows:</p> <p style="text-align: center;"><i>'Ensuring that the economic or employment strategy of the development plan is translated into the appropriate land-use zoning proposals is an important consideration in the plan preparation process. The evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature'.</i></p> <p>The submission notes that while the Local Authority have evidence and a rationale for the strategic need to support the 'Outlet Centre', there is no evidence to warrant any reference to café/restaurant/eateries in the 'zoning objective', a matter of detail best left to planning applications. It is stated there is no evidence to support a restriction on café/restaurant /eateries on the subject lands and only these lands in the town of Kildare. The submission uses the following from the DPGs in this context:</p> <p style="text-align: center;"><i>'As development planning becomes more data-driven, the value of spatial data is critical to the planning process in supporting transparent and evidence-based decision making. From the core strategy to zoning decisions, to planning permission and commencement of construction, the planning system must incorporate data collection and analysis at all stages'.</i></p> <p>The submission states that no evidence base has been presented that has formed the basis of the focus on café/restaurant/eateries at KTOV or how the results of such evidence and analysis show that the restrictions that would be placed on food and beverage sales at KTOV, if the material alterations were to be adopted, are necessary in order to protect the primacy of the town centre.</p>

Sub. No.	Name	Summary of Submission
		<p>The submission refers to how it supports trade in the town centre in terms of bed space for overnight guests as a result of marketing promotions between local hotels and the KTOV and also clients engage with food operators in the town. The submission quotes the owners of Firecastle, Hartes, Cunningham’s Bar and Silken Thomas on how the KTOV positively impacts their businesses in the town.</p> <p>The submission requests the removal of any reference to “café/restaurant/eateries” which would result in the complete deletion of all text in the last paragraph of ‘D: Retail Outlet Centre’ zoning objective’.</p> <p>The submission suggests that if the PMA is to be adopted that ‘<i>new additional floorspace for</i>’ café/restaurant/eateries, is added as a minor change to the PMA.</p> <p>The submission includes a table in Annex 1 where the Development Plan Guidelines require clear evidence to allow policies, zonings and objectives to be included in the Plan.</p>
036	Seán O’Feargháil	<p>Kildare Village No additional restrictions on its ability trade or the nature of its offer should be included in the Plan.</p> <p>Very careful monitoring of the hospitality provision at the Village is required to ensure hospitality facilities onsite do not negatively impact those which are available in Kildare Town.</p> <p>Connections between the town and Kildare Village should be strengthened and further developed.</p> <p>The National Stud Grave concerns and opposed over proposed changes to the Irish National Stud lands. The Stud have not requested the change and no consultation has taken place with the Stud. The Stud needs to be valued, treasured and protected and not zoned for Recreation and Amenity.</p>

Sub. No.	Name	Summary of Submission
		<p>Land severed from the National Stud at Cherry Avenue have been earmarked for development as a recreational and park area for the town and if delivered would be a major attraction. The submission states it is arrant nonsense to talk about developing further lands when not a sod has been turned on this project.</p> <p>The Carmelite Lands The submission refers to the submission made on the Draft Plan where it was stated the lands should be developed for housing purposes specifically for supported living or trading down opportunities for older people. It is also stated that a need exists for executive type large houses. It is requested to remove the educational zoning and replace it would something more practical like housing close to the town centre.</p> <p>Car Parking The submission refers to land to the rear or Cunningham’s and Bank of Ireland for parking. It is suggested that the Council should develop a low-rise style/ two-storey carpark facility to meet the needs of the town.</p> <p>In respect of the De LA Salle school car park it is stated that agreement is need with the school and Board of Management. And in its absence in premature.</p> <p>Permeability and Walkways The submission supports the submissions made in respect of through ways or walkways being opened between estates and particularly those made by the residents of Drumcree Court, Rathbride Close and Curragh Finn. It is stated that throughout Kildare walkways are requested to be closed and it is stated that to open new ones in the face of this experience is sheer and absolute lunacy.</p> <p>In the closing comments the submission states that the presentation of the draft and the PMAs are not readily accessible, unless you are a cartographer. It is also stated that having a display period</p>

Sub. No.	Name	Summary of Submission
		that coincided with the summer holidays further diminishes the likely participation of the public in the process.
037	Tom Blennerhassett	<p>Opposed to PERM 4 and considered there is no logical reason for it to remain as others have been revoked.</p> <p>The Rathbride road is considerably wide to cater for segregated cycle lanes and high-quality walkways, as well as the normal road for vehicular traffic, which could be safer, easier to maintain, less of a risk for anti-social behaviour.</p> <p>Concerns are raised in respect of e-bikes and scooters travelling at speed, safety concerns, litter noise, anti-social behaviour, routes for burglaries, and dealing drugs. It should be struck out. illogical to destroy mature plantings and wildlife by bulldozing a pathway.</p>
038	Denise and John Spencer	<p>Opposed to Perm 4 through Drumcree Court.</p> <p>The concerns raised are that it threatens to ruin the beautiful mature green area, safety especially for children and the elderly, impact freedom of children to play, impact on wildlife habitat, and antisocial behaviour.</p> <p>The submission states that similar openings in other neighbouring areas caused anti-social behaviour.</p> <p>Addressing housing, schools and recreational facilities should take precedent over these proposals.</p>
039	RSR Kildare (Ireland) Ltd.	<p>Proposed Material Alteration 88</p> <p>The submission relates to the Bothair Na gCorp site and it is stated the site has remained derelict and undeveloped for decades and represent a significant under-utilised area of infill land within the town boundary and the proposed zoning prevents any viable development. It is also stated that KCC deliberately excluded the serviced infill site from the Settlement Capacity Audit.</p> <p>Social Infrastructure Audit</p>

Sub. No.	Name	Summary of Submission
		<p>The submission refers to the Chief Executive’s Report (June 2023) referencing the SIA in the context of the zoning on the site in relation to the site and states the SIA <i>‘is set forth to support the assertion that the site at issue is “ideal” for “a range of community and education uses”</i>. It is also states that this was why the site was deliberately excluded from the SCA.</p> <p>The submission argues that the exclusion from the SCA is contrary to wider planning policy which supports the inclusion of significant infill sites. The submission states that it ‘could be objectively stated that the site is in fact ideal for residential and or mixed-use development’, reference is made to this being ‘independently affirmed by An Bord Pleanála’.</p> <p>The submission notes with reference to the Planning Act that KCC has a clear legal obligation to provide zoning for community and education. It references S7.2 of the DPGs regarding a ‘clear evidence-base for amenity policies’ which could be provided through audits. Reference to S7.3 relating to an ‘evidence-based approach’ is also referred to.</p> <p>The submission states that the Draft Plan did not specify any particular community or education use or offer any material evidence of the specific need for the same on the site.</p> <p>E1 Specific Zoning</p> <p>The submission references the proposed change under PMA 88 and states this specific zoning for a nursing home reverts to the zoning already designated in the 2012 Plan. It states the SIA does not substantiate this designated zoning. It is also stated there is no material evidence to support any specific community uses on the site and identifiable need for education or other community uses are provided for in extant permissions or located on other specifically stated areas.</p> <p>The submission states the reality behind PMA 88 is perplexing. HSE data does not provide any material evidence coupled with the fact the site has been vacant all this time. It is stated that the HIQA reports on the existing three nursing homes refer to capacity exceeding demand. There is no evidence for sheltered social housing need for elderly also. There is nothing to substantiate the entire site being designated E1.</p>

Sub. No.	Name	Summary of Submission
		<p>Settlement Capacity Audit It was predetermined by KCC before conducting and producing the SCA that the significant serviced site in the town would be deliberately excluded from the SCA. The DPGs refer to the potential for brownfield / infill must be identified and estimated, contrary to this the subject lands were excluded with no explanation in law or fact.</p> <p>The submission references the NPF's 30% target of residential development to be within the town boundary, underutilised sites and buildings to be brought into residential use. The submission considered the site would be described as such and therefore should have been included.</p> <p>Extant Planning Permission and Additional Provision The submission states that the Chief Executive's report stated that <i>'due to extant planning permission within the CSO town boundary, the NPF required minimum of 30% of new residential zoned land to be located within the boundary was complied with without the site at issue being zoned in whole or part residential'</i>. The submission refers to the Guidelines on extant permissions which states <i>'permissions represent potential housing delivery over the plan period but cannot be considered in isolation to the wider issues involved in the preparation of the core strategy'</i>.</p> <p>The submission points out as a result of the PMAs there are now significant additional sites including unserviced greenfield sites being proposed for residential zoning. In this regard it is stated the calculation of the minimum 30% will need to be updated to reflect the additional provision.</p> <p>In conclusion the submission reiterates that there is a lack of a rational evidence-based approach to the site and asks that the designated zoning be reconsidered in accordance with law and substantiated with material evidence. It is stated that the onus was on the Council to consider every landholding for new residential zonings rather than those which were under a previous Plan.</p>

Sub. No.	Name	Summary of Submission
040	An Taisce	<p>The submission provides an introductory overview on the Obligations for KCC under the Climate Action and Low Carbon Development (amendment) Act 2021 and the carbon budget situation in respect of analysis carried out by An Taisce, which are that the percentage reductions required by 2023 will be much greater than 51%.</p> <p>In respect of the Proposed Material Alterations An Taisce recommend the retention of PERM 7, PERM 8, PERM 9, PERM 23, PERM 24, PERM 25, PERM 34, PERM 35, PERM 39, PERM 41, Cycle 32, Cycle 34, Cycle 35, Cycle 37, Cycle 38, Cycle 46, and Cycle 58 in the Draft Plan. The removal accounts for almost 25% of the permeability objectives in the Draft Plan and should not be deleted. The measures are crucial to reducing transport emissions and facilitates simpler and faster access to local services, amenities and public transport via routes not open to cars. It also facilitates the realisation of the 10-minute concept which is supported by planning policy and the CDP.</p> <p>Consistency Across the Planning Policy Hierarchy</p> <p>The submission highlights that in accordance with the Planning and Development Act (Section 19(2)) that and LAP needs to be consistent with higher tier plans and the deletions would be consistent with the planning policy hierarchy. The submission considers the deletion of the measures would be contrary to RE P12, UD O3, TM P1, TM P2, TM T2, TM T3, TM O7, TM O20, TM O23, TM A2, TM A3, TM A5, TM A12 and TM A13 of the Kildare CDP 2023-2029. Furthermore, it would be at variance to RPO 4.41, RPO 8.1, RPO 8.4 and RPO 9.10 of the RSES and the overarching National Strategic Outcomes NSO 1, 2, 4, 7, 8 as well as NPO 27, 54 and 64 of the NPF.</p> <p>It is also stated that the removal of the measures is not consistent with the GDA Transport Strategy 2022-2042, to which an LAP is required to be consistent under Section 19(2A) of the Planning Act. The submission also considers that removing the permeability measures are inconsistent with the National Sustainable Mobility Policy and the Programme for Government.</p> <p>The submission requests that in order to align the Draft Plan with the CDP, the RSES and the NPF permeability and cycle measures should be reinstated.</p>

Sub. No.	Name	Summary of Submission
		<p>Strategic Environmental Assessment The submission noted in the SEA Addendum Report in respect of the removal of permeability measures that no further assessment is required on foot of the removal of the measures. However, An Taisce would consider that further assessment is in fact required as the deletions are inconsistent with higher level plans and evaluation of the potential changes in direct, indirect and cumulative impacts to air quality, climate and human health resulting from the reduction in permeability and active travel infrastructure is required. It is also stated that the deletions may reduce the emissions mitigation potential of the LAP. An Taisce recommend an updated assessment to be carried out and the Environmental Report be updated.</p> <p>Misalignment of Modal Shift Targets In respect of PMA 42 which adds specific modal shift targets it is stated that setting the target year at 2036 for these reductions puts the Draft Plan LAP out of alignment with the carbon budget cycles, particularly the stringent targets for emissions reduction in the transport sector. Targets need to be coordinated across sectors. The submission recommends the PMA is changed to align with 2021-2025 and 2026-2030 budget periods and the targets in the most recent Climate Action Plan.</p> <p>Zonings near the M7 The submission notes a number of PMAs relate to zoning changes near the M7 which would increase dependence on private car use, increase transport emissions, overload the already capacity-constrained Junction 13, and be contrary to proper planning and sustainable development in line with the hierarchy of planning policies. In this context An Taisce recommend that PMA 8(b), PMA 89, PMA 97, PMA 104 and PMA 112(a) are not adopted.</p>
041	OPR	<p>Please refer to Section 3 which relates to the submission received from the Office of the Planning Regulator.</p>

Sub. No.	Name	Summary of Submission
042	Colbid Investment Holdings	<p>The submission states that currently zoned lands are not subject to the same archaeological concerns for the present purpose of Community and Education Zoning. It is stated that ‘there are presently no plans to provide comparable, eligible Community and Education uses on alternative suitable sites.</p> <p>It is stated that a previous motion was not heard, due to a ‘traffic light system’ but under the PMA the concerns must now be heard.</p> <p>Two reports have been included with the submission, titled an Archaeological Review of lands Proposed for Community and Educational Zoning².</p> <p>Archaeological Review of lands Proposed for Community and Educational Zoning, prepared by IAC (Archaeology & Conservation Consultants).</p> <p>The subject lands are located in Brallistown, adjacent to the Lourdesville Nursing Home³ are greenfield and extend to 4.765 ha.</p>

² A comparison was made of the two reports and the same information is contained in each report.

³ The subject lands as indicated in the submission are not located within the boundary of the Draft Kildare Town Local Area Plan 2023-2029. Furthermore, there is no Proposed Material Alteration that relates to the subject lands.

Sub. No.	Name	Summary of Submission
		<div data-bbox="994 288 1641 735" data-label="Image"> </div> <p data-bbox="994 735 1464 756">Figure 1: Location of Colbid lands showing nearby archaeology</p> <p data-bbox="618 807 2024 916">The submission states there are no recorded monuments, no previous excavations and no features or structures of archaeological or built heritage significance present. Aerial imagery was also consulted, and no previously unidentified archaeological sites or features were visible.</p> <p data-bbox="618 954 1697 986">Lands Proposed for Community and Education Zoning, Hospital Street</p> <p data-bbox="618 992 2024 1248">The submission notes that the Draft Plan shows additional lands proposed for Community and Education zoning to the west of the HSE Primary Care Centre , a review of the Excavations Bulletin (1970–2023) has revealed that there was a burial ground discovered during the construction of this facility of the primary care centre KD022-11, disarticulated material indicated that at least 49 individuals may have been buried there, but some evidence suggest there may be additional burial there. The report states that the site should be viewed as a high archaeological potential with the risk of further development works disturbing additional burials.</p> <p data-bbox="618 1289 1659 1321">Lands Proposed for Community and Education Zoning, Melitta Road</p> <p data-bbox="618 1327 1984 1391">The submission refers to lands located adjacent to Kildare Educate Together and Gaelscoil Mhic Aodha on the Melitta Road which lie within the Kildare (Magee) Military Barracks and any</p>

Sub. No.	Name	Summary of Submission
		<p>development within the lands proposed for zoning will have a negative impact on the remains of the barracks that survive below the existing ground level.</p> <p>Conclusion The land owned by Colbid Investment Holdings contain no known archaeological sites or monuments, whereas the development of the two sites previously mentioned could negatively impact archaeology.</p>
043	Eoin Leavy	<p>The submission relates to lands at Grey Abbey which extend to 0.899 ha. And request an increase in zoning at the subject lands as shown on the map.</p> <div data-bbox="1137 683 1525 1225" data-label="Image"> </div> <p>It is stated the site has the potential to provide a streetscape on the Slí na Sláinte and the entranceway to the town. The map provided relates to a proposed extension to the zoning to the</p>

Sub. No.	Name	Summary of Submission
		<p>boundary of the land to allow for a more cohesive streetscape and allow the development to make full use of the pedestrian facilities.</p> <p>The subject land offers an opportunity to broaden the range of housing typologies in the town and an opportunity for intergenerational living opportunities. It would also provide an opportunity for a modest scheme in number compared to the large developments completed recently.</p> <p>The introduction of a new bus stop under PMA 55 is welcome. The extension of the residential zoning on the subject lands would allow for better pedestrian access to the bus stop and increase the number of houses within 500m of a bus stop, supporting the sustainable transport network.</p>
044	St Brigid's Primary School	<p>PMA 68 inserts a new objective relating to the De La Salle school. The submission states that while the Board of St. Brigid's Primary School is happy to support KCC no plan or agreement for the use of school premises for public parking or use is in place or is envisaged as feasible or practical in the future.</p> <p>The submission also states that in respect of the walkway from Kildare Village to Kildare Town Centre, the Board of Management does not support any walkway / access from Kildare Village through the school premises which compromises the safety and operation of the school.</p>
045	MRP Oakland Ltd	<p>Proposed Material Alteration No. 105</p> <p>The submission refers to the previous submission made on the Draft Plan and that PMA 105 proposes the rezoning of the Industrial/warehousing site to Residential (albeit C: Phase 2 New Residential)⁴. It is stated that rezoning is welcome but the Phase 2 zoning along with the remainder of the site is unsupported and will be counter-productive and will contribute to the significant under provision of housing.</p>

⁴ It is important to clarify that PMA 105 refers to the amendment of ca. 0.7 ha of land from 'H: Industry and Warehousing' to 'E: Community and Education', as per page 57 of the Proposed Material Alteration Report.

Sub. No.	Name	Summary of Submission
		<p>It is requested that the lands are zoned (Phase 1) New Residential. It is stated that the development of the lands would facilitate the development of the Council's lands at Collaghknock which rely on the open space to provide the NBMA to serve the Council's lands.</p> <p>Map 10.2 – Proposed Material Alteration No. 82 PMA 82 related to a revised pluvial flooding map. The submission notes that the relevant flood report that guided this map has not been provided so it is not possible to directly assess the origin of the flooding indicated.</p> <p>Two assumption scenarios have been provided as to the reasons behind the pluvial flooding associated with the subject lands.</p> <div data-bbox="1140 719 1509 1066" data-label="Image"> </div> <p>Assumption Scenario 1: Development Site Pluvial Flooding Pluvial flooding may have been determined to accumulate as a result of development at the proposed development site. In response to this it is stated that it should be noted that proposed development at the site would be required to accommodate its own drainage with design to 1 in 100 year with suitable climate change and urban creep in accordance with the Kildare CDP.</p> <p>Assumption Scenario 2: Overland Flow Directed from Neighbouring Site</p>

Sub. No.	Name	Summary of Submission
		<p>Pluvial flooding may have been determined to flow overland from a neighbouring site, directly to the south. The submission contends that the flood zone indicated on the development site results directly from the incorrect interpretation of the surface water runoff and associated flood risk in the area. It is believed that the pluvial flooding assessment has been based on a high-level review of aerial imagery and that the lands in question have been incorrectly identified as impermeable hard standing material, e.g., concrete or pavement. It is also stated that the area assumed to discharge to the development site currently consists of an exercise arena for horses with a permeable sand-based surface and does not provide an increase in runoff to the development site.</p> <p>The submission queries the validity and accuracy of this flood extent as the extent of pluvial flooding appears unreasonably large compared to the area assumed to drain to it.</p> <p>The proposed development will provide a wall along the boundary, so any surcharge drainage routes from the neighbouring site would be blocked and thus would require the adjacent site to manage their own drainage within their own site.</p>

Appendix 3 – Proposed Material Alterations

Chapter 1 Introduction and Context

Proposed Material Alteration No. 1

Chapter 1 Introduction and Context, amend Section 1.2 to incorporate reference to Appendix D - Kildare Town Centre Land Use Survey and Vacancy Survey as follows:

A local area plan shall be consistent with the objectives of the county development plan, its core strategy, and any regional spatial and economic strategy that apply to the area of the plan. This Plan comprises a written statement and is accompanied by a suite of maps (Appendix A), an estimate of the land requirements for employment purposes (Appendix B), ~~and a~~ Statement of Character for the defined Architectural Conservation Area (Appendix C) *and maps illustrating land uses and vacancy levels at both ground floor and first floor levels in Kildare Town Centre (Appendix D)*. The written statement shall take precedence over the maps should any discrepancy arise between them.

Incorporate the Kildare Town Centre land use survey and vacancy survey maps below as:

Appendix D - Kildare Town Centre Land Use Survey and Vacancy Survey.

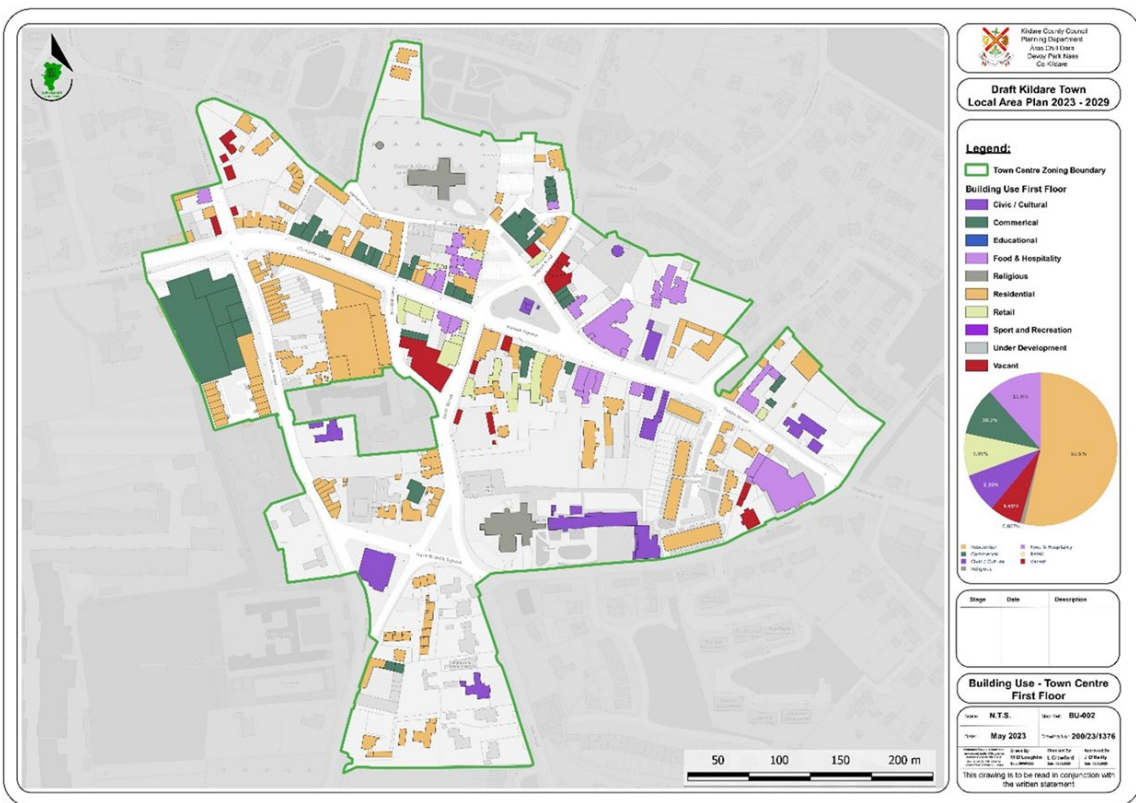
(Comprising of the 4 following maps).

Appendix D Map BU-001 Building Use - Town Centre Ground Floor
Appendix D Map BU-002 Building Use - Town Centre First Floor
Appendix D Map BU-003 Building Use - Town Centre Vacancy Ground Floor
Appendix D Map BU-004 Building Use - Town Centre Vacancy First Floor

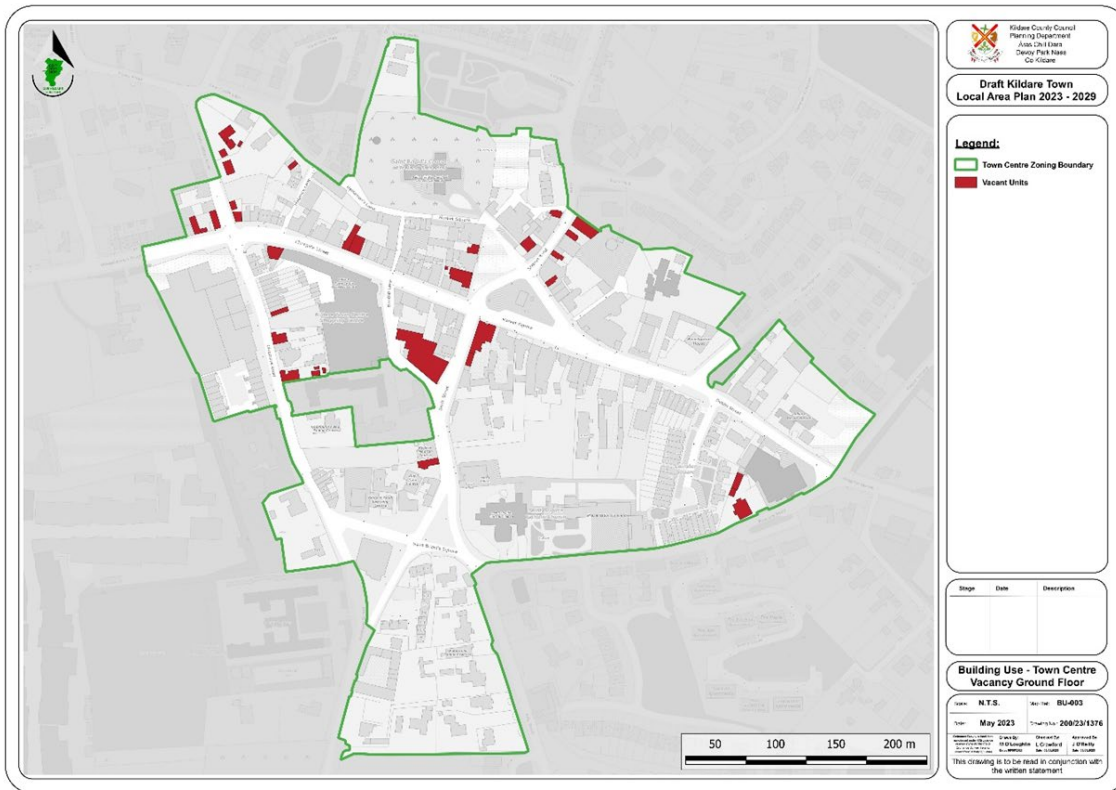
Appendix D 1 Building Use - Town Centre Ground Floor



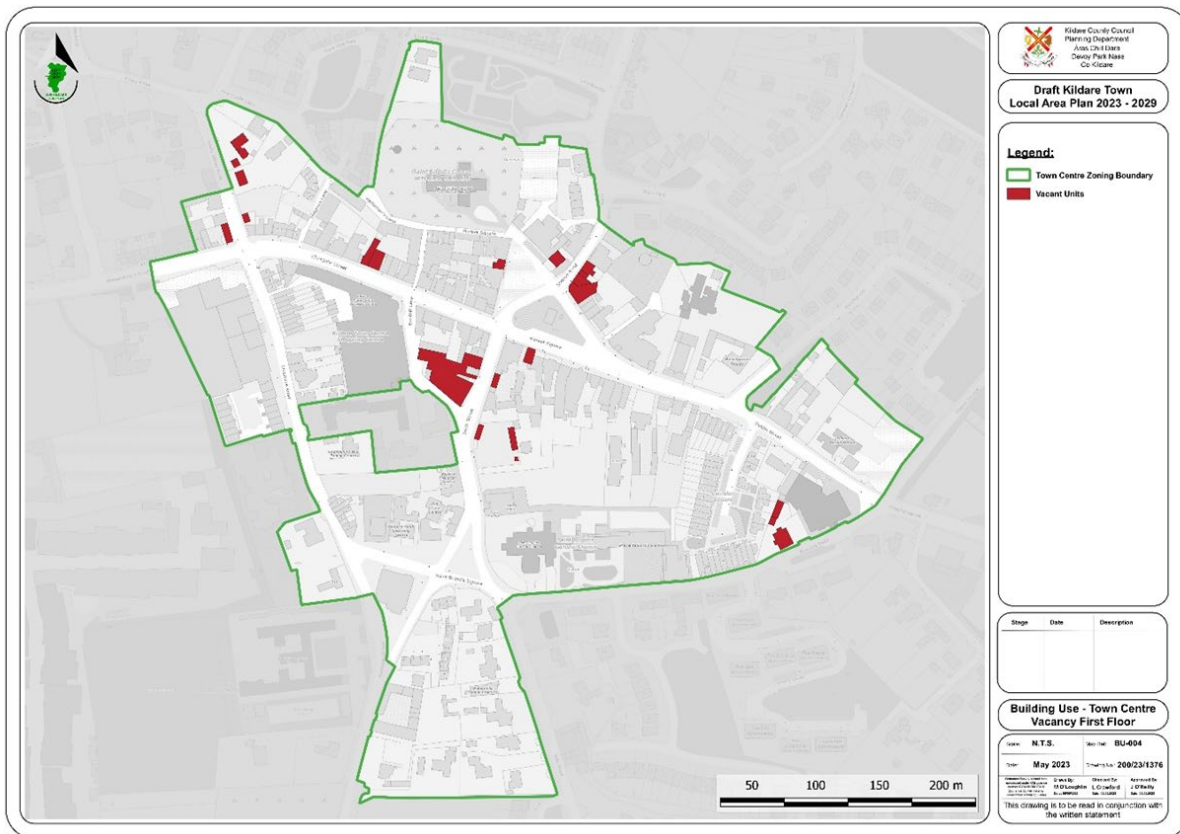
Appendix D 2 Building Use - Town Centre First Floor



Appendix D 3 Building Use - Town Centre Vacancy Ground Floor



Appendix D 4 Building Use - Town Centre Vacancy First Floor



Chapter 2 Spatial Planning Context and Vision for Kildare Town

Proposed Material Alteration No. 2

Chapter 2 Spatial Planning Context and Vision for Kildare Town, amend the third paragraph under Section 2.1.1. Integrating Climate Considerations into the Kildare Town Local Area Plan, as follows:

The Climate Action Plan ~~2024~~2023 (CAP 2023) is the first to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021 and sets out how Ireland can accelerate the actions that are required to respond to the climate crisis. The sectoral emissions ceilings (SECs) agreed in July 2022 put in place targets for each sector to achieve, as part of the CAP 2023 progress reports will be published each quarter. The six high impact sectors are powering renewable, building better, transforming how we travel, making family farms more sustainable, greening business and enterprise and changing our land use. ~~which followed on from the 2021 Act sets a roadmap for sectoral actions for decarbonisation. These actions and policy frameworks set out how Ireland will achieve its international and European commitments relating to reductions in greenhouse gas emissions. Every sector must adapt rapidly, and some sectors will be more impacted than others.~~

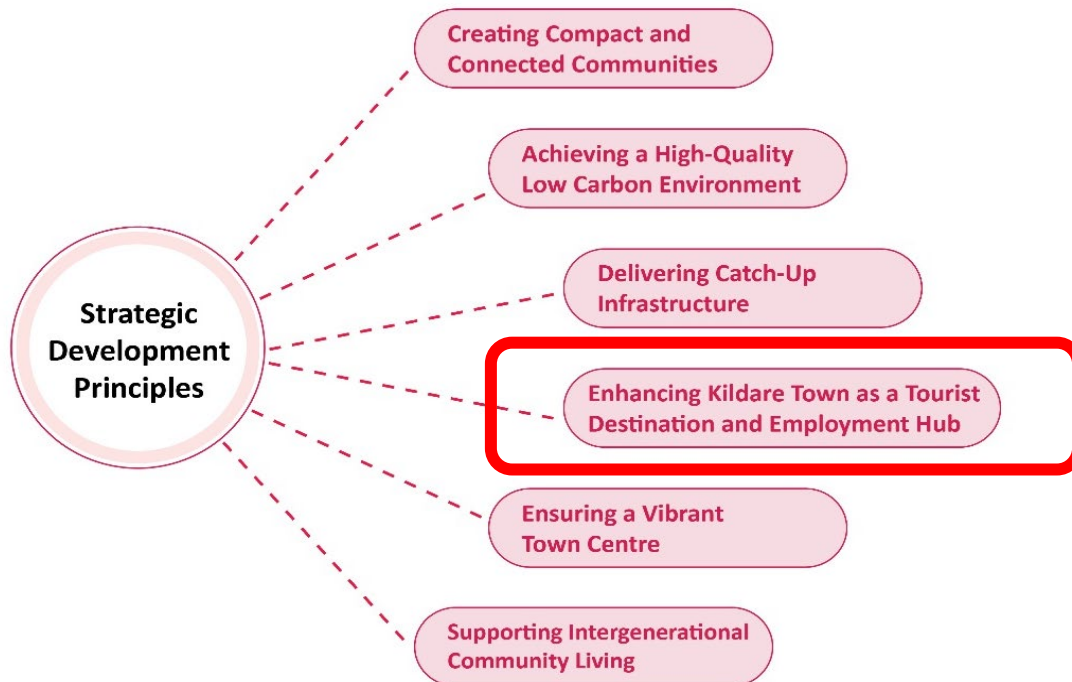
Proposed Material Alteration No. 3

Chapter 2 Spatial Planning Context and Vision for Kildare Town, insert a translation of the Vision Statement as *Gaeilge* after the English version in Section 2.2, as follows:

Forbairt shóisialta, eacnamaíoch agus fhisiciúil Bhaile Chill Dara mar bhaile fáis féin-chothabhálach a chur chun cinn ar bhonn dlúth, tréscailteach agus leanúnach; tabhairt faoi easnaimh in infreastruchtúr sóisialta ionas go mbeadh pobail faoi bhláth; cinntiú go bhforbraítear i lár an bhaile ionad ionchuimsitheach, bríomhar, tarraingteach agus nasctha; leas a bhaint as láidreachtaí reatha na n-acmhainní eachaí, eaglasta agus miondíola sa bhaile; agus timpeallacht ard-chaighdeán, ar bheagán carbóin, le rochtain do chách, a chruthú do chónaitheoirí agus cuairteoirí araon.

Proposed Material Alteration No. 4

Chapter 2 Spatial Planning Context and Vision for Kildare Town, update Figure 2-2 Strategic Principles to Achieve the Vision, as follows:



Proposed Material Alteration No. 5

Chapter 2 Spatial Planning Context and Vision for Kildare Town, amend Section 2.2.1 Achieving the Vision (under Strategic Development Principle ‘*Enhancing Kildare Town as a Tourist Destination*’) as follows:

Enhancing Kildare Town as a Tourist Destination *and Employment Hub*

This Plan places particular emphasis on the development of the town as a key tourist destination within the county by capitalising on its intrinsic built heritage and history. Tourism and the expansion of the existing tourist offer is seen as a key element of the town’s economic development strategy.

This Plan acknowledges the unique assets that Kildare Town and its surrounding hinterland have which distinguishes it as an international tourism destination, particularly in relation to its significant heritage and cultural features including the St Brigid’s Cathedral, the Irish National Stud, Japanese Gardens, Curragh Racecourse. Furthermore, the Kildare Tourist Outlet Village attracts national and international customers throughout the year. *The Plan therefore supports the development of new tourist offerings based around Kildare’s historic, cultural, ecclesiastical, equine and retail assets.* The town ~~therefore~~ has a clear opportunity to further capitalise on its role as a national tourism destination and as an attractive centre for business, whilst preserving and enhancing its unique historic identity, heritage and environment, in line with achieving National Strategic Outcome No. 5 (Strong Economy) and 7 (Enhanced Amenity and Heritage) of the NPF.

Additionally, the Plan supports Kildare Town becoming an employment hub though increasing local employment opportunities not just in the important

tourism and hospitality sector but also in other key areas such as bloodstock, enterprise and manufacturing. The Economic Development Strategy set out in the Plan seeks for Kildare to successfully fulfil its role as a 'Self-Sustaining Growth Town' through a range of measures including the targeting of an increased jobs ratio for the town and providing an adequate quantum of appropriately located zoned employment lands. Such an approach is also in keeping with the principles of compact growth and the 10-minute settlement by providing greater opportunities for people to both live and work in Kildare Town in order to enhance peoples' quality of life and to contribute to low carbon development.

Proposed Material Alteration No. 6

Chapter 2 Spatial Planning Context and Vision for Kildare Town, insert the following new text in Section 2.2.1 Achieving the Vision (under Strategic Development Principle 'Ensuring a Vibrant Town Centre' after the second last line of the first paragraph) as follows:

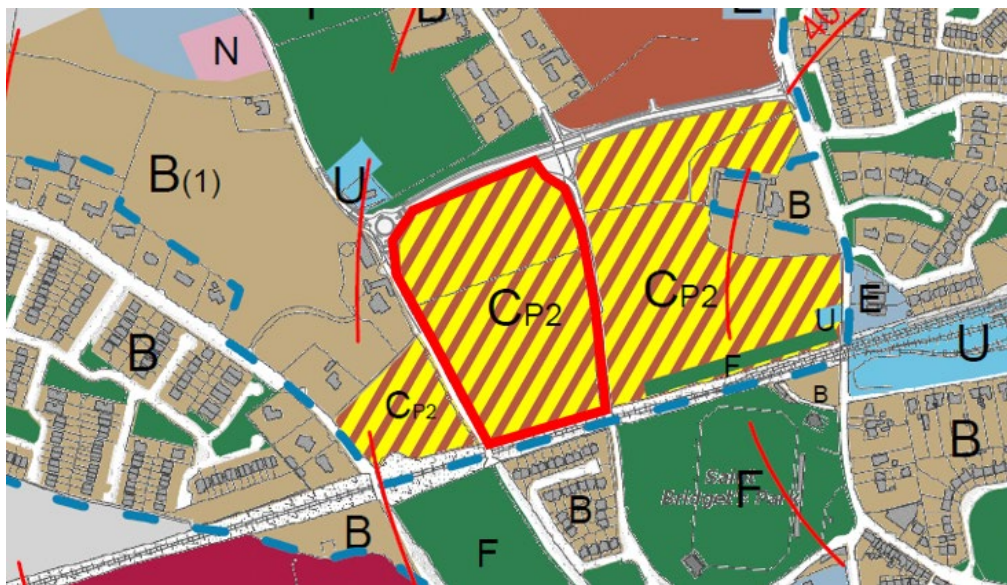
In keeping with Town Centre First approach, this Plan supports increased opportunities for town centre living including 'living above the shop' initiatives and through high-quality residential developments on brownfield and backland sites.

Chapter 3 Compliance with the Kildare County Core Strategy

Proposed Material Alteration No. 7

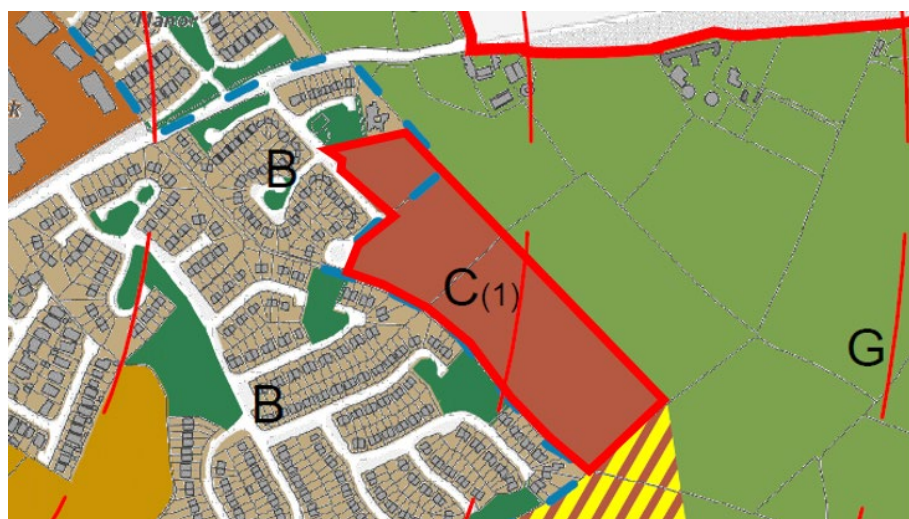
Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 4.53ha) from 'C: New Residential Phase 2' to 'C: New Residential'.

(Note: The adoption of this PMA will result in a consequential amendment to include information relating to the site under Section 11.2. Table 1-2 Implementation and Delivery Schedule Residential Lands).



And

Amend Map 11.1 Land Use Zoning to amend the zoning of the site outlined in red below (approx. 4.87ha) from 'C: New Residential' to 'C: New Residential Phase 2'.



And

Amend Table 3-7 Residential Development Capacity Audit as follows:

Table 3-7 Residential Development Capacity Audit

Site Ref.	Location	Site Area (Ha.)	Site in Built-up area	Residential Yield	Net Density
N/A	Infill Sites within CSO boundary	-	Yes	32 ¹	35-50
T	Former Magee Barracks	11.35	Yes	375 ²	39*
C (1)	Collaghknock	4.87	Partially within	85	80-85³
<i>C (1)</i>	<i>West of Old Road</i>	<i>4.53</i>	<i>No</i>	<i>158***</i>	<i>35-50</i>
C (2)	Greyabbey View	8.5	No	207	23*
B (1)	Walker's Gate	10.3	No	56	31*
C (3)	Oak Church	7.8	No	260	35*
C (4)	Rathbride Road	3.7	No	87	28**
Total Area		47.88 ha <i>46.18</i>	Total Units	1,102 1,175	

¹ Allocation of 5% of the allocated units for Kildare Town for various sites within the Town Centre and Existing Residential / Infill lands land use zonings for potential yield from infill development.

² The residential yield of 375 units relates to the permitted development under Phase 1 only.

³ Public Private Partnership to be subject of a Part 8 application.

Proposed Material Alteration No. 8

Amend Map 11.1 Land Use Zoning, by introducing three sites as New Residential C* and amend Table 3-7 to reflect the introduction of these sites.

NOTE: See Proposed Material Alteration No. 31 also

PMA No. 8 (a)

Change the site outlined in red (1.97 ha) from I: 'Agriculture' to C(a)*: New Residential.



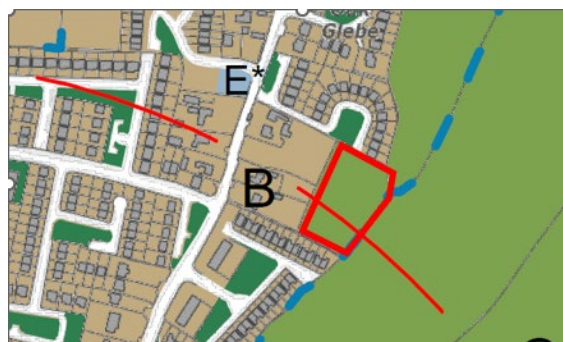
PMA No. 8 (b)

Change the site outlined in red (1.13 ha) from G: 'National Stud and Green Belt' to C(b)*: New Residential.



PMA No. 8 (c)

Change the site outlined in red (0.67 ha) from G: 'National Stud and Green Belt' to C(c)*: New Residential.



And

Amend Table 3-7 Residential Development Capacity Audit as follows:

(Note: PMA No. 7 is a separate item and has been included for illustration purposes only).

Table 3-7 Residential Development Capacity Audit

Site Ref.	Location	Site Area (Ha.)	Site in Built-up area	Residential Yield	Net Density
N/A	Infill Sites within CSO boundary	-	Yes	32 ⁴	35-50
T	Former Magee Barracks	11.35	Yes	375 ⁵	39*
<i>C (1)</i>	<i>Collaghknock</i>	<i>4.87</i>	<i>Partially within</i>	<i>85</i>	<i>80-85⁶</i>
<i>C (1)</i>	<i>West of Old Road</i>	<i>4.53</i>	<i>No</i>	<i>158***</i>	<i>35-50</i>
C (2)	Greyabbey View	8.5	No	207	23*
B (1)	Walker's Gate	10.3	No	56	31*
C (3)	Oak Church	7.8	No	260	35*
C (4)	Rathbride Road	3.7	No	87	28**
<i>C(a)*</i>	<i>Greyabbey</i>	<i>1.97</i>	<i>No</i>	<i>5</i>	<i>3</i>
<i>C(b)*</i>	<i>South of Grey Abbey Road</i>	<i>1.13</i>	<i>No</i>	<i>4</i>	<i>3</i>
<i>C(c)*</i>	<i>Whitesland East</i>	<i>0.67</i>	<i>No</i>	<i>4</i>	<i>6</i>
Total Area		47.88 ha 49.95	Total Units	1,102 1,188	

⁴ Allocation of 5% of the allocated units for Kildare Town for various sites within the Town Centre and Existing Residential / Infill lands land use zonings for potential yield from infill development.

⁵ The residential yield of 375 units relates to the permitted development under Phase 1 only.

⁶ Public Private Partnership to be subject of a Part 8 application.

Chapter 4 Consolidation of the Town Centre

Proposed Material Alteration No. 9

Chapter 4 Consolidation of the Town Centre, amend chapter title, as follows:

4. Consolidation *and Renewal* of the Town Centre

Proposed Material Alteration No. 10

Chapter 4 Consolidation of the Town Centre, amend Section 4.1.2. Town Centre Land Use and Vacancy, as follows:

Many vacant units around Market Square have subsequently been occupied over recent years. A subsequent land use *and vacancy* survey ~~is being~~ carried out *in the town centre* in Q2 2023 *indicated a vacancy rate of 9.54%*. As per Chapter 14 of the County Development Plan 2023-2029, the target for town centre retail vacancy under normal trading conditions is 5%. *Appendix D of this Plan contains maps illustrating land uses and vacancy levels at both ground floor and first floor levels in Kildare Town Centre.*

Proposed Material Alteration No. 11

Chapter 4 Consolidation of the Town Centre, Town Centre Objectives, amend objective TCO 1.3, as follows:

- TCO 1.3** Protect the vibrancy, ambience, quality and vitality of the town centre by:
- (i) Promoting an appropriate mix of day and night-time uses.
 - (ii) Preventing an excessive concentration of ~~less non~~ desirable uses ~~unless carefully managed through an appropriate sympathetic design approach~~ *including takeaways, off-licences, bookmakers, phone repair shops and vape shops (where planning permission is required).*
 - (iii) Facilitating development that will attract and retain commercial and retail activities in the town centre.
 - (iv) Encouraging the re-use of vacant units for alternative functions and uses such as live-work units, residential units, remote working hubs, enterprise incubation, tourist spin-off enterprises, tourist accommodation, niche retail including food or craft enterprises and cultural offerings such as theatre or museum.

Proposed Material Alteration No. 12

Chapter 4 Consolidation of the Town Centre, include an additional objective after objective TCO 1.6, as follows:

TCO 1.7: *To support the establishment of a multidisciplinary stakeholder team to develop a marketing and activation strategy for the town to re-establish the primacy of the town centre and to support the delivery of projects set out in the Kildare Town Renewal Masterplan.*

Proposed Material Alteration No. 13

Chapter 4 Consolidation of the Town Centre, amend Section 4.3.3, as follows:

'The feasibility of providing a bike hire scheme (Objective MTO 1.7 refers) to connect the *Kildare Town* †Train ‡Station, Market Square, Cherry Avenue *Park* (~~when completed~~), *Kildare Tourist Outlet Village and the Irish National Stud and Japanese Gardens.* and *Connections* to other historic sites will also be examined as part of the project.

Proposed Material Alteration No. 14

Chapter 4 Consolidation of the Town Centre, include an additional objective after TCO 2.4, as follows:

TCO 2.5 *Support and facilitate an extension to the Heritage Centre (Market House) as appropriate, to facilitate the development of additional office, retail, hospitality and performance space and the relocation of the existing ESB substation. Any future extension to the Heritage Centre would be subject to normal planning and design requirements.*

Proposed Material Alteration No. 15

Chapter 4 Consolidation of the Town Centre, insert new objective, as follows:

TCO 2.6 *Support the completion of a public realm strategy for Kildare Town, as part of the implementation of the Town Renewal Masterplan. Such a strategy shall incorporate a bespoke materials palette, including for pavement, signage and street furniture which will complement and enhance the natural and built environment of Kildare Town.*

Chapter 5 Economic Development

Proposed Material Alteration No. 16

Chapter 5 Economic Development, Section 5.4 and insert additional bullet point (after point 6) within the Economic Development Strategy as follows:

- *Promoting and building on the St Brigid brand as a unique selling point for Kildare Town at international / national level.*

Proposed Material Alteration No. 17

Chapter 5 Economic Development, insert additional text in the third paragraph of Section 5.5.1, as follows:

~~A central landscaped courtyard can be incorporated either a ground floor or first floor level depending on the uses envisaged.~~ *Any application for the lands which includes the old Chilling Factory site itself shall be accompanied by an Architectural Heritage Impact Assessment (AHIA).*

Proposed Material Alteration No. 18

Chapter 5 Economic Development, Section 5.5.4 National Equine Innovation Centre at the Irish National Stud insert additional text (red), as follows:

The Kildare 2025 and, in turn, the County Development Plan places particular emphasis on the equine sector as a key focus area for growth across the county. Kildare Town features strongly with regard County Kildare's reputation with the equine industry with both the Irish National Stud, the Racing Academy and Centre of Education (RACE), its proximity to the Curragh Racecourse and its central location within the 'Thoroughbred County'. The National Equine Innovation Centre is a Research and Development Hub in the grounds of the Irish National Stud. The hub has been established *by Kildare County Council's Local Enterprise Office* to promote innovation in the equine sector, by supporting entrepreneurial businesses in the field and fast-tracking the commercialisation of equine research of national and international significance.

Proposed Material Alteration No. 19

Chapter 5 Economic Development, amend Objective EDO1.3 under the Economic Development Objectives, as follows:

- EDO 1.3** Support the *expansion of the* National Equine Innovation Centre *as industry needs arise* and proposals for future hubs, *incubation units* and co-working spaces in the town centre, particularly where they reuse dormant buildings/sites to stimulate urban renewal and decarbonisation, and where possible integrated with other key community facilities / services in order to share resources. Future development of Hubs shall be in accordance with the Locations Assessment Model as detailed in the Kildare 2025 Economic Strategy and consultation with the Kildare Local Enterprise Office shall be carried out.

Proposed Material Alteration No. 20

Chapter 5: Economic Development, amend Objectives EDO 1.5 and EDO 1.6 as follows:

- EDO 1.5** Promote Enterprise and Employment development north and south of the R445 Monasterevin Road focusing on light industry, offices, research and development, within a high-quality business park development supported by the connectivity links detailed on Maps 7.12, 7.2 and 7.5. The development of the lands *requires a detailed design statement which also provides for a clearly defined access arrangement and a sustainable transport network which provides accessibility and permeability by active travel and public transport to be developed in consultation with the National Transport Authority and the Traffic Infrastructure Ireland (where appropriate). Any development proposal shall have regard to the Spatial Planning and National Road Guidelines (or any subsequent Guidelines) and also be subject to a Traffic and Transport Assessment to ensure there are no negative impact on the local and national road network.*
- EDO 1.6** Facilitate the development of Industry and Warehousing on the lands south of the motorway at Grey Abbey Road for manufacturing, warehousing, distribution, logistics and other uses associated with the transport industry. *Any development proposal shall have regard to the Spatial Planning and National Road Guidelines (or any subsequent Guidelines) and also be subject to a Traffic and Transport Assessment to ensure there are no negative impact on the local and national road network.* ~~subject to the protection of the carrying capacity of the national road network and a Traffic and Transport Assessment.~~

Proposed Material Alteration No. 21

Chapter 5 Economic Development, amend Objective EDO 1.10 as follows:

- EDO 1.10** Support the examination of the feasibility of Cherryville Junction and Kildare Town to become a transport hub and distribution centre, by maximising its strategic location at the intersection of key national road and rail networks, *in collaboration with key relevant stakeholders such as Transport Infrastructure Ireland, Irish Rail and the National Transport Authority and subject to ensuring the protection of the carrying capacity of the national road network and the associated junctions and local transport networks.*

Proposed Material Alteration No. 22

Chapter 5, Economic Development, amend Objective EDO 2.1 as follows:

- EDO 2.1** Encourage the development of new or the upgrading / extension of tourism activities/facilities including supporting infrastructure (*such as cycle/bus/car parking and public toilets*), in particular those related to religious tourism, equine tourism, retail tourism, food tourism and military tourism within Kildare Town, that respect, respond and enhance their physical location, environmental quality and community setting.

Proposed Material Alteration No. 23

Chapter 5 Tourism Objectives amend Objective EDO 2.2, as follows:

- EDO 2.2** Facilitate the provision of ~~standardised~~ *bespoke bilingual (Irish and English)* signage and interpretation for tourism facilities and tourist attractions throughout the town, ensuring signage is located to facilitate cross-sector promotion between tourist sites.

Proposed Material Alteration No. 24

Chapter 5 Economic Development, insert an additional Tourism Objective as follows:

- EDO 2.7** *Facilitate the provision of a range of additional tourist accommodation types in Kildare Town Centre, and support the implementation of a Pilot Project, led by local businesses through a co-operative of landowners, to reactivate vacant properties in the town centre for the use of over-night tourist accommodation supported by the Local Enterprise Office.*

Proposed Material Alteration No. 25

Chapter 5 Economic Development, insert an additional Tourism Objective as follows:

- EDO 2.8** *Support and promote eco-tourism facilities to foster greater appreciation for the natural environment of Kildare Town.*

Proposed Material Alteration No. 26

Chapter 5 Economic Development, Retailing Objectives insert additional text under Objective EDO 3.3, as follows:

- EDO 3.3** Support and facilitate the development of retail, retail services, *independent retailers* and niche retailing in the town centre area, through the development of infill sites and the redevelopment/renewal of under-utilised sites and buildings, at an appropriate scale, with universal access and design.

Proposed Material Alteration No. 27

Chapter 5, Economic Development, amend objective EDO 3.6 as follows:

EDO 3.6 *Protect and support the continued operation* ~~Ensure the development~~ of the Kildare Tourist Outlet Village ~~is carried out~~ in accordance with the definition of outlet centres as detailed in the Retail Planning Guidelines (2012) (or any subsequent guidelines). ~~to ensure that the products sold are not in competition with those on sale typically in town centre locations.~~

Proposed Material Alteration No. 28

Chapter 5: Economic Development, insert additional Retailing Objective as follows:

EDO 3.9 *To restrict the development of standalone coffee / fast food kiosks having regard to impacts on the amenity and character of the area, traffic, clustering of similar uses and impact on the primacy of the town centre.*

Chapter 6 Homes and Communities

Proposed Material Alteration No. 29

Chapter 6 Homes and Communities, amend the first sentence of Section 6.4.2 as follows:

The population of Ireland is ageing. According to Census ~~2016~~ 2022 there are more than ~~637,000~~ 776,315 people aged 65 years or older in the country, an increase of more than ~~49%~~ 21.7% over the last ~~five~~ six years, and now representing ~~13.4%~~ 15.1% of the population.

Proposed Material Alteration No. 30

Chapter 6 Homes and Communities, amend Objective HCO 2.5 as follows:

HCO 2.5 Support the provision of specific purpose-built housing for older people to facilitate '~~downsizing~~ *right sizing*' and assisted living accommodation, particularly on the Former Magee Barracks site.

Proposed Material Alteration No. 31

Chapter 6 Homes and Communities, Residential Objectives, insert new Objective as follows:

HCO 2.6 *Support the provision of appropriately designed 'self-build' houses on the sites zoned as New Residential* (C*) at a low residential density. A detailed design framework for each site will be required to set out overall layout, siting, access, landscaping, boundary treatments and connection to public services.*

AND

Chapter 11 Implementation insert Specific Objective under Table 11-4 Land Use Zoning Objectives, C 'New Residential' as follows:

Specific Objective:
Site C(a)*, C(b)* and C(c)*: *These lands have been designated for the provision of 'self-build' houses at a low residential density in accordance with Table 3-7 Residential Development Capacity Audit and Objective HCO 2.6.*

Proposed Material Alteration No. 32

Chapter 6 Homes and Communities, amend the second paragraph of Section 6.5.1.6 as follows:

The location of future community services should be provided relative to the location of target user groups and their level of accessibility insofar as practical. ~~Based on benchmarks used in Northern Ireland (Causeway Coast and Glens Borough Council, Strategic Framework for Community Centre Provision, 2016) there is no requirement for additional facilities in the town as the existing number will exceed the benchmark of 0.30 per 1,000 people in 2029 at 0.55 per 1,000 (based on existing facilities excluding the Garda~~

~~Station.~~ *The Plan ensures that lands are appropriately zoned and located for community purposes throughout the plan area to support the provision of social and community services as the need and funding opportunities arise.*

Proposed Material Alteration No. 33

Chapter 6 Homes and Communities, amend Objective HCO 3.1 as follows:

HCO 3.1 Support and facilitate new facilities and improvements / expansion of existing educational, *including third level and further educational opportunities which may arise*, early learning, childcare and healthcare facilities, at appropriate locations in Kildare Town, *and encourage the co-location of childcare with educational uses.*

Proposed Material Alteration No. 34

Chapter 6 Homes and Communities, objectives for Community, Sport and Recreational Facilities, amend Objective HCO 4.4

HCO 4.4 Facilitate sports *clubs* and community groups in the acquisition and/or use of lands for sports and recreation purposes *and support the delivery of multi-use sports facilities (including play facilities and swimming pool) on appropriately zoned land within the plan area.*

Proposed Material Alteration No. 35

Chapter 6 Homes and Communities, objectives for Community, Sport and Recreational Facilities, amend Objective HCO 4.7 as follows:

HCO 4.7 Improve existing open space areas in housing developments that have been taken in charge by Kildare County Council and to provide additional play facilities, *pocket parks and outdoor seating*, where feasible and appropriate.

Proposed Material Alteration No. 36

Chapter 6 Homes and Communities, objectives for Community, Sport and Recreational Facilities include a new objective as follows:

HCO 4.10 *Support and facilitate the provision of a skatepark at an appropriate location within Kildare Town.*

Proposed Material Alteration No. 37

Chapter 6 Homes and Communities, objectives for Community, Sport and Recreational Facilities include a new objective as follows:

HCO 4.11 *Promote community-managed gardens/allotments at appropriate locations in Kildare Town.*

Proposed Material Alteration No. 38

Chapter 6 Homes and Communities, objectives for Community, Sport and Recreational Facilities include new objective as follows:

HCO 4.12 *Support and facilitate the development of a multipurpose community centre on the Dunmurray Road opposite St Conleth's Graveyard.*

Proposed Material Alteration No. 39

Chapter 6 Homes and Communities, objectives for Community, Sport and Recreational Facilities include new objective as follows:

HCO 4.13 *Support the provision of community meeting rooms at appropriate locations throughout Kildare Town.*

Chapter 7 Movement and Transportation

Proposed Material Alteration No. 40

Chapter 7 Movement and Transportation, amend Section 7.2 Kildare Town Transport Strategy, paragraph two, to make reference to the Road Traffic Act 1994.

The progression of the measures in the future will be subject to a separate statutory procedure *either by Section 38 of the Road Traffic Act 1994, or as a Part 8 process in accordance with the Planning and Development Act 2000 (as amended) (or any subsequent Planning Act) which includes for detailed design and appraisal, consultation with the relevant statutory stakeholders and public consultation.*

Proposed Material Alteration No. 41

Chapter 7 Movement and Transportation, Section 7.3 Active Travel - Walking and Cycling, amend the fourth sentence to provide up to date information as follows:

In relation to cycling, there ~~is~~ ~~are~~ *no very limited* cycle *infrastructure paths* in the town such as the recently constructed link road between *Southgreen Road and the Dunmurray Road. In many instances, with* cyclists using footpaths instead ~~in some instances~~.

Proposed Material Alteration No. 42

Chapter 7 Movement and Transportation, insert additional text and associated footnote, at the end of 7.1.2. Achieving a Modal Shift, as follows:

The measures proposed in this Plan (as detailed in the following Sections) in respect of improving infrastructure for active travel and public transport will endeavour to move towards achieving the targets set out in the County Plan to reduce car journey and increase trips by walking, cycling, bus and train. *It is considered that a 10% reduction in private motor vehicle use for work trips and a 5% reduction in private motor vehicle use for education trips by Census 2036⁷, would be challenging modal shift targets for Kildare Town. If these modal split targets are achieved, then car dependency for work trips would reduce to 64.1% and education trips car dependency would fall to less than half of trips at 49.4%.*

⁷ If the strategy is implemented as planned, most measures will be in place by Census 2036.

Proposed Material Alteration No. 43

Chapter 7 Movement and Transportation, amend Table 7-1 Permeability Measures by removing the PERM measures as follows:

Ref. No.	Measure	Delivery Timeframe
PERM 7	Creation of pedestrian / cyclist link connecting Fenner Lawns with North Glebe	Medium-term
PERM 8	Creation of pedestrian / cyclist link connecting Drumcree Court with Curragh Finn	Short-term
PERM 9	Creation of pedestrian / cyclist link connecting North Glebe with Curragh Finn	Short-term
PERM 23	Creation of pedestrian / cyclist link connecting Coolaghknock Park, Coolaghknock Close, Coolaghknock Drive and Coolaghknock Gardens together	Medium-term
PERM 24	Creation of pedestrian / cyclist link connecting Ruanbeg to Coolaghknock Gardens	Short-term
PERM 25	Creation of pedestrian / cyclist link connecting Ruanbeg Drive to Phase 2 of the Former Magee Barracks internal roads	Long-term
PERM 34	Road Scheme with footpaths connecting Hospital Street to Tully Road	Medium-term
PERM 35	Road Scheme with footpaths – Modus Link Road	Medium-term
PERM 39	Creation of walking/cycling only link as part of Modus Link Road development	Medium-term
PERM 41	Link between Oaktree Road and Cherry Avenue Park	Long-term

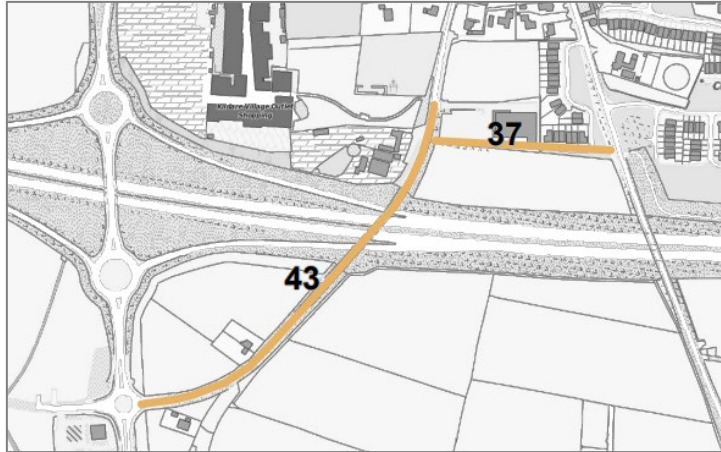
Proposed Material Alteration No. 44

Chapter 7 Movement and Transportation, insert new measure under Table 7-1 and on the corresponding Map 7.1, as follows:

Table 7-1 Permeability Measures

Ref. No.	Measure	Delivery Timeframe
PERM 43	Create a new pedestrian / cyclist link along the Grey Abbey Road connecting from the R415.	Medium-term

Map 7.1 Permeability Measures



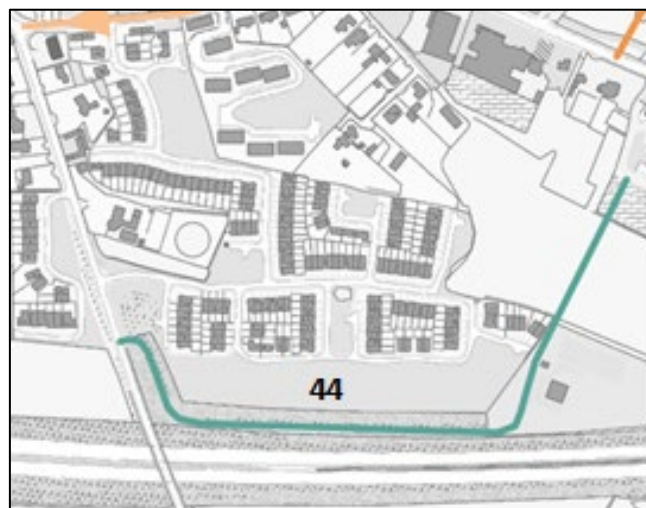
Proposed Material Alteration No. 45

Chapter 7 Movement and Transportation, insert new measure under Table 7-1 and on the corresponding Map 7.1, as follows:

Table 7-1 Permeability Measures

Ref. No.	Measure	Delivery Timeframe
<i>PERM 44</i>	<i>Create a new pedestrian / cyclist link from Tully Road-Hospital Street, as part of the road measure south of Cunnaberry Hill and parallel to the motorway.</i>	<i>Long-term</i>

Map 7.1 Permeability Measures.
Include new PERM 44 as follows:

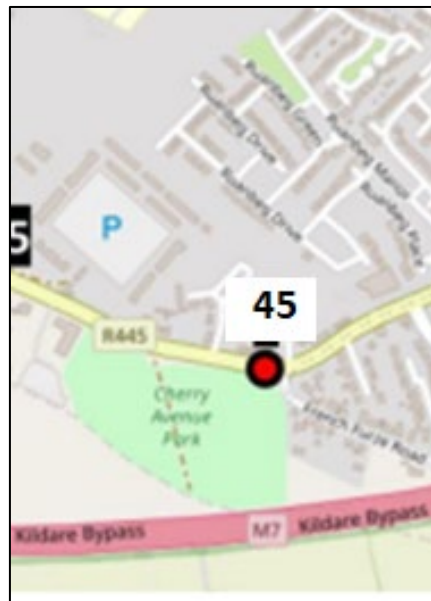


Proposed Material Alteration No. 46

Chapter 7 Movement and Transportation, insert new measure under Table 7-1 and on the corresponding Map 7.1, as follows:

Table 7-1 Permeability Measures

Ref. No.	Measure	Delivery Timeframe
<i>PERM 45</i>	<i>Crossing point to Cherry Avenue Park</i>	<i>Short-term</i>



Proposed Material Alteration No. 47

Chapter 7 Movement and Transportation, insert additional text (after Table 7-1) under Section 7.3.1. Walking to provide further information, as follows:

The above referenced permeability measures will bring a 42.5% increase in the number of homes within the 1km catchment of the primary schools. However, there will only be a minor increase (2%) in the 1km catchment of the post-primary school. *However, there will be a substantial reduction of over 100m in school trips distances for 1,469 buildings, which represents a reduction in walking distance for 46% of buildings within Kildare Town for post-primary schools.* The measures will bring a 20.2% increase (237) in the number of residential addresses within 1km of the train station and 14.9% (227) increase in the number of homes within 500m of a bus stop.

(Note: the statistics provided under Section 7.3.1. would require amendment / removal in the event the previous Proposed Material Alterations No. 43 is adopted. This would be a consequential amendment).

Proposed Material Alteration No. 48

Chapter 7 Movement and Transportation, amend Table 7-2 Cycling Measures by removing / modifying the Cycle measures as follows:

Ref. No.	Description	Proposed Link Type	Proposed Timeframe
Cycle 17	R415 (Monasterevin Road to Kildare Tourist Outlet Village) <i>to Newtown</i>	Cycle track/ cycle lane	Medium-term
Cycle 19	Grey Abbey Road (southern section adjacent to development lands) <i>to Newtown</i>	Cycle track/ cycle lane	Long-term
Cycle 21	Tully Road (section adjacent to National Stud) <i>and junction improvements required</i>	Cycle track/ cycle lane	Long-term
Cycle 32	Hospital Street to Oaktree Road	Cycle track/ cycle lane (part of road scheme)	Medium-term
Cycle 34	Lourdesville – active mode priority/elimination of through traffic as part of Northern Link Street scheme	Active mode priority, local vehicle access	Medium-term
Cycle 35	Market Square (west) – active mode priority through elimination of through traffic	Active mode priority, local vehicle access	Short-term
Cycle 37	Fire Castle Lane improvement	TBD by detailed study	Short-term
Cycle 38	Chapel Hill/Chapel Lane improvement	TBD by detailed study	Medium-term
Cycle 46	Oaktree Road improvement	TBD by detailed study	Medium-term
Cycle 58	Link between Oaktree Road and Cherry Avenue Park	Greenway	Long-term

Proposed Material Alteration No. 49

Chapter 7 Movement and Transportation, amend Table 7-2 in respect of Cycle 4 and Cycle 9 as follows:

Table 7-2 Cycling Measures

Cycle 4	Tully Road (middle section)
Cycle 9	R413 Melitta Road (middle section)

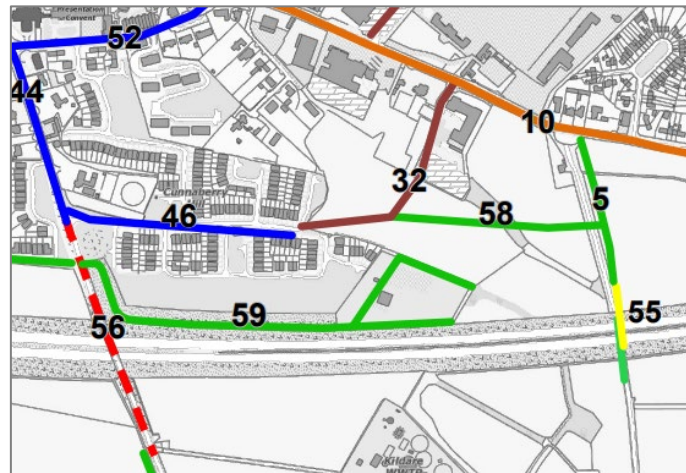
Proposed Material Alteration No. 50

Chapter 7 Movement and Transportation, insert new cycling measure in Table 7-2 and on Map 7.2 as follows:

Table 7-2 Cycling Measures

Ref. No.	Description	Proposed Link Type	Proposed Timeframe
Cycle 59	<i>Link between Tully Road and Cherry Avenue Park, south of Cunnaberry Hill and parallel to the motorway.</i>	<i>Greenway</i>	<i>Long-term</i>

7.2 Cycling Measures



Proposed Material Alteration No. 51

Chapter 7 Movement and Transportation, amend Objective MTO 1.1 as follows:

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

Proposed Material Alteration No. 52

Chapter 7 Movement and Transportation, Walking and Cycling Objectives, amend Objective MTO 1.3, as follows:

- MTO 1.3** Ensure all footpaths in Kildare Town are accessible to all members of the community, including people with disabilities, older persons and people with young children, *having regard to the challenges posed by differing road levels in the historic town centre.*

Proposed Material Alteration No. 53

Chapter 7 Movement and Transportation, Walking and Cycling Objectives, amend Objective MTO 1.7, as follows:

- MTO 1.7** Investigate the feasibility of the provision of a bike hire scheme to connect Kildare Town Train Station - Market Square - Cherry Avenue *Park (when completed) - Kildare Tourist Outlet Village - Irish National Stud and Japanese Gardens. and Connections* to other historic sites will also be examined as part of the project.

Proposed Material Alteration No. 54

Chapter 7 Movement and Transportation, amend paragraph two of Section 7.4 as follows:

The train station that serves Kildare Town is located on the main southern rail line which connects Dublin with the regional cities of Cork, Galway, Limerick and Waterford. All inbound services that stop at Kildare terminate at Heuston Station and do not use the Phoenix Park Tunnel. ~~Potential changes to the train infrastructure that were highlighted across the survey analysis were improved facilities at the train station and an extension of the 'short hop' rail fare zone.~~

In January 2023 the National Transport Authority (NTA) published its National Fares Strategy for commuter and inter-urban journeys on Public Service Obligation (PSO) bus and rail services. In Dublin a City Zone will be introduced and a new Outer Dublin Commuter Zone will be introduced which will include Kildare Town. Under the new strategy lower fares will be made available for passengers travelling from the Outer Dublin Commuter Zone into the Dublin City Zone (or vice-versa).

Proposed Material Alteration No. 55

Chapter 7 Movement and Transportation, insert additional point on Map 7.3 in relation to Table 7-3 Public Transport Measures, PT 3 to improve quality and coverage of bus stops.



Proposed Material Alteration No. 56

Chapter 7 Movement and Transportation, insert additional text in legend of Map 7.4 to reference coach parking as follows: (See Map 7.4)

Legend :

- Existing electrical vehicle charge points

Car Parking Strategy Measures

Variable Messaging Signs (VMS)

- Outer ring
- Inner ring

Potential sites for new off street car park

- Bride Street (to include designated area for coach parking) (PMA No. 56)**
- Water Tower Site
- Dublin Street

Car Parking

- Relocation of Main Street parking
- Upgrade of Nugent Street Car Park
- Upgrade of Train Station Car Park

Proposed Material Alteration No. 57

Chapter 7 Movement and Transportation, Section 7.4 amend the paragraph immediately below Table 7-3 Public Transport Measures, as follows:

A number of ancillary measures are also proposed to ensure the effective operation of public transport within Kildare Town. However, many of these are outside the remit of a local area plan but are important at a county strategic level which will in turn favourably impact Kildare Town. For example, working with the NTA ~~to achieve Leap Card Integration at Kildare Train Station will involve extending the 'short hop zone' to Kildare Town. Thereby, allowing local residents to avail of lower rail fares which would increase the appeal of the train for commuter and non-work trips to Dublin City. Currently the 'short hop zone' stops at the Sallins and Naas station. The other measures that would benefit Kildare Town are an extension to~~ *pursue the delivery of extending the rail services to Kildare Town* using the Phoenix Park Tunnel to further increase the appeal of rail travel for residents.

Proposed Material Alteration No. 58

Chapter 7 Movement and Transportation, insert new objective MTO 2.2 (re-number subsequent objectives), as follows:

MTO 2.2 *Liaise with the National Transport Authority (NTA), the owners of Kildare Tourist Outlet Village and bus operators to support and facilitate the improvement of bus services provision including the upgrading of existing infrastructure and the provision of the necessary supporting bus infrastructure (bus stops, lay over, turning areas) within the Kildare Tourist Outlet Village.*

Proposed Material Alteration No. 59

Chapter 7 Movement and Transportation, amend Objective MTO 2.2 (which may be re-numbered should the proceeding PMA be adopted), as follows:

MTO 2.2 Support and facilitate the implementation of an extension of route 126 to the R415 to create a bus transfer point in the short term and in the longer term establish a transfer point within Kildare Tourist Outlet Village *(subject to consultation / engagement with landowners and bus operators)* after the connectivity route between Kildare Tourist Outlet Village with Academy Street and the Cleamore Road area has been secured.

Proposed Material Alteration No. 60

Chapter 7 Movement and Transportation, amend Objective MTO 2.4, (and subsequent re-numbering) as follows:

- MTO 2.4** Work with the **National Transport Authority (NTA)** to *support and* pursue the delivery of the following:
- a) Improvements to the quality and coverage of the bus stops (*including artistically commissioned bus stops*) and achieve more frequent bus services in Kildare Town.
 - b) *Rural Transport Services and associated bus stops (to be artistically created) within the town.*
 - ~~e) Achieve Leap Card integration at Kildare Train Station.~~
 - d) c) Extension of the Phoenix Park tunnels rail services to Kildare Town.

Proposed Material Alteration No. 61

Chapter 7 Movement and Transportation, Public Transport Objectives, amend Objective MTO 2.5, as follows:

- MTO 2.5** Engage with the NTA and Irish Rail to support and facilitate the following rail improvements, and where necessary to preserve the identified routes free from development:
- The formation of a northern entrance to the train station.
 - The upgrading of the train station.
 - Achieving more frequent rail services.
 - *Providing sufficient car-parking having regard to the efficient use of land.*

Proposed Material Alteration No. 62

Chapter 7 Movement and Transportation, Table 7-4 and from Map 7.4, remove PA 3 (Hospital Street to Tully Road link), insert a new road measure to Table 7-4 and Map 7.4 and amend RD 4 (one-way system on Meadow Road) in Table 7.4 as follows:

Ref. No.	Short Description	Delivery Timescale
RD 4	One-way system on Meadow Road running east to west (to be delivered after the development of the Hospital Street – Tully Road link road to ensure an alternative route is available). <i>(which may require the delivery of RD 6, subject to the results of one-way trials).</i>	Short-term
RD 6	<i>Potential future link (inclusive of an active travel measure) from Hospital Street to Tully Road south of Cunnaberry Hill and parallel to the motorway (to support the implementation of a one-way system on Meadow Road, if required)</i>	<i>In tandem with the delivery of Cherry Avenue Park</i>
Previously Approved Measures		
PA 3	Hospital Street to Tully Road link	Developer led



Proposed Material Alteration No. 63

Chapter 7 Movement and Transportation, include additional text under Section 7.5 as follows:

The identified road/street measures are based on the evidence-based transport modelling assessment as part of the Transport Strategy. *The closure of Old Road Bridge to vehicular traffic (RD1) will allow for improved pedestrian and cyclist safety, boosting active travel along this route, and reducing emissions and noise. Vehicular accessibility will improve with the introduction of two-way traffic on Southgreen bridge (RD1).*

Proposed Material Alteration No. 64

Chapter 7 Movement and Transportation, insert additional subsection after Table 7-4 Road Measures, update Map 7.4 and insert a new objective MTO 3.7 as follows:

7.5.1. Outer Relief Road - Long Term Road Corridor

There is a very long-term road measure for an outer relief road which may be required beyond the lifetime of this plan, the indicative route of which warrants protection in this plan period. This protected corridor is linked to the potential future development of land beyond the lifetime of this Plan. It is of importance to note that, the town would be required to expand significantly for this protected corridor to be required for a new road, which is unlikely to happen even in the next Plan period. The protected corridor illustrated in Map 7.4 is indicative only and the precise location of the road will be determined through a route selection and detailed design process if it is deemed to be required in the future.

MTO 3.7 *Preserve the indicative route illustrated on Map 7.4 free from development where possible, in order to provide for the potential delivery of an outer relief road in Kildare Town under future local area plans.*

See Map 7.4 for Indicative Route for proposed Outer Relief Road:



Proposed Material Alteration No. 65

Chapter 7 Movement and Transportation, Road and Street Network Objectives, amend Objective MTO 3.6 as follows:

- MTO 3.6** Investigate the possibility of ancillary road measures such as the potential for a one-way system on Nugent Street, as part of the closure of Bride Street, *a one-way system between Dunmurray Road and Rathbride Road, an inner relief road one-way system using Meadow Road and Academy Street, from Melitta Road to Pigeon Lane or to the north of town*, and also the possibility of a future HGV ban in the town centre within the lifetime of the Plan and/or under future land uses plans for the town.

Proposed Material Alteration No. 66

Chapter 7 Movement and Transportation, insert new objective MTO 3.8 as follows:

- MTO 3.8** *Provide improved turning lanes at the intersection of the Monasterevin Road (R445) and the Nurney Road (R415), where feasible.*

Proposed Material Alteration No. 67

Chapter 7 Movement and Transportation, Parking Objectives, insert new objective MTO 4.8 as follows:

- MTO 4.8** *Support the provision of charging facilities for Electric Vehicles (EVs) on public and private land in accordance with County Development Plan standards.*

Proposed Material Alteration No. 68

Chapter 7 Movement and Transportation, Parking Objectives, insert a new objective MTO 4.9 as follows:

- MTO 4.9** *Promote the use of the De La Salle school site as a public carpark to provide additional capacity within Kildare Town, outside the operating hours of the school particularly during school holidays.*

Chapter 8 Built Heritage

Proposed Material Alteration No. 69

Chapter 8 Built Heritage, amend chapter title to, Built Heritage and Archaeology and all consequential amendments throughout the Draft Plan, including titles of Map 8.1 and Map 8.2 as follows:

8. Built Heritage *and Archaeology*

Built Heritage *and Archaeology*

Proposed Material Alteration No. 70

Chapter 8 Built Heritage, amend the second sentence of Section 8.5., as follows:

Archaeological heritage consists of such material remains (whether in the form of sites and monuments or artefacts in the sense of moveable objects) ~~and environmental evidence and are located to the south of the motorway within the Plan boundary.~~

Proposed Material Alteration No. 71

Chapter 8 Built Heritage, Section 8.5.2. Zone of Archaeological Potential, amend the citations of the Department of Housing, Local Government and Heritage, as follows:

~~Department of Culture, Heritage and the Gaeltacht~~ *Department of Housing, Local Government and Heritage.*

Proposed Material Alteration No. 72

Chapter 8 Built Heritage, Section 8.2. insert new objective after BHO 1.4:

BHO 1.5 *Support the sensitive incorporation of public amenity and open spaces around monuments, in a manner compatible with the protection and proper management and conservation of the monument, subject to an appropriate management and conservation plan to be prepared by the relevant landowner or stakeholder.*

Proposed Material Alteration No. 73

Chapter 8 Built Heritage, Section 8.2. insert new objective after BHO 1.4:

BHO 1.6 *To support the delivery of a walking trail along the Town Walls within the curtilage of St. Brigid's Cathedral in an appropriate manner that is sympathetic to the historical context of the site.*

Proposed Material Alteration No. 74

Chapter 8 Built Heritage, amend Objective BHO 4.2 of the Archaeological Heritage Objectives as follows:

- BHO 4.2** Prioritise the protection/preservation in situ (or upon agreement preservation by record) of items of archaeological interest as listed in Table 8-5 and shown on Map 8.1 and Map 8.2 Built Heritage *and Archaeology* from inappropriate development that would adversely affect and/or detract from the interpretation and setting of these sites.

Proposed Material Alteration No. 75

Chapter 8 Built Heritage, include a new Objective as follows:

- BHO 4.6*** *To support the repair and conservation of the Kildare Town Walls within the curtilage of St Brigid's Cathedral.*

Chapter 9 Natural Heritage and Green Infrastructure

Proposed Material Alteration No. 76

Chapter 9 Natural Heritage and Green Infrastructure Amend Objective NHO 2.4 as follows:

- NHO 2.4** Support the preparation of a Biodiversity Action Plan for Kildare Town including the development of a Community Biodiversity Toolkit, *a Tree Planting Programme and local Bee-hive Initiative*, in line with all national policy documents that relate to biodiversity.

Proposed Material Alteration No. 77

Chapter 9 Natural Heritage and Green Infrastructure, insert a new objective after NHO 2.6 as follows:

- NHO 2.7** *Support the relocation of the Kildare Wild Animal Rescue Centre on appropriately zoned land, including but not limited to land identified as Q (1) on Map 11.1.*

Proposed Material Alteration No. 78

Chapter 9 Natural Heritage and Green Infrastructure, amend NHO 4.2 as follows:

- NHO 4.2** Require all new residential developments (of 10 units or more) and commercial developments (on sites 0.5ha or larger) to include *mixed native* tree-planting proposals, *to include specimen Oak*, in the range of 1-5% site coverage, depending on the nature of the proposed use and function of associated open spaces.

Chapter 10 Infrastructure and Environmental Services

Proposed Material Alteration No. 79

Chapter 10 Infrastructure and Environment, insert new Objective IO 1.3 under Section 10.2 Water Supply and Wastewater as follows:

IO 1.3 *Consult with Uisce Éireann prior to the implementation of any significant Public Realm Works or Transportation Measures contained in the Kildare Town Local Area Plan 2023-2029 to avoid and/or mitigate impacts on existing or planned water and wastewater infrastructure.*

Proposed Material Alteration No. 80

Chapter 10 Infrastructure and Environment, insert new objective under Section 10.5 Energy Supply and Communications Objectives as follows:

IO 4.6 *Consult with the Electricity Supply Board prior to any significant Public Realm Works to ensure opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services.*

Proposed Material Alteration No. 81

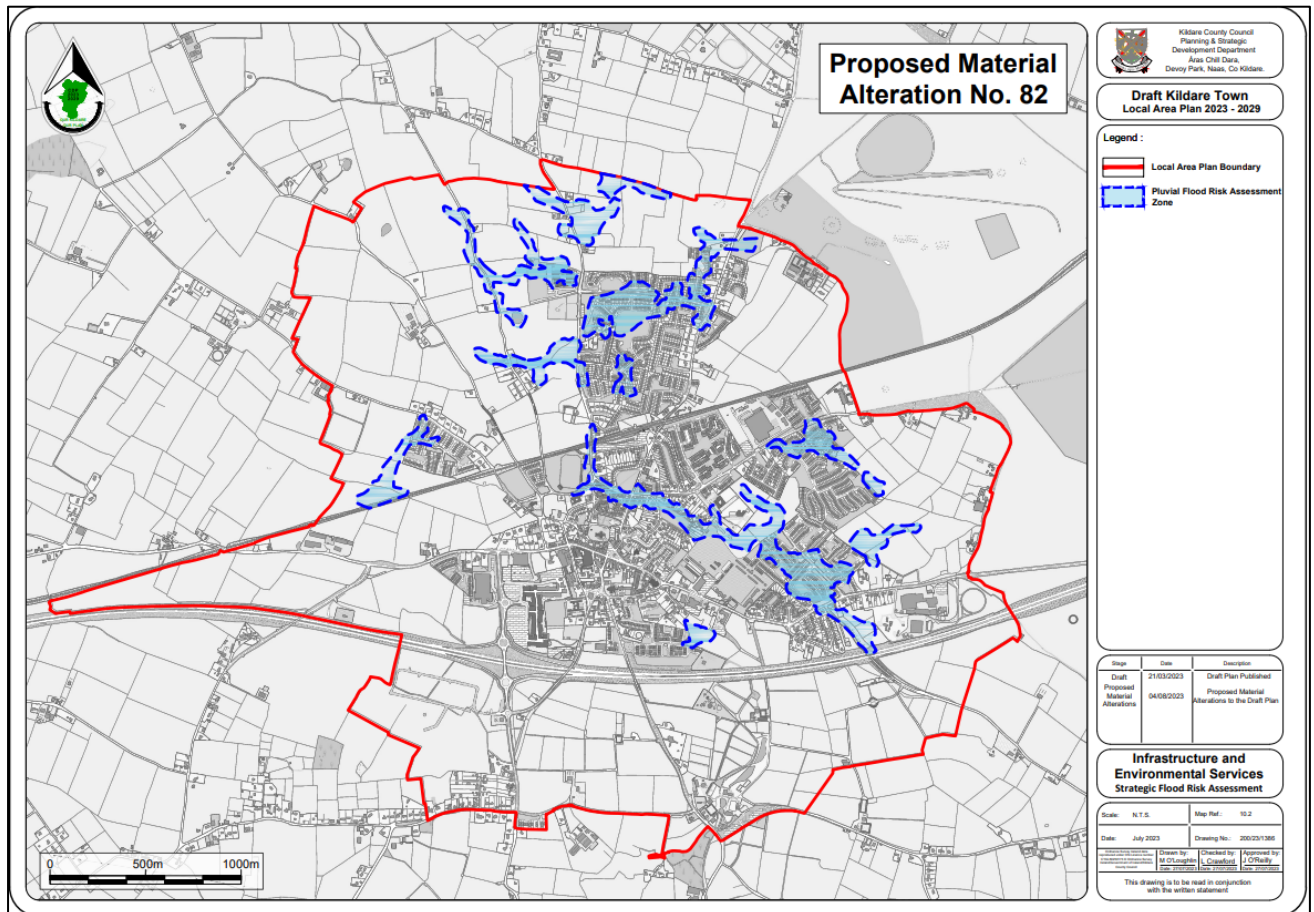
Chapter 10 Infrastructure and Environment, insert new objective under Section 10.5 Energy Supply and Communications Objectives as follows:

IO 4.7 *Work in conjunction with ESB Ireland to facilitate enhancements to the boundary treatment and screening surrounding the existing 38Kv substation on Southgreen Road.*

Proposed Material Alteration No. 82

Replace Map 10.2 with the following map based on recent pluvial flood modelling as recommended in the Surface Water Study. (The adoption of this PMA will result in a consequential amendment to Map 10.2(a)).

Note: See Proposed Material Alteration No. 114 (Strategic Flood Risk Assessment) also.



Chapter 11 Implementation

Proposed Material Alteration No. 83

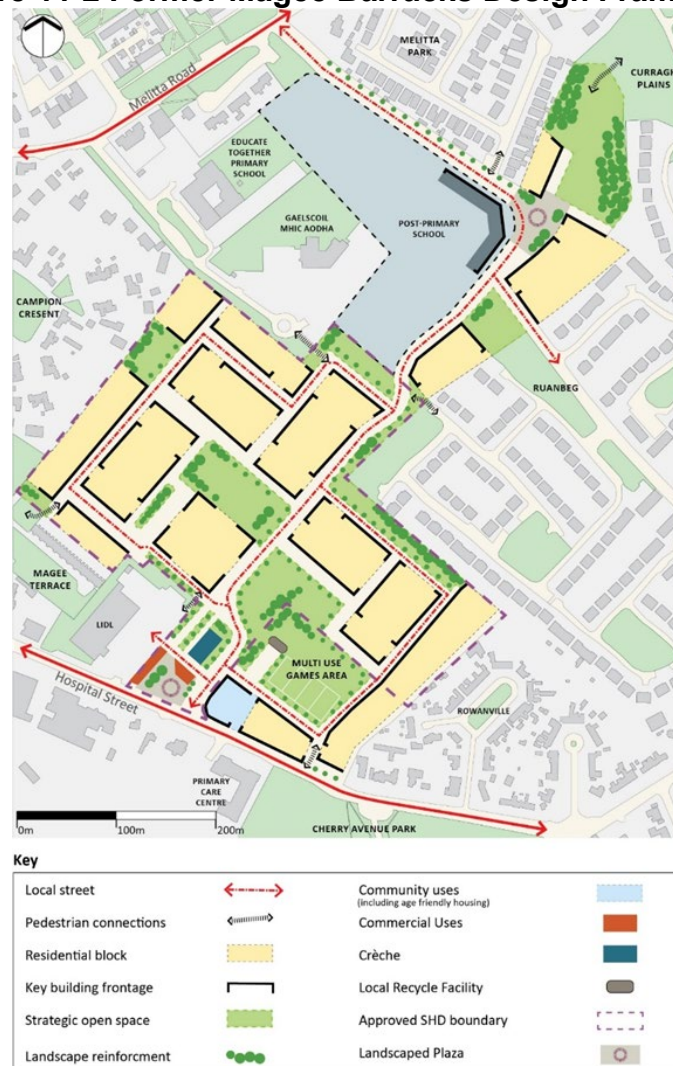
Chapter 11 Implementation, delete footnote 68 in its entirety as follows, and renumber all subsequent footnotes accordingly:

~~68 Planning permission has been granted for Phase 1 of the development which at the time of writing (February 2023) construction had not commenced and permission expires ca. December 2024. This framework provides guidance in the event that any subsequent applications are made on the site and for the remaining portions of the overall land bank to ensure a cohesive overall approach.~~

Proposed Material Alteration No. 84

Chapter 11 Implementation, Section 11.1, amend Figure 11-2 Former Magee Barracks Design Framework, to reduce the area specifically dedicated to community uses fronting on to Hospital Street and replace with an increase in the provision of residential uses, as follows:

Figure 11-2 Former Magee Barracks Design Framework



Proposed Material Alteration No. 85

Chapter 11 Implementation, insert new Sub-section 11.2. Southgreen Key Development Area and insert Figure 11-3 Southgreen Key Development Area Design Framework, as follows:

11.2. Southgreen Key Development Area

The Southgreen area has come under increasing pressure from development in recent years. Accordingly, the purpose of this Key Development Area is to provide for the orderly and sequential development of this strategic growth area of Kildare Town. The design strategy seeks to implement the '10-minute settlement' principle by providing for a range of complementary land uses (residential, open space and employment) within walkable distance of a centrally located neighbourhood centre and adjacent primary school site (see Figure 11.3). The neighbourhood centre will front onto a landscaped civic plaza which will provide a focal point for the expanding Southgreen area, imparting a sense of legibility and identity to residents and visitors alike. Crucially, the design framework incorporates key links and connections to future urban expansion lands to the west, which are zoned SR: Strategic Reserve in the Plan.

Alongside housing, a critical component of the design framework incorporates the provision of a large quantum of strategic open space. This will not only provide for the long-term sporting and recreational needs of the growing community in Southgreen but also for the wider settlement. Key green infrastructure assets identified in Map 9.1 have been retained as far as practical. The design framework illustrates an indicative layout of playing fields, five-a-side pitches and a playground. It is envisaged that such facilities will be developed on the lands over the long term, alongside the possibility of a running track and other ancillary infrastructure such as clubhouses and car parking. The framework also incorporates the Northwestern Greenway, an important sustainable movement route planned for the area (see Table 7.2).

The strategic open space amenity shall be developed sequentially from the south. Vehicular access to the lands shall be either from the south or from the west via Southgreen Road. The rural character of Old Road shall be retained with only pedestrian/cyclist access to the lands to be provided. The design framework also provides for new tree planting to be undertaken within the strategic open space to contribute to the implementation of actions BI A14 and BI A29 of the Kildare County Development Plan 2023-2029 which seek to increase the urban canopy coverage within towns such as Kildare by 30% (Section 9.9. refers).

Figure 11-3 Southgreen Key Development Area Design Framework



Key

Local route		Education/Community Uses (Identified primary school site)	
Pedestrian/cyclist connections		Neighbourhood Centre	
Residential block		Vehicular Access Point	
Key building frontage		Future greenway	
Strategic open space		Green infrastructure	
Landscape reinforcement		Landscaped civic plaza	

Proposed Material Alteration No. 86

Chapter 11 Implementation, under Section 11.2. Infrastructure Delivery Schedule insert additional text with respect to water and wastewater and the re-ordering /re-numbering of the listings under Table 11-2, as follows:

Collaghknock – C (1)		
Infrastructure	Delivery Schedule	Funding Sources
Water and Wastewater		
Water supply – <i>There is a watermain immediately to the west of the site and in Melitta Rd to the north.</i> Improvements may be required, modelling for suitability required.	In tandem with new development	PPP
Wastewater - <i>A 225 uPVC runs through the southwest of the site and Collaghknock Glebe WWPS is on the site.</i> Collaghknock Glebe Pumping Station will need to be assessed. <i>Wayleaves will need to be maintained over sewers.</i>	In tandem with new development	PPP

Grey Abbey View – C (2)		
Infrastructure	Delivery Schedule	Funding Sources
Water and Wastewater		
Water supply – <i>There is a 150mm DI Watermain (<20m) to east of site (R415).</i> Improvements may be required, modelling for suitability required.	In tandem with new development	Developer
Wastewater – <i>There is no Drainage Area Plan available for this area at present. Likely the site would have to provide its own sewer and connect to Armour Bridge Pumping Station @100m.</i> The pumping station and downstream sewers will need to be assessed. An upgraded or new pumping station will most likely be required.	In tandem with new development	Developer

Rathbride Road – C (4) and C (5)		
Infrastructure	Delivery Schedule	Funding Sources
Water and Wastewater		
<p>Water supply – C (4) A 100mm uPVC runs into the site at the northwest side and on the Rathbride Road for second portion of the site improvements may be required, modelling for suitability required.</p> <p>C (5) Approximately 200m to the closest 100 mm uPVC in the Rathbride Road through Site C (4). Water main may need upgrading.</p>	In tandem with new development	Developer
<p>Wastewater – C (4) sewer in Dunmurray Drive may need upgrading, 35m to 225uPVC to the northwest of the site on Rathbride Rd / Curragh Finn. Capacity of downstream sewers, pumping station, pumped main and railway crossing will need to be assessed.</p> <p>C (5) is 225m to the closest 225uPVC to the south of the site through Site C (4). Capacity of downstream sewers, pumping station, pumped main and railway crossing will need to be assessed.</p>	In tandem with new development	Developer

Proposed Material Alteration No. 87

Chapter 11, Implementation, under Section 11.3. Table 11-4, amend (delete and replace) **last paragraph of 'D: Retail Outlet Centre'** zoning objective, as follows:

~~Limited provision of Café/Restaurant uses shall be considered on a case-by-case basis, having regard to the principal function of the KTOV as a Retail Outlet Centre and to the primacy of Kildare Town Centre for town centre activities.~~

In the context of enhancing the overall offer of Kildare Town as a visitor and tourist destination, while protecting the primacy of Kildare Town Centre for town centre activities, the Council will consider the limited provision of café/restaurant/eateries on a case-by-case basis, having regard to:

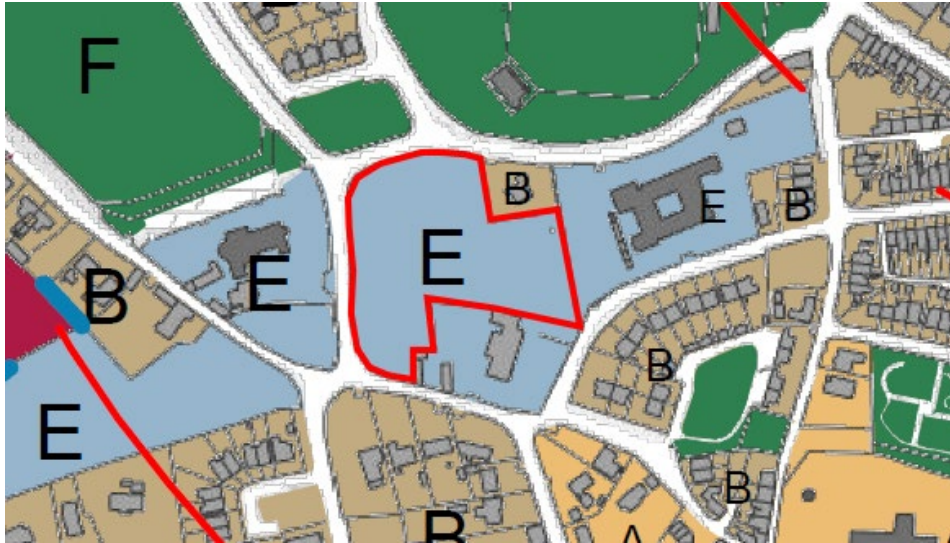
- the principal function of the KTOV as a Retail Outlet Centre,*
- the permitted public operating hours of KTOV which such uses shall operate within.*

The level of café/restaurant/eateries within the KTOV shall not exceed 10% of the total permitted gross floor area of the KTOV. Any planning application for additional café/restaurant use must be accompanied by detailed justification to demonstrate compliance with this objective.

Proposed Material Alteration No. 88

Chapter 11, Implementation, under Section 11.3. Table 11-4 Land Use Zoning Objectives, include a site-specific objective and amend Map 11.1 Land Use Zoning by including reference to E (1) on the map regarding the site outlined in red below.

E (1) This site-specific zoning objective provides for the development of individual housing units and/or a nursing home facility to provide for the needs of the elderly, in accordance with Policy SC P6 and Objectives SC O40 and SC O41 of the County Development Plan, in addition to the provision of a childcare facility.



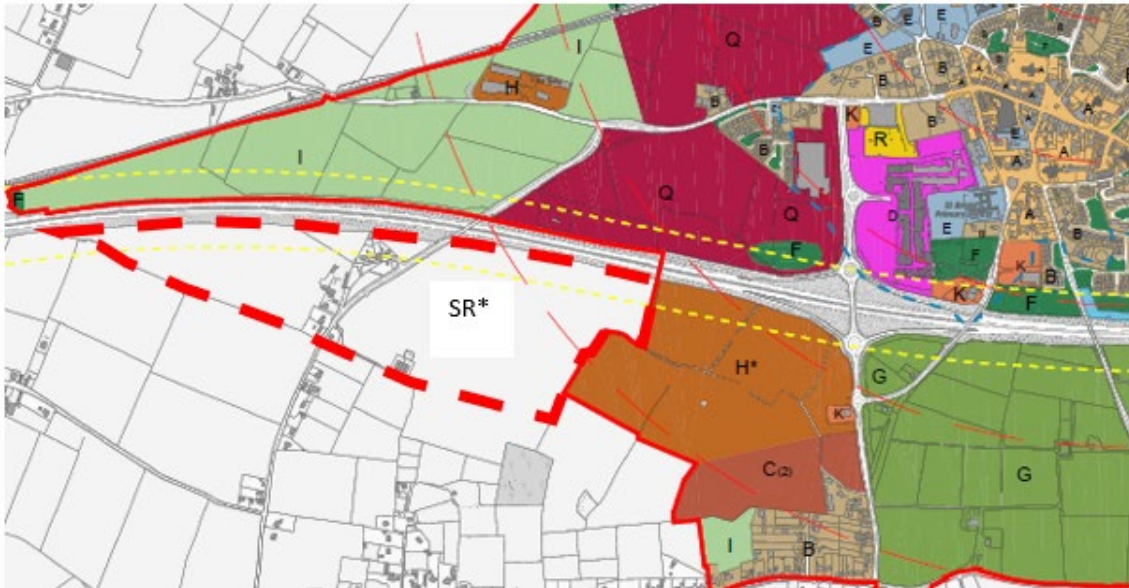
Proposed Material Alteration No. 89

Chapter 11, Implementation, under Section 11.3. Table 11-4 Land Use Zoning Objectives, include a site-specific objective as the fourth and fifth paragraph, SR*: Strategic Reserve [Employment] and amend Map 11.1 Land Use Zoning by including reference to SR* on the map for the site outlined in red below.

Strategic Reserve [Employment] (SR*)

To protect the integrity of the lands to provide for the future strategic expansion of the town for employment purposes (if required). The development of the lands is a long-term vision and does not form part of the Development Strategy of Kildare Town during the lifetime of this Plan.

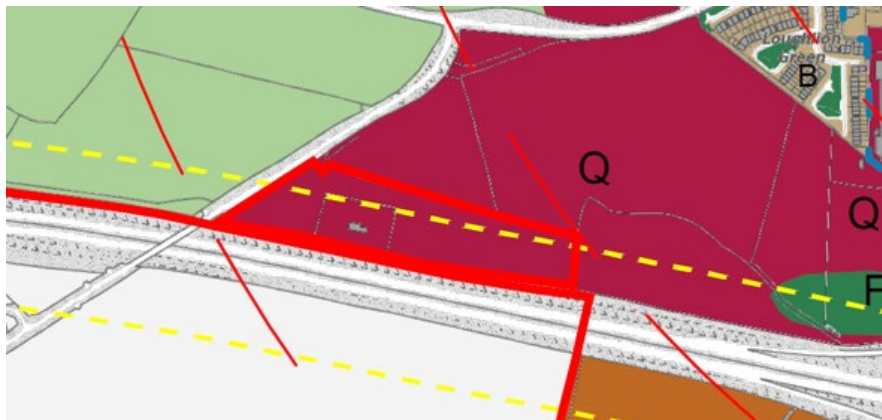
The inclusion of these lands will not in any way infer a future commitment regarding the nature of any future zoning. Such a decision will be considered within the framework of the need for additional zoned lands and the proper planning and sustainable development of the area.



Proposed Material Alteration No. 90

Chapter 11, Implementation, under Section 11.3. Table 11-4 Land Use Zoning Objectives, include a site-specific objective and amend Map 11.1 Land Use Zoning by including reference to Q (1) on the map for the site outlined in red below.

Q (1) *The south-west corner of the Q lands to the north of the motorway have been designated for the provision of a facility for the Kildare Wildlife Rescue services.*



Proposed Material Alteration No. 91

Chapter 11, Implementation, under Section 11.3, Table 11-4, insert a site-specific objective under the zoning objective F (1): 'Open Space and Amenity', as follows:

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

- *phasing details whereby the site is developed sequentially from the south in tandem with new housing.*

- *active travel links (walking and cycling) connecting with neighbouring (existing and planned) residential areas, neighbourhood centre, school campuses and community uses.*
- *a vehicular access point from the Southgreen Road, proximate to the built up area;*
- *retention of mature trees and hedgerows in accordance with Map 9-1 Natural Heritage and Green Infrastructure.*

AND

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 15.5 ha) from 'I: Agriculture' to 'F: Open Space and Amenity'.



Proposed Material Alteration No. 92

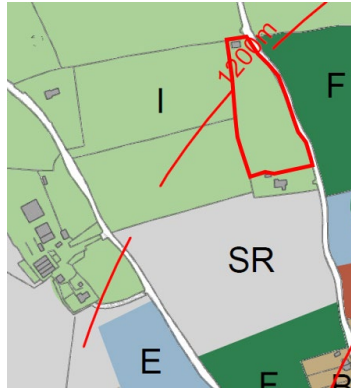
Chapter 11, Implementation, under Section 11.3, Table 11-4, insert a site-specific objective under the zoning objective F (1): 'Open Space and Amenity', as follows:

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

- *phasing details whereby the site is developed sequentially from the south in tandem with new housing.*
- *active travel links (walking and cycling) connecting with neighbouring (existing and planned) residential areas, neighbourhood centre, school campuses and community uses.*
- *a vehicular access point from the Southgreen Road, proximate to the built up area;*
- *retention of mature trees and hedgerows in accordance with Map 9-1 Natural Heritage and Green Infrastructure.*

AND

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (1.7 ha) from 'I: Agriculture' to 'F: Open Space and Amenity'.



Proposed Material Alteration No. 93

In order to provide consistent references throughout the Draft Plan references to the Land Use 'B: Existing Residential' should be amended to 'B: Residential / Infill' as already stated on Map 11.1.

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:

B: Existing Residential / Infill

Proposed Material Alteration No. 94

Chapter 11 Implementation, Table 11-6 Land Use Zoning Matrix, amend as follows: Under the 'Town Centre' land use category amend 'Amusement Arcade' from 'O: Open for Consideration' to 'N: Not Normally Permitted'. Include 'Casino' within the same land use category.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Amusement Arcade/ <i>Casino</i>	⊕ N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N

Proposed Material Alteration No. 95

Chapter 11, Table 11-6 Land Use Zoning Matrix, amend as follows: Car Park (other than ancillary) / *Bus Parking*.

Proposed Material Alteration No. 96

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:
 Under the 'N: Neighbourhood Centre' land use category amendment
 'Crèches/Playschool' from 'O: Open to Consideration' to read 'Y: Permitted in Principle'.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Crèche/ Playschool	Y	O	Y	N	Y	N	N	N	N	O	Y	O	O	N	Y	N

Proposed Material Alteration No. 97

Chapter 11, Implementation, amend Table 11-6 Land Use Zoning Matrix, by inserting
 a new land use 'Conference / Exhibition Centre', as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Conference / Exhibition Centre	Y	N	N	N	N	N	N	N	N	O	N	O ^x	N	N	O	N

Footnote (Q zone): A conference centre will be considered in the eastern section of lands zoned Q: Enterprise and Employment only.

Proposed Material Alteration No. 98

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix in relation to land zoned D: Retail Outlet Centre, as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Restaurant	Y	O	O	O x	N	N	N	O	N	O	O	O ₈₅	O	O ₈₆	O	N
Offices	Y	O ⁸	O ⁹	O x	N	N	N	O	N	O	O	O	O	N	O	N
Park/ Playground	Y	Y	Y	O x	Y	Y	N	N	O	O	O	N	N	N	Y	N

Footnote (Restaurants): *Subject to compliance with zoning objective defined in Table 11-4.*

Footnote (Offices): *Ancillary only to supporting operations of KTOV.*

⁸ Proposals of this nature shall be restricted to a gross floor area of 100sqm.

⁹ Proposals of this nature shall be restricted to a gross floor area of 100sqm.

Proposed Material Alteration No. 99

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix in relation to land zoned E: Community and Education, as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Restaurant	Y	O	O	N	N Q ^x	N	N	O	N	O	O	O ¹⁰	O	O ¹¹	O	N

Footnote: *Only when ancillary to a community use.*

Proposed Material Alteration No. 100

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix in relation to lands zoned Q: Enterprise and Employment as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Offices	Y	O ¹²	O ¹³	N	N	N	N	O	N	O	O	O Y	O	N	O	N

¹⁰ Ancillary to an enterprise and employment function or part of a mixed-use enterprise facility.

¹¹ Ancillary to the existing use on site.

¹² Proposals of this nature shall be restricted to a gross floor area of 100sqm.

¹³ Proposals of this nature shall be restricted to a gross floor area of 100sqm.

Proposed Material Alteration No. 101

Chapter 11 Implementation, amend Table 11-6 Land Use Zoning Matrix, as follows:
Under the 'National Stud and Green Belt' land use category amend 'Restaurant'
'from 'N: Not Normally Permitted' to 'O: Open for Consideration'.

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Restaurant	Y	O	O	N	N	N	N O ^x	O	N	O	O	O ⁸⁵	O	O ⁸⁶	O	N

This amendment should be accompanied by the insertion of the following additional footnote:

Footnote: '*To be provided within the established visitor amenities area of the Irish National Stud only.*'

Proposed Material Alteration No. 102

Chapter 11, Section 11.4, amend footnotes under Table 11-6 Land Use Zoning Matrix as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
Shop - Convenience	Y	O ⁸⁹	O ⁹⁰	N	N	N	N	N	N	O ⁹¹	O ⁹²	O ⁹³	Y ⁹⁴	O ⁹⁵	O ⁹⁶	N

Footnote 89: No single unit shall exceed 100sqm. of net retail space, *except within the area north of the rail line between east of Green Road and west of Dunmurray Road which shall not exceed 150sqm of net retail space.*

Footnote 90: No single unit shall exceed 100sqm. of net retail space, *except within the area north of the rail line between east of Green Road and west of Dunmurray Road which shall not exceed 150sqm of net retail space.*

Proposed Material Alteration No. 103

Chapter 11 Implementation, Table 11-6 Land Use Zoning Matrix, insert additional land use and associated footnote, as follows:

LAND USE	A: Town Centre	B: Existing Residential	C: New Residential	D: Retail Outlet Centre	E: Community and Education	F: Open Space and Amenity	G: National Stud and Green Belt	H: Industry and Warehousing	I: Agriculture	K: Commercial	N: Neighbourhood Centre	Q: Enterprise and Employment	R: Retail/Commercial	S: Equine Industry	T: Mixed Use	U: Utilities/Services
<i>Indoor Recreational & Amenity Facilities^x</i>	Y	N	N	N	O	N	N	N	N	Y	N	O	O	N	O	N

Footnote: *This land use relates to play centres such as indoor play/adventure centres, bowling alleys, trampoline parks.*

Proposed Material Alteration No. 104

Chapter 11 Implementation, Table 11-6 Land Use Zoning Matrix, insert additional land use zoning Tourism, and insert on Map 11.1, as follows:

Ref.	Land Use	Land-Use Zoning Objectives
M	Tourism	<i>To provide for tourism and leisure facilities. The primary use within this zone is for the provision of a hotel and its ancillary uses only.</i>

LAND USE	<i>M: Tourism</i>	LAND USE	<i>M: Tourism</i>	LAND USE	<i>M: Tourism</i>
Amusement Arcade	<i>N</i>	Guest House/ Hotel/Hostel	<i>Y</i>	School	<i>N</i>
Agricultural Buildings	<i>N</i>	Heavy Commercial Vehicle Park	<i>N</i>	Shop -Comparison	<i>N</i>
Car Park (other than ancillary)	<i>N</i>	Hot food take-away	<i>N</i>	Shop -Convenience	<i>N</i>
Betting Office	<i>N</i>	Industry (light)	<i>N</i>	Retail Outlet	<i>N</i>
Cemetery	<i>N</i>	Industry (general)	<i>N</i>	Retail Warehousing	<i>N</i>
Cinema	<i>N</i>	Medical Consultant/ Health Centre	<i>N</i>	Stable Yard	<i>N</i>
Community / Recreational / Sports buildings	<i>N</i>	Motor Sales	<i>N</i>	Utility Structures	<i>O</i>
Crèche/ Playschool	<i>N</i>	Nursing Home	<i>N</i>	Veterinary Services	<i>N</i>
Cultural Uses/Cultural Tourism ¹⁴ /Library	<i>N</i>	Offices	<i>N</i>	Warehouse (wholesale) /Logistics /Store/Depot	<i>N</i>
Dancehall/ Disco	<i>N</i>	Park / Playground	<i>O</i>		
Dwelling	<i>N</i>	Service Station	<i>N</i>		
Emergency residential accommodation	<i>O</i>	Place of Worship	<i>N</i>		
Funeral Homes	<i>N</i>	Playing Fields	<i>N</i>		
Garage/Car Repairs	<i>N</i>	Pub	<i>O*</i>		
Group/Special Needs Housing ¹⁵	<i>N</i>	Restaurant	<i>O*</i>		

¹⁴ Cultural tourism relates to uses associated with architectural, archaeological, religious, and military tourism uses.

¹⁵ For further information on group/special needs housing refer to Section 4.4.1 of this Plan.

Footnote (Pub) – A pub will only be considered ancillary to the overall function of a hotel.

Footnote (Restaurant) - A restaurant will only be considered ancillary to the overall function of a hotel.

Note: in the event PMA No. 97 is adopted Conference / Exhibition Centre will be 'N' Not Normally Permitted within the M: Tourism land use zoning objective. In the event PMA No. 103 is adopted Indoor Recreational and Amenity Facilities will be 'N' Not Normally Permitted within the M: Tourism land use zoning objective.

AND

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 2.8ha) from 'G: National Stud and Green Belt' to 'M: Tourism'.



Map 11.1 Proposed Changes to Land Use Zoning Map

A number of Proposed Material Alterations relate to the Map 11.1 Land Use Zoning. In the interests of clarify in Appendix 1 of this report a revised Map 11.1 indicating all the changes has been provided.

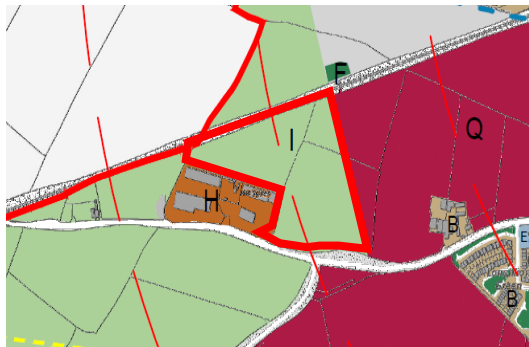
Proposed Material Alteration No. 105

Map 11.1 Land Use Zoning, amend zoning of land outlined in red below (approx. 0.7 ha) from 'H: Industry and Warehousing' to 'E: Community and Education'.



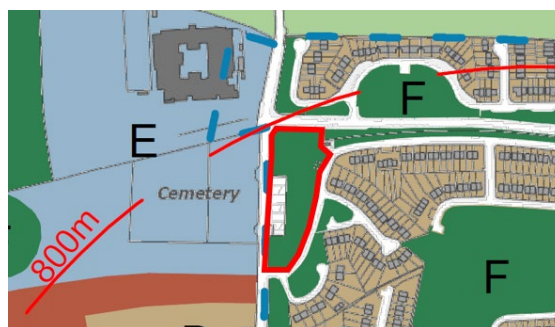
Proposed Material Alteration No. 106

Map 11.1 Land Use Zoning, amend zoning of land outlined in red below (approx. 6.3 ha) from 'I Agriculture' to 'Q; Enterprise and Employment'.



Proposed Material Alteration No. 107

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 0.9ha) from 'F: Open Space and Amenity' to 'E: Community and Education'.



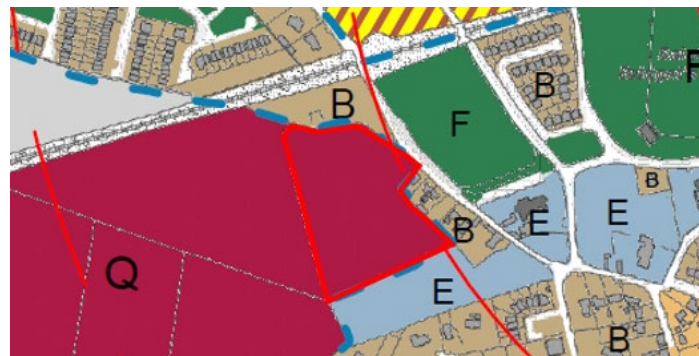
Proposed Material Alteration No. 108

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 3.6 ha) from 'C New Residential Phase 2' to 'Q: Enterprise and Employment'.



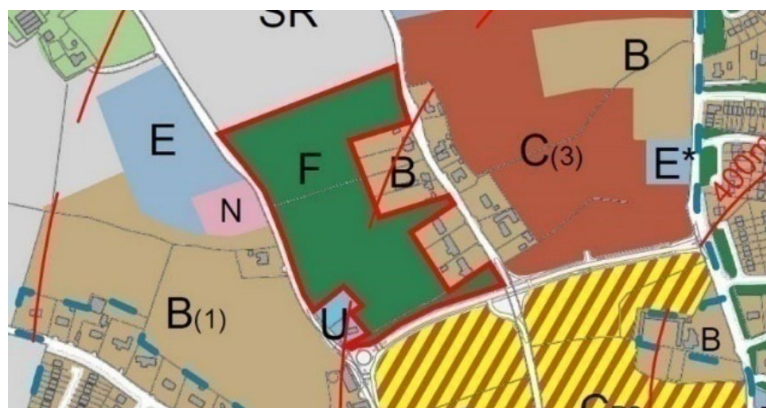
Proposed Material Alteration No. 109

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 2.5 ha) from 'Q: Enterprise and Employment to 'E: Community and Education'.



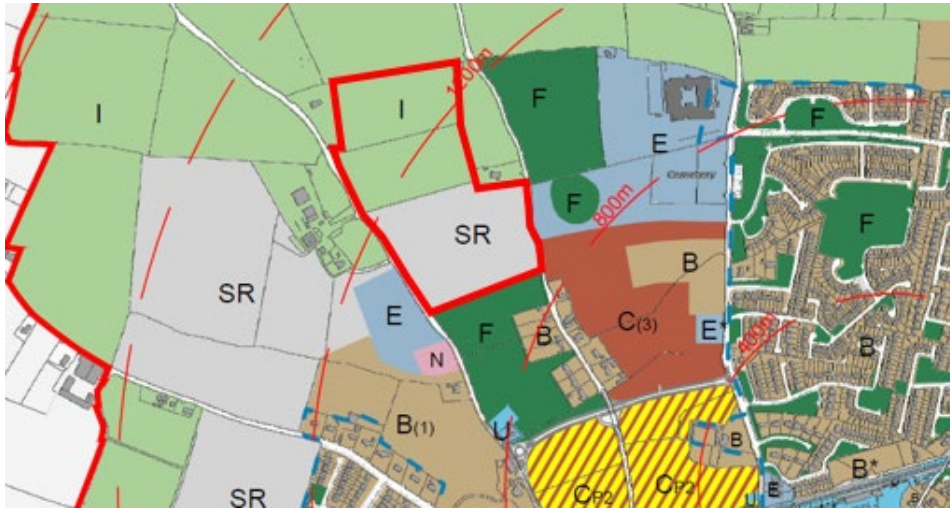
Proposed Material Alteration No. 110

Chapter 11, Map 11.1 Land Use Zoning Map, amend the zoning of lands outlined in red below (5.2 ha) from 'F: Open Space' to 'C: New Residential Phase 2'.



Proposed Material Alteration No. 111

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below (approx. 13 ha) from 'I: Agriculture' and 'SR: Strategic Reserve' to 'F: Open Space and Amenity'.



AND

Chapter 11, Implementation, under Section 11.3, Table 11-4, insert a site-specific objective under the zoning objective F (1): 'Open Space and Amenity', as follows:

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

- phasing details whereby the site is developed sequentially from the south in tandem with new housing.*
- active travel links (walking and cycling) connecting with neighbouring (existing and planned) residential areas, neighbourhood centre, school campuses and community uses.*
- a vehicular access point from the Southgreen Road, proximate to the built up area;*
- retention of mature trees and hedgerows in accordance with Map 9-1 Natural Heritage and Green Infrastructure.*

Proposed Material Alteration No. 112

Map 11.1 Land Use Zoning, amend zoning objective of land outlined in red below as follows:

PMA No. 112 (a)

1. G: 'National Stud and Green Belt' as F: 'Open Space and Amenity' (approx. 16 ha).



PMA No. 112 (b)

2. G: 'National Stud and Green Belt' as F: 'Open Space and Amenity' (approx. 13.8ha).



PMA No. 112 (c)

3. S: 'Equine Industry' as F: 'Open Space and Amenity' (approx. 2.8ha).



Census 2022 Update

Proposed Material Alteration No. 113

On 29th June 2023, the Central Statistics Office (CSO) released further results for Census 2022 in relation to settlements.

Of particular note is the following:

- The population of Kildare Town on Census Day 2022 was 10,302 persons.
- The term 'Settlement Boundary' has now been replaced with the term 'Built Up Area'.

This Material Alteration proposes to update the Draft Plan as follows:

Item 1:

Chapter 1, Introduction and Context, amend Section 1.1. Background, under the first paragraph (and associated footnote) as follows:

The Kildare Town Local Area Plan 2023 – 2029 (the Plan) has been prepared in accordance with the requirements and provisions of the Planning and Development Act 2000 (as amended) (the Act), in particular Sections 18-20 of the Act. A local area plan is required to be prepared in respect of an area that is designated as a town in the most recent census, other than a town designated as a suburb or environs in that census, has a population in excess of 5,000 and is situated in the functional area of the planning authority which is a county council (Section 19 of the Act). Census ~~2016~~ 2022 recorded a population of ~~8,634~~ 10,302 persons for the *defined Built-Up Area settlement*¹ of Kildare Town and therefore a local area plan is mandatory.

Footnote 1: *Central Statistics Office (CSO) defined the Built-Up Areas (BUAs) under Census 2022 which represents a land cover definition. ~~Census 2022 data at settlement level was not available at time of publication of this Draft Plan.~~*

Item 2:

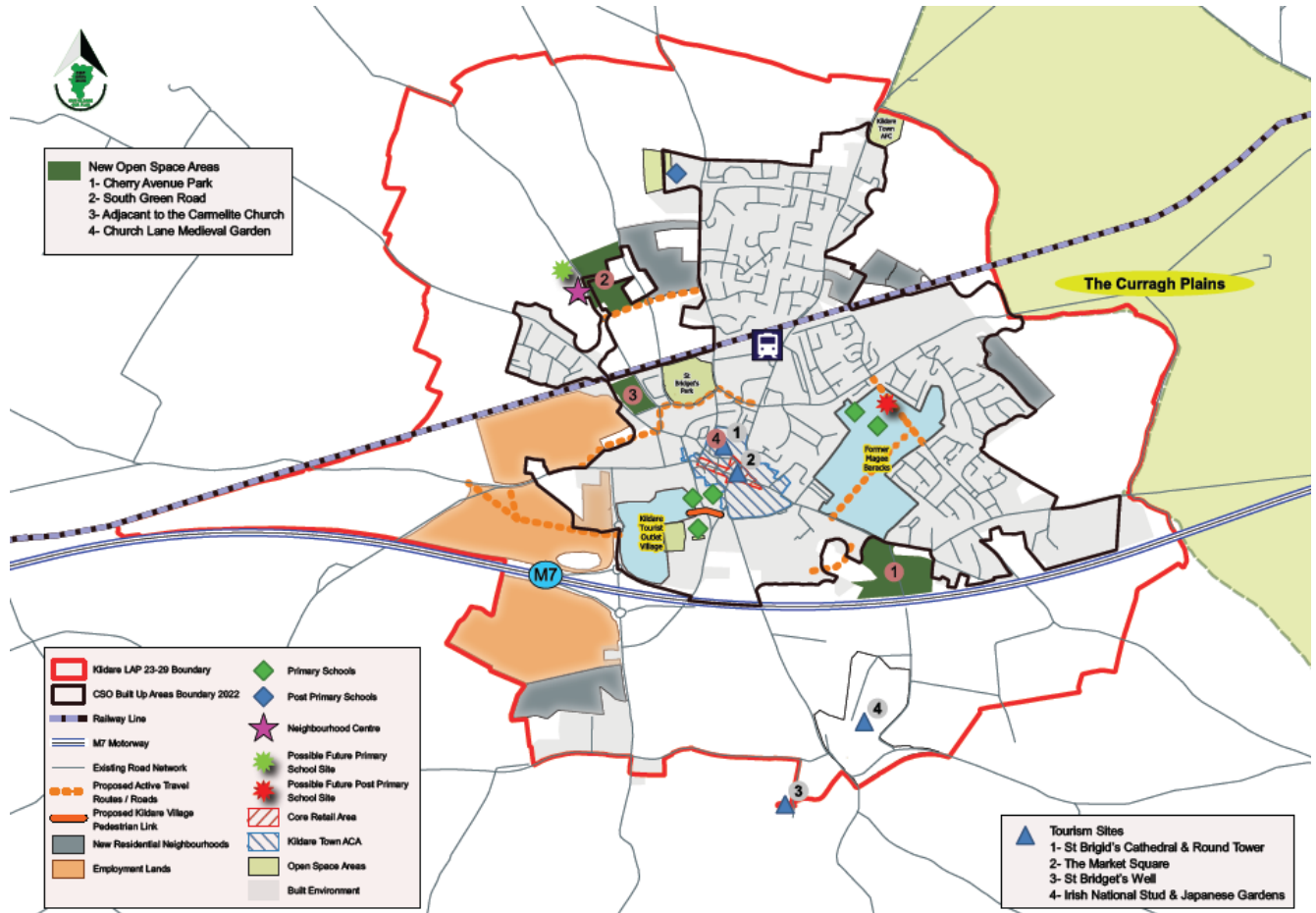
Chapter 1, Introduction and Context, amend Section 2.2.1. in respect of the Strategic Principle, Creating Compact and Connected Communities, first paragraph as follows:

Creating Compact and Connected Communities

Consolidation and infill development underpin the development strategy in this Plan in line with National Strategic Outcome No. 1 (Compact Growth) of the National Planning Framework (NPF). Accordingly, the Plan provides for circa 65%² of all new homes to be developed within the defined *settlement Built-Up Area boundary* of the town. This approach to land use zoning therefore seeks to consolidate the built urban form by prioritising the development of identified sequentially preferable lands in order to ensure the delivery of sustainable compact development in the town whilst also preventing further urban sprawl.

Item 3:

Chapter 2, Spatial Planning Context and Vision for Kildare Town, replace Figure 2-3 Kildare Town Development Strategy with a new image with the 'Settlement' boundary replaced with the 'Built-Up Area' boundary, as follows:



Item 4:

Chapter 3 Compliance with the Kildare County Core Strategy, amend the second paragraph under Section 3.1. Function, Scale and Population of Kildare Town (and the associated footnote), as follows:

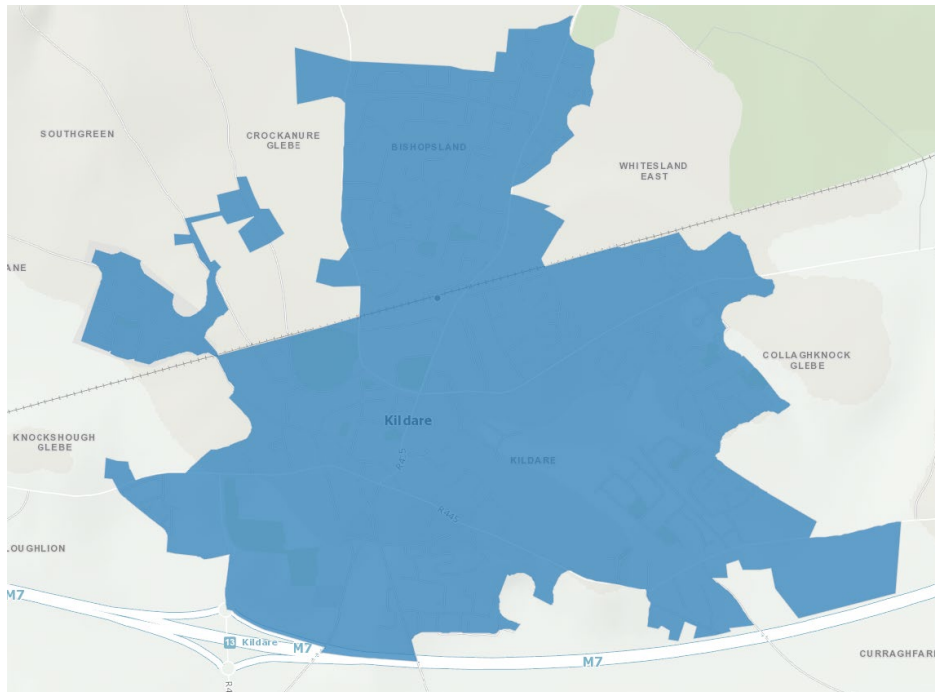
According to Census ~~2016~~2022, Kildare Town had a population of ~~8,634~~ **10,302** persons *within the defined Built-Up Area*. ~~This relates to the Settlement Boundary of the town~~ as identified by the CSO⁵ (Figure 3-1 refers). The population of the town has seen a steady increase over the last number of census periods. Census 2006 recorded a population of 7,538⁶ persons growing to 8,142 persons in 2011 *and 8,634 in 2016*. However, as a result of the COVID-19 Pandemic the Census was delayed until April 2022 and the updated population figures at the settlement level were not available prior to the adoption of the Kildare County Development Plan 2023-2029 ~~or the preparation of this draft Local Area Plan~~. ~~Therefore, Census 2016 data is the most up to date population figures for the settlement of Kildare.~~

Footnote 5: Under Census ~~2016~~2022, a new statistical geography was released; Built-Up Areas, which was created by combining small areas to identify the footprint of urban centres. BUAs represent a land cover definition based on a minimum of 100 buildings within 65 meters of one another, with a maximum distance of 250 meters between clusters.

Item 5:

Chapter 3 Compliance with the Kildare County Core Strategy, Section 3.1. Function, Scale and Population of Kildare Town, replace Figure 3-1 to reflect the new 'Built-Up Area' boundary and rename the image title, as follows:

Figure 3-1 ~~CSO defined Built-Up Area~~ Settlement Boundary as Defined by the ~~CSO 2016~~ 2022



Source: www.cso.ie

Item 6:

Chapter 3 Compliance with the Kildare County Core Strategy, Section 3.1.1. Population Growth 2016-2022 and Section 3.1.2. Estimated Population Methodology, delete both Sections in their entirety, as follows:

~~3.1.1. Population Growth 2016 – 2022~~

~~The Kildare County Development Plan 2023–2029 provides an estimated 2021 population of 9,134 person for the town of Kildare. This estimation was based on the percentage growth from the period 2011–2016 which coincided with the financial crisis and a deep recession in Ireland. However, there were signs of recovery in the latter years of 2014–2016 which saw a slow supply recovery in the housing market.~~

It is important for the preparation of a land use plan that there is a clear understanding of the existing population and the allocated future population growth. Population forms the fundamental basis for identifying the quantity of a range of land uses such as economic lands, schools, childcare facilities and public open spaces, within an area. To this effect the Kildare County Development Plan 2023-2029 states that the 2021 population estimate is a holding figure, and is used as a guide only until Census 2022 is published, and that any local area plan prepared before the publication of Census 2022 will require an updated population estimate to be prepared, based on factors including the quantum of residential units built since Census 2016, which will differ from that shown in the '2021 Population Estimate' column in Table 2.8 – Core Strategy Table of the County Development Plan.

3.1.2. Estimated Population Methodology

The Central Statistics Office (CSO) Preliminary Results (June 2022) showed an increase of 1,747 persons across the Kildare Electoral Division (ED) from 9,874 persons in Census 2016 to 11,621 persons in Census 2022. There has been a considerable amount of housing completions since Census 2016 both within the defined CSO Settlement Boundary (195 units)¹⁶ and on its periphery (ca. 424 units¹⁷) during the intercensal period. While the ED boundary is larger than the boundary of the local area plan it includes the Curragh Plains and rural areas where development is carefully managed. However, it sets the parameter of growth in terms of estimating the population. Given the 17.69% growth in population across the Electoral Division between the Census years of 2016 and 2022, applying the same growth rate to Kildare Town¹⁸ results in an increase of 1,527 persons¹⁹ providing an estimated population of 10,161 person to April 2022.

Item 7:

Chapter 3 Compliance with the Kildare County Core Strategy, Section 3.2. Future Population and Housing Targets, insert a footnote under Table 3-1 Kildare County Development Plan 20236-2029 Core Strategy, in respect of the 2016 Pop as follows:

Table 3-1 Kildare County Development Plan 20236-2029 Core Strategy

Town	2016 Pop	2021 Pop Est.	Allo-cated Growth	Pop Target 2023 - 2028	Housing Target 2023 - 2028	Residential zoned land required	Target Residential Density (UPH)
Kildare	8,634 ¹¹	9134	4.7%	1182	430	14	35-40

Footnote 11: *As per the CSO defined settlement boundary Census 2016.*

¹⁶ Source: <https://data.cso.ie/> NDA06 New Dwelling Completions by Settlement.

¹⁷ Desktop analysis and site survey April 2022.

¹⁸ Census 2016 settlement boundary.

¹⁹ $(11,621 - 9,874) / 9874) * 8634 = 1,527 + 8634 = 10,161$ persons.

Item 8:

Chapter 3 Compliance with the Kildare County Core Strategy, Section 3.2. Future Population and Housing Targets, amend Table 3-2 Population and Housing Targets for the Kildare Local Area Plan 2023-2029 and insert an additional footnote, as follows:

Table 3-2 Population and Housing Targets for the Kildare Local Area Plan 2023-2029

Census 2022 Pop¹²	2023 - 2028 population target	2023 – 2028 housing target	Annualised housing target end of Q3 2029	Annualised Pop target end of Q4 2029	LAP Growth in Units	LAP Growth in Pop
10,302	1182	430	72 ¹³	198 ¹⁴	502 units	1380 persons

Footnote 12: *CSO defined Built-Up Areas.*

Item 9:

Chapter 3 Compliance with the Kildare County Core Strategy, Section 3.2. Future Population and Housing Targets, amend Table 3-3 Population Growth for Kildare Town Settlement 2016-2029 as follows:

Table 3-3 Population Growth for Kildare Town Settlement 2016-2029

Year	Data Source	Population
2016	Census (<i>CSO defined settlement boundary</i>)	9,874
2022	Census (<i>CSO defined Built-Up Area boundary</i>)	10,161 (estimated) 10,302
2029	CDP Core Strategy growth <i>plus annualised growth</i> (Increase of 1,380 persons)	11,541 11,682

Item 10:

Chapter 3 Compliance with the Kildare County Core Strategy, Section 3.4. Social Housing Requirement, under Table 3-5 amend the first paragraph as follows:

There is one PPP Housing Scheme that is at pre-approval stage located at Coolaghknock Glebe which has capacity for 80-85 social housing units and is situated immediately adjacent to the CSO *defined Built-Up Area settlement boundary*. This site was designated part Tier 1 and part Tier 2 lands under the Settlement Capacity Audit (SCA) which accompanies the Plan.

Item 11:

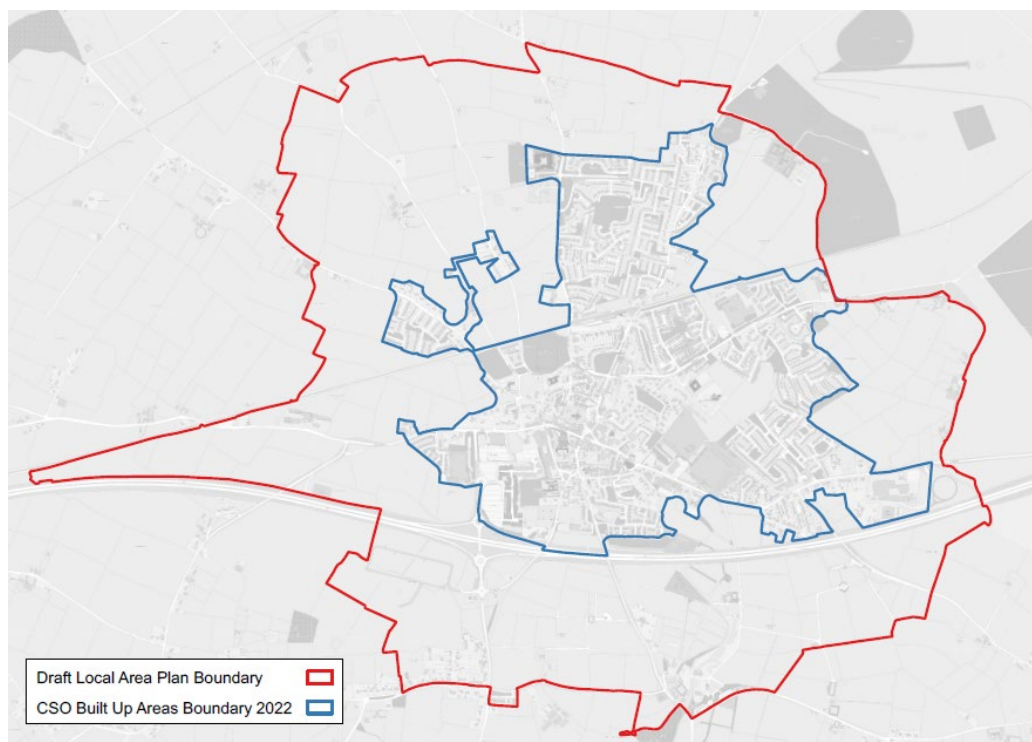
Chapter 3 Compliance with the Kildare County Core Strategy, Section 3.5. Delivering Compact Growth, amend paragraph two, as follows:

In order to deliver compact growth within the Kildare Town Local Area Plan a greater proportion of residential development will be focused on urban infill, in particular the regeneration and revitalisation of the urban area of the Former Magee Barracks. Phase 1 of the Former Magee Barracks redevelopment accounts for ca. 60% of all new housing units (taking account of the adjustment for additional provision) within the Census ~~2016~~ 2022 defined **Built-Up Area**. ~~settlement boundary~~. Therefore, given the importance of the site for the delivery of sustainable compact growth the Plan has designated the Former Magee Barracks site as a Settlement Consolidation Site (Section 11.1, refers).

Item 12:

Chapter 3 Compliance with the Kildare County Core Strategy, Section 3.5. Delivering Compact Growth, replace Figure 3-2 by removing the CSO 'settlement' boundary and replacing it with the CSO 'Built-Up Area' boundary, as follows:

Figure 3-2 **Defined Built-Up Area** ~~Settlement~~ Boundary and Plan Boundary



Item 13:

Chapter 3 Compliance with the Kildare County Core Strategy, Section 6.6. Projecting Residential Yield, amend Table 3-7 Residential Development Capacity Audit, the second row in the Table as follows:

Table 3-7 Residential Development Capacity Audit

Site Ref.	Location	Site Area (Ha.)	Site in Built-up area	Residential Yield	Net Density
N/A	Infill Sites within CSO boundary <i>Built-Up Area</i>	-	Yes	32 ²⁰	35-50

Item 14:

Chapter 5 Economic Development, amend Section 5.4. Kildare Town’s Economic Development Strategy, the last line in the first paragraph and Table 5-1 Job Ratio for Kildare Town, as follows:

The Plan aims to protect existing employment in the town and to create new employment opportunities to ensure long-term and sustainable growth. The Vision for Kildare Town seeks to harness the towns’ existing strengths across equine, ecclesiastical, and retail assets as a key component in the future economic development of the town. For Kildare Town to become more self-sustaining, the town must aim to increase its job ratio (employment-to-population ratio), which provides a good indicator of the balance that exists between the location of the labour force and the location of jobs. Census 2016 demonstrated a job ratio of 0.615 for Kildare Town. The County Development Plan suggest that the job ratio for a settlement should not fall below 0.70. Table 5-1 illustrates that to reach a job ratio of 0.70, an additional 1,127 jobs are required for a population of 11,541,682.

²⁰ Allocation of 5% of the allocated units for Kildare Town for various sites within the Town Centre and Existing Residential / Infill lands land use zonings for potential yield from infill development.

Table 5-1 Job Ratio for Kildare Town

	2016	2029
Population	8,634	11,541,682 ²¹
Resident Workers	3,520	4,705,63 ²²
Total Jobs	2,166 ²³	3,293,334 ²⁴
Job Ratio	0.615 ²⁵	0.70

Item 15:

Chapter 6 Homes and Communities, amend Section 6.2.1. Population by amending paragraph one and paragraph two, delete Figure 6-1 Electoral Division and 2016 Settlement Boundary and replacing with Figure 6-1 Census 2022 and Census 2016 Boundaries, as follows:

Under Census 2022 the defined Built-Up Area (BUA) had a population of 10,302 persons, whereas the settlement boundary from Census 2016 had a population of 8,634. The BUA is a new statistical geography introduced replacing the previous 'settlement boundary', therefore direct comparison cannot be made. While small area statistics have not been tabulated for the 2022 Census (at the time of writing this Plan), the population of the Electoral Division (ED) of Kildare had been released, which is 11,621 persons. Census 2022 saw a growth of 1,747 persons (+17.7%) on the 2016 population. However, this ED is not wholly applicable to this Plan as it covers a much larger geographical area. The settlement of Kildare Town as defined by the Central Statistics Office (CSO) is more applicable in this circumstance (Figure 6-1, refers).

Figure 6-1 Electoral Division and 2016 Settlement Boundary (remove image)

Census 2016 calculated the population of the defined settlement boundary relating to Kildare Town as 8,634 persons. As small area statistics are not available under census 2022, the Census 2016 settlement This boundary will form the basis for the analysis in the sections below and where available Census 2022 data will be included.

²¹ See Section 3.2. Future Population and Housing Targets.

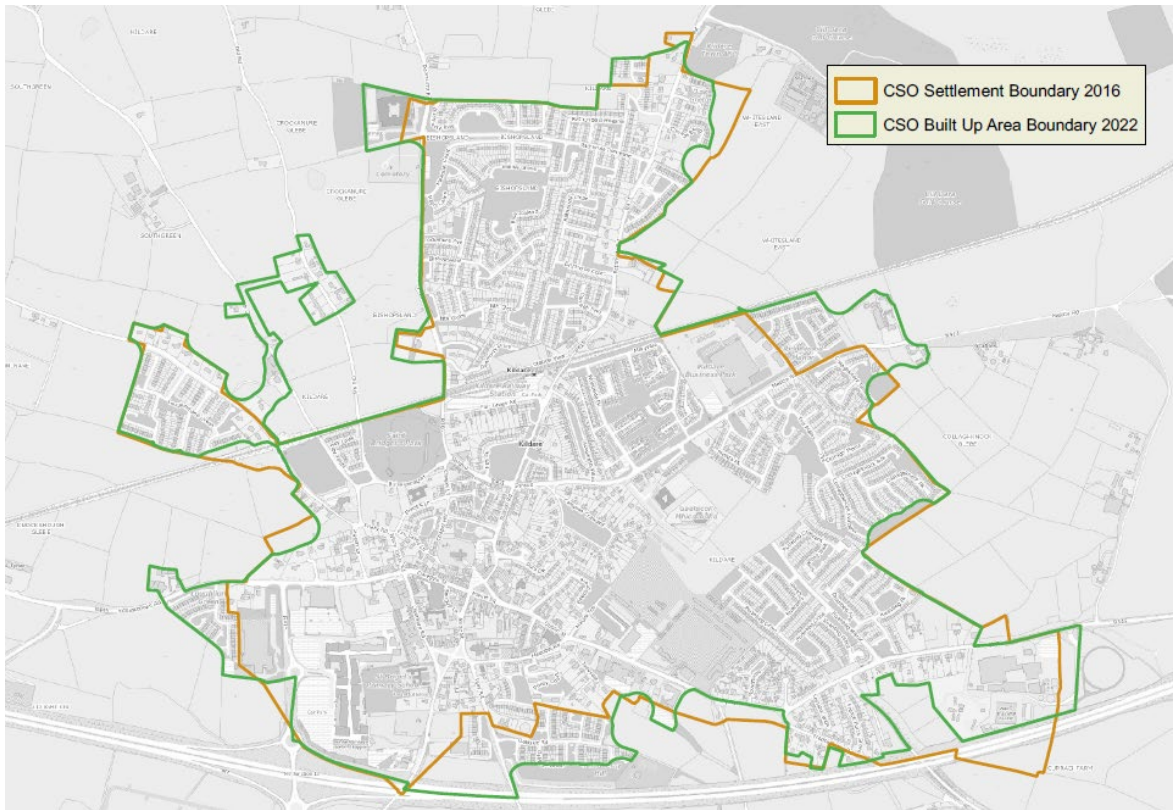
²² Represents a proportionate increase as a derivative of population growth (11,541,682/8,634*3,520)

²³ National Planning Framework (2018) - Appendix 2.

²⁴ Total jobs to 2029 (4,705,63*0.7 = 3,293,334).

²⁵ Total jobs/resident workers (2166/3520) = 0.615.

Figure 6-1 Census 2022 and Census 2016 Boundaries



Item 16:

Chapter 6 Homes and Communities, amend Section 6.2.2. Age Profile as follows:

The age profile of the settlement of Kildare Town has a significantly younger population than the rest of the state with 32.66% of its population under 19. This is five percentage points greater than the State (2016), while Kildare Town’s older population (65+) accounts for nearly 8% of its population. This indicates that the need for childcare and school places are greater than average in Kildare Town.

Table 0-1 Population Profile Census 2016

Age Group	Population 2016	Kildare Town Population 2016 %	National Population 2016 %	National Population 2022 %
0-4	691	8.0	6.96	5.74
5-14	1524	17.65	14.18	13.92
15-19	605	7.00	6.36	6.56
20-64	5131	59.43	59.11	58.7

Item 17:

Chapter 6 Homes and Communities, amend Section 6.2.5 Housing Tenure, first paragraph as follows:

Census 2016 records shows that 59% of the population within the settlement of Kildare Town are owner occupiers, this is lower than both the county rate (72% *in 2016 and 71.34% in 2022*) and the national average (67.6% *in 2016 and 65.9% in 2022*). Other housing tenures are 21% privately rented and socially rented 15%. The number of residents renting is proportionally higher in the settlement of Kildare Town at 33% when compared to the county (24.3% *in 2016 and 23.6% in 2022*) and nationally (27.6% *in 2016 and 27.9% in 2022*).

Item 18:

Chapter 6 Homes and Communities, Section 6.2.6., amend Table 6-2 Educational Attainment as follows:

Table 6-2 Educational Attainment

	No Formal Education / Primary Education	Secondary Education	Technical / Apprentice / Certificate	All Third Level
Kildare Town	12%	41%	19%	18.9%
County Kildare 2016	10%	33.3%	15.6%	36.3%
State 2016	12.5%	33%	14.7%	33.4%
State 2022	<i>8%</i>	<i>26%</i>	<i>15%</i>	<i>28%</i>

Source: Census 2016 Small Area Population Statistics and Census 2022

Item 19:

Chapter 6 Homes and Communities, Section 6.3 Residential Development: Capacity and Delivery, amend the first bullet point in the third paragraph as follows:

- A minimum of 65%²⁶ of all new residential development within the CSO defined *Built-Up Area settlement* boundary as delineated under Census 2022~~16~~.

²⁶ Accounts for 65% of all new homes of the future housing allocation including 'Additional' Provision' as set out in Table 3-6 Additional Provision.

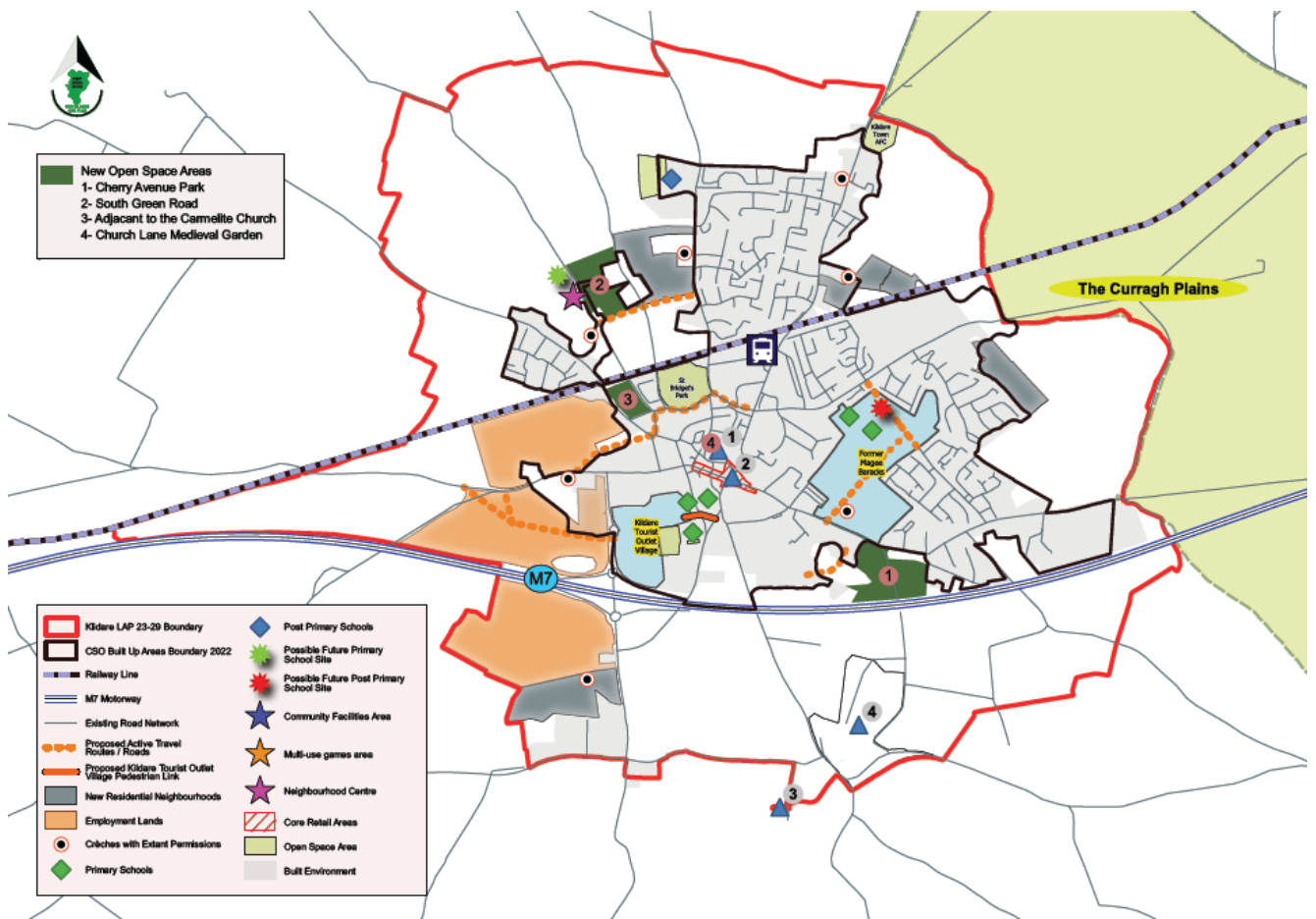
Item 20:

Chapter 6 Homes and Communities, Section 6.5. Social Infrastructure, amend the second paragraph as follows:

As part of the plan-making process a Social Infrastructure Audit (SIA) was published alongside this Local Area Plan. It was carried out to examine the availability and capacity of existing social infrastructure facilities in Kildare Town (within the Kildare Town Local Area Plan 2012-2018 boundary), to determine future requirements and make recommendations based on anticipated settlement growth. *It is important to note that the Social Infrastructure Audit is a moment in time and the future population figure was based on an estimated Census 2022 figure of 10,161 persons compared to the official released Census 2022 figure of 10,302. Thereby the population growth over the lifetime of the Plan would be 11,541 persons in comparison to 11,682 persons as provided for under Table 3-3. However, this does not negatively impact the robustness of the audit or have material implications on the recommendations contained in the audit.*

Item 21:

Chapter 6 Homes and Communities, replace Figure 6-4 Social Infrastructure Provision with an amended image that replaces the 2016 boundary with the 2022 Built-Up Area boundary as follows:



Strategic Flood Risk Assessment

Proposed Material Alteration No. 114

Strategic Flood Risk Assessment (SFRA) - Section 2.2

Amend the Strategic Flood Risk Assessment (SFRA), Section 2.2 as follows:

Within the Kildare Town LAP area, there are no watercourses identified within the EPA Flow Network dataset (<https://gis.epa/EPAMaps/>) within the Kildare Town LAP area, with. The closest identified watercourse to Kildare Town being the Tully Stream, which originates on the southern boundary of the LAP area and flows in a southerly direction away from Kildare Town. Other watercourses around Kildare Town include:

- River Liffey 8.5km to the east, flowing northward;
- Cloncumber Stream 5km to the northeast, flowing northward;
- Slate River 11km to the north, flowing west; and,
- River Barrow 9.5km to the west, flowing south.

A former tributary of the Tully Stream, commonly referred to as the Armour Stream previously drained a catchment area to the west of Kildare Town. Further information was drawn from the Hydrogeological Assessment of Saint Brigid's Well (Aqua Geoservices Ltd, 2021)²⁷.

*The assessment states that the Kildare Town By-Pass (M7 Motorway) altered the natural flow of a former Tully Stream tributary (Armour Stream), as the feeding springs/wells in its upper catchment area were located to the North of the motorway. **Error! Reference source not found.** Figure 2.2 shows an extract map from the report showing the assumed former catchment feeding the tributary. The map shows the M7 motorway has altered the Tully Stream catchment, with the upper portion of the catchment now diverted westward towards the River Barrow.*

²⁷ Hydrogeological Assessment (Phase 1) At Saint Brigid's Well, Aqua Geoservices Ltd, 2021

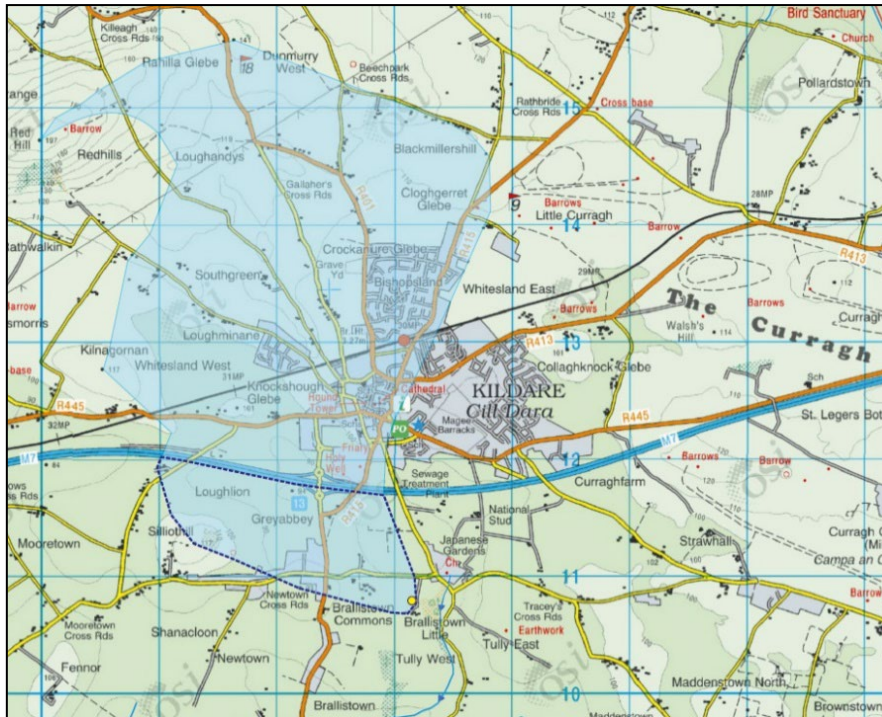


Figure 0-2 Extract from Hydrogeological Assessment of Saint Brigid's Well showing M7 motorway has altered the Tully Stream catchment.

South of the M7, recent developments in the Greystown area have altered the nature and form of the watercourse channel through conversion into land drains overlain by infill or culverted to form part of the local stormwater drainage design. As such, it is understood that the former Armour Stream is no longer an active fluvial watercourse and currently functions as a local field drainage and stormwater drainage network conduit.

Approximately 800m of the former watercourse is culverted with a 450mm diameter concrete pipe downstream of Armour bridge through the Irish National Stud lands and outfalls to open channel adjacent to St. Brigid's Well.

Strategic Flood Risk Assessment (SFRA) - Section 3.1

Amend Section 3.1 of SFRA as follows:

This section presents a brief summary of The Guidelines, for more detail refer to The Guidelines and the accompanying Technical Appendices at

[\(https://www.gov.ie/en/publication/7db50-the-planning-system-and-flood-risk-management-guidelines-for-planning-authorities-nov-09/\)](https://www.gov.ie/en/publication/7db50-the-planning-system-and-flood-risk-management-guidelines-for-planning-authorities-nov-09/).

Strategic Flood Risk Assessment (SFRA) – Figure 3.1

Amend Figure 3.1 of SFRA as follows:

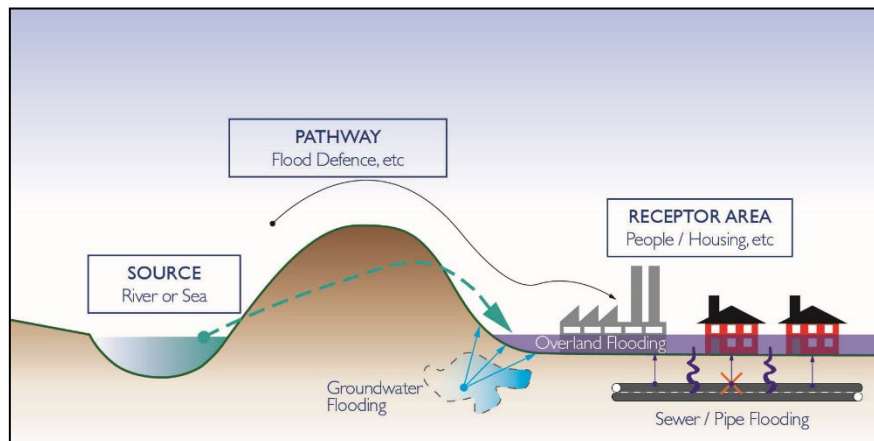


Figure 0-1 Flood Risk Assessment Source – Pathway – Receptor Model

Strategic Flood Risk Assessment (SFRA) - Section 3.7

Amend Section 3.7 of the SFRA, Table 3-4, Line 1 as follows:

The *urban settlement is targeted for growth as it is identified as a Self-Sustaining Growth Town in the Core Strategy of the Kildare County Development Plan 2023-2029, aligning with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (now superseded by the Regional Spatial Economic Strategy for the Eastern Midlands Region 2019- 2031) set out the planned direction for growth within the Greater Dublin Area up to 2022 (2031)* by giving regional effect to national planning policy under *the National Spatial Strategy (NSS) (now superseded by Project Ireland 2040; the National Planning Framework & its Implementation Roadmap) County Development Plan or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.*

Strategic Flood Risk Assessment (SFRA) - Section 4.4.2

Amend Section 4.4.2, point vi, of SFRA as follows:

As well as reducing and treating runoff in accordance with GSDSDS, NBS and NWRM also promote biodiversity and provide important amenity value to residents and visitors alike. Therefore, KCC require that SuDS features *may* should contribute towards a *maximum minimum* of *15-10%* of the open space requirement *where it contributes in a significant and positive way to the design and quality of open space.*

Strategic Flood Risk Assessment (SFRA) - Section 5.5.1

Amend Section 5.5.1 of the SFRA as follows:

The CFRAM Studies have developed FRMPs to manage flood risk within the relevant catchment. Flood maps were one of the main outputs of the studies and indicate modelled flood extents for flood events of a range of annual exceedance probability (AEP) for catchments greater than *5-1* km².

Strategic Flood Risk Assessment (SFRA) - Section 5.5.2

Amend Section 5.5.2 of the SFRA as follows:

Subsequent to the completion of CFRAM, the NIFM study was undertaken to assess fluvial flood risk for catchments greater than 4.5 km² not included within CFRAM studies.

Strategic Flood Risk Assessment (SFRA) - Section 6

Update Section 6 to reflect results of Pluvial Flood Modelling (see Map 10.2 of Draft Plan).

6.3 Fluvial Flooding

There are no identified watercourses within Kildare Town, no recorded incidents of fluvial flooding affecting the study area and no predictive flood mapping studies identifying flood risk to the LAP area.

The former watercourse of the Armour Stream is understood to no longer function in a fluvial capacity due to the construction of the M7 motorway diverting the natural catchment and source flows. The remaining channel is heavily culverted and functions as a stormwater drainage asset of the local fields and recent developments.

The risk of fluvial flooding for Kildare Town is deemed to be low and therefore can be screened out at this stage.

6.5.4 ~~Identified Area of Potential Flood Risk~~ Pluvial Flood Modelling

Given the significant area of surface water drainage reliant on discharge via infiltration *in addition to* historic observations of surface water flood risk within Kildare Town, *a pluvial flood model was developed to inform the identification of areas within the LAP area that may be susceptible to surface water flooding.*

The modelled area was determined based on the information gathered in Stage 1: Flood Risk Identification and took account of:

- *Locations with observed historic flooding*
- Noted *locations of* infiltration capacity issues
- Topography
- Wastewater Sewer Networks coverage
- Stormwater Sewer Network coverage

*The modelling was completed for the 1%AEP (1-in-100 year) rainfall event covering the modelled area illustrated in **Figure 0-2**.*

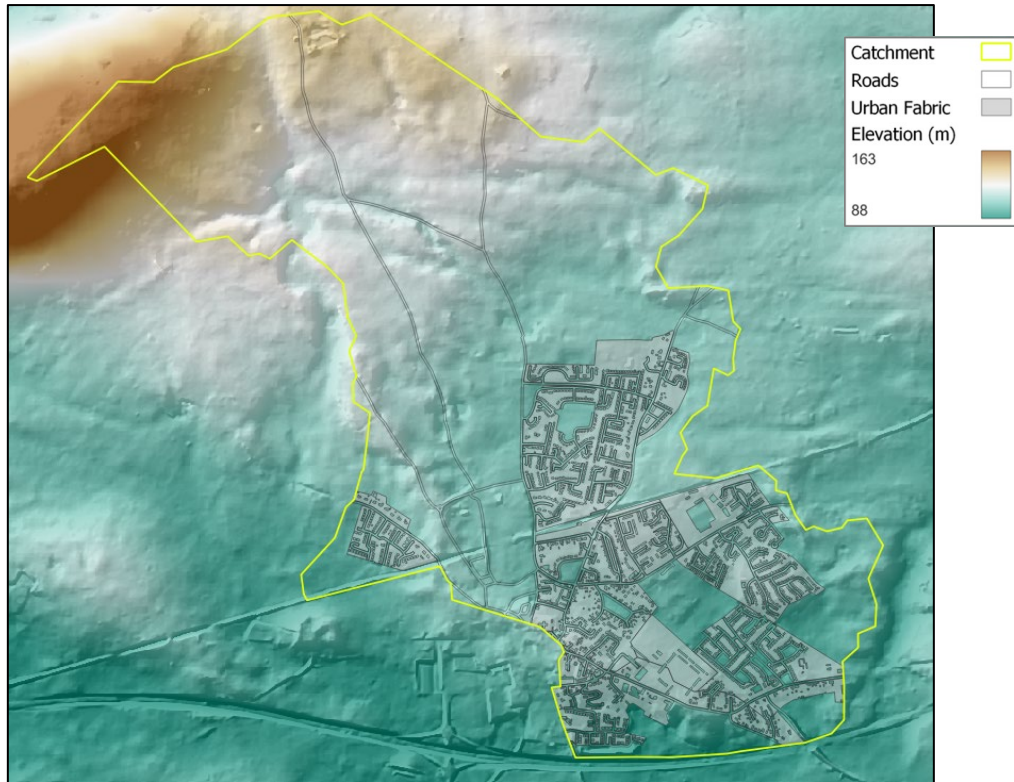


Figure 0-2 Pluvial Model Area

A 2-dimensional 'rain-on-grid' flood model was built in AutoDesk Infoworks ICM and included:

5m Photogrammetric DTM

Spatially Varying Manning's Roughness

Building Representation

Met Eireann Depth-Duration-Frequency Rainfall

Design Rainfall Event hyetographs

An allowance for infiltration and urban drainage losses




The output of this model is intended for the sole purpose of determining the need to implement Site-Specific Flood Risk Assessments to support development proposal applications within the Kildare Town LAP.

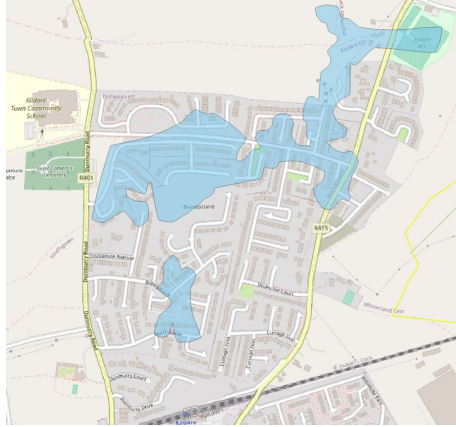
The model results confirm there is a potential risk of pluvial flooding within some areas of the LAP. A precautionary approach has been taken in delineating the areas identified with potential flood risk, as recommended by the Flood Risk Assessment Guidelines for Planning Authorities (2009). However, the results of this modelling are not intended for any other purpose and should not be interpreted for wider application of flood risk.

Future development within the identified areas at potential risk will require a Site-Specific FRA to support development applications. The Site-Specific FRA should

demonstrate that pluvial flood risk is appropriately managed within the development, and that there is no increase in flood risk elsewhere as a result of the development.

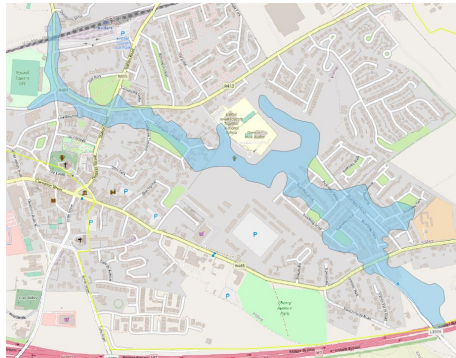
Table 0-2: Potential Pluvial Flood Risk Locations

	<p>Loughminane</p> <p>Overland flooding from lands to the north of the estate flow south until they are blocked by the railway embankment.</p> <p>The area has previously been reported to suffer pluvial flooding due to capacity issues in its soakaway systems.</p>
	<p>Crockanure Glebe</p> <p>Runoff from the north of the catchment follows the Old Road in a southerly direction. The flow splits into two flow paths – one towards the pond at Crockanure Glebe and the other towards the Community School. The School also receives overland flow from its north side.</p> <p>Further south, a flow path exists from west to east which crosses the road and ponds in the new Oakchurch development due to the presence of the Dunmurry Road blocking its progress further east.</p>
	<p>Clogharret Glebe</p> <p>Flood waters accumulate from the north due to low topography.</p>



Bishopsland

Runoff from the northern part of the catchment enters the estate and pools in a low point where its only escape is drainage to infiltration systems.



Town Centre and Ruanbeg

Runoff follows the R401 south of the railway the road before cutting through housing estates at Champion Crescent, through the Barracks and Ruanbeg on to French Furze Road where depths reach a maximum of 1.3m.

Capacity issues have been reported where the R401 crosses under the railway and in some of the estates in this area.



Collaghknock Glebe

Flood waters accumulate from the north due to low topography.



Cunnaberry Hill

Flood waters flow through the estates to the west and accumulate in a field due to low topography.

This area was highlighted as having a history of flooding during public consultations.

Amend Section 6.6 with a new final paragraph as follows:

All development proposals should incorporate surface water management in compliance with the Greater Dublin Drainage Strategy (GDSDS), in particular Volume 2 Chapter 6 Stormwater Drainage Design Criteria, and CIRIA SuDS Manual (C753) and with Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document (2021, DHLGH).

Strategic Flood Risk Assessment (SFRA) - Section 7

7 Development Plan Zoning

7.1 Introduction

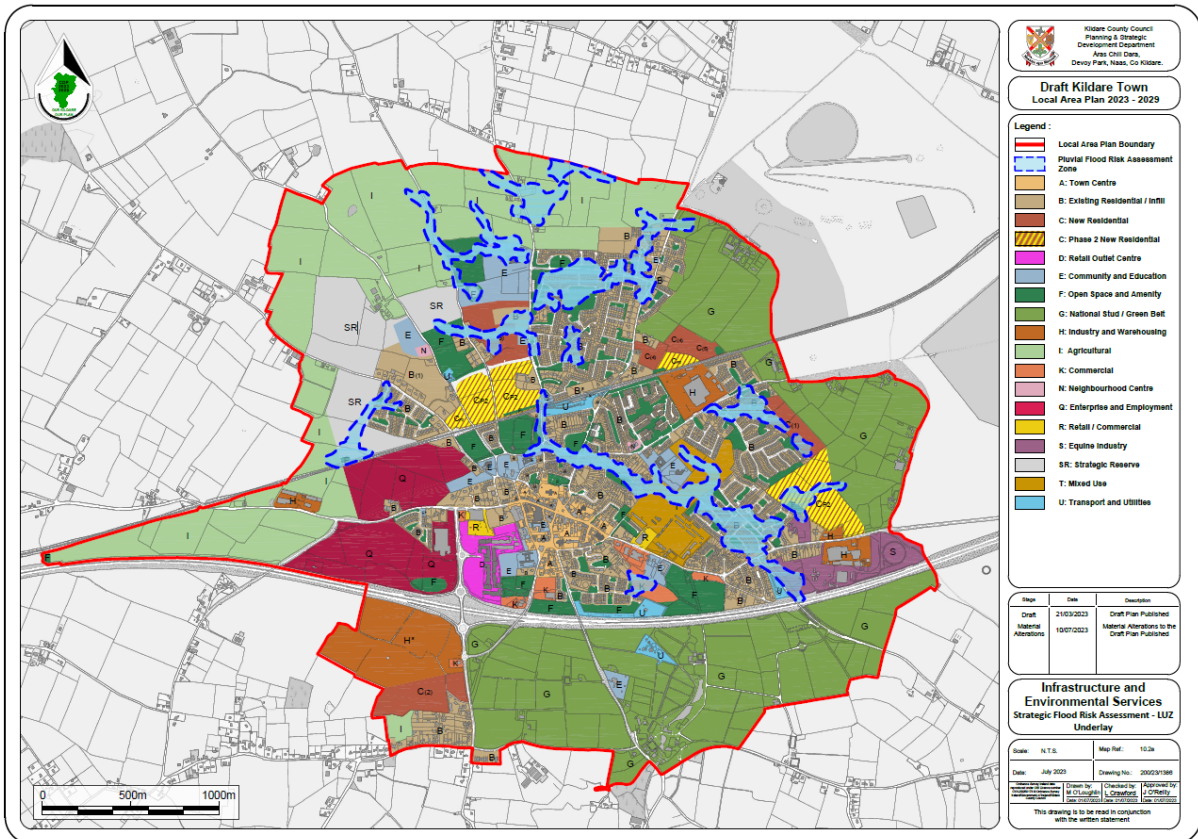
The land use zonings provided by KCC for Kildare Town have been reviewed in the context of the available flood zone mapping, the indicative pluvial risk, the sensitivity of flood extents to climate change and previous SFRA reports.

The entire LAP area is contained within Flood Zone C. Therefore, all land use zones both pre-existing and proposed are appropriate for development in accordance with the objectives of the LAP.

Due to the identified pluvial flood risk in Stage 2, developments identified in Figure 7.1 the noted area at risk of pluvial flooding should be subject to a site-specific flood risk assessment at development management stage which should be carried out appropriate to the scale and nature of the development and the risks arising in accordance with Section 5.2 of the Guidelines.

The *Site-Specific* FRAs should address the site layout with respect to vulnerability of the proposed development type, finished floor levels *with freeboard allowance* should be above the 0.1% or 1% AEP level where appropriate, flood resilient construction materials and fittings should be considered and the site should not impede existing flow paths or cause flood risk impacts to the surrounding areas.

Applications for minor development to existing buildings in areas of flood risk such as small extensions and most changes of use must include a flood risk assessment of appropriate detail to demonstrate that they would not have adverse flood risk impacts and employ flood resilient construction materials and fittings.



Strategic Flood Risk Assessment (SFRA) - Section 7

9. Summary

9.2

Kildare Town is not susceptible to any coastal, fluvial or groundwater flooding but may be susceptible to pluvial flooding. The flood zones extents were reviewed in accordance the Planning System and Flood Risk Assessment Guidelines, identifying Flood Zone C for the entire LAP area. Flood zones only account for fluvial and coastal flooding and are generated without the inclusion of climate change factors. They should not be used to suggest that any areas are free from flood risk as they do not account for potential flooding from pluvial and groundwater.

All development proposals taking place in areas where pluvial flooding is recognised as a flood risk within Kildare Town, must be supported by an appropriately detailed Flood Risk Assessment. The level of detail within the FRA will depend on the risks identified and the proposed land use. The FRA should in general address the site layout with respect to vulnerability of the proposed development type. Finished floor levels should be above the 0.1% or 1% AEP level *with appropriate freeboard* and an allowance for climate change. Flood resilient construction materials and fittings may be considered, and the developments should not impede existing flow paths or cause flood risk impacts to the surrounding areas. It also may be necessary to develop emergency evacuation plans and defined access / egress routes for extreme flood events.